

SCOPING OPINION

PROPOSED NUCLEAR POWER STATION NEAR OLDBURY-ON- SEVERN

May 2010



Independent, impartial, inclusive

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1.0 INTRODUCTION

Purpose

1.1 This is the Infrastructure Planning Commission's ('IPC') scoping opinion on information to be provided in the environmental statement ('ES'), in connection with a proposed nuclear power station near Oldbury-on-Severn, South Gloucestershire by Horizon Nuclear Power. Horizon Nuclear Power is a joint venture by RWE AG (RWE) and E.ON AG (E.ON).

Background

1.2 An environmental statement is required under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI 2263 ('EIA Regs').

1.3 The EIA Regs enable a promoter, before making an application for a development consent order ('DCO'), to ask the relevant authority for its formal opinion ('scoping opinion') of the information to be included in an ES. In this way, the promoter can be clear what the relevant authority considers are the potential impacts on the environment which should be assessed in connection with the proposed development.

1.4 On 19 November 2009, Horizon Nuclear Power submitted a scoping report to the IPC under Regulation 8 of the EIA Regs in order to request a scoping opinion.

1.5 Before adopting a scoping opinion, the IPC (or the relevant authority) must take into account:

- the specific characteristics of the particular development;
- the specific characteristics of the development of the type concerned; and
- the environmental features likely to be affected by the development.

(EIA Regs 8 (9))

Consultation

1.6 The IPC has a duty under Regulations 2(1)(a) and 8(6) of the EIA Regs to consult widely before adopting a scoping opinion. A full list of the consultation bodies is given at Appendix 1. The list of respondents, with copies of their comments is given at Appendix 2, to which reference should be made.

- 1.7 The responses received have been considered by the IPC and taken into account in preparing this scoping opinion ('Opinion'). The ES must demonstrate consideration of points raised by the statutory consultees in development of its methodology and detailed impact assessments. Therefore, it is recommended that a table is provided in the ES summarising the scoping responses from the statutory consultees and where they were considered in the ES.
- 1.8 Consultation responses received after the deadline will be forwarded to the promoter at regular intervals and should be given due consideration.

Structure of the Scoping Opinion

- 1.9 This Opinion sets out what information the IPC considers should be provided in the ES for the purpose of the Environmental Impact Assessment (EIA) of the proposed nuclear power station. The Opinion is provided in accordance with the EIA Regs and has taken account of the nature and scale of the proposals, the nature of the receiving environment and current best practice in the preparation of environmental statements.
- 1.10 The IPC has taken account of the responses raised by the statutory consultees and has carefully considered matters addressed by the promoter. The IPC has also used professional judgement and experience in order to come to this Opinion.
- 1.11 The views expressed in this Opinion are made in response to Horizon Nuclear Power request for a scoping request under Regulation 8 of the EIA Regs. Comments and recommendations in the Opinion should be read in conjunction with the scoping report submitted with that request. The Opinion does not represent the IPC's final view in relation to any future ES submitted in support of a DCO. The IPC reserves the right to revise its opinion in light of new legislation or new information in relation to the application.
- 1.12 The IPC also sets out how the ES should be structured to allow proper consideration of the results contained in it.
- 1.13 Comments in this Opinion are structured in the same order as the scoping report to assist identification of areas where the IPC either places a different emphasis or considers further matters should be dealt with. These are as follows:
 - i. Introduction – background to the IPC's Opinion, the statutory consultation exercise, and approach to assessing the scoping report:

- ii. Information on the proposed development – a review of the background information provided within the scoping report (Chapter 1) and outline of the proposed development (Chapter 2):
- iii. EIA Approach - assessment of the approach taken (Chapter 3):
- iv. EIA Topics – review of each topic identified for consideration (Chapter 4): and
- v. Other Information – review of remaining chapters (Health Safety and Security; and The Way Forward – Chapters 5 &6).

2.0 INFORMATION ON THE PROPOSED DEVELOPMENT

Background Information about the Proposal

- 2.1 Section 1 of the promoter's scoping report provides information about the site location and project outline, information on the aims and purpose of the report, and a strategic planning policy context.
- 2.2 The Decommissioning Report for the existing Oldbury Nuclear Power Station is considered under '*Site Description*' (para 1.7 and 1.14). It is recommended that the ES for the proposed nuclear power station should give careful consideration to the existing power station's decommissioning report recommendations and relevant mitigation measures agreed. If the ES proposes any changes to previously assessed impacts related to this decommissioning, the IPC recommends these should be made clear to all relevant authorities.
- 2.3 The main elements of the proposal, listed under '*Project Outline*', include a brief description of likely associated development and ancillary matters (para 1.8). The ES should describe the characteristics of the development and all associated and ancillary matters in a level of detail equal to that applied to the development itself, taking full account of any alternatives, relevant licenses and permit authorisations pertinent to planning application. In addition, the ES must indicate any potential elements of the project or alternatives that have not been considered.
- 2.4 The scoping report suggests at paragraph 1.9 that 'some aspects of the development may be determined after planning applications have been submitted'. It should be noted that when considering an application for development consent the application will need to be sufficiently developed to allow the IPC to consider granting or refusing development consent. The information should be provided in sufficient detail so that any changes to the proposal would not result in any adverse effects not previously identified in the ES. With this in mind, the ES should define the scheme parameters with full appreciation of anticipated design changes.
- 2.5 The Report at paragraph 1.14 highlights background information considered as part of the desk study investigation. Core documentation of particular relevance and not specifically listed include the Site Reports for Oldbury 2009: Appraisals of Sustainability and Habitats Regulations Assessment (both dated November 2009).

- 2.6 Within the '*Generic Design Assessment*' (para 1.10 to 1.32) two potential reactor technologies are considered, neither has yet to be finalised. When making judgement on an application for development consent, the IPC will give due consideration to the Nuclear Installation Inspectorate's position on issuing a nuclear site licence. If the necessary licence has not been received prior to making an application for development consent the promoter should provide with its application to the IPC a letter of comfort from the licensing authority, stating the likely timing of and any regulatory conditions that are likely to be attached to the licence, which will indicate that the design is acceptable and likely to be approved.
- 2.7 Paragraph 1.32 describes the process for assessing the generic design. When describing the Generic Design Assessment process (refer to HSEs consultation response presented in Appendix 2) the applicant may wish to consider clarifying the roles and responsibilities of the HSEs Nuclear Directorate (which encompasses the Nuclear Installations Inspectorate (NII) and the Office for Civil Nuclear Security (OCNS)) and its partner regulator, the Environment Agency.
- 2.8 The Report at paragraph 1.41 identifies the draft Overarching National Policy Statement (NPS) for Energy (EN-1) and Nuclear Power Generation (EN-6) which sets a framework for decisions taken by the IPC on NSIPs. Although these NPSs are not designated and may be subject to further review, they are relevant matters in the decision making process and therefore the content should be taken into account. Thus, careful consideration and sufficient weighting should be given to the NPSs particularly where detailed assessments are recommended to support applications, for example in connection with the feasibility for CHP and climate change adaptation.
- 2.9 The Report (para 1.42 + Table 2) presents a list of primary consents typically required for a new nuclear power station. It is recommended that the ES should consider and make suitable reference to all relevant guidance, legislation, standards and best practice that have been used to scope the baseline and assess significant effects.
- 2.10 The promoter should ensure that all relevant authorisations, licences, permits and consents are obtained to enable operations to proceed and that any likely significant effects of the proposed development which may be regulated by other statutory regimes have been properly taken into account in the ES.

Description of the Proposal

- 2.11 Section 2 of the promoter's scoping request provides a high level description of the project. It makes clear that many of the detailed parameters of the project are yet to be determined. It should be noted that if the proposals change substantially the promoter should consider whether a new scoping opinion should be sought.
- 2.12 The main components that the power station is likely to comprise are identified and shown on site layout plans. This includes two options: one showing three Westinghouse Electric Company's WEC AP 1000 reactors, and one showing two AREVA's EPR reactors.
- 2.13 Cooling towers and associated infrastructure are positioned along the land side edge of the Severn Estuary flood wall, while turbine halls, ancillary buildings and electrical substations are to the south east of the main reactor buildings. The two options are broadly similar in layout and lie to the east of the existing nuclear power station.
- 2.14 The scheme will need to be defined in sufficient detail in the ES so that a robust assessment of both negative and positive impacts can be undertaken. Any infrastructure required off-site in connection with the proposal should also be taken into account.
- 2.15 The dimension and location of the buildings and structures should be clearly described. Given the large scale of many of the proposed structures, it will be important to consider colour and form in addition to other matters. Lighting proposals should also be described.
- 2.16 Sufficient information should be provided so that it is clear that any changes to the proposals would not result in adverse effects not previously identified in the ES nor would result in any greater adverse impacts than those already identified. It is recommended that parameters are identified that are sufficient to allow for minor variations in the scheme design. It is important that these variations are not so great that they would effectively represent a new scheme. The description should consider the most likely design and identify the worst case in terms of environmental impact.
- 2.17 The ES should describe the current situation and the proposed development within the context of the existing station and its decommissioning activities as well any other proposals in the vicinity.
- 2.18 Timescales for the proposals and the activities are broadly identified for all stages: these include construction, operation and decommissioning.

- 2.19 The IPC considers that the ES should contain information on the study of alternative schemes for the site; further information is provided in Chapter 3.

The Surrounding Environment

- 2.20 Each topic chapter provides a brief description of the key environmental features including geology; hydrogeology and soils; surface water and flooding; and ecology and nature conservation and is addressed in Chapter 4 of the Opinion.
- 2.21 The descriptions in the ES should be accurate and refer to appropriate surveys or drawings to evidence that accuracy wherever appropriate.

3.0 GENERAL CONTENT OF ENVIRONMENTAL STATEMENT

Approach to EIA

- 3.1 The scoping report outlines the main elements of the proposed approach to the ES.
- 3.2 It is recommended that the following additional topics are included within the ES, either addressed separately or included within the existing structure as appropriate:
- i. Consultation (with prescribed statutory consultees and other interested parties) – during the scoping phase and preparation of the ES. It is recommended that the promoter provides preliminary environmental information to the local authority when presenting it with the draft Statement of Community Consultation (SoCC) for comment under s47 of the Planning Act 2008. Consultation with the local community will be carried out in accordance with the SoCC which will state how the promoter intends to consult on the preliminary environmental information (this term is defined in the EIA Regs). This could include results of detailed surveys and recommended mitigation actions. Where consultation responses have resulted in proposals affecting the EIA, such significant comments could usefully be reported and considered. This could assist the promoter in preparation of its consultation report required to be submitted with its application of development consent.
 - ii. Legislation and Guidance – the regulatory requirements that apply to the proposed development must be included where relevant to each topic. All relevant legislation, permit and licences required should be listed. Any standards and guidance that has been used to inform the assessment should also be referenced.
 - iii. Policy Context – the ES should demonstrate consistency with all relevant local, regional and national (and where appropriate international) planning and environmental policies.
 - iv. Transboundary Effects – Consideration should be given to providing an indication whether the proposal is likely to have any significant impacts on another European State. The ES will need to address this matter in each topic area and summarise the position on transboundary effects of the proposed project, taking into account interrelationships between any impacts in each topic area.

- v. Environmental Management – The ES should clearly state where an environmental management plan (EMP) will be utilised during construction and operation to control the proposed development within the parameters of the ES. It is considered best practice to outline the structure of the EMP within the ES.

Baseline

- 3.3 Section 3.15 of the Scoping Report states that whilst survey work will be conducted during the period 2010-2011 the baseline will be 2013 on the assumption that the environmental conditions will be similar. The IPC notes that conditions will be monitored and considers that particular care should be taken with this approach in the light of both the decommissioning works at the existing station and the need to take account of traffic impacts.
- 3.4 The IPC would expect the promoter to place high importance on liaising with key statutory consultees when preparing the baseline and the methodology of investigation to appreciate any potential changes to the baseline during the proposed development timeframe, and agree in advance the scope and level of detail for any investigations proposed.
- 3.5 Due to the size of the development and likely duration of construction and operation, care should be taken to ensure details of the baseline information are considered when programming each element of each phase of the proposal i.e. seasonal variations. The ES should appreciate when effects are most likely to occur and highlight when environmental effects have been considered in shaping the design proposals.

Alternatives

- 3.6 As a result of Directive 97/11 and subsequently the EIA Regs (Sch 4 para 18) the ES should outline the main alternatives studied by the promoter, address in detail any associated elements of the development to demonstrate the potential activities on and off site, take account of the environmental effects arising and so give the main reasons for the promoter's choice of preferred option.
- 3.7 The IPC expects the promoter to justify the final choice and evolution of the scheme including information on alternatives in terms of the number and size of nuclear reactors, setting out the main reasons for the choice in terms of potential environmental impacts.
- 3.8 An assessment of alternative sites for the NSIP does not need to be included in connection with the EIA process but other matters should be included, such as *inter alia* alternative design options, siting or routing (environmentally better routes), process alternatives (different

processes have different emissions), means of dealing with radioactive waste and the secure interim storage, and any alternative mitigation measures. The justification for the final choice should be made clear.

Associated Development

- 3.9 The ES should give equal prominence to associated development and the impacts arising, as defined in the Planning Act 2009 s115 (2).

Assessment of Impact Significance

- 3.10 The scoping report describes the methodology for identifying significant effects. When considering the significance of the impact the ES should include:
- i. likelihood or probability; and
 - ii. policy and legal significance.
- 3.11 Section 3.22 of the scoping report explains the methodology for determining significance. The scoring system proposed to be used is: major; moderate; minor and negligible. The IPC accepts that it may not be possible to state categorically that an impact is either 'significant' or 'not significant' (either positive or negative), as described under the EC Directive, but considers that for the EIA to aid the decision making process 'not significant' should replace the proposed category 'negligible'. The ES must also set out clearly the interpretation of 'significant' in terms of each of the specialist topics and in terms of any cumulative impacts.

Inter-Relationships and Combined Effects

- 3.12 Reference is made to the '*inter-relationship*' between topics and the IPC considers that the combined effects of the project should not be overlooked (section 3.30). Whilst the scoping report refers to the individual EIA topic chapters, there is no reference as to how the inter-relationships and combined impacts of these topics will be assessed. The EIA should not be a disparate group of technical reports but rather a comprehensive report addressing the environmental impacts of a project as a whole.
- 3.13 The ES will need to address inter-relationships that occur within each topic area and summarise the interrelationships, their environmental effects and the mitigation to address those interrelationships.

Cumulative and In-Combination Effects

3.14 Section 3.31 of the scoping report considers cumulative assessment in terms of other developments in the area. The IPC agrees with the proposal to identify other projects in the area through consultation with all relevant local planning authorities.

Mitigation Measures

3.15 Mitigation measures may fall into certain categories: namely avoid, reduce, compensate or enhance, and should be identified as such in the specialist reports (Schedule 4 para 21). Mitigation measures should not be developed in isolation but may benefit more than one topic area.

3.16 The effectiveness of mitigation should be apparent. Only mitigation measures which are a firm commitment should be included.

3.17 Each topic chapter should, where possible, include an inventory of environmental effects, mitigations and residual impacts. This is aimed at being able to easily cross refer specific provisions proposed within the DCO or proposed development consent obligations.

3.18 The promoter should wherever possible:

- Highlight where environmental considerations affect the form / location of the development;
- Clearly identify the impact being mitigated and its effectiveness (evidenced wherever possible through supporting data);
- Integrate mitigation as part of the design (where a potential impact has resulted in embedded design changes or separate mitigation); and
- Highlight additional control items included as environmental management measures during construction and operation.

Balance

3.19 The ES should be balanced, with prominence given to matters which give rise to a greater number or more significant impact. Where few or no impacts are identified, the technical section may be much shorter with greater use of information in appendices as appropriate.

Presentation

3.20 All paragraphs in the ES must be numbered and cross references clearly made throughout the ES where relevant. This is to assist all parties navigate the evidence provided. Appendices must be clearly referenced, again with all paragraphs numbered. All figures and drawings should be clearly referenced.

4.0 EIA Topics

4.1 The scoping report for Oldbury has considered the environment under the following topics:

- Geology, hydrogeology and hydrology;
- Surface water and flooding;
- Landscape and visual amenity;
- Ecology and nature conservation;
- Archaeology and cultural heritage;
- Traffic and transport;
- Noise and vibration;
- Air quality and dust;
- Public access and recreation; and
- Socio-economics.

4.2 The IPC has reviewed the EIA topics and considers the following general issues to be applicable:

- i. Appreciation of the existing baseline in many topic areas was brief and the Report could have gone further to demonstrate a clear understanding of the existing environment. The ES must explain in detail the extent of the study area and reasons for this; all relevant environs associated with each topic; highlight documented evidence to support the case; and outline the timeframe. Any site specific data or monitoring associated with the existing power station should be utilised.
- ii. Some topic areas do not fully consider the legal and planning context necessary for evaluating significance e.g. consents required for marine offloading facility, dredging, disposal activities and inlet / outlet pipes. This is an essential part of the ES as it will inform the choice of a robust methodology and lead to identifying significant effects.
- iii. Some topics either required by the EIA Regs or considered best practice have not been scoped. These are: elimination of waste; transportation of waste off-site (during construction, operation and decommissioning); use of natural resources; and climate factors. These should be included in the ES.
- iv. The IPC would expect the ES to include a clear and definitive description of all the aspects of the development, at the construction, operation and decommissioning stages, including the number of reactors, marine off loading facility, and removal of stored radioactive wastes once a final disposal facility is available.
- v. The ES should give full consideration to combined effects and any cross-cutting mitigation solutions.

- 4.3 Paragraph 3.37 states that radioactive discharges will be addressed in the sections on water, air and land. This is not the case for air and land. It is recommended that the potential effects of radiological emissions (both environmental and human) are covered in all relevant topic areas, taking into account the short, medium and long term effects (refer to Appendix 2 – response from the Welsh Assembly Government). The Applicant may care to consider whether it would be helpful if this information was also collated into one section in order to better understand the cumulative and combined effects.
- 4.4 In addition, the IPC has observed the following in each of the topic areas.

Geology, Hydrogeology and Soils

- 4.5 The baseline is incomplete but there is a commitment to carry out a comprehensive assessment of baseline conditions. The baseline for the ES should explain in detail the extent of the study area and the reasons for this.
- 4.6 The methodology is still in development and requires detailed input from the Environment Agency (EA). Please pay particular attention to the EAs scoping response attached in Appendix 2.
- 4.7 The scoping report refers to the coastal processes assessment and how this will inform elements of the ES. The methodology supporting this assessment has not been included for review and it is unclear if the coastal processes document will be a standalone document. The scoping report also omits to recognise the potential impact of the Marine Offloading Facility (MOF) and sediment movements from the outlet and from the cooling tower ponds. Clarification of these points is required.
- 4.8 The policy context should include full consideration of Planning Policy Statement 23 (PPS 23), all relevant legislation, guidance and best practice. The ES will need to satisfy the IPC that the development does not pose an unacceptable risk in this context to humans or the environment during and after the development.

Surface Water and Flooding

- 4.9 The baseline for the ES should explain in detail the extent of the study area and the reasons for this.
- 4.10 The IPC would expect to see full consideration for water quality, thermal and sediment impacts within this section. Baseline flood risk and hydraulic modelling for the existing and proposed situations should be developed to a sufficient level of detail. Proper consideration should

be given toward key policy context including the requirements of the Water Framework Directive and PPS 25.

- 4.11 The ES will need to consider the impacts resulting from site decommissioning.
- 4.12 The methodology is still in development and requires detailed input from the Environment Agency (EA). Please pay particular attention to the risk of flooding from the numerous rhynes and ditches in the area as well to assessing the tidal risk. Consultation with the EA should inform the selection of an appropriate methodology.
- 4.13 The ES will need to include the information gathered as part of the coastal processes assessment and the details of the flood risk assessment.
- 4.14 The ES will need to explain the impacts associated with the proposal to return river sediment at one discharge location.
- 4.15 The ES will need to explore and assess the impact of fowl flows, trade effluent discharges and impacts of any emergency incidents from the site during construction, operation and decommissioning.

Landscape and Visual Amenity

- 4.16 The proposed study area has been prepared within a 35km study area that was generated using a Zone Theoretical Influence (ZTV) computer model. The model was prepared assuming cooling towers would be 70m but proposed towers could be as high as 200m. Clarification of this is required and further assessment carried out in accordance with advice contained within this Opinion.
- 4.17 Early consideration should be given to the potential impacts from all development activities (during construction, operation and decommissioning) and the likely mitigation solutions.
- 4.18 The ES should consider the visual impact derived from emitted steam in addition to the height of cooling towers.

Ecology and Nature Conservation

- 4.19 The IPC agrees that a full Phase 1 Habitats Survey should be undertaken to update the existing information both for terrestrial and marine habitats. It is recommended that the scope of the investigation should be in line with relevant assessment guidelines and best practice and should inform further and more detailed habitat / species specific assessments. The effects of the proposal on commercial fisheries in

the Severn Estuary should be considered and any combined effects on shipping businesses (socio-economic).

- 4.20 The ES should specify the assessments planned for potential impact to estuarine habitats, such as saltmarsh and mudflats from construction.
- 4.21 There are a number of International, European, UK and local conservation designations in the Severn Estuary, Usk River and River Wye, including the Severn Estuary Ramsar site, Special Areas of Conservation (SAC) and Special Protection Areas (SPA). The ES should give full consideration to the potential impacts of the proposed development on these protected sites and species as well as the risk of long term accumulation of all emitted radioactive and non-radioactive contaminants.
- 4.22 The IPC considers that protected species surveys should be conducted in accordance with best practice. This includes that surveys are carried out at optimal times and with sufficient number of visits.
- 4.23 The impacts on designated sites should be considered in detail with appropriate methodology agreed by Natural England and Countryside Council for Wales. Consideration should be given to the likely impacts arising during construction operation and decommissioning from cooling water abstraction and discharge (sediment and thermal loading), the Marine Offloading Facility (MOF) and land take resulting from upgrading sea defences.
- 4.24 It is recommended that any ecological mitigation is incorporated into site management, land restoration and monitoring plans. All plans should incorporate relevant sensitive habitats and species affected during construction, operation and decommissioning and recommended mitigation solutions.
- 4.25 Where applicable sufficient information should be prepared to enable the IPC to complete an appropriate assessment or be satisfied that no significant effect is likely to result in accordance with The Conservation (Natural Habitats, &c) (Amendment) (No. 2) Regulations 2009.

Archaeology and Cultural Heritage

- 4.26 The ES should clarify why the study area has been chosen at 10km when the theoretical zone of influence extends beyond this.
- 4.27 The IPC would expect the ES to give full consideration to the scale of the development and the potential range of investigation techniques needed (i.e. trial trenches) to identify any important archaeological and cultural heritage resources.

- 4.28 The report identifies that there could be archaeological remains within the proposed site. There is no mention of suitable mitigation proposals during construction e.g. watching brief, presentation of records and removal or remains.

Traffic and Transport

- 4.29 The assumption of peak work force of 3,500 for construction has not taken into account the combined effect of workers required for the decommissioning of the existing power station which could be underway by 2013. The ES (and resulting Construction Workers Travel Plan) should specifically consider the cumulative impact of the proposed development and decommissioning of the existing power station. In addition, the effects of two alternative approaches put forward to provide access to the construction site should be assessed.
- 4.30 Due to the size and complexity of the proposed development the Transport Assessment (TA) should clearly identify the scope of the study area, assess the worst case scenarios of peak flow traffic periods during construction and operation and take account of relevant guidelines and best practice.
- 4.31 The ES should consider the impact of the proposed development on local roads and settlements leading to the Site.
- 4.32 The potential impacts have been limited to two distinct phases being construction and operation. This appears to be inconsistent with the overall approach that also considers decommissioning.
- 4.33 Alternative transport options should be addressed during the construction, operation and decommissioning phases, as well as the impact on rail networks (both from the main development and any ancillary and associated development) and of transporting radioactive waste.
- 4.34 The ES should consider the impact of any structures built in the estuary on navigation routes during construction, operation and decommissioning and the effects on navigation from localised climatic changes (mist arising from operation of plant).

Noise and Vibration

- 4.35 The ES will need to consider noise impacts to include:
- i. areas across the estuary e.g. Chepstow and Lydney;
 - ii. ecological noise receptors in the vicinity of the development;
 - iii. combined effect with the decommissioning of the existing Oldbury power station;

- iv. increased traffic movements in the long term (operational);
- vi. vibration impacts during construction e.g. piling;
- vii. early consultation on the siting of noisy plant; and
- vi. reference to all relevant guidance, Codes of Practice and Best Practice methods.

Air Quality and Dust

- 4.36 The ES should be informed by the CRTN guidance that will identify potentially significant changes in traffic counts. In establishing the baseline the report should set out if there are locally designated sites including Air Quality Management Areas (AQMA).
- 4.37 The scoping report does not discuss micro-climate and local geographical features associated with the site. The ES should make reference to this and any meteorological factors that could be significantly affected by the development.
- 4.38 The ES should consider the impacts derived from the combined effects with the decommissioning of the existing Oldbury Power Station.
- 4.39 The ES should give consideration to the stack plumes and the micro-environmental effects on local sensitive receptors.

Public Access and Recreation

- 4.40 In establishing a baseline it will be good practice to conduct surveys to identify current levels of resource use to inform the assessment.
- 4.41 There are potential beneficial impacts from proposals to enhance the existing recreation/education facilities at the site. The potential benefits should be explored in detail to ensure the best practicable option is adopted.

Socio-Economics

- 4.42 The ES should be specific in identifying the associated development for the scheme including options such as park & ride and accommodation where this is to be provided.
- 4.43 Further information will be required within the ES to assess the land take and disturbance associated with these proposals.
- 4.44 Additional pressure on basic and emergency services should be considered, as well as demand for additional services such as health services, police, fire and rescue, schools, as well as demands for housing.

- 4.45 Impacts on the local community should be considered including crime.
- 4.46 The assessment should cover all stages including decommissioning of the new station.

5.0 OTHER INFORMATION

Initial Environmental Information

- 5.1 The scoping report has indicated that a Statement of Community Consultation will be prepared. Within the consultation statement, under Regulation 10 of the EIA Regs the promoter must set out how the promoter intends to consult on the preliminary environmental information, which is defined in the EIA Regs and is referred to in Part 1 of Schedule 4.

Habitats – Appropriate Assessment

- 5.2 On the basis of the information included in the scoping report, the IPC considers that it will be necessary to conduct an appropriate assessment concerning the potential impact of the project on European protected sites. The applicant must provide the IPC with information in order to enable the appropriate assessment to be undertaken.

Health Impact Assessment

- 5.3 The Promoter may wish to consider the preparation of a separate Health Impact Assessment Report (HIA) to address the potential long term effects of the proposed scheme on human health and wellbeing. This may be cross referenced in the ES where appropriate to complement and not replace the EIA assessment process and outcomes of the ES. The Commission considers it important to establish an appropriate and agreed scope and baseline for the Health Impact Assessment with relevant stakeholders, and respond to all relevant consultation responses. Relevant stakeholders may include local Primary Health Trusts, local authorities and the Welsh Assembly Government.

APPENDIX 1

LIST OF CONSULTATION BODIES FORMALLY CONSULTED BY THE IPC DURING A SCOPING EXERCISE FOR THE PROPOSED OLDBURY NUCLEAR POWER STATION SITE

APPENDIX 1

LIST OF CONSULTATION BODIES FORMALLY CONSULTED BY THE IPC DURING A SCOPING EXERCISE FOR THE PROPOSED OLDBURY NUCLEAR POWER STATION SITE

Prescribed Consultee*	Organisation
Schedule 1 List of Consultees	
The Welsh Ministers	Welsh Assembly Government
The Scottish Executive	Scottish Government
The Relevant Northern Ireland Department	Northern Ireland Assembly
The Relevant Regional Planning Body	Regional Assembly (Now South West Councils)
The Health and Safety Executive	Health and Safety Executive
The Relevant Strategic Health Authority	South West Strategic Health Authority
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	The Historic Buildings and Monuments Commission
The Relevant Fire and Rescue Authority	Avon Fire Rescue Service Headquarters
The Relevant Police Authority	Avon and Somerset Constabulary
The Relevant Parish Council	Oldbury-Upon-Severn Parish Council Hill Parish Council Rockhampton Parish Council Thornbury Town Council Aust Parish Council Tidenham Community Council

	Woolaston Community Council Aylburton Community Council
The Environment Agency	The Environment Agency
The Commission for Architecture and the Built Environment	CABE
The relevant Regional Development Agency	South West RDA
The Equality and Human Rights Commission	The Equality and Human Rights Commission
The Commission for Sustainable Development	Sustainable Development Commission
AONB Conservation Boards	Cotswolds Conservation Board
Royal Commission on Ancient and Historical Monuments of Wales	Library and Enquiries Service
The Countryside Council for Wales	CCW
The Homes and Communities Agency(a)	The Homes and Communities Agency
The Joint Nature Conservation Committee	Joint Nature Conservation Committee
The Commission for Rural Communities	The Commission for Rural Communities
The Maritime and Coastguard Agency	Maritime and Coastguard Agency
The Marine and Fisheries Agency	The Marine and Fisheries Agency
The Marine and Fisheries Agency	The Marine and Fisheries Agency
The Civil Aviation Authority	Civil Aviation Authority
The Highways Agency	The Highways Agency
The relevant Highways Authority	South Gloucestershire Highways Authority

The Rail Passengers Council	Passenger Focus
The Disabled Persons Transport Advisory Committee	Disabled Persons Transport Advisory Committee
The Coal Authority	The Coal Authority
The Office of Rail Regulation and approved operators(a)	Office of Rail Regulation
Approved Operator	<p>Amey LG Ltd</p> <p>Babcock Rail Ltd</p> <p>Balfour Beatty Rail Infrastructure Services Limited</p> <p>Balfour Beatty Rail Plant Ltd</p> <p>Carrillion Construction Ltd</p> <p>Colas Rail Ltd</p> <p>DB Schenker Rail (UK) Ltd</p> <p>EWS DB Schenker</p> <p>Direct Rail Services Ltd</p> <p>Fastline Ltd</p> <p>Freightliner Group Ltd</p> <p>First GB Railfreight Ltd</p> <p>Great Central Railway (Nottingham) Ltd</p> <p>Jarvis Rail Ltd</p> <p>Network Rail Infrastructure Ltd</p> <p>Rail Express Systems Ltd</p> <p>Secro Integrated Transport</p> <p>Stagecoach South Western Trains Ltd</p> <p>Wensleydale Railway PLC</p>
The Gas and Electricity Markets Authority	OFGEM
The Water Services Regulation Authority	OFWAT

The relevant waste regulation authority	South Gloucestershire Council
The relevant internal drainage board	Lower Severn Internal Drainage Board
The British Waterways Board	British Waterways South Wales and Severn
Trinity House(b)	Trinity House
The Health Protection Agency	The Health Protection Agency
The Relevant Local Resilience Forum	Avon and Somerset Local Resilience Forum
Relevant Statutory Undertakers	
Dental Practice Board	NHS Dental Services
Foundation Trust	University Hospitals Bristol NHS Foundation Trust
Acute Trust	North Bristol NHS Trust
Ambulance Trust	Great Western Ambulance Service NHS Trust
Foundation Trust	Avon and Wiltshire Mental Health Partnership NHS Trust
Primary Care Trust	NHS South Gloucestershire
Railway	BRB Residuary Limited Network Rail Infrastructure Ltd Network Rail (CTRL) Ltd
Dock	Sharpness Dock
Harbour	Gloucester Harbour Trustees
Licence holder (Chapter 1 of Part 1 of Transport Act 2000)	NATS En Route plc
Universal Service Provider	Royal Mail

Water and Sewage Undertakers	Bristol Water Wessex Water
Public Gas Transporters	British Gas Pipelines Limited Energetics Electricity Limited Energetics Gas Limited ES Pipelines Ltd ESP Connections Ltd ESP Networks Ltd ESP Pipelines Ltd Fulcrum Pipelines Limited Fulcrum GTC Pipelines Limited Energy House Independent Pipelines Limited Intoto Utilities Limited National Grid Gas Plc (NTS) National Grid Gas Plc (RDN) Northern Gas Networks Limited Quadrant Pipelines Limited Scotland Gas Networks Plc Southern Gas Networks Plc SP Gas Limited SSE Pipelines Ltd The Gas Transportation Company Limited Energy House Wales and West Utilities Limited Utility Grid Installations Limited Wales and West Utilities Ltd
Electricity Transmitters with CPO Powers	National Grid National Grid Electricity Transmission Plc
Electricity Generators with CPO Powers	Magnox North Magnox North Limited

Electricity Distributors with CPO Powers	EDF Energy (IDNO) Limited Western Power Distribution (South West) Plc Energetics Electricity Limited ESP Electricity Limited Independent Power Networks Limited The Electricity Network Company Limited ECG (Distribution) Limited
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission
Local Authorities (s.43)	South Gloucestershire Council Gloucestershire County Council Stroud District Council Bristol City Council Bath and North East Somerset (BANES) Wiltshire Council Monmouthshire County Council Cotswold District Council Forest of Dean

* Schedule 1 The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Non Prescribed Consultee	Organisation
The Welsh Language Board	
Cadw	

APPENDIX 2

LIST OF RESPONDENTS (RECEIVED WITHIN THE STATUTORY 28 DAY PERIOD) AND COPIES OF REPLIES

APPENDIX 2

LIST OF RESPONDENTS RECEIVED WITHIN THE STATUTORY 28 DAY PERIOD

1. Highways Agency
2. Gloucester Harbour Trustees
3. Maritime and Coastguard Agency
4. Cotswolds Conservation Board
5. Oldbury Parish Council
6. Network Rail
7. Wessex Water
8. Joint Nature Conservation Committee
9. Cotswold District Council
10. The Coal Authority
11. Trinity House
12. Crown Estates
13. South Gloucestershire Council
14. English Heritage
15. Health Protection Agency
16. Natural England
17. Environment Agency
18. Gloucestershire Council
19. South West Regional Development Agency
20. British Waterways
21. Health and Safety Executive – Nuclear Directorate
22. Marine and Fisheries Agency
23. Bristol City Council
24. Avon Fire and Rescue
25. Commission for Architecture and the Built Environment (CABE)
26. Countryside Council for Wales (CCW)
27. Welsh Assembly Government – Head of Radioactivity and Pollution Prevention
28. Southern Gas Network
29. Joint Nature Conservation Committee (JNCC)
30. Northern Ireland Planning Service
31. Rockhampton Parish Council
32. Thornbury Town Council
33. Network Rail

APPENDIX 2 (continued)

COPIES OF REPLIES

REF:

1 DEC 2009

Our ref: HA 004/001/010055
Your ref: EN010006/Preapp

IPG

Mrs Jacqui Ashman
Assistant Network Manager
2/08K
Temple Quay House
2 The Square, Temple Quay
Bristol BS1 6HA

Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Direct Line: 0117 372 8756
Fax: 0117 372 8810

For the attention of David Cliff

IPG

11 December 2009

11 DEC 2009

Dear Mr Cliff

REF: COR060

**Land adjacent to Oldbury Nuclear Power Station
Proposal by Horizon Nuclear Power
Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI
2263 Regulations 8 and 9**

Thank you for consulting the Highways Agency (HA), and requesting our comments regarding the Environmental Impact Assessment Scoping Report (EIASR) for the proposed development identified above in your letter dated 23 November 2009 addressed to John Bagley. Please note that I will be the Highways Agency's case officer for this development. Our comments on the EIASR are set out below and are identical to those provided to the applicant who had provided us with a copy of the EIASR directly.

We have previously provided comments in response to a Transport Assessment Scoping Report submitted by James Eaton at E.ON. I attach the letter containing these comments for ease of reference, as they are closely linked to this latest response.

We have reviewed the EIASR to understand the potential impact that this proposal could pose to the safe and free flow of the strategic road network (SRN).

Please note our acknowledgment of the current uncertainty with regards to the reactor type to be commissioned as part of this development and the knock-on effect this has, at this stage, with regard to construction/operational staff levels and construction periods. We appreciate therefore that precise assessment cannot be expected until a final decision has been made.

We are encouraged to note references to Park and Ride (P&R), Marine Off-load Facilities (MOF) and material delivery via rail to Sharpness Docks, as well as options for managed access strategies for construction workers and Travel and Traffic Management Plans. We will require that every effort is made to use means alternative to movements by road in the first instance. Once these have been exhausted we will require the application to set out measures to mitigate against the impact on the SRN

that could be caused by such a considerable build programme and associated workforce.

We acknowledge commitment to completing a Transport Options Study (TOS) to consider the likely requirements of construction, operation and eventual decommissioning of a new power station. Of particular relevance is reference to consideration of the likely cumulative aspects of decommissioning the existing power station and other projects. We understand the existing power station is due to cease operation in 2011; therefore it is imperative that the cumulative impacts of the decommissioning of this facility and construction of any new facility are assessed robustly. Moreover, assessment must specifically identify peaks where construction/decommission programmes coincide and identify phasing measures to minimise peaks periods.

We welcome commitment to production of a Construction Traffic Management Plan and Construction Workers Travel Plan as we feel both are imperative to support this development. We do however note that an Operational Workers Travel Plan (OWTP) has not been mentioned, this will certainly be required to mitigate the impact of the future workforce on the SRN.

We acknowledge that "a considerable number" of the workforce "would require long distance transport access on a daily basis or temporary accommodation more locally", may I take this opportunity to state that our preference would be for the use of temporary residential accommodation to directly and positively address this issue; assuming that it could be located such that it would not increase movements around or across any part of the SRN.

Regarding the approaches put forward for transporting construction workers to and from the site we find it entirely necessary for approach ii) to be pursued. Approach ii) seeks to provide a "managed access strategy", reduced parking at the site and alternative modes of transport to the site. Alternatively we find that approach i), which allows for "un-restricted access" with "land made available for parking at Oldbury... a daily influx of several thousand workers and their vehicles" and the subsequent "additional pressure...experienced on the M5, particularly around Junction 14", wholly unacceptable. Approach i) will lead to an objection from the Agency and should not be pursued, and indeed is contrary to the applicants previously stated commitment to produce a Construction Worker Travel Plan.

It is identified that "study areas will be determined in consultation with the local authority... to take into account the Daily Commuting Zones". We note that it is intended for the Construction Daily Commuting Zone to extend to 90 minutes commuting time each way, with the Operational Daily Commuting Zone likely to be smaller than this. Please be advised that we will require substantial evidence to support any commuting zones used for assessment, it may therefore be beneficial to involve the HA as well as the Local Authority when consulting on this element of assessment.

It is apparent that the proposed power station is expected to employ up to 800 people, however, we note that "during periods of outage maintenance workforce numbers can

be expected to increase by up to 1000 or 1,300 for a 10 year outage". It is absolutely necessary that the Transport Assessment (TA) produced in support of this development proposal addresses the impact posed by the potential peak operational workforce of some 2100 staff. We reiterate our previously made comment that an OWTP be produced to support this proposal. In light of this latest information, regarding the outage maintenance workforce, the OWTP should provide targets and measures specifically to address this significant increase in staff on a non-permanent basis.

Regarding the TA and the intention to obtain existing traffic data from the Highways Agency where available, may we take this opportunity to inform you and the applicants of the Trads database, which is available online at <http://trads2.co.uk/>. This facility will allow you, the applicants or their consultants to register and then obtain any flow data for the SRN that the HA has available. Please do not hesitate to contact me if you experience any issues when registering to use this facility.

We note the acknowledgement that an "abnormal loads study" will be required, we can confirm that this will be required by the HA for any abnormal loads which are expected to route along the SRN.

I trust the comments made above are useful, however, if you have any queries please do not hesitate to contact me.

Yours sincerely



Mrs Jacqui Ashman
Network Operations South West Planning
Email: jacqui.ashman@highways.gsi.gov.uk

Cc:	Rob Holloway	JMP (by email)
	Helen Ainsley	South Gloucestershire Council (by email)
	Tim Proudler	Horizon Nuclear Power (by email)
	John Bagley	Highways Agency (by email)

Encs: HA letter dated 9 October 2009

Our ref: HA 004/001/0010055
Your ref:

E.ON UK plc
Westwood Way
Westwood Business Park
Coventry
CV4 8LG

For the attention of James Eaton

Mrs Jacqui Ashman
Network Planning Manager
2/08K
Temple Quay House
2 The Square, Temple Quay
Bristol BS1 6HA

Direct Line: 0117 372 8756
Fax: 0117 372 8810

09 October 2009

Dear James

Oldbury Nuclear Power Station

Thank you for consulting the Highways Agency at this early scoping stage. This letter sets out our response to the meeting minutes and Scoping Report for Transport Assessment (SRTA), both sent via email on 30/09/09.

Thank you for providing minutes for the meeting of 17/09/09. We found the meeting useful and have only one comment to make regarding the minutes. Please could you amend the fifth paragraph of section 2, as it does not acknowledge that Rob Holloway (ROH), on behalf of the Highways Agency, identified that the vehicle occupancy figure of 1.35 would have to be supported by appropriate justification for use in the Transport Assessment (TA).

In response to the SRTA we have set out our comments below in the order in which they arose and have therefore grouped them under the section headings from the SRTA for clarity.

Methodology

We agree with your methodology of assessing the worst case scenario based on all workers and bulk materials coming by road.

We are pleased to note your intention to complete the TA in accordance with the Guidance on Transport Assessment (GTA) and your acknowledgement of Circular 02/07 Planning and the Strategic Road Network. It is imperative that the TA produced is compliant with the policy and guidance set out in these documents.

Proposed Development

We do not contest that development of two Areva EPR reactors may give rise to a greater transport impact than other options e.g. three Westinghouse AP1000 reactors. However, we will require that the TA demonstrates that this is indeed the case.

It will be necessary to provide the "UK – EPR – MANPOWER CONSTRUCTION LOAD – FESIBILITY STUDY – E.ON POWER TECHNOLOGY" document so that we might confirm the profile of daily workforce throughout the construction period, as presented in Table 3.1 is accurate.

As discussed at the meeting it will be necessary to provide justification for using any vehicle occupancy rate within the TA, for construction workers or otherwise.

We note that the Daily Construction Worker Vehicle Profile as presented in Table 3.2 is based on a "fairly standard pattern". It will be necessary to fully justify the profile used in the TA. Assuming it is possible to justify the profile as presented it will be necessary to determine the SRN network peak. This is particularly relevant given that the greatest volume of workers is presented as arriving and departing outside of the traditional network peaks. It must be demonstrated whether this effectively changes the network peak for this period of construction, if so assessment should be provided for the amended peak.

As discussed in the meeting of 17/09/09, justification will have to be provided to support the assumption that "30% of the construction workforce will be permanent residents and will already have accommodation, and that the remaining 70% will be transitory". The exact make up, and living, working, and commuting patterns of the workforce will have a significant influence on the impact of development. As such it is absolutely critical that the distribution and assignment of the workforce can be fully justified. Any distribution presented, such as that shown in Tables 3.3 and 3.4 will need to be supported with relevant base information and workings e.g. a full gravity model rather than headline results.

We will require information to support figures given for HGV movement, as explained in paragraphs 3.13 to 3.16 and graphically represented in Figure 3.2. We are encouraged that "studies are underway to identify how much of the 9.12 million tonnes required could be delivered by other modes". The HA would be keen to see as much material as possible being delivered by non-road based transport and as such would encourage the use of a Marine Off-Loading Facility if feasible.

We note that the SRTA focuses entirely on construction traffic and that there is no mention of assessment of operational traffic. It may be that the site is due to operate in a similar fashion to how it does currently, particularly once the existing reactors are decommissioned. However, the situation will have to be explained within the TA, and assessment provided for any residual trips or for any period post construction if the new site is operational whilst the existing operation or decommissioning continues.

Study Area and Traffic Growth

As acknowledged in the meeting of 17/09/09 it is sufficient for the study area to extend to M5 Junction 14 at this current time. However, and as discussed, it may be necessary to assess other parts of the SRN dependant on the exact characteristics of the workforce and delivery traffic.

It is agreeable to provide assessment for the peak period of construction in 2017. The HA will also require assessment for operational traffic in the year of opening, expected to be 2020, unless the opening year ends up being less than ten years after registration of the planning application.

We note that no mention has been made of committed development. This should be taken into account in the TA. In particular it is our understanding from the meeting held on 17/09/09 that there is a possibility that the existing Oldbury reactors may be being decommissioned in conjunction with the construction period for this proposal. The combined impact of these two projects will need to be assessed.

Mitigation

We agree that mitigation measures will be required and that these should seek to manage the demand for road space. We also agree that measures should be put in place to transfer workers (both construction and operational) from single occupancy vehicles. To this end we are encouraged that you intend to produce a Construction Worker Travel Plan and Construction Traffic Management Plan, indeed we feel each of these is required to support this development. Please note that it will also be necessary to produce and operate a Travel Plan for the site once operational.

I trust the comments made above are useful, however, if you have any queries please do not hesitate to contact me.

Yours sincerely



Mrs Jacqui Ashman
Network Operations South West Planning
Email: jacqui.ashman@highways.gsi.gov.uk

Cc: Helen Ainsley South Gloucestershire Council
Martin Crawford South Gloucestershire Council
Rob Holloway JMP
Liz Summers JMP

17 December 2009

David Cliff
Infrastructure Planning Commission
Temple Quay House
Temple Quay
BRISTOL
BS1 6PN

Dear Sir,

**LAND ADJACENT TO OLDBURY POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (EIA REGS) 2009 SI 2263 Regulations 8 and 9**

Thank you for inviting our comments on the above proposal. The Trustees are a statutory harbour authority and have responsibilities for matters of navigational safety and the licensing of works and dredging within the area of the Severn Estuary up to the line of Mean High Water Spring Tides adjacent to the land likely to be affected by the above proposals.

The proposals for a new power station are therefore likely to be of significance to this organisation. The Trustees welcome, and are supportive of, proposals that involve the transport of materials and equipment by water.

The Trustees' main interests thus include:

- the management of increased numbers of ship movements within the estuary (whether with regard to Sharpness Dock or a Marine Offloading Facility)
- the potential requirement for improvement to, or installation of additional aids to navigation to facilitate the safe and expeditious berthing of vessels
- the potential for change to local climatic conditions (e.g. localised mist/fog occurrences arising from operation of the plant)

We therefore suggest that it would be appropriate for Horizon Nuclear Power to consider the above matters within the environmental statement and consult the Trustees as part of the Transport Options Study.

Yours faithfully,



M Johnson
Marine Officer

-----Original Message-----

From: Geoff Lifeboat [<mailto:geoff.sharpness@sara-rescue.org.uk>]

Sent: Thursday, January 28, 2010 6:17 PM

To: keith@KeithSullivan.co.uk; mansel.hughes@htc.uk.com

Cc: David Cliff; NuclearPoweropc@googlemail.com

Subject: Re: Oldbury Power Station Scoping Report

Dear Keith, Many thanks for copying me the email and the corrections that you highlight. Of course you are quite correct, the RNLI do not cover any estuarial waters further than Clevedon, the nearest RNLI station being Weston Super Mare. Again you are quite correct in that ALL lifeboat search and rescue on these waters is carried out on behalf of Swansea MRCC by SARA (Severn Area Rescue Association) Lifeboats.

Many thanks for correcting the error by the authority carrying out these investigations. As you imply, we would very much like to be involved in these matters due to the rescue work carried out 24 hours all year round. Geoff Dawe, SARA Sharpness Lifeboat Station Chairman.

----- Original Message -----

From: <keith@KeithSullivan.co.uk>

To: <mansel.hughes@htc.uk.com>

Cc: <David.cliff@infrastructure.gsi.gov.uk>;

<NuclearPoweropc@googlemail.com>; <Geoff.dawe@BTconnect.com>

Sent: Thursday, January 28, 2010 2:25 PM

Subject: Oldbury Power Station Scoping Report

> Dear Mr Hughes

>

> I refer to your letter dated 16 December 2009 to the IPC on behalf of your
> client MCA.

>

> In bullet point 2 you refer to the "RNLI operations in the vicinity". may

> I point

> out that the RNLI do not normally operate above Avonmouth and that these
> services are supplied by the Severn Area Rescue Association (SARA) in the
> vicinity of Oldbury on Severn.

>

> Clearly SARA should be consulted on these matters rather than the RNLI

>

> Yours sincerely

>

> Keith Sullivan

> Greenwood House

> Church Road

> Oldbury on Severn

>

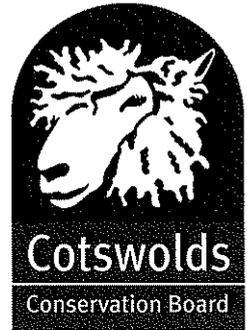
Correspondents should note that all communications to Department for
Communities and Local Government may be automatically logged, monitored
and/or recorded for lawful purposes.

Mr David Cliff
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

IPC

17 DEC 2009

REF:



Project Ref: **EN010006/Preapp**

15th December 2009

Dear Mr Cliff

**Land Adjacent to Oldbury Nuclear Power Station
Proposal by Horizon Nuclear Power
Infrastructure Planning (Environmental Impact Assessment) Regulations
2009 SI 2263 Regulations 8 and 9**

Thank you for your letter dated 23rd November 2009.

Please find attached the comments of the Cotswolds Conservation Board on the draft scoping report.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Malcolm Watt'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Malcolm Watt
Planning Officer
On behalf of the Cotswolds Conservation Board
01451 862004
malcolm.watt@cotswoldsaonb.org.uk

**Project Reference EN010006/Preapp
Land adjacent to Oldbury Power Station**

Scoping Report

Comments of the Cotswolds Conservation Board

1. The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

2. The Board adopted the Cotswolds AONB Management Plan 2008-13 in April 2008. This is a statutory plan prepared under the provisions of section 89 of the Countryside and Rights of Way Act 2000. This plan "formulates their [the Board's] policy for the management of their area of outstanding natural beauty and for the carrying out of their functions in relation to it."
3. The Management Plan identifies "The Cotswold Escarpment" as a "special quality" of the Cotswolds AONB. Key issue LK2 of the Plan identifies that "it is important to protect the appearance of the escarpment and other skylines from inappropriate developments and inappropriate landscape management, including telecommunication masts and wind turbines, and to reduce the the impact of existing structures."
4. The Management Plan contains the following policies of relevance to this project:

Landscape Policy LP1: *That the unique character, tranquillity, and special qualities of the Cotswolds landscape are conserved and enhanced.*

Development and Transport Policy DTP1: *That all Local Development Framework documents and planning decision-making processes will use the following criteria to determine the acceptability of a proposed development in the Cotswolds AONB. Development will:*

- *be compatible with the distinctive character of the location as described by the relevant landscape character assessment, strategy and guidelines*
- *incorporate designs and landscaping consistent with the above, respecting the local settlement pattern and building style*
- *be designed to respect local building styles and materials*
- *incorporate appropriate sustainability elements and designs*
- *maintain or improve the existing level of tranquillity*

¹ Section 87, Countryside and Rights of Way Act 2000.

- not have an adverse impact on the local community amenities and services and access to these
- protect, or where possible enhance, biodiversity
- be in accordance with a more sustainable pattern of development, reducing dependence on car travel.

5. The Board would also suggest that Policy ENV3 of the draft South West Regional Spatial Strategy (SWRSS) is relevant

ENV3

Protected Landscapes

In Dartmoor and Exmoor National Parks and the 14 Areas of Outstanding Natural Beauty in the region, the conservation and enhancement of their natural beauty, wildlife and cultural heritage will be given priority over other considerations in the determination of development proposals. Development will only be provided for where it would:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park or Area of Outstanding Natural Beauty, or
- Promote the understanding and enjoyment of the special qualities of the National Park, or
- Foster the social or economic well-being of the communities within the National Park or Area of Outstanding Natural Beauty, provided that such development is compatible with the pursuit of National Park or Area of Outstanding Natural Beauty purposes.

Consideration will also be given to proposals which promote the understanding and enjoyment of the special qualities of the Areas of Outstanding Natural Beauty

Particular care will be taken to ensure that no development is permitted outside the National Park or Areas of Outstanding Natural Beauty which would damage their natural beauty, character and special qualities or otherwise prejudice the achievement of National Park or Area of Outstanding Natural Beauty purposes.

6. In this context the Board would suggest the EIA should, in addition to the assessments identified in paragraphs 4.49 -4.52 of the scoping report, include an assessment of the impact of the project on views of the Cotswolds AONB from locations to the west of the site.
7. In the section "Public Access and Recreation" (p.53), although the Cotswold Way National Trail is referred to in paragraph 4.155, no indication is provided of an intention to assess the impact of the project on the perceptions of users of the Trail. The Board would suggest that this issue should be addressed in the EIA.

Malcolm Watt
Cotswolds Conservation Board
14th December 2009

Further to the Scoping opinion request the IPC has received from Horizon Nuclear Power Ltd (HNPL), Oldbury on Severn Parish Council on behalf of the Parishioners of the Parish wish to register the following points and convey to the IPC the information we consider should be provided in the environmental statement.

Introduction .

The Draft Nuclear Policy Statement(NPS) is comprehensive in many of the areas where we would wish to comment , likewise the(HNPL) Environmental Impact Scoping Report covers similar ground and so our response focuses on the local aspects which effect our community .We anticipate that the advice to the IPC provided in the Draft NPS, in particular Part 4 of EN1 & EN6 will be incorporated in the opinion the IPC will give to Horizon.

Overall Impression

The Draft Policy Statement for Nuclear Power Generation (EN6) gives details of the new capacity required and suggests that 25 GW will come from 'conventional generating capacity' a large proportion of which will be Nuclear generated. Even if the capacity was solely Nuclear it is clear that the number of Sites required is less than the 10 listed.

Of the 10 listed it is only Oldbury that needs to incorporate an Indirect Cooling System due to insufficient cooling water being available by other means. If it were not for the Technology to deliver Indirect Cooling Oldbury would not be a suitable site for this generation of Nuclear Power Stations.

The introduction of Cooling Towers, the magnitude of the facility and the impact such structures will have on the environment is a factor unique to Oldbury and colours the views of many Parishioners who have lived with the existing Magnox Facility , some for the whole of their lives, the impact both physical and visual is immense .

Given the close proximity to Hinckley, the work being done on alternative /renewable sources of power and the potential this has on the amount of generating capacity which could become available the question of whether or not the Severn Estuary will be overburdened and why Oldbury needs to be redeveloped are quite clearly issues that must be included in the Environmental Impact Studies and be the subject of rigorous consultation.

We have tried not to duplicate our responses under different headings, in some cases a point under one heading has some relevance to another heading. And so we respond to the Question of what information we consider should be provided in the environmental statement as follows:-

1 Traffic and Transport

- a This subject is well covered in the Summary of Surveys and Investigations prepared by (HNPL), we would wish to see particular recognition of conditions within the Parish and a clear understanding of how the consultative processes would be effected. This is of particular concern to the Council as the current road to the existing Power Station is inadequate and hazardous even in today's traffic conditions. Roads locally are unsuited for the kind of traffic that will be required should this project go ahead. The continuing use by the applicant of Oldbury Naite and Shepperdine Road is testimony to this.
- b Given that the potential construction of a new facility coincides with the decommissioning of the old facility the combined impact could be a serious hazard to the Quality of Life of Parishioners, given the volume and types of traffic likely to be involved. We would like to be consulted on all proposals for the transportation of resources using local roads and what plans would be put in place to ensure that Traffic management disciplines would be applied, in particular those affecting the movement of personnel from and to the site, eg control of parking, insistence on the use of designated areas/routes and prohibition of the use of undesignat ed areas/routes.
- c The concept of transportation using the River is welcome as it could to some degree mitigate some of the problems of using conventional road transport. The river is part of the Parish and as such a valuable amenity, we want to be involved in Plans for any Marine Offloading Facility.

2 Landscape and Visual Amenity

- a Again the work being undertaken /planned by (HNPL) shows good intent
- b The Parish is fortunate to be located in such a beautiful area and the scenery is enjoyed by Local people and visitors alike. The existing Facility has become part of the landscape but the proposed new facility incorporates features which are a serious concern in terms of visual impact not only for Parishioners but for those of neighbouring

Parishes on both sides of the estuary. The assessment of Cooling Tower designs, efficiency and cost effectiveness have to have broad exposure particularly because without them Oldbury is not a suitable site.

- c Plans for landscaping should include early consideration of landscaping which will mitigate the unsightly activities of construction and advance the benefits of landscaping for when the Facility is completed and also help to reduce the environmental issues covered in section 4 below.
- d The scoping report includes illustrations of the potential location of the facilities within the site, this is an area of concern, and the Council feels that there must be some consultation regarding the trade off between nature and the wellbeing and day to day lives of those Parishioners who will if this facility goes ahead be most affected.
- e Arrangements for connecting to the National Grid involve upgrading of the current system to enable greater voltage; this also has potential hazards to the Health and Safety of Parishioners. The Parish Council want to be consulted on plans for upgrading and the routing of the infrastructure which accompanies this.

3 Surface Water and Flooding

- a The Parish has considerable concerns regarding flooding, not only as a result of the potential new Facility, but due to current and future Developments at Thornbury. This is essentially an internal drainage problem with little influence from the River Severn, albeit that under certain conditions egress of drainage water is hampered. The Parish Council would like to see a composite plan which addresses the combined issues of the effect of a new facility and the existing situation. This can be best achieved using local knowledge and the resources of the Lower Severn Drainage Board.

4 Noise, Vibration, Air Quality , and Quality of Life

- a The Parish Council is pleased to see the plans and work being undertaken by (HNPL), at a local level however we want to see what

the plans are to minimise these unpleasant intrusions during the construction phase.

- b If construction does occur , the working patterns and controls over when antisocial processes are likely to occur must be the subject of local discussion.
- c It is unclear at this stage how the project will be resourced with labour and what facilities are planned to accommodate workers if they are to become resident for the duration of the project. The implications to the Parish of a large influx of people must be the subject of serious discussion at an early stage , we wish to see that Horizon have plan for this and that it is bought off locally .
- d Horizon's plans include substations shown near the site Boundary , these have noise characteristics which are of concern to those living nearest to the proposed facility , it is essential that consultation regarding the siting of this and other structures is held at an early stage with Parish input.
- e The Scoping Report describes the objective of constructing a facility capable of 3300 megawatts from either two or three reactors depending on the reactor type selected. This has important implications on the visual, environmental (and landscape) issues but is also significant in the manner in which they might be constructed ie in parallel or in a phased manner. This has a bearing on virtually every heading; We want to ensure that this is also one the Environmental Impact Assessment Topics and to be consulted on the emerging plan.

5 Socio Economic

- a The work being done and planned by (HNPL) is broad and detailed. The Parish Council would like to see that benefits are likely accrue in the more local setting, eg in a five mile radius. We also feel that proposals for the use of local enterprise should be made quite public so that local business can be considered for contracts for which they have expertise or resource.
- b During construction in particular there is the potential for a negative economic impact on the value of property prices caused directly by these activities; similarly there is the potential that incomes will be affected for those involved in rural enterprise. The Parish Council would like to see proposals for how these effects will be mitigated.

6 Public Access and Recreation

- a The Parish has a significant network of footpaths and bridleways some of which will be lost should this development go ahead. We

recognise the surveys and investigations proposed by (HNPL), but want to see how local consultation will be managed.

7 Archaeology and Cultural Heritage

- a The proposed surveys and investigation by (HNPL) appear comprehensive; we would again like to see how local consultation will be managed.

8 Ecology and Nature Conservation

- a The proposed surveys and investigation by (HNPL) appear comprehensive; we would again like to see how local consultation will be managed. It is a concern that nature issues will if not approached practically overshadow some of the human issues so the need for local input is paramount.

9 Geology, Hydrology and Soils

- a This is not a subject we have any particular views on.

10 Consultation

- a Recognising that it is the Parish of Oldbury on Severn which is where the construction of this Project could be taking place, this Council feels it is essential that at the earliest stage in the Environmental Impact Assessment a local group reflecting all opinions is established to champion local issues between the Parish and Horizon Nuclear Power Ltd.
- b The Council recognise that there are regulatory authorities who deal with the many aspects of managing nuclear power generation , nonetheless concerns regarding radiation and it effects , magnetic fields and the health issues relating to them and many other issues are foremost in the minds of those who will be living close by . There has to be arrangements to discuss those concerns and the mitigating measures Horizon have planned to minimise the risk; and ready access to the appropriate controlling bodies by Parishioners with concerns.
- c Coincidental with the potential construction a number of other issues impact on the area. The Council feel that there must be efficient links between the management of decommissioning the existing Facility and the potential construction of the new facility, there is much to be gained by exploiting the synergy of these activities thereby reducing some of the negative impacts on the local community. We note that there is some attempt by Horizon to

do this but their statement 'as far as practicable ' is a bit woolly. The Council would like to be confident that the best is made of the synergy opportunity. Likewise the Shore Management Plan SMP2 suggests that further work will need to be done to the flood defences in perhaps 20 years or so. It seems logical that consideration should be given to the utilisation of excavated materials from the Horizon site for this purpose. At this stage we would like to be assured that consideration will be given to this idea recognising the benefits that could accrue.

- d The Scoping Report submitted by (HNPL) describes its approach to the Environmental Impact Assessment, there are two issues which concern the Council, firstly the statement regarding decommissioning (3.12) we feel that a more comprehensive approach is required than "but will summarise the likely effects". Likewise we feel that the "author of the relevant chapter " being the person who judges the significance of the effects (3.25) is wrong and requires an independent review body to deal with points of contention.

For and On behalf of Oldbury on Severn Parish Council

B F Turner (Chairman)

From: Morgan Barbara [mailto:Barbara.Morgan@networkrail.co.uk]
Sent: Friday, December 18, 2009 9:18 AM
To: IPC Enquiries
Subject: FW: Your Ref: EN010006/Preapp

Network Rail
3rd Floor
Bristol Temple Point
Bristol
BS1 6NL

Ask : Barbara Morgan
for : 0117 3721118
Tel :
My Ref : CP/TP09/0416/BM
Your :
Ref : EN010006/Preapp
Date : 18th December
2009

Dear Sir/Madam

**LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT
ASSESSMENT) REGULATIONS 2009 SI 2263 Regulations 8 and 9**

Thank you for your letter dated 23rd November with regard to the proposed development at the above address. For the purposes of the Environmental Impact Assessment we are pleased to set out below those matters which we consider relevant in the context of the development in proximity to our infrastructure.

Please note that Network Rail have a statutory obligation to ensure the availability of safe train paths and as such we are required to take an active interest in any construction/demolition activity adjacent to our property that potentially could affect the safe operation of the railway.

On specific matters, clearly our key interest is to protect the physical railway infrastructure and the EIA should demonstrate that the railway infrastructure will not be compromised and be adequately protected; we need to be satisfied that there will be no adverse safety issues arising as a result of this development to users of the railway

Network Rail would need to be consulted on any planning application submitted as our primary concern is the safety of the adjacent railway.

Please note our address is: Network Rail, 3rd Floor, Bristol Temple Point, Redcliffe Way, Bristol BS1 6NL

Yours sincerely,

Barbara Morgan
Town Planning Technician (Western)

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Network Rail Infrastructure Limited registered in England and Wales
No. 2904587, registered office Kings Place, 90 York Way London N1 9AG

Our Ref: ST69NW/ 8
Your Ref: EN010006/Preapp

Mr D Cliff
ipcenquiries@infrastructure.gsi.gov.uk
IPC
Temple Quay House
Temple Quay
Bristol
BS1 6PN

16 December 2009

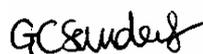
Dear Mr Cliff,

Re: Land adjacent to Oldbury Nuclear Power Station Proposal by Horizon Nuclear Power Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI 2263 Regulations 8 & 9.

I refer to your letter of 9th December addressed to Dave Ogborne inviting comments on Horizon Nuclear Power EIA Scoping Opinion. Wessex Water is the Sewerage Undertaker for the area in which the new nuclear power station is proposed. As such we request to be listed as one of the consultees for the project, with our main interest identified as follows:

The consideration of the impact of foul flows / trade effluent discharge from the site and any temporary flows associated with the worker's accommodation on the existing foul system.

Yours sincerely,



Gillian Sanders
Planning Liaison
Developer Services
gillian.sanders@wessexwater.co.uk





Joint Nature Conservation Committee
Dunnet House, 7 Thistle Place
Aberdeen, AB10 1UZ, United Kingdom
Telephone: 01224 655707
Email: victoria.appleyard@jncc.gov.uk

David Cliff
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By e-mail to ipcenquiries@infrastructure.gsi.gov.uk

Your Ref: EN010006/Preapp

15th December 2009

Dear David,

**LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 Regulations 8 & 9**

We received your consultation in relation to the scoping opinion for the above development proposal on 24 November 2009.

JNCC has responsibility for the provision of nature conservation advice in the offshore area. 'Offshore' is defined as beyond 12 nautical miles (nm) from the coastline to the extent of the United Kingdom Continental Shelf (UKCS). Within territorial limits (<12 nm) nature conservation advice is the responsibility of the relevant country agencies these being: Natural England (NE), Countryside Council for Wales (CCW), Scottish Natural Heritage (SNH) and the Council for Nature Conservation and the Countryside (CNCCNI).

This development proposal is not located within the offshore area and does not have any potential offshore nature conservation issues therefore JNCC does not have any comments to make on the scoping report or any future environmental statement.

Yours sincerely,

Victoria Appleyard
Offshore Industries Advisor

Dear Sirs,

I refer to your letter dated 23rd November, 2009.

We would not wish to make comments to you on this scoping opinion but assume that you will be asking the Environment Agency for their views.

We defer to you and them to give full consideration to the scope of any Environmental Impact Assessment.

Yours faithfully,

MA Kitchen
Planning Service Improvement Manager
www.cotswold.gov.uk

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Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.coal.gov.uk/services/planning

Mr David Cliff – Case Leader on behalf of the IPC
Infrastructure Planning Commission

[By Email: ipcenquiries@infrastructure.gsi.gov.uk]

8 December 2009

Your Ref: EN010006/Preapp

Dear Mr Cliff

**Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI
2263 Regulations 8 and 9
Land Adjacent to Oldbury Nuclear Power Station**

Thank you for your letter dated 23 November 2009 consulting The Coal Authority on the above scoping opinion.

On behalf of The Coal Authority, I would like to confirm that we have no specific information requirements to be provided in the Environmental Statement for this particular proposal.

Yours sincerely



Mark E. N. Harrison *B.A.(Hons), DipTP, MRTPI*
Planning Liaison Officer

From: Navigation Directorate [mailto:Navigation.Directorate@thls.org]
Sent: Friday, December 04, 2009 3:18 PM
To: IPC Enquiries
Subject: ENVIRONMENTAL IMPACT ASSESSMENT - SCOPING OPINION. OLDBURY NUCLEAR POWER STATION EN010006/PREAPP

Dear Mr. Cliff,

ENVIRONMENTAL IMPACT ASSESSMENT - SCOPING OPINION. OLDBURY NUCLEAR POWER STATION EN010006/PREAPP

With reference to your letter dated 23rd November, 2009, concerning the above, in the interests of the safety of navigation taking into account any environmental matters, Trinity House Lighthouse Service have no objections to the proposed application from Horizon Nuclear Power for the proposed development of a Nuclear Power Station at Oldbury, as detailed.

If any structures are to be built in the river (marine offloading facility, cooling water intakes / outakes are mentioned in the scoping report), an assessment would need to be made as to the marking in the interests of navigation during construction, operation, decommissioning / removal and thereafter if any obstruction to navigation remains.

Provision would need to be made in the permissions eventually given if this projects goes ahead for construction / operation to include for marking to be provided as specified by Trinity House Lighthouse Service in conjunction with Gloucester Harbour Trustees as the Local Lighthouse Authority for the area.

Yours sincerely,

Martin Thomas - Navigation Support Officer
Trinity House London tel: 020 7481 6920
email: navigation.directorate@thls.org

Trinity House
Tower Hill
LONDON
EC3N 4DH

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From: Green, Charles [mailto:Charles.Green@thecrownestate.co.uk]
Sent: Monday, December 21, 2009 4:13 PM
To: IPC Enquiries
Cc: oldburyenquiries@horizonnuclearpower.com; McGrogan, Joan; Jacobson, Neil; Michael Bapty
Subject: Land Adjacent to Oldbury Nuclear Power Station - Proposal by Horizon Nuclear Power Station -Comments on scoping opinion - FAO David Cliff Esq.

Our ref: 320/12

Dear Mr Cliff

I write further to your letter dated 23rd November 2009 addressed to Dr Tim Norman, to which I am responding as the Coastal Manager covering Gloucestershire.

The Crown Estate is a land owner but not a regulatory authority, as such we are responding primarily with material facts as to our ownership:

I attach a plan on which we have overlaid the extent of the Oldbury Power Station Development Site edged red. Most of the foreshore and seabed within the red boundary does not belong to the Crown, however the small area that is owned by the Crown, under the management of this office is shaded pink. The Crown Estate's ownership is registered with the Land Registry predominantly under title GR307340, with a small section within title GR319291. This title is subject to the doctrine of accretion and diluvion.

The foreshore and river bed which is coloured pink and cross-hatched in grey is owned by the Crown but subject to fishing rights in favour of Mr WP Cullimore, whose contact details would be obtainable from the Land Registry.

The whole of the foreshore owned by The Crown Estate is subject to a lease of the sporting rights from ourselves to the Gloucestershire Wildfowlers Club <http://www.gloucestershirowildfowlers.co.uk/> and we feel that both the interests of the Gloucester Wildfowlers and Mr Cullimore should be considered and they should be consulted.

The entire site is subject to the Severn Estuary SSSI, SPA and RAMSAR Designations plus it is a candidate SAC, so it is a highly important site due to its ecological status. The nature of tidal flows mean there are vast quantities of suspended particles and sediment transportation in the river and the impact of any river reclamation or building-up of a natural flood area on the banks of the river would need very careful consideration, including its possible impact on erosion affecting landowners of property along the banks of the River Severn. Much work has taken place in this field in connection with capital dredge proposals at Port of Bristol and other general studies on the River Severn and these studies should be drawn upon if possible.

Any plans for outfalls or jetties or intrusive investigations on The Crown Estate's land would require our consent and this office should be contacted.

Please contact me if I can be of any further assistance.

Yours sincerely

Charles Green

Charles Green MRICS
Coastal Manager

The Crown Estate
16 New Burlington Place
London W1S 2HX
Tel: 020 7851 5184
Fax: 020 7851 5125
Email: Charles.Green@thecrownestate.co.uk
www.thecrownestate.co.uk
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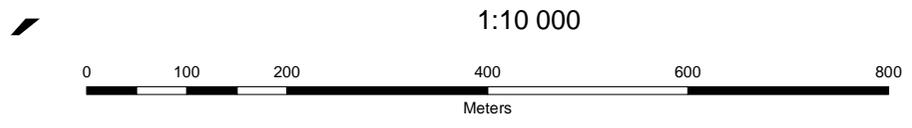
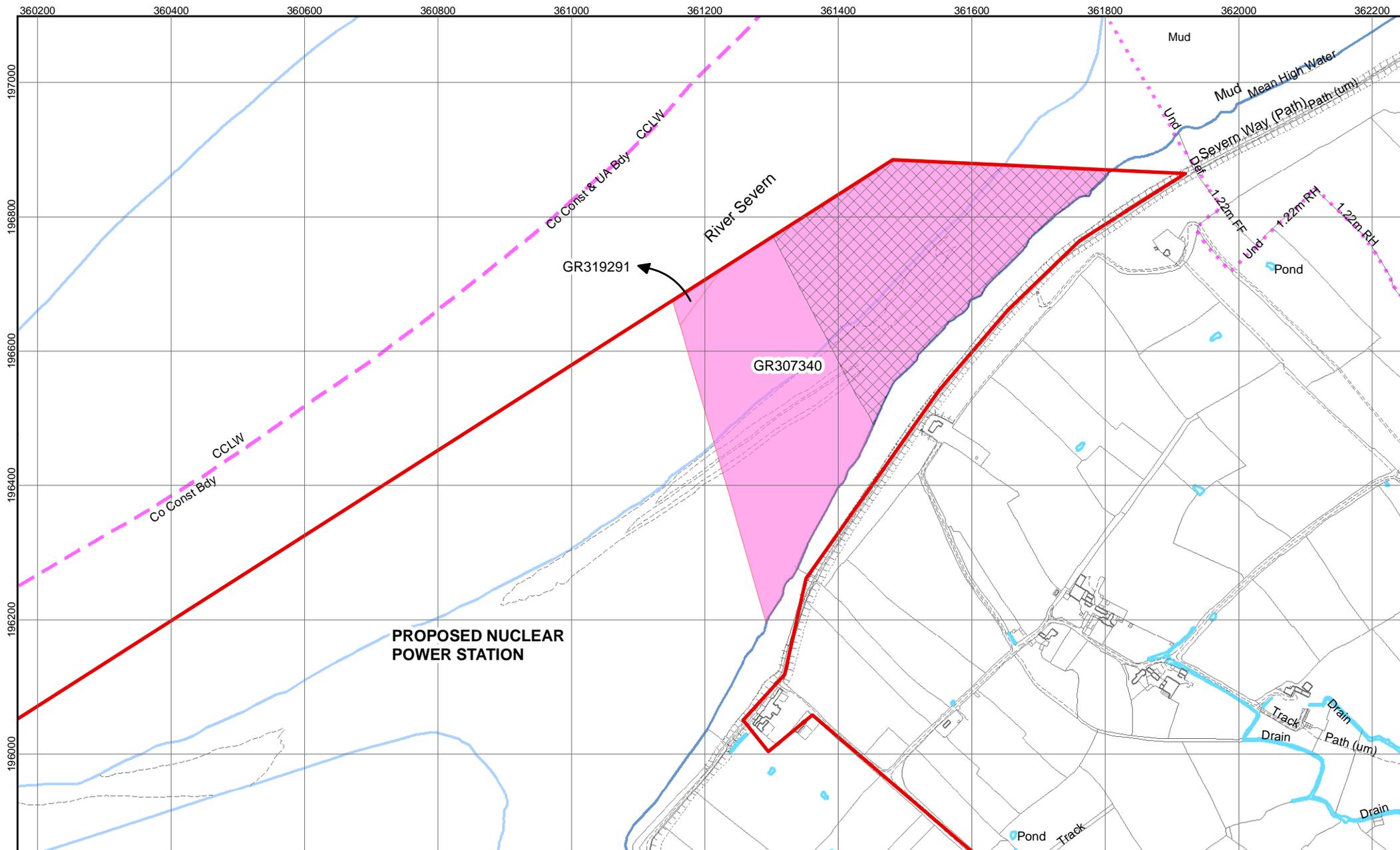
The Crown Estate's head office is at 16 New Burlington Place London W1S 2HX

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 Date: 21-Dec-2009
 Drawn by: JP
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Marine Estates
 16 New Burlington Place
 London W1S 2HX
 Tel: 020 7851 5080
 Fax: 020 7851 5125



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Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Date: 18th December 2009
Your Ref: EN010006/Preapp
Our Ref: HBA/ Oldbury scoping
Enquiries to: Helen Ainsley
Tel: 01454 863643
Fax: 01454 863440
Email: Helen.ainsley@southglos.gov.uk

FAO David Cliff

Dear Mr Cliff

**LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 Regulations 8 and 9**

Thank you for your letter regarding the above dated 23rd November 2009, in which you request comments by 22nd December 2009 on the applicant's Scoping Report dated November 2009. The Council considers the following *additional* matters should be considered:

Approach to the EIA

3.27 – the commitment to identifying '*further mitigation measures*' to '*prevent reduce and where possible offset any adverse affects... but are not part of the assessed project*' is welcomed as this would form, or may form, an integral part of the appropriate assessment process (as well as any identifying measures and opportunities to deliver environmental enhancement and benefits (3.31)

Assessment of Effects

This section does not include any reference at all to the appropriate assessment (AA) process. The AA will form an integral and crucial legislative component of the ES and, because of this, merits a paragraph describing how it will be married in with and form part of the EIA, particularly cumulatively (see 3.31).

Whilst the Scoping Report contains a separate section on AA (6, page 6-63), because of the inter-relationship between the AA and assessment of wider environmental impacts under the EIA, as well as the joint imperative to assess cumulative affects on both the specific European features of interest and on a wider scale, details of the AA process should form an integral part of section 3.

Peter Jackson, Director of Planning, Transportation & Strategic Environment.
The Council Offices, Castle Street, Thornbury, South Gloucestershire BS35 1HF.
Telephone 01454 868686 Fax 01454 863440



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Reactor Type

It is noted at 2.27 that the construction methodologies of the two potential reactor designs are different and hence the workforce numbers will vary depending on which reactor is eventually proposed; for example the AP100's modular construction techniques require lower workforce numbers than the UK EPR. It is not considered that an EIA can properly assess the impacts of a proposal prior to knowledge of the precise nature of the proposal.

Cumulative Effects

It is acknowledged that 3.31 – 3.32 refer to consideration of the cumulative effect of the project together with other developments planned in the area, and that the scope of cumulative effects will be agreed with the local planning authorities. It is considered that, as well as the projects noted in the report, it should be flagged up at this stage that projects already identified should include the proposed Hinkley Nuclear Power Station, and large scale employment development at Severnside arising from the historical 1957 consent.

Ancillary Development and Associated Works

As set out at 2.14, the ancillary facilities and associated development aspect of the EIA should not be underestimated or dealt with any less thoroughly than the proposed development within the nomination site boundary. If these matters are not yet known then a worst case scenario should be assumed, and cumulative effects considered too. The ancillary facilities referred to will need to be included within both the EIA and appropriate assessment processes and be subject to 'appropriate assessment' in their own right.

Socio- economics

It is acknowledged that it is not known whether the workforce would be permanently resident or temporarily resident in the commutable catchment area, or whether they would require long distance transport access on a daily basis. As it is unlikely to be known throughout the EIA process, the Environmental Assessment (and Transport Assessment, see below) should consider the social implications, for example housing, service and facilities, of these two scenarios on a sliding scale.

In addition, it is noted that the Highways Agency has stated a preference for the use of temporary residential accommodation rather than daily commuting for a considerable number of the workforce. This is not a view necessarily supported by South Gloucestershire Council, and the EIA must carefully consider the impact of any temporary residential accommodation, due to its potentially significant impact on local residents, facilities and services.

The effects on the resident population should be included in this chapter.

The socio-economic section could include the skill sets required and scope for relationships with local Schools and Further/Higher Education establishments.

Archaeology and Cultural Heritage

The scoping report correctly identifies the need to assess the direct and indirect impacts of these proposals upon the archaeology, historical landscapes and built heritage of the site and the associated locations where development or ancillary works are proposed, and sets out within the

Peter Jackson, Director of Planning, Transportation & Strategic Environment.
The Council Offices, Castle Street, Thornbury, South Gloucestershire BS35 1HF.
Telephone 01454 868686 Fax 01454 863440



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section (paragraphs 4.87 – 4.109) entitled Archaeology and Cultural Heritage the work carried out to date and the proposals for further assessment to inform the Environmental assessment document.

This chapter appears to be thorough, however there are only a couple of points of clarification to raise at this stage.

1. Scope of Assessment:

4.94-5 sets out potential direct and indirect impacts associated with the development and 4.97 indicates that impacts will be assessed not only on the site itself but also for the “development activities away from the site development area”.

It is assumed that this covers all the activities set out in 2.14 however it is not clear from the section on *Further studies and assessment* (4.98 onwards) whether the different radii of study areas actually include the areas proposed for the additional development set out in 2.14.

It is essential that an assessment of these additional impacts is included in the environmental impact assessment and that this should include alternative locations for these facilities where possible. Under paragraph 4.104 it is stated that these assessments would only be made once the location of the necessary infra structure has been agreed. The implication is that the impacts of the infrastructure development would not necessarily be included within the E.I.A.

2: Proposed methodology:

There is concern over the implications of paragraph 4.108 that additional archaeological surveys may not be necessary in order to assess the direct and indirect impacts of the proposed development.

- 1) In order to consider indirect affects on soil hydrology it is essential that baseline data is available and this should be being collected now.
- 2) Even with the area covered by the previous phase of ground investigation there is insufficient data available to confirm the presence or absence of remains of archaeological/environmental interest or assess their importance. This likely only to be established via additional geophysical surveys (Caesium vapour and electro-magnetic) confirmed where necessary by additional ground investigation including trial excavation. The location of buried remains such as palaeo-channels will help in the assessment of archaeological potential and the use of LIDAR should be considered now that this is available.
- 3) Where clearance of buildings or historic landscapes is proposed as part of the direct or indirect impacts of the proposed development, assessments of their individual and cumulative significance should be undertaken as part of the environmental impact assessment. This may involve detailed archive and documentary investigation if historical significance is to be assessed as well as their archaeological, architectural or landscape significance. Whilst the Gloucestershire Record Office is referred to as a source of information (4.100) historical importance is not specifically referred to within the supporting text of this section.

Peter Jackson, Director of Planning, Transportation & Strategic Environment.
The Council Offices, Castle Street, Thornbury, South Gloucestershire BS35 1HF.
Telephone 01454 868686 Fax 01454 863440



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We would be happy to agree specifications and details of appropriate further evaluation within the areas affected by the proposed development and those areas likely to be used for the additional infrastructure projects. Clearly where limited ground disturbance is likely - i.e. construction of temporary – perhaps permeable hard standings with limited service provision- then ground disturbance will be reduced and a reduced mitigation strategy would be required.

Noise and Vibration

There is no specific mention of the residential amenity of existing occupants, nor PPS 24: Planning and Noise. The EIA should assess whether the proposed development, its construction including transport movements, would be in accordance with PPG24 in relation to noise sensitive development such as residential properties.

At this stage the exact design of the proposed power station has yet to be established. The report therefore only considers the areas of potential impact on the environment and local community in general terms. As noise has the potential to be a significant issue the Council wishes to be assured that there will be more certainty surrounding the proposal in order to properly assess the potential noise impact.

Traffic and Transport

Whilst the scoping report deals primarily with more strategic/higher level access issues the following points are noted;

General points

4.110 The submission and scope of a Transport Options Study (TOS) is welcomed for this proposal, especially given that it will consider the cumulative impacts of the construction of the new power station and the decommissioning of the old power station. Any resulting access strategy would then need to consider sustainable alternatives to the motor vehicle in the first instance justify if /why non sustainable modes are chosen.

4.111 Construction workers and Materials travel plans are welcomed and necessary. However the construction workers travel plan should specifically consider how the plan would be enforced.

Potential Effects and Mitigation

Recognition of the two distinct phases in relation to construction and operation is welcome as is the recognition that sustainable transport modes are required for construction materials and workforce, however, consideration should also be given to the ongoing decommissioning of the existing power station and how shared usage of transport can be utilised

Workforce

4.120 Whilst the need to indicate both options is understood, option (i) (i.e. unrestricted access to transporting construction workers to the site) is not acceptable. Given the nature of the local highway network if this option came forward it would be considered unacceptable by the Council.

It is acknowledged that it is not known whether the workforce would be permanently resident or temporarily resident in the commutable catchment area, or whether they would require long distance transport access on a daily basis. As it is unlikely to be known throughout the EIA process, the Transport Assessment should consider the transport implications of these two scenarios on a sliding scale.

Peter Jackson, Director of Planning, Transportation & Strategic Environment.
The Council Offices, Castle Street, Thornbury, South Gloucestershire BS35 1HF.
Telephone 01454 868686 Fax 01454 863440



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Construction Materials

4.122 The potential options indicated do not include investigation of the use of a foreshore as a means of transport for material to/from Sharpness Docks/Sharpness Rail Head. This could be looked at as a way to minimise construction materials traffic on both South Gloucestershire and Gloucester County local (non strategic) roads.

A number of quarries are located within South Gloucestershire, if these are to be considered for materials further comment upon travel options will be required.

The possible raising of the level of the access roads within the flood cell, if required by the Environment Agency, in the interests of flood risk protection, should be considered in terms of the suitability of the local road network for construction traffic.

Further Studies and Assessment

It is acknowledged that until number and type of reactors is chosen, together with full assessment of resulting access options that local impact within SGC's road network is not yet known and that a full TA will be forthcoming to address these issues, for which we reserve the right to comment upon at the appropriate time.

Landscape and Visual Amenity

Given that the visual impact of the cooling towers will be an issue of great significance for the Environmental Impact Assessment, it is of concern that the '*...number, type and height of cooling towers will be determined for the completion of the ES...*' This implies that the details will only be known at a late stage in the process, leading to uncertainty over a major issue throughout the EIA consultation process. If the 'iterative process' mentioned at 4.48 will enable consultees to genuinely influence the nature and design of the cooling towers however, then this is welcomed.

South Gloucestershire local Plan policy L1 requires new development to conserve and enhance the character distinctiveness, quality and amenity of the landscapes of South Gloucestershire. It is important to note that this applies to all landscapes and not just those with designations. The EIA should take account of this.

The possible raising of the level of the site as well as, in particular, the access roads within the flood cell, if required by the Environment Agency, in the interests of flood risk protection, should be considered in terms of landscape and visual amenity.

The possibility of plumes associated with the cooling towers are not mentioned and should be addressed within the visual amenity section as well as the air quality section.

Preliminary work on zones of theoretical visibility have identified a large potential area of search. Representative view points will be explored as a full coverage of all residential properties, footpaths, roads etc would not be feasible. It is necessary that this next stage of work verifying the theoretical model is done using marker balloons or similar, to indicate the height of the cooling towers and the reactor, in order to ensure that the visual impact is accurately assessed. Additional view points will be needed around Thornbury as this is an important location in South Gloucestershire.

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The visual impact will be substantially affected by the number of reactors and type of cooling technology used. It would be beneficial if the visual impacts of the alternatives could be assessed and contribute to the final decisions made. All other decisions will have a relatively minor impact on the final appearance by comparison.

It would have been useful if the scoping report could have included information on how the findings will be presented, for example production of photomontages, and videos.

Surface Water and Flooding

Reference to item 4.35, it is indicated that 'it is anticipated that the flood risk assessment will be supported by detailed hydraulic modelling studies'. There is a requirement that a baseline model of the existing rhine drainage system is developed for assessment of the power station project impact under various conditions. As well as tidal flood risk modelling, hydraulic modelling work must be included.

It is noted within 4.36 that it is indicated that 'further work needed to support this will be subject to further discussion with the Environment Agency ... amongst others'. Hydraulic modelling should be mentioned within 6.1, Table 3.

Ecology

4.70 – add in a reference to likely impacts arising during construction phase for cooling water abstraction and discharge structures, such as vibration, sedimentary disturbance, lights, noise and any temporary machinery or structures.

4.74- tends to 'skimp' on detail of the impacts on the Severn Estuary cSAC/SPA/Ramsar/SSSI, arising from both the construction and operational phases of developing the Marine Off-loading Facility (MOF). This will include elements such as a direct loss of habitat, vibration, sedimentary disturbance, lights, noise any temporary machinery: or structures: or dredging of the estuary bed if a deep access channel is required. Greater detail needs to be provided within the Scoping Report as this is a significant aspect of development in relation to the scheme's impacts on the Severn Estuary European Site.

4.74 should also cover upgrading of sea defences if this will necessitate land-take or a (temporary) loss of habitat from the SPA/SSSI/Ramsar.

4.85 – should include a (general) breeding bird survey (e.g. use of hedges/scrub).

The section on Ecology (4.53 – 4.86) omits to include any reference to the necessity for the development of a new power station at Oldbury to be subject to the process of appropriate assessment – as referred to in section 6.9.

Whilst Section 6.9 acknowledges the need for appropriate assessment (AA), there should be reference to the fact that stand-alone 'topics' within the EIA – noise/vibrations, aerial discharges etc – all potentially inter-relate and overlap with ecology in their ability to impact upon designated sites and protected species. The impacts arising from these individual topic areas on the European features of interest needs to be assessed cumulatively, as do the more general and wider environmental impacts. It is thus important that this cumulative inter-relationship of impacts, as well as the integration of the 'appropriate assessment' of said impacts within the wider EIA, is referred to within the Assessment of Effects (Section 3), Ecology (4.53-4.86) and the Section 6.9 and cross-referenced.

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I trust the comments made above are useful, however if you have any queries please do not hesitate to contact me.

Yours sincerely

Helen Ainsley
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ENGLISH HERITAGE

SOUTH WEST REGION

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Your ref: EN010006/Preapp

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22nd December 2009

Dear Mr Cliff

RE: Land Adjacent to Oldbury Power Station- Proposal by Horizon Nuclear Power- Infrastructure Planning (EIA) Regulations 2009-SI 2263 Regs 8 & 9

Thank you for your letter and the invitation to submit preliminary comments on the scoping opinion for the above document.

As the Government's statutory advisor on the historic environment, English Heritage is principally concerned with the potential impact of this major development within this part of South Gloucestershire and its wide range of designated and undesignated historic assets. English Heritage promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory protection but also those which are locally distinctive, valued and important. Due to the scale and far-reaching implications of on-site and off-site infrastructure for this proposal, we would anticipate that this scoping report should not only pick up on local impacts but upon sub-regional and regional implications on the most significant historic assets in the area including the World Heritage Site of Bath.

Baseline Information

Baseline information should describe the current and future likely state of the historic environment, providing the basis for identifying sustainability issues, predicting and monitoring effects and alternative ways of dealing with them. It can use both quantitative and qualitative information, and should be kept up to date. The information should be tailored to the scale, type and topic of the development. There will also be a need to look at the wider geographic area in order to assess the likely significant environmental effects (e.g. traffic generation, noise during construction, setting issues etc).

When collecting baseline information it is important that the historic environment is broadly defined. All designated historic assets should be considered, together with

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Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become
publicly available



potential impacts on non-designated features of local historic, architectural or archaeological interest and value, since these can make an important contribution to creating a sense of place and local identity. This covers buildings and other structures and features, archaeological remains including marine archaeology, historic open spaces and the wider historic landscape/townscape.

Statutory designations cover: World Heritage Sites, Listed Buildings (all grades, I, II*, II), Scheduled Monuments plus other nationally important archaeological sites, Registered Historic Parks and Gardens (all grades, I, II*, II), Registered Battlefields and Conservation Areas. Their settings should also be considered e.g. World Heritage Site Buffer Zones. Bath is an especially good example of where there will be a need to ensure that the setting to the WHS is comprehensively assessed.

Other important considerations include: information held on Sites and Monuments Record /Historic Environment Record sites; locally listed heritage assets; the character of the wider historic landscape / townscape and other valued historic landscapes; areas of archaeological importance and the potential for unrecorded archaeology.

Analysis of the baseline information for the historic environment and early consultation with local authority conservation officers and archaeologists who understand local issues and opportunities, and with other key stakeholders and local communities will help identify sustainability issues relating to the historic environment.

Preliminary Consultation

We were involved in one meeting on August 19th 2009 with the developers concerning this proposal. As a result we have already made some initial comments on the draft EIA scoping report. As these comments do not appear to have been incorporated into this version of the Scoping Report that you have sent us, we shall repeat them below:

- The impact of all proposed transport and related infrastructure options on the historic environment should be appropriately assessed as they are likely to have a significant impact both regionally, sub-regionally and locally. Therefore, issues related to the impact of any designated and non-designated historic assets should be fully identified within each of the transport options. There are a number of listed buildings and a conservation area in and around Sharpness Docks. In addition, there are likely to be other buildings and structures which would qualify for listing or scheduling, some at a high level. Others of local importance could be detrimentally affected by any major developments at the dock. The presence of maritime and estuarine deposits and features, such as wrecks and environmental deposits, both within the docks and outside, should also be considered. The issue of the need for a



new road link between the Docks and the power station and the impact of this on the existing landscape character of the area and of the large number of archaeological deposits that may be affected by such a proposal needs to be fully assessed. We would encourage the proposal to produce a Master plan on transport issues and would welcome the opportunity to be involved in consultation on it.

- The EIA should include **ALL** necessary impacts including the main site and any associated infrastructure during construction e.g. transport links, construction workers Park and Rides, housing and other facilities etc. The visual impact should be assessed from all high level designated sites from which it will be visible, including any plume impacts. Given the size of the project a set distance would be inappropriate. There is no cut off distance at which something impacts on the setting of a historic asset. This should therefore include an assessment of the impact of the plume in terms of the long distance views from the WHS of Bath. This latter point was emphasised in the meeting itself.
- **Under Section 4.6 Archaeology and Cultural Heritage, 4.6.6-** Documentary Research mentions a gazetteer of identified sites. We asked that a copy of this should be provided but have not seen it to date. Without seeing it we are not aware of how comprehensive it is and whether the Phase I Rapid Coastal Zone Assessment includes a Desk based assessment on

this area particularly concerning the palaeo-environmental history of the site and its immediate environs. This in turn would provide base line data feeding into this assessment.

- Similarly under 4.6.7 we requested a summary of the findings of the archaeological horizons of preservation buried within the sediment sequence of the development site. This has not been provided. On this basis we are not able to judge how robust this part of the assessment has been in terms of the identification of potential archaeological remains in the immediate surroundings of the main site.
- It may also be necessary to undertake archaeological evaluation via trial trenching to further inform the scope of an EIA as part of a programme of archaeological evaluation. This is because there is known from the HER and earlier investigations of this area to be a high likelihood of significant archaeological deposits, both terrestrial and estuarine.

In addition to these earlier comments we would also raise the following issues that require consideration within the Scoping Report:

- **Introduction:** Table 2 provides a summary of the main regulatory permissions required for the construction and operation of a nuclear power station. We would advise that in order to gain permission for a marine off-loading facility (MOF), or certain other coastal and marine impacts, , English Heritage, as a statutory consultee, would expect to be consulted on license applications to the Marine and Fisheries Agency / Marine Management Organisation.

- **Archaeology and Cultural Heritage section:** Whilst the scoping opinion appears to outline the fundamental requirements in terms of Archaeology and Cultural Heritage, we note there are some omissions. Within Figure 6 there is no indication of the location and extent of designated Historic Parks and Gardens. It is acknowledged in 4.88 that the Park and Garden to Berkeley Castle is a designated asset. This is one of several in the study area that should be fully assessed. Furthermore there is no indication that any consideration has been given to the presence of potentially important marine archaeology. This will need to be fully assessed irrespective of whether the MOF goes ahead or not. Any proposal to alter or deepen the Severn Estuary channel, Sharpness Docks or the area immediately to the north of the power station site for water extraction and waste dispensing must benefit from a comprehensive study of the sea bed and deposits from the silt.
- **Landscape Character- (4.37):** This section describes methodology that will be used to assess the impact of the proposal upon the landscape character of the area. There is no direct reference within this section to the historic landscape character and the part it plays in shaping the current landscape around the site, although there are references to historic features within the text. We are supportive of the use of ZTVs in assessing this aspect of the environment however we would reiterate the need to take account of the historic landscape and the significance of its contribution. The study on landscape character in Gloucestershire should assist this process. The use of ZTVs is also invaluable method in assessing the impact of a development upon the historic environment and on specific historic assets within it. We would therefore advocate the need to provide a comprehensive baseline context of the landscape around the site and indicate how the various assets fit into this context currently and how the development may impact upon this context. For example the presence of a number of historic Parks and Gardens within the area, what their current impact is and the context that they are found in within the overall landscape needs to be assessed before the impact of the development itself can be fully identified and assessed.
- **Legacy.** The need for a work-force of the scale suggested may have implications on the existing infrastructure of the locality. As well as roads and parking pressures, it is envisaged that there may be a need for residential accommodation and a host of other facilities for the work-force. This could have an impact on historic assets within the area with extra pressure placed upon the local authority to provide housing, schools, health facilities etc. and in turn putting pressure on available land supply. Whilst this pressure may be for a temporary period during the



construction phase, the longer term legacy of these additional resources needs to be fully considered and integrated into the local policy framework for South Gloucestershire and the wider regional implications for this project also needs to be understood.

- We note within the list of organisations that have been sent the Scoping Report that CADW have not been consulted on this proposal. Given the close proximity of a number of significant historic assets including the WHS at Blaenavon, it is recommended that they are included in this process.

I trust the above will be of assistance in refining the EIA scoping report for the next phase of this proposal.

Yours sincerely

Andrew Vines - Regional Director

Cc Vanessa Straker- Regional Science Adviser

David Bull- Inspector Ancient Monuments

Caroline Power- Historic Environment Adviser.

Ross Simmonds – Team Leader & Planning Policy Adviser.

Beth Harries – Legal Adviser English Heritage

David Haigh – Historic Environment Manager- South Gloucestershire Council.

Jan Wills – County Archaeologist, Gloucestershire

Tim Proudler – Planning and Consents Manager – Horizon Nuclear Power Ltd.



Centre for Radiation, Chemical and Environmental Hazards



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Health Protection Agency

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4 December 2009

Your Ref: EN010006/Preapp
Our Ref: NU091215_0012

REF: CP078
- 9 DEC 2009
I P C

Dear Mr Cliff

Thank you for your letter, dated 23 November 2009, advising of the request for a scoping opinion on the proposal by Horizon Nuclear Power regarding land adjacent to Oldbury Nuclear Power Station.

In considering the health impact of the ionising radiation aspects of potential new nuclear power stations, the Health Protection Agency (HPA) is guided by the basic principles of radiological protection, justification, optimisation and limitation. Currently, the Government is carrying out a public consultation on its intention to justify two new types of nuclear reactor. In order to judge whether the operation of a nuclear reactor is optimised and meeting the appropriate dose constraints, information is required on the nature of the operations including the extent of any waste arisings and discharges into the environment. Information is also required on the likely radiation exposures for individuals and the population as a whole (the collective dose) for both the public and the workers. To ensure that regulatory dose limits will not be exceeded, information is also required on the radiation doses from other nearby sources of radioactivity.

At this early stage HPA is unable to comment on this notification (or application) as the practice is not yet justified and there is insufficient supporting information.

If you require further clarification, please send all correspondence to strategicplanning@hpa.org.uk to ensure we are able to deal with your queries more efficiently.

Yours sincerely

A handwritten signature in black ink that reads 'Jane Simmonds'.

Ms JANE SIMMONDS
Head, Environmental Assessments Department

Direct dial: 01235-822778
e-mail: jane.simmonds@hpa.org.uk

Date: 21st December 2009
Our ref:
Your ref: ENO10006/Preapp



David Cliff
Case Leader on behalf of the IPC
Infrastructure and Planning Commission

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By email only

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Dear Mr. Cliff

**LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATION
2009 SI 2263 Regulations 8 and 9**

Thank you for consulting Natural England on the above proposal.

Natural England is a non-departmental public body, established under the Natural Environment and Rural Communities Act 2006, charged with the responsibility of ensuring England's unique natural environment, including its flora and fauna, land and seascapes, geology and soils are protected and improved.

Our purpose, as outlined in the Act, is to ensure the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.

EIA Scope

Overall, we consider the Report to be comprehensive in its scope, and it appears to adhere to relevant government and other recommended guidance in terms of its format and content. We are satisfied that many points raised by Natural England, as part of the pre-scoping discussions, have been considered and incorporated where relevant. This includes the range of existing and proposed ecological surveys for terrestrial and estuarine/protected and notable species. Other questions relating to the proposed Marine Offloading Facility, dredging requirements, and cooling/pollution issues are addressed in the report, as are potential impacts on landscape and public access. At any rate, it is reassuring to note Horizon's intention to continue to engage with statutory agencies and others on these and other key aspects.

Specific Comments on EIA Topics > Ecology and Nature Conservation

- 4.68 There is also the potential for impact on the designated sites (direct loss of habitat) by coastal squeeze if sea defences are maintained or improved, rather than retreated, in response to sea level rise.
- 4.70 The tidal reservoir was to be removed as part of the decommissioning process for the current Oldbury power station. The proposal for its continued use should be recognized as a significant impact as it constitutes a major constraint on natural geomorphological processes in the Severn.
- 4.75 Fish (and also marine mammals) may also be impacted by underwater construction activities such as piling.

In Combination and Cumulative Effects

One omission may be with respect to the '*in combination and cumulative effects with other developments*' paragraphs on page 27, which identify the existing Magnox power station and possible tidal power generation in the Severn as being relevant. It goes on to cite Gloucestershire County Council Minerals & Waste HRA report and suggests the listed plans and projects may also be relevant in terms of potential combined effects on the Severn Estuary.

However it does not mention the WoE Joint Waste Core Strategy (JWCS) or its accompanying HRA report and we suggest that this document should also be taken into consideration, particularly as the JWCS effectively directs significant new waste technology facilities to the Avonmouth/Sevenside area.

Uncertainties

The Report identifies the very broad range of variations and current uncertainties associated with the project, including reactor and cooling tower technologies, flood defence measures, transport/movements (type, number, loads, frequencies etc) and acknowledges the need to assess all these variations against the EIA topics. We are pleased to note that mitigation and enhancement measures will be fully incorporated within the EIA for integrated assessment.

The complexity of the various planning regimes involved in decision making, including multiple consenting and licensing requirements, is further compounded by the separate, but integral, grid connection application being brought forward by NGET plc. Understanding all the issues and meaningfully aligning the various, sometimes concurrent, processes will be a huge challenge for everyone involved.

Conservation (Natural Habitats, & c) Regulations 1994 (b) – Appropriate Assessment

Finally, we are pleased to note the Report acknowledges that it is not possible to conclude No Likely Significant Effect on the interests of the Severn Estuary N2K (pg 63 Para 6.14) '*subject to the findings of this strategic level appropriate assessment, it is likely that appropriate assessment of the proposal for a new Oldbury nuclear power station will be required for the relevant European Sites. All the information necessary to inform the Appropriate Assessment will be included in the Environmental Statement*'

Natural England is a statutory consultee where an 'appropriate assessment' is required, and we are keen to engage constructively with the applicants, South Gloucestershire Council, the IPC and other interested parties with respect to this and other aspects of the proposal as it progresses.

I hope this letter is helpful, but would be happy to discuss any of the points raised.

Yours sincerely



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Severn Estuary Maritime and Coastal Advisor

angus.bloomfield@naturalengland.org.uk

Mr David Cliff
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Our ref: WX/2009/113370/01-L01
Your ref:
Date: 21st December 2009

Dear Mr Cliff,

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT NOV '09 - PROPOSED NUCLEAR POWER STATION AT OLDBURY NUCLEAR POWER STATION, OLDBURY ON SEVERN.

Thank you for referring Horizon's EIA scoping report (dated November 09 written by RPS) received by the Environment Agency on the 24th of November 2009.

Please note the view expressed in this letter by the Environment Agency is a response to the Scoping Report only and does not represent our final view in relation to any future planning/ permit application made in relation to this site. We reserve the right to change our position should new information, or updates to guidance occur, in relation to any such application.

General Comments:

We recognise that this Scoping Report is high level as decisions have yet to be made on key aspects of the proposal, such as reactor type, flood protection measures and associated infrastructure arrangements.

The proposed list of topics in section 4 is not comprehensive and is slightly different to that given in section 1. We have found the proposed structure difficult to follow, e.g. topic 2 is titled "Surface water and Flooding" but only addresses flooding and there is some further information on proposals for water quality and sediment in the "Ecology and Nature Conservation" section, but this is limited. We consider that the scope of the assessment needs strengthening in the topic areas of ecology, flood risk hydrodynamics, coastal morphology, water quality and marine sediments.

I have set out further detailed comments laid out in the order of the scoping report section.

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Cont/d..

1 Introduction

Project outline

We have concerns over the statement in section 1.9 (p6)

.. "some aspects of the development may remain to be determined after planning applications have been submitted".... etc

There is a duty on promoters to ensure that proposals are properly prepared and consulted on before they submit an application for development consent. Under the IPC process this information needs to be submitted as a whole and the information supplied at the forefront of the process. The IPC will not be accepting outline planning applications. The 2008 Planning Act states submitting this information late/ as outline would be in breach of the promoters 'duty'. Data received late would not be acceptable.

Strategic Siting Assessment

We note that in footnote 1 on p14 the reason quoted for the exclusion of Dungeness from the nuclear NPS is incorrect, it was excluded because "The nominated site did not meet discretionary criterion D6: Internationally designated sites of ecological importance."

Consents required

We consider there are some omissions in this table, these include:

- The construction of a new intake and outlet may also require FEPA Licences.
- The flood defences may also require Flood Defence Consents,
- A Site Waste Management Plan will be required under Site Waste Management Plans Regulations 2008 (No. 314)
- Exemptions from the Environmental Permitting Regulations 2007 for moving waste spoil/subsoil off-site will also be required,

Also note that the Article 37 process produces an opinion rather than an approval.

2 Project Description

Within the project outline it is highlighted that the nuclear development is expected to include a number of associated developments including a park and ride, access roads and highways improvements etc. The impacts of these associated developments will need to be addressed in EIA. Due to the limited information included in the scoping report it is not possible to comment on their impacts.

Since this scoping report was produced Central Government has released the draft National Policy Statements EN 6 (Nuclear power generation) and EN1(draft National Policy Statements for Energy Infrastructure). Developers need to be aware of the requirements within these documents and address them in the EIA process.

3 Approach to the EIA

Section 3.37 states that radioactive discharges will be addressed in sections on water, air and land, but it is not covered in the air and land sections. As previously noted the section on water appears to be missing, Whilst radioactive discharges will be assessed in detail in Environmental Permitting, the EIA should describe how the baselines will be measured and reference the relevant regulatory process. We recommend that the EIA includes a radiological section.

4 EIA Topics

Geology, Hydrogeology and Soils,

Within this section potential sources may also include unregulated and unrecorded historic landfill features. It is encouraging to see that Annex 2 of Planning Policy Statement 23 has been referred to in this section of the report.

It is noted that there is the potential for sandstone horizons within the Mercia Mudstone within the area to "transmit significant volumes of water". The Mercia Mudstone at this location is now designated as 'Secondary B' under the new aquifer typology.

(Secondary B is defined as a predominantly lower permeability strata which may in part have the ability to store and yield limited amounts of groundwater by virtue of localised features such as fissures, thin permeable horizons and weathering. These are generally the water bearing parts of the former 'Non-Aquifers'.)

Surface Water and Flooding

Under PPS 25 Development and Flood Risk, the Environment Agency has strategic and specific flood risk management roles and we comment in that context. Further to this on nuclear sites the risks of flooding are regulated by the Health and Safety Executive as part of the site's safety case.

We endorse that a detailed Flood Risk Assessment (FRA) is required in accordance with PPS25.

Paragraph 4.23. A "tidal cell" approach is not mentioned as a study boundary; this should be used as the study extent in the FRA. Assessment of risk is required to incorporate the flood threats to the power station itself as well as other infrastructure related to the site – roads etc.

Paragraph 4.24. In addition to the sources of flooding identified account needs to be taken of wave action, wave overtopping and tsunamis.

Paragraph 4.25. The ability of the defences to be extended to protect against the maximum credible projections of sea level rise should be incorporated.

Paragraph 4.29. We agree that the dominant flood risk to the site is tidal, but Oldbury Lane, which is the access road to the main site could be flooded from the surrounding rhynes, ditches, standing water etc. Our fluvial flood risk mapping only

covers watercourses with a catchment area of 3 square km or greater and, as such, our flood risk maps do not reflect this potential source of flooding at Oldbury. The fluvial flood risk must be taken into account for the site. The FRA should look at the risk from the numerous rhynes and ditches in the area as well as assessing the tidal risk. Joint probability should also be explored as these watercourses may be tide locked for long periods of time.

Figures 3a and 3b provide an indicative layout of the power stations. This layout needs to be influenced by the modelling work being undertaken. This should apply effectively a sequential approach as required under PPS 25.

Paragraph 4.31. The mitigation must include a comprehensive flood risk management strategy that is informed by competent modelling to ensure that sound decisions are made. Appropriate mitigation is paramount to make this development safe.

Paragraph 4.32. The effects of a tidal barrage will need to be explored in more detail in the FRA.

Paragraph 4.35. Detailed hydraulic modelling must accompany the FRA.

Paragraph 4.36. 'others' will need to include the Lower Severn IDB who have responsibility for the rhyme network in this area.

Ecology and Nature Conservation

Fish studies should be included in the table on pages 59-60 in line with the statement in the ecology section (paragraph 4.85).

As assessment is required of the impact on fish species within the tidal reservoir, with particular attention paid to species protected under the Natura 2000 and Ramsar designations. Larval and juvenile stages, such as shad fry, lamprey transformers and salmon smolt should be considered. .

An assessment of the abstraction intake design to demonstrate it would use the Best Available Technology (BAT) to reduce fish entrainment and impingement should be included within the EIA. Appropriate monitoring arrangements should also be detailed.

Although estuarine habitats are acknowledged within the ecology section, there seems to be no specific assessment planned for potential impacts to estuarine habitats, such as impacts on saltmarsh and mudflats from construction.

As part of the EIA, it is recommended that the ecological mitigation and a management plan should incorporate a monitoring plan for biodiversity and species, with particular attention paid to bird species during the construction phase of the development and fish species during the operational phase.

The plan should also consider short-term and long-term biodiversity management and land restoration plans for the area that will be used for construction around the potential plant. The plans should ensure that development takes into account the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment. Short-term plans should consider what mitigation will

be in place to avoid complete biodiversity loss during construction phase, for example maintaining some hedgerows and tree lines along roads around the construction site.

Areas that have not been included within the topics set out by the Scoping Report, but which need to be incorporated in the EIA, include:

Coastal Issues

There is no recognition of the potential impacts the development of the site, the Marine Offloading Facility (MOF) or the flood defences might have on coastal geomorphology. Coastal change may be experienced on both sides of the estuary as well as sub tidally. Investigations (desk study or modelling) are required to provide the scientific understanding relating to the changes to estuarine geomorphology at the site and surrounding area.

There has also been no mention of coastal erosion and how that might impact on the site when considering the lifetime of the development.

Cumulative/ In combination effects:

It is noted that the in combination effects of the development will be assessed with Oldbury decommissioning. However there is a need to assess so far as is reasonable on the basis of available information the potential in combination effects from other major schemes (existing and proposed) within the area. For example Hinkley Point Nuclear Power Station and the Seven Barrage.

Waste:

There is very little information on construction/inert waste streams other than that the developer will use the waste hierarchy. A Site Waste Management Plan would assist in delivering a sustainable approach.

Water Quality

The proposed development site is in a particularly sensitive area with regard to water quality. Construction activities have the potential to cause significant pollution of water. A scheme/construction management plan for prevention of pollution is required to minimise the risks of pollution occurring. This should be identified in the EIA.

If you have any questions on the above then please do not hesitate to contact me.

In order to facilitate an early response, please quote the Environment Agency's reference on any future correspondence regarding this matter.

Yours sincerely

Miss Louisa McKay

Planning Liaison Officer

Direct dial 01278 484512

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cc Horizon Nuclear Power

End

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16th December 2009

David Cliff
Infrastructure Planning Commission
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Dear Sir

**Land Adjacent to Oldbury Nuclear Power Station
Proposal by Horizon Nuclear Power
Infrastructure Planning (Environment Impact Assessment) Regulations 2009 SI 2263 Regulations 8
and 9**

Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following observations to make.

Flood Risk Management Comments

The Severn Estuary Shoreline Management Plan Review (SESMP) shows the proposed area for the Oldbury Power Station within Policy Unit: SEV 4. Tidal influence will cause an increase in sea level within this policy unit in the short, medium and long term. An increase in flooding of this area is therefore predicted which may well be exacerbated by increased fluvial flow from more extreme flooding events upstream. The SESMP outlines the predicted implications of the Plan and notes that major assets including the existing Oldbury Power Station are at flood risk should defences come to the end of their serviceable life. The Unit has been marked with a 'Hold the Line' policy noting defences are likely to need reconstruction/extensive works within the next 20 years.

Coastal squeeze will occur in this area between 20 – 100 years resulting in some loss of intertidal habitat.

Ecology Comments

We would recommend the EIA considers (screens for potential impact) all SAC, SPA and Ramsar sites within at least 10km rather than just 8km of the proposed new Nuclear Power Station (NPS). This may not scope in additional international sites such as Walmore Common SPA/Ramsar or Cotswolds Beechwoods SAC in Gloucestershire (paras. 4.58, 4.59, 4.84 and Fig. 5) but would be good practice. A 10 to 15km search area for international site presence is consistent with the emerging Habitats Regulations Assessment processes for Development Plans such as Gloucestershire's Waste Core Strategy. A similar approach to the presence of SSSIs and Key Wildlife Sites in Gloucestershire, i.e. up to 10km distant from the new NPS is also recommended.

We assume that existing records of protected and notable species within the nearest parts of Gloucestershire have been or will be captured from GCER (Gloucestershire Centre for Environmental Records – see <http://www.gloucestershire.gov.uk/index.cfm?articleid=96009>).

The scope of surveys planned and completed (para. 4.85) appears to be appropriate although most of these will occur outside of the Gloucestershire county boundary.

Archaeology and Cultural Heritage

I note from the scoping report that the area of proposed development is identified as the land in South Gloucestershire where the new power station will be focussed. However, it is clear from the scoping report that substantial ancillary development and construction works (including a maritime off-loading facility) may also be required elsewhere. In addition, I am aware from previous consultations that the option to construct a haul-route within Gloucestershire to serve the proposed development has also been under consideration.

The current red-line area shown within the scoping report does not therefore reflect the whole of the area that will be subject to development. I recommend that the scoping report should be amended to show the whole of the land subject to development (including any temporary haul roads, construction compounds, and accommodation sites required for construction staff), so that the full impacts on archaeology and cultural heritage may be identified and considered within the ES.

I note that the scoping report incorporates a section on the approach to assessing and evaluating the impact of the proposed development on archaeology and cultural heritage. While this mentions the collection of documentary evidence and site surveys, there is very little detail concerning what these might comprise. In addition, while the potential need to undertake archaeological field work (discussed in 4.108 and 4.109) is mentioned in the scoping report, the discussion would appear to consider that such investigation may not be necessary.

In my view a development of this scale would merit a fully detailed investigation, utilising a range of techniques (including desk-based assessment, historic landscape characterisation, geophysical survey and trial-trenching), in order to identify the extent, character, date and importance of the archaeological and cultural heritage resource.

I therefore recommend that the scoping report should be amended to show in detail the full scope of that investigative work which will be undertaken in order to investigate any impacts on archaeology and cultural heritage.

Were any area of the proposed development in Gloucestershire then I would be pleased to recommend the scope of the assessment and evaluation of archaeological and cultural heritage impact.

For development proposed in South Gloucestershire then I recommend that the scope should be recommended by the archaeological advisor to the planning authority.

Minerals and Waste Comments

The scoping report seems to cover how radioactive waste will be handled therefore the issue will be to check the main application when it comes in as to the details. From the scoping report it doesn't seem to require use of anywhere in Gloucestershire (which we will need to check on the main

submission). However, it is likely that waste would be transported through the County therefore we may wish to comment on that when the application comes in to the Infrastructure Planning Commission.

I note there is a section on construction materials. It suggests that these will come into Sharpness Docks. The inclusion of the sources of construction materials might be useful to assess the full EIA of this development.

If you wish to discuss any of the issues raised in this letter please do not hesitate to contact me.

Yours faithfully

Rob Niblett
Senior Planning Officer



David Cliff
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

21 December 2009

Dear Mr Cliff,

**Proposed Nuclear Power Station near Oldbury-on-Severn, South Gloucestershire
Consultation on EIA Scoping Report**

Thank you for consulting the South West RDA (Regional Development Agency) in relation to the above.

Under the Planning Act 2008 and 'The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009', the South West Regional Development Agency (RDA) has a duty as a statutory consultee for nationally significant infrastructure projects within the region that will be considered by the Infrastructure Planning Commission.

The new Oldbury nuclear power station, generating around 3300MW of power, qualifies as a nationally significant infrastructure project. As such, the South West RDA will be asked to provide comment on the proposals.

We will assess the application on the ability of the proposals to help deliver the Regional Economic Strategy (RES). In order to formulate this view, we will require information on the wider economic and socio-economic impacts of the proposals to be included in the Environmental Impact Assessment (EIA).

We therefore welcome the proposed inclusion of a 'Socio-economics' chapter within the EIA. This should include evidence to demonstrate how the proposals will help to promote successful and competitive businesses, strong and inclusive communities and an effective and confident region, as identified in the RES. We would expect this to include, for example, impacts on job creation, GVA, skills, and supply chain linkages. The RES, including its Delivery Framework and Spatial Annex, are available at: www.southwestrda.org.uk/RES.

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www.southwestrda.org.uk



Should you wish to discuss this matter further please do not hesitate to contact Alice Ordidge (Interim Head of Planning and Transport), or me.

Yours sincerely

Jessica Potter
Interim Planning Manager

Direct Line: 01392 229367

E-mail: Jessica.potter@southwestrda.org.uk



22 December 2009

Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our Ref [Ref]
Your Ref [Ref]

Dear Sirs

**LAND ADJACENT TO OLDBURY POWER STATION, PROPOSAL BY HORIZON NUCLEAR
POWER INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009**

Thank you for your consultation dated 23 November 2009 in respect of the above.

British Waterways (BW) is a public body set up to maintain and develop the network of canals and other inland waterways in a sustainable manner so that they fulfil their full economic, social and environmental potential. In addition to statutory navigation and safety functions, British Waterways has to:

- Conserve our waterway heritage and environment
- Promote and enable rural and urban regeneration
- Maintain and enhance leisure, recreation, tourism and education opportunities for the general public and
- Facilitate waterway transport

British Waterways has no infrastructure in the immediate area and therefore, after due consideration of the submitted details, has no comments to make at this stage of the proposal.

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Area Planner
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South West

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David Cliff
Case Leader
Infrastructure Planning Commission
Temple Quay House
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Nuclear Directorate

Steve Gibson

HM Superintending Inspector
New Build Inspection Unit
Nuclear Installations Inspectorate
4S1 Redgrave Court
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Tel: 0151 951 4954

steve.nsd.gibson@hse.gsi.gov.uk

<http://www.hse.gov.uk/>

Head of Division: Mr Colin Patchett

Date: 21st December 2009

TRIM ref: 2009/501768

Dear Mr Cliff

**LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER**

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2009 Regulations 8 & 9**

Thank you for your letter of 23rd November 2009 seeking views on the EIA Scoping Report submitted by Horizon Nuclear Power in respect of land adjacent to the Oldbury nuclear power station.

Environmental Impact Assessments are concerned with projects which are likely to have significant effects on the environment. HSE's principal concerns are the health and safety of people affected by work activities. In broad terms, therefore, HSE cannot usefully comment on the information provided in Environmental Statements, nor the content of EIA Scoping Reports.

However, such reports should not reference measures which would conflict with the requirements of the Health and Safety at Work etc Act 1974 and its relevant statutory provisions, nor should they misrepresent HSE's role in relation to the regulation of nuclear development projects. With regard to the latter, having reviewed the submitted report, we would like to point an area of inaccuracy.

Para 1.32, page 12, in describing the Generic Design Assessment (GDA) process says:

".....A detailed assessment of the two designs is due to be completed at the end of 2009, and following a period of public consultation in 2010 it is expected that a decision as to which designs will receive final approval will be made mid 2011. If the reactor designs are judged to be satisfactory, the regulators will issue the following:

- *Design Acceptance Confirmation (NII);*
- *Generic Conceptual Security Plan approval (OCNS);*
- *Statement of Generic Design Acceptability (EA)."*

This does not correctly describe the process that HSE's Nuclear Directorate (which encompasses the Nuclear Installations Inspectorate (NII) and the Office for Civil Nuclear Security (OCNS)) is undertaking and confuses our process with that of our GDA partner regulators, the Environment Agency. It is the Environment Agency which is proposing to consult in 2010 on its conclusions on the acceptability of the two designs which are being subjected to GDA. HSE's Nuclear Directorate will be continuing its assessment process throughout 2010 and will be looking to report on its GDA findings for each design in June 2011. Depending on those findings, for each design HSE may be able to issue a Design Acceptance Confirmation. The Environment Agency is proposing to issue its final view on the acceptability of each design at the same time.

Also, it is not correct to say that the designs will receive "final approval" in mid-2011. The GDA process does not 'approve' the designs for construction: that will be a matter for both regulators to consider in the event of site- and design-specific applications, although the results of GDA will be taken fully into account in coming to any subsequent regulatory decisions.

Yours faithfully

Steve Gibson

Nuclear Directorate



Marine and Fisheries Agency, PO Box 1275, Newcastle Upon Tyne. NE99 5BN
Telephone: **0191 2023751** Email: **David.Morris@mfa.gsi.gov.uk**
Website: www.mfa.gov.uk

Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
KT18 5BW
FAO: David Cliff

Your Ref:EN010006/Preapp

Our Ref: PDC 1387

Date: 04 January 2010

Dear Mr Cliff

LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION PROPOSAL BY HORIZON NUCLEAR POWER.

I refer to your letter of 23rd November 2009 relating to a request for a Scoping opinion on the above proposed project. We have consulted with Cefas and the local Marine and Fisheries office based on their environmental responsibilities.

I have set out below the comments we have received with regards to the proposed works and encourage you to consider them carefully when preparing an Environment Statement.

Location of the project

The proposed project will be adjacent to the existing Oldbury power station, which is south west of the new development. The proposed land for development covers an area of 150ha and is comprised of mainly agricultural grassland.

Description of the proposed project

It is proposed the new nuclear power station at Oldbury will comprise the following:

- 3 nuclear reactors with a combined expected output of approximately 3300MW.
- Up to four cooling towers of between 70m and 200m in height
- Interim waste storage facilities
- Electricity transmission infrastructure
- Access roads and highways improvements and a possible park and ride facility
- A marine off-loading facility (MOF) and other such construction transport options
- Implementation of a flood defence strategy for the site
- Construction areas and facilities
- Ancillary development such as other buildings and infrastructure associated with the nuclear site
- Landscape and biodiversity initiatives and mitigation measures associated with the construction and operation of a new power station.

The proposed power station will use pressurized water reactor (PWR) technology. However, at this stage, the reactor supplier, and therefore the capacity of each reactor and the exact reactor type, and the overall number of reactors, has not been determined.

Due to the greatly increased capacity of the proposed power station an indirect cooling water system i.e. cooling towers will be required. The final design of these cooling towers is yet to be finalised, but the two main types of cooling tower most likely to be used in this project are:

- Natural draught wet cooling towers which use evaporative cooling and a combination of natural convection and the 'chimney effect'. Warm water is sprayed down inside the tower and is cooled by the air flowing upwards inside the tower, mostly by evaporative cooling. The warmed air rises, drawing in more cool air and creating a natural air flow. No fans are required and therefore no electrical power is consumed.
- Mechanical draught cooling towers in which fans blow in air at the bottom of the tower (forced draught) or pull air through the tower (induced draught). These are shorter as they do not rely on the natural 'chimney effect'. Various designs are available.

The sediment solids within the inlet water from the estuary will be allowed to settle out into the cooling tower ponds before the water is used for cooling and then will be mixed and discharged with the purged cooling water and returned to the estuary.

It is intended that the existing tidal reservoir will be retained to supply the cooling towers via a new intake structure(s) located somewhere in the middle of the reservoir. A new outfall to the main river channel will be built.

The construction and commissioning phases are expected to take 9 years. Eighteen months to three years may be necessary for site preparation, whilst the construction of the buildings and the commissioning tests phases may take up to six years.

It is anticipated that the new power station will be operational for 60 years and the Decommissioning will take approximately 20 years.

Scoping Recommendations

I would like to emphasise the importance of potential impacts on the marine environment as this does not come across in the report. A number of aspects of the works have not yet been defined such as the final design of the power station, including the reactor type, and the marine offloading facility. Once determined these will need to be better defined within the EIA. If a decision regarding the reactor type is not decided on before the EIA is produced, an impact assessment of both options will need to be included. The document does not comment on the possible need for a dredging licence as a result of the possible development of the marine

offloading facility and therefore the associated impacts of dredging and disposal should be included within the ES.

Modelling work needs to be considered to assess the possible impacts associated with the discharge of the cooling water, both in respect to thermal and sediment movements from the outlet and from the cooling tower ponds. The scoping report suggests that the impacts associated with the new power station will be less than the existing power station. However, evidence based support will be helpful to confirm this.

The project is within the Severn Estuary Ramsar site, SAC, SPA and SSSI. It is likely that an Appropriate Assessment will be required for the European Sites and any relevant information should be included within the ES. The importance of estuarine ecology surveys with respect to any marine works needs to be highlighted. This should cover all the various construction options outlined in the scoping document, if a decision of design has not been made before the ES is published.

The surrounding area is a nursery ground for whiting, plaice and sole. These species should be considered when undertaking the future fish monitoring/surveys. However, there are no shellfisheries within the vicinity of the project.

An assessment needs to be made of the affects of the proposals on commercial fisheries (including socio-economic impacts) and any impacts on shipping facilities in the Severn Estuary

As this project is situated next to an existing power station, it is important that any existing site-specific survey or monitoring data is utilised, such site-specific information will be a valuable resource for the impact assessment.

The report provides a list of primary consents for the project. However there is no mention of acquiring Food and Environment Protection Act 1985 (FEPA) and Coast Protection Act 1949 (CPA) consent for the marine works associated with the project. FEPA and CPA applications will be required from the Marine and Fisheries Agency required for the inlet and outlet pipes, the possible marine offloading facility and the dredging and any disposal activities.

The items highlighted in this letter should be considered in the Environmental Impact Assessment process, and we would like to see the outcome of our suggestions in subsequent Environmental Statements. However we would not see this letter as a definitive list of all Environmental Statements / Environmental Impact Assessment requirements and other subsequent work may prove necessary.

Conclusion

I am generally content with the issues identified within the scoping report. However a number of minor comments and recommendations are made with regard to this project.

It is my opinion that due to the nature and location of this project and its vicinity to the Severn Estuary Ramsar site, SAC, SPA and SSSI, an Appropriate Assessment is required under The Conservation (Natural Habitats &c.) Regulations 1994.

Recommendations are provided on what information should be included within the Environmental Statement to inform an assessment of the potential environmental effects, however our recommendations are not a definitive list of all EIA requirements and additional work may prove necessary.

Please contact this office if you require further clarification on these comments.

Yours sincerely,

David Morris
Marine Environment Team



David Cliff
Infrastructure Planning Commission (IPC)
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Reply to Martin Seaton
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Fax 0117 922 3883
E-mail martin.seaton@bristol.gov.uk
Our ref Oldbury/EIA/ms
Your ref EN010006/Preapp
Date 30th December 2009

Dear David,

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 Regulations 8 and 9**

**LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER**

I am writing to you in reference to the request that you have received from Horizon Power for a formal Scoping Opinion in accordance with Regulation 8 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.

In responding to the request from the IPC for information that Bristol City Council (BCC) considers should be provided in the environmental statement, the Local Planning Authority has in accordance with regulation 8(9) taken into account:

- (a) The specific characteristics of the particular development;
- (b) The specific characteristics of development of the type concerned; and,
- (c) the environmental features likely to be affected by the development.

The Local Planning Authority, whilst generally agreeing that the Scoping Report identifies the potential key environmental impacts of the proposed development, consider that the following areas should be within the scope of the Environmental Impact Assessment in terms of significant potential impacts.

Geology, Hydrogeology and Soils

BCC Pollution Control team have assessed the issues set out in the Scoping report with particular reference to the details of the surveys and investigations that are required at Chapter 6, entitled 'The Way Forward'. Whilst there is no objection to the proposed scope of works, the only observation made is that it is essential that these requirements be undertaken prior to the commencement of any development works.

Cont'd/...

David Cliff
30 December 2009
Page 2

Landscape and Visual Amenity

The proposed scoping of the Landscape and Visual Amenity chapter is noted by BCC's Landscape team, although it is considered that any landscape impacts on northern east views from Shirehampton Ridge and Moorgrove Wood should form part of the assessment.

Archaeology and Cultural Heritage

BCC Archaeology team acknowledge that the area is archaeologically very sensitive (as shown by the Scheduled Ancient Monument at Oldbury) and whilst the range of measures to augment existing information is fine, there is less certainty over the potential for mitigation if sites/landscapes of high archaeological importance were found as a result of the studies that are being proposed.

It is also observed that the now published results of the Rapid Coastal Zone Assessment (RCZA), a joint project between Gloucestershire and Somerset County Councils and English Heritage and covering the English side of the estuary from Porlock Bay in Somerset to the present tidal limit at Maisemore Weir in Gloucestershire, are available and should be referred to.

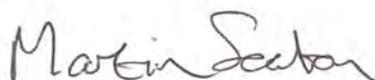
Air Quality and Dust

BCC Air Quality team have reviewed the air quality section of the EIA scoping document, and agree with the scope of the air quality aspects of the EIA and that given the nature of the development, there should be insignificant emissions of local air quality pollutants from the plant itself.

Please note that where BCC internal consultees have responded without any specific comment on the Scope of the EIA (or other issues), they have not been referred to directly within this letter. Furthermore, a number of consultation responses have not yet been received, although these will be forwarded on in a supplementary response at a later date.

Please contact me on the above number should you have any further queries.

Yours sincerely,



Development Management.



IPG

23 DEC 2009

REF: COR117

David Cliffe
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Your ref: EN010006/Preapp

21/12/2009

Dear David

**LAND ADJACENT TO OLDBURY NUCLEAR POWER STATION
PROPOSAL BY HORIZON NUCLEAR POWER
INFRASTRUCTURE PLANNING (Environmental Impact Assessment) Regulations 2009
SI 2263 Regulations 8 and 9**

Further to your letter of 23rd November, we would like to make comment on the above proposed project in two general areas:

1. The potential environmental impact of any on-site emergency and our subsequent response to this.
2. The potential resourcing implications for Avon Fire and Rescue Authority of any changes in the risk profile, either directly or indirectly from the proposed development.

1. Potential environmental impact of any on site emergency

We would expect to see full consideration given to the environmental impact of any potential emergency incidents within the Environmental Impact Assessment (EIA) for the proposed development.

Avon Fire & Rescue Authority would like to be consulted on this, in particular regarding early action to design out these risks and mitigate potential environmental impacts of our operational interventions. These might include:

- contaminated water run-off from fire fighting operations
- storage and use of foam in the event of a fuel fire
- increased vehicle movements due to the need for any enhanced emergency response
- the provision of suitable and sufficient access routes for emergency services
- containment during the early stages of fuel and hazardous materials spillages

PREVENTING PROTECTING RESPONDING

2. Potential resourcing implications for Avon FRS

Depending upon the final specific design and use of the site, we anticipate that this proposal could present significant additional resourcing and training implications for Avon FRS; each of which could also have associated additional environmental impacts, including:

- inherent construction risks (both conventional and nuclear related construction) including additional heavy plant movements, excavations, working at height, pressure on the transport infrastructure;
- the need to provide an enhanced response to a range of on site emergencies requiring the Fire and Rescue Service including any specialist teams such as rope rescue, water rescue, dealing with hazardous materials and mass decontamination;
- the need to provide an enhanced response to a range of off site emergencies requiring the Fire and Rescue Service including an increase in traffic related risk resulting from increased transport movements to and from the site both during and following construction;
- the need to consider an enhanced provision to mitigate the risk caused by an increase in the movement of hazardous materials on the area's transport networks; *and*,
- the provision of new or enhanced capabilities required to mitigate new risks created by the introduction of new site developments such as the maritime off-loading facility and water cooling towers.

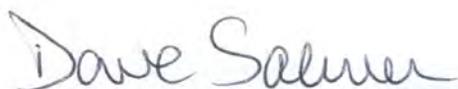
In addition to the new and enhanced risks that the development itself may directly promote, we believe that this proposal will also have wider impacts on the community risk profile within South Gloucestershire, which will require an enhanced partnership response.

The EIA therefore needs to consider the implications for Avon Fire Authority's Integrated Risk Management Plan (IRMP). For example, the risks associated with increased demand for housing, or pressure on the transport infrastructure and networks in the area will impact on our risk reduction agenda, and could potentially lead to an increase in demand for our services both in terms of prevention and response.

We believe that this proposal also provides significant partnership opportunities both in terms of our shared environmental responsibilities and the wider community agenda and are keen to be involved at the earliest opportunity.

Thank you for the opportunity to comment on this proposal, we would welcome further discussion on any of the issues raised in this letter.

Yours sincerely,



Dave Salmon
Assistant Chief Fire Officer
Director of Risk Reduction

IPC
23 DEC 2009
REF: COR.120

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22 December 2009

David Cliff
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol BS1 6PN



Our ref: CSE-19136

Dear David Cliff

**INFRASTRUCTURE PLANNING COMMISSION: OLDBURY NUCLEAR POWER
STATION
PLANNING APPLICATION REFERENCE: EN010006/PREAPP**

Thank you for consulting the Commission for Architecture and the Built Environment (CABE) about this proposal.

We do not wish to comment on the scoping report, nor do we wish to comment on the Environmental Impact Assessment. However, we would like to be consulted in due course on the power station building, other infrastructure, and any public space works that might be proposed as part of this scheme.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clare Rutherwood', written in a cursive style.

Clare Rutherwood
Design Review assistant

Cc Tim Proudler Horizon Nuclear Power Ltd

Commission for Architecture
and the Built Environment

The government's advisor
on architecture, urban design
and public space



Cyngor Cefn Gwlad Cymru Countryside Council for Wales

CADEIRYDD/CHAIRMAN: MORGAN PARRY

Anfonwch eich ateb at/Please reply to: Dr S C Howard
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PRIF WEITHREDWR/CHIEF EXECUTIVE: ROGER THOMAS

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Mr David Cliff
Case Leader
Infrastructure Planning Commission
Temple Quay House
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BS1 6PN

Ein cyf/Our ref: C38.09.03/SCH/CW
Eich cyf/Your ref: EN010006/PREAPP/COR663

26 April 2010

Email address: ipcscopingopinion@infrastructure.gsi.gov.uk

Dear Mr Cliff

**PROPOSED NUCLEAR POWER STATION AT OLDBURY, SOUTH GLOUCESTERSHIRE
PROPOSAL BY HORIZON NUCLEAR POWER LTD
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009**

**SEVERN ESTUARY SPECIAL PROTECTION AREA (SPA), SPECIAL AREA OF
CONSERVATION (SAC) WETLAND OF INTERNATIONAL IMPORTANCE (RAMSAR SITE)
AND SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
RIVER USK SAC, RIVER USK (LOWER USK) SSSI
RIVER WYE SAC, RIVER WYE SSSI**

Thank you for your letter of 1 April 2010 consulting the Countryside Council for Wales (CCW) about the information to be provided in an environmental statement (ES) for the proposals for a nuclear power station at Oldbury.

In discharging its functions under Section 130 of the Environmental Protection Act 1990 the Countryside Council for Wales (CCW) champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning opportunities. CCW aims to make the environment a valued part of everyone's life in Wales.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning, Infrastructure Planning Commission (IPC) or other applications or on the full ES. At the time of any IPC application there may be new information available which we will need to take into account in making a formal response to the IPC.



Gofalu am natur Cymru - ar y tir ac yn y môr • Caring for our natural heritage - on land and in the sea

Prif Swyddfa/Headquarters

MAES-Y-FFYNNON, PENRHOSGARNEDD, BANGOR LL57 2DW FFÔN/TEL: 01248 385500 FFACS/FAX: 01248 355782

<http://www.ccw.gov.uk>



Cyngor Cefn Gwlad Cymru Countryside Council for Wales

Please note that our advice with respect to the ES is limited to those sites and other countryside interests which lie wholly or partly within Wales. It does not cover those interests which lie entirely within England. However, our advice should be read in conjunction with comments from Natural England as the issues raised may be relevant to the assessment as a whole. Similarly, it should be also be read in conjunction with advice from other organisations such as the Environment Agency as again the issues raised may be relevant to the assessment as a whole.

I confirm that the application site lies within and adjacent to the Severn Estuary Special Protection Area (SPA), Special Area of Conservation (SAC) Wetland of international importance (Ramsar Site) and Site of Special Scientific Interest (SSSI). The proposals have the potential to affect these sites, which are all cross-border sites between England and Wales. The proposals also have the potential to affect the River Usk SAC, River Usk (Lower Usk) SSSI, River Wye SAC, and River Wye SSSI.

The Environmental Impact Assessment (EIA) for the proposals, to be summarised in the ES, should include sufficient information to enable the IPC and any other authorising authority(s) to determine the extent of any environmental impacts arising from the proposed scheme on nature conservation, protected species and other countryside and landscape interests. In particular we recommend that the EIA addresses the potential environmental impacts for the Severn Estuary SSSI, Ramsar Site, SPA, SAC; River Usk SAC and River Usk (Lower Usk) SSSI; River Wye SAC and SSSI.

The conservation objectives for the Severn Estuary international sites can be found at: <http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/search-results.aspx?txtSearchTerms=severn+estuary&submit=Go>. The conservation objectives for the River Usk sites can be found at: <http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/search-results.aspx?txtSearchTerms=river+usk&submit=Go>. The conservation objectives for the River Wye sites can be found at <http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/search-results.aspx?txtSearchTerms=river+wye&submit=Go>. General information about the Severn Estuary and River Usk is provided in annexes 1 and 2.

The proposals have the potential to affect all the features of the Severn Estuary designated sites. Our concerns for the Rivers Usk and Wye relate to the migratory fish features. The ES should include sufficient information to enable the Competent Authority(s) to carry out an appropriate assessment of the implications of the proposal on the integrity of the Severn Estuary SPA, SAC, River Usk SAC and River Wye SAC under the Conservation of Habitats and Species Regulations 2010 should this be required. More detailed advice on the matters to be addressed in the EIA and associated ES is given in annex 3.

As you may be aware, CCW has provided advice to Department of Energy and Climate Change (DECC) on the proposed Nuclear National Policy Statement. This advice included specific comments on the Habitats Regulations Assessment and on the Appraisal of Sustainability relating to the proposals at Oldbury. We recommend that the EIA addresses the points raised in this advice. Please let me know if you require copies of our letters to DECC.



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The proposed nuclear power station at Oldbury is a complex proposal, and a number of authorisations may be required in addition to that from the IPC before it can go ahead. For your information, CCW is a member of the Statutory Working Group set up by the applicant for this project. Through this and associated groups we have provided detailed advice to the applicant and to other regulators, both for the proposals themselves and also for proposed survey work.

In line with internal guidance I am copying this letter to Prys Davies, Welsh Assembly Government.

I hope these comments are of assistance, please contact me at the above address if you want to discuss any of these matters in more detail.

Yours sincerely

Dr S C Howard
Team Leader
Cardiff and Newport

Encl Annex 1- Natural heritage interests of the Severn Estuary

 Annex 2 - Natural heritage interests of the River Usk

 Annex 3 - General scoping advice for an assessment of environmental impacts

cc by email Angus Bloomfield, Natural England,
 Rebecca Hardy, Horizon Nuclear Power
 Peter Minto, CCW
 Prys Davies, Welsh Assembly Government



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ANNEX 1

PROPOSED NUCLEAR POWER STATION AT OLDBURY, SOUTH GLOUCESTERSHIRE, PROPOSAL BY HORIZON NUCLEAR POWER LTD

NATURAL HERITAGE INTERESTS OF THE SEVERN ESTUARY

1. GENERAL

The proposal site lies within and adjacent to the Severn Estuary Site of Special Scientific Interest (SSSI), Ramsar Site, Special Protection Area (SPA) and Special Area of Conservation (SAC).

The Severn Estuary has an immense tidal range and contains an intertidal zone of mudflats, sandbanks, rocky platforms and saltmarsh that is one of the largest and most important in Britain. The Estuary also supports important populations of invertebrates, waterfowl and migratory fish. The details of the natural and international importance of the Estuary are given below.

2. SEVERN ESTUARY SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)

In summary, the Severn Estuary SSSI was notified in 1989 to protect the wide range of habitats and species associated with the site. The more sheltered mud and sand banks support beds of eel grass and very high densities of benthic invertebrates. The invertebrates help to support the internationally important numbers of overwintering waterfowl and passage wading birds. The Estuary is fringed with saltmarsh that contains a number of nationally scarce plant species. Seven species of migratory fish move between the sea and the rivers feeding the Estuary.

Copies of the SSSI citation, map, site management statement and potentially damaging operations list can be supplied on request.

3. SEVERN ESTUARY WETLAND OF INTERNATIONAL IMPORTANCE (RAMSAR SITE)

The Severn Estuary meets the following criterion for a Wetland of International Importance especially as a Waterfowl Habitat:

Criterion 1c Due to the immense tidal range that affects both the physical environment and the biological communities

Criterion 2b Due to the unusual estuarine communities, reduced diversity and high productivity

Criterion 2c Due to the run of migratory fish between sea and river via the estuary, species include Atlantic salmon *Salmo salar*, sea trout *S. trutta*, sea lamprey *Petromyzon marinus*, river lamprey *Lampetra fluviatilis*, Allis shad *Alosa alosa*, twaite shad *A. fallax* and eel *Anguilla anguilla*.



Due to the migratory birds during spring and autumn, including nationally important numbers of ringed plover *Charadrius hiaticula*, dunlin *Calidris alpina*, whimbrel *Numenius phaeopus* and redshank *Tringa totanus*.

Criterion 3a Due to the internationally important waterfowl assemblage in winter (greater than 20,000)

Criterion 3c Due to the internationally important populations of dunlin, Bewick's swan *Cygnus columbianus*, gadwall *Anas strepera*, redshank, shelduck *Tadorna tadorna*, white fronted goose *Anser albifrons albifrons*.

Copies of the Ramsar classification and map can be supplied on request

4. SEVERN ESTUARY SPECIAL PROTECTION AREA (SPA)

The Severn Estuary qualifies as an SPA under the following Articles of EC Directive 79/409 on the Conservation of Wild Birds:

Article 4.1 Due to the fact that the Estuary regularly supports internationally important wintering populations of Berwick's swan.

Article 4.2 Due to the fact that the Estuary is a wetland of international importance regularly supporting over 20,000 waterfowl in winter.

Due to the fact that the Estuary regularly supports in winter internationally important numbers of 5 species of migratory waterfowl: gadwall, European white fronted goose, dunlin, shelduck and redshank.

Copies of the SPA classification and map can be supplied on request

5. SEVERN ESTUARY SPECIAL AREA OF CONSERVATION (SAC)

The Severn Estuary has been designated as a SAC for the following habitats and species:

- Subtidal sandbanks.
- Atlantic salt meadows.
- Estuaries.
- Intertidal mudflats and sandflats.
- Reefs.
- Twaite shad.
- River lamprey.
- Sea lamprey.

Copies of the SAC registry entry and map can be supplied on request



6. CONSERVATION OBJECTIVES

English Nature and the Countrywide Council for Wales have prepared conservation objectives for the Severn Estuary SPA, SAC and Ramsar site, in compliance with Regulation 33 of the Conservation (Natural Habitats &c) Regulations 1994 as amended. This is available on the English Nature website, www.englishnature.org and the Countrywide Council for Wales' website:

<http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/search-results.aspx?txtSearchTerms=severn+estuary&submit=Go>

The Association of Severn Estuary Relevant Authorities (ASERA) has prepared a Management Scheme for the Severn Estuary SPA, in compliance with Regulation 34 of the Conservation (Habitats &c.) Regulations 1994 as amended. This is available on the ASERA website: <http://www.severnestuary.net/asera/>. This is currently being updated to include both the SAC and the Ramsar site.

7. PROTECTED SPECIES

7.1 Otter (*Lutra lutra*)

The otter is known to use the Severn Estuary. This species is given full protection under the Wildlife and Countryside Act 1981 (as amended). It is also included on Annex II and Annex IV of the Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Article 6.1 of the Directive). As the otter is included on Annex IV of the Directive it will be necessary to apply for a licence from National England prior to commencement of any works that will affect this species.

7.2 Salmon

Atlantic salmon is a migratory fish that is present in the Severn Estuary throughout the year prior to its migration to the spawning grounds in the upper reaches of the catchments further upstream in the Severn and its tributaries, including the River Wye and the River Usk. As well as being a feature of the Severn Estuary Ramsar Site, salmon are given full protection under Annex II and Va of the Council Directive 92/43/EEC on the Conservation of Natural Habitats of Wild Flora and Fauna.

7.3 Allis and Twaite shad

Allis and twaite shad are migratory fish inhabiting marine and estuarine areas, including the Severn Estuary throughout much of the year, migrating into freshwaters to spawn during between April and June. In addition to twaite shad being a feature of the Severn Estuary SAC, both shad are features of the Ramsar Site, and are listed in Annexes IIa and Va of the Council Directive 92/43/EEC on the Conservation of Natural Habitats of Wild Flora and Fauna.

7.4 River and Sea Lamprey

River lamprey and sea lamprey are both migratory fish that inhabit estuarine conditions, prior to migrating into freshwaters to spawn, between the months of March to June.

In addition to being features of the SAC, both species are listed in Annexes IIa and Va of the Council Directive 92/43/EEC on the Conservation of Natural Habitats of Wild Flora and Fauna.

8. BIODIVERSITY ACTION PLAN HABITATS AND SPECIES

The saltmarsh within the Severn Estuary is an example of “coastal and floodplain grazing marsh”, a habitat included in the UK Biodiversity Action Plan (UK Government 1994. Biodiversity: the UK Action Plan. CM2428. HMSO, London). Allis and twaite shad, two of the fish that migrate through the Estuary, are species included in the UK Biodiversity Action Plan (BAP). Similarly, a number of birds (such as the sky lark) that are found within the Estuary are also included in the UK BAP.

For habitats and species of local interest, refer to the Local Biodiversity Action Plans and the record centres. In Wales Newport, Cardiff and Monmouthshire all have LBAPS. The relevant Local Record centre is: South East Wales Biodiversity Records Centre, 13 St. Andrews Crescent, Cardiff, CF10 3DB, Tel: 02920 641110, Fax: 02920 387354, Web link: www.sewbrec.org.uk. See also www.lrcwales.org.uk

We refer you to Natural England for information on biodiversity interests which lie entirely within England.

9. LANDSCAPE

Information on the seascape of the Severn Estuary, as part of the wider assessment of the seascapes of Wales, can be found at:

<http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/assessing-the-landscape/assessing-seascapes.aspx>

We refer you to Natural England for more details information on local landscape issues.

Cardiff
April 2010

ANNEX 2

PROPOSED NUCLEAR POWER STATION AT OLDBURY, SOUTH GLOUCESTERSHIRE, PROPOSAL BY HORIZON NUCLEAR POWER LTD

NATURE CONSERVATION INTERESTS OF THE RIVER USK

1. GENERAL

The proposals have the potential to affect the migratory fish features of the River Usk SAC and River Usk (lower Usk) SSSI.

The River Usk is considered to be one of the best examples of a near natural river system in England and Wales. The range of plant and animal communities reflect a transition from nutrient poor, in the headwaters, to naturally nutrient rich water chemistry in the lower reaches.

2. RIVER USK SAC

The River Usk SAC status reflects the international importance of the River for the following features:

- Allis shad (*Alosa alosa*);
- Twaite shad (*Alosa fallax*);
- Bullhead (*Cottus gobio*);
- River Lamprey (*Lampetra fluviatilis*);
- Brook Lamprey (*Lampetra planeri*);
- Otter (*Lutra lutra*);
- Sea Lamprey (*petromyzon marinus*);
- Atlantic salmon (*Salmo salar*);
- Watercourses of plain to montane levels with *Ranunculion fluitanis* and *Callitricho-Bratrachion* vegetation.

With respect to watercourses of plain to montane levels (with *Ranunculion fluitanis* and *Callitricho-Bratrachion* vegetation) this habitat feature is found in the higher reaches of the River, and is unlikely to be affected by these proposals.

The River Usk SAC Registry entry and map can be supplied on request.

The conservation objectives for the River Usk sites can be found at: <http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/search-results.aspx?txtSearchTerms=river+usk&submit=Go>



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3. RIVER USK (LOWER USK) SSSI

The River Usk (Lower Usk) SSSI was notified in 1996 to protect the wide range of habitats and species associated with the River. The Usk acts as an important wildlife corridor, an essential migration route and key breeding area for many nationally and internationally important species. For example, the otter (*Lutra lutra*) is widespread along the length of the river where suitable bankside cover exists.

Copies of the SSSI citation, map, site management statement and potentially damaging operations list can be supplied on request.

4. PROTECTED SPECIES

Please refer to annex 1 (Natural heritage interests of the Severn Estuary) for information on protected species associated with the River Usk that could be affected by these proposals.

5. BIODIVERSITY ACTION PLAN HABITATS AND SPECIES

For habitats and species of local interest within and around the River we refer you to the Newport Local Biodiversity Action Plan and the South East Wales Biodiversity Records Centre.

The habitats and species listed in the UK Biodiversity Action Plan that could be affected by these proposals (for example, coastal and floodplain grazing marsh, Allis and twaite shad, otter and Atlantic salmon) are covered in more detail in Annex 1 which gives details of the Severn Estuary.

Cardiff
April 2010



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ANNEX 3

PROPOSED NUCLEAR POWER STATION AT OLDBURY, SOUTH GLOUCESTERSHIRE, PROPOSAL BY HORIZON NUCLEAR POWER LTD

COUNTRYSIDE COUNCIL FOR WALES' (CCW) GENERAL SCOPING ADVICE FOR AN ASSESSMENT OF ENVIRONMENTAL IMPACTS

1. SCOPING FOR AN ASSESSMENT OF ENVIRONMENTAL IMPACTS

The Environmental Impact Assessment (EIA) should include sufficient information to enable the IPC to determine the extent of any environmental impacts arising from the proposed scheme on ecological and landscape interests, and the public's access to the countryside.

In particular, we recommend that the assessment determines the nature and extent of any environmental impacts arising from the proposals on the Severn Estuary Site of Special Scientific Interest (SSSI), Ramsar Site, Special Protection Area (SPA), Special Area of Conservation (SAC), River Usk SAC and River Usk (Lower Usk) SSSI, River Wye SAC and SSSI.

Evaluation of the impacts of the scheme should include: direct and indirect; secondary, cumulative, short medium and long term, permanent and temporary, positive and negative, construction (including impacts of constructions sites and construction access), operation and decommissioning phase impacts on the nature conservation resource, public access and landscape.

The EIA should include sufficient information to enable the Competent Authority(s) to carry out an appropriate assessment of the implications of the proposal on the integrity of the Severn Estuary SPA, SAC, River Usk SAC and River Wye SAC under the Conservation of Habitats and Species Regulations 2010 should this be required. Similarly, sufficient information should be included to decide whether the development is likely to damage any of the SSSI features, in which case the provisions of Section 28 G and I of the Wildlife and Countryside Act, as amended, apply.

2. GUIDANCE

We recommend that the EIA make reference to the latest policy guidance, including the following documents:

National Documents

- Welsh Assembly Government (2002). *Planning Policy Wales*. Welsh Assembly Government, Cardiff.
- Welsh Assembly Government (2009). *Technical Advice Note 5 - Nature Conservation and Planning*. National Assembly for Wales, Cardiff.



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- Welsh Assembly Government (2004). *Technical Advice Note (Wales) 15 – Development and Flood Risk*.
- Welsh Office Circular 11/99: *Environmental Impact Assessment (EIA)*.
- The Severn Estuary Shoreline Management Plan (SMP) and the North Devon and Somerset SMP. Both these are currently under review.

3. DESCRIPTION OF THE PROJECT

The entire scheme should be described in detail. This description should cover construction, operation and decommissioning phases and include detailed, scaled maps and drawings as appropriate. We would expect the description to include:

- The purpose and physical characteristics of the proposals;
- Location, development size and configuration of the development including flexibility of the site layout
- Details of the connection to the National Grid;
- Details of any land contamination issues and remediation plans;
- Land use requirements and other physical features of the project;
- Details of associated infrastructure works including disposal of surface water drainage, and access routes.
- Details of the landscape and seascape character of the area.
- Resource use, including waste, minerals and energy;
- Details of access routes/transport links, alterations to traffic flows, including the type and frequency of vehicles, noise and dust levels;
- Details of all structures, temporary or permanent, within or adjacent to the Severn Estuary;

Construction Phase

- Details of construction working sites, construction access/working corridors, including alterations to traffic flows, noise and dust levels and stock piling sites;
- Timing of all works, particularly adjacent to and within designated sites, and contingency plans should slippage in the programme occur;
- Details of noise and dust levels;
- Quantity and content of any discharges from the development site;
- Details of the disposal of any surplus material e.g. material displaced from constructing bases or access roads.
- Maintenance of any biodiversity interests within the site;
- Details of all construction works and structures within or adjacent to the Severn Estuary, together with construction methods;
- Details of maintenance required during the construction period for all structures, temporary or permanent, within or adjacent to the Severn Estuary;
- Procedures for good working practice within or adjacent to the Severn Estuary;
- Source and type of any fill material required;



- Details of any borrow pits, piling, and excavations
- Details of disposal of any material in the Severn Estuary
- Details of any proposals for dewatering (for example associated with piling, coffer dams, excavations);
- Details of surface water drainage proposals;
- Details of works to existing structures eg Flood Defences.

Operational Phase

- Maintenance requirements of any structures including flood defences, jetties and access structures, within or adjacent to the Severn Estuary;
- Operation and maintenance requirements of inlet and outlet structures within or adjacent to the Severn Estuary.
- Identification of appropriate pollution contingency and emergency measures;

CCW recommend that the decommissioning phase is also included within the scope of the EIA, so far as this might be practical.

Ancillary development

Projects such as this bring with them their own related developments, often referred to as ancillary development. These may be constructed and operated by a different developer and could be assessed as a separate project, but are inextricably linked to the original project. The cumulative impacts of the project and ancillary development could potentially be significant. If however, the ancillary development is not included in the assessment, the Environmental Statement may not identify such a degree of adverse impact. By not including the ancillary development the assessment would therefore not fully reflect the environmental impacts of the whole project.

Information on ancillary development associated with the project, which may be controlled by another developer, should be obtained where possible at the scoping stage. This information will enable potential indirect and cumulative impacts and impact interactions arising from that development to be considered as early as possible in the Environmental Assessment. If insufficient information is available to allow an assessment, this should be reported in the Environmental Statement to ensure that it is considered as part of the decision-making process.

Types of ancillary development that should be considered where possible in the Environmental Assessment include:

- access roads;
- jetties
- construction worker accommodation
- grid connection (overhead lines or buried cables);
- quarries or borrow pits for the supply of materials;
- construction compounds;
- disposal sites.

Failure to consider the impacts of ancillary development linked to this proposed development is likely to render the EIA incomplete as it will not have considered all associated impacts of the proposal.

Illustrations within the Environmental Statement

Any maps, drawings and illustrations that are produced to describe the project should be designed such that they can be overlaid with maps, drawings and illustrations produced for other sections of the EIA such as biodiversity.

For example it will be important that the location of any outfalls and/or jetties can be shown in relation to the habitats and biotopes of the Severn Estuary.

4. DESCRIPTION OF BIODIVERSITY AND LANDSCAPE

The EIA should include a description of all the existing natural resources and landscape, including seascape, interests within and in the vicinity of the proposed development, together with an assessment of the significance of any likely impacts.

4.1 Natural Resource

We refer you to the conservation objectives for the Severn Estuary SPA, SAC and Ramsar site; River Usk SAC and River Wye SAC. We also refer you to Annexes 1 and 2, which summarises the designated sites, other wildlife and landscape issues of the area, for the Severn Estuary, and River Usk respectively.

We also recommend that the developer consults the relevant local authority Ecologist/Biodiversity Officer on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plans. In addition, other species listed under Section 42 of the Natural Environment and Rural Communities (NERC) Act (2006) are important for the conservation of biological diversity in Wales and England, and it is expected that these species would also be considered within the EIA. Information about habitats and species listed under S.42 of the NERC Act may be found on the Wales Biodiversity Partnership website (www.biodiversitywales.org.uk)

CCW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include:

- the Local Records Centre(s);
- the relevant local Wildlife Trust;
- the RSPB;
- the Environment Agency;
- local ecological interest groups (bat groups, mammal groups, badgers groups, ornithological societies etc).

In addition to the contact information given in Annex 1, we refer you to Natural England for the contact details for the above.





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The Natural History Museum's website offers a useful list of nature societies that may also help in this respect (<http://internt.nhm.ac.uk/jdsml/research-curation/library/digital-library/nature-societies-online/>).

It should be noted that in many cases, no proactive survey work will have been undertaken to survey for species and the absence of records for a site should not be taken to indicate the absence of species of interest, but is more likely to reflect a lack of information.

The assessment should include a description of the aspects of the environment that could be affected by the development; including the flora, fauna, soil, water, air and the inter relationship between these. Of particular relevance to this scheme are:

- The location, size, and topography of the application site;
- Existing landuse including public access/ rights of way of the site;
- Existing land drainage and hydrology;
- The Severn Estuary sediment environment (including transport, sources and sinks) , which could be affected by elements of the proposals such as the inlet/outlet structures, jetty and coastal defences;
- the marine processes (including tidal, wind and wave processes) which could be affected by elements of the proposals such as the inlet/outlet structures, jetty and coastal defences;
- Geology and soils, including the presence of any contaminated ground and soils;
- The existing nature conservation resource, including the identification of relevant statutory nature conservation designations; existing habitats and species (including those identified in the UK Biodiversity Action Plan) and the various nature conservation interests given in Annexes 1 and 2. We refer you to Natural England for detailed information on interests which lie entirely within England.

Full details should be provided of the likely impacts of the proposals on the notified features of the designated sites and their significance, along with comprehensive information about the measures that will be put in place to avoid and minimise adverse impacts.

Habitats Regulations Assessment

Proposed developments likely to significantly affect European sites (SAC, SPA), either alone or in combination with other plans or projects, require special consideration by the competent authority (ie. the IPC) under Regulation 61 of the Conservation of Habitats and Species Regulations 2010. As a matter of Government policy, the same applies to Ramsar sites. Competent authorities may only permit proposals where they will not adversely affect the integrity of European sites or Ramsar sites.

The process of the Local Planning Authority's/DECC's/IPC's special consideration of development proposals likely to affect European sites (& Ramsar sites) is known as Habitats Regulations Assessment (HRA) and it takes into account the conservation objectives of the site(s) concerned. It is an additional requirement to Environmental Impact Assessment; however, the information contained within the Environment Statement may be of relevance and be used in the HRA.



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The HRA process is a two stage process, the first stage being a 'test of Likely Significant Effects' to establish whether the proposals are likely to result in significant effects on European sites or Ramsar sites. If this establishes that significant effects are likely, or there is uncertainty whether significant effects are likely to result, then a full HRA is required.

CCW recommends that sufficient information is provided in support of an application for these proposals in respect of both the EIA and HRA processes. This should include all of the measures that will be implemented to prevent damage to the European sites and/or Ramsar sites specified above.

We would refer you to the following document for guidance and information on assessing projects under the Habitats Directive:

- David Tyldesley and Associates for the Countryside Council for Wales (September 2008). *Assessing projects under the Habitats Directive: Guidance for Competent Authorities.*

An electronic copy of this document may be supplied by CCW upon request.

4.2 Landscape

Information on the seascape of the Severn Estuary, as part of the wider assessment of the seascapes of Wales, can be found at:

<http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/assessing-the-landscape/assessing-seascapes.aspx>

The EIA should include a description of the landscape and seascape that could be affected by the proposals. We refer you to Natural England for details of the English landscape interests

5. IMPACTS ON BIODIVERSITY

The EIA should consider the impacts of the scheme (as described in 3 above) on the interests (as set out in 4 above). Our particular concerns are detailed below.

These impacts potentially overlap with the interests of other bodies, such as the Environment Agency (EA). Please cross-refer to their advice when considering this section.

5.1 Impacts on the Severn Estuary SPA, Ramsar site, SAC and SSSI

The nature conservation interests of the Severn Estuary are given in Annex 1.

The potential impacts on the nature conservation resource of the Severn Estuary that should be addressed in the assessment include:

- Disturbance to the bird features of the Severn Estuary SPA
- Impacts on bird flight lines, for example by the construction jetty, during both construction and operation phases



- Loss of, or alteration to saltmarsh and intertidal features, both as features of the Severn Estuary SAC and as supporting habitat for the bird features of the SPA
- Loss and damage to subtidal sandbanks feature of the Severn Estuary SAC
- Water quality (we recommend referral to the Natura 2000 Guidelines for managing water quality within European Marine Sites), especially on the intertidal, bird and fish features of the Severn Estuary sites;
- Water temperature, especially from the outlet structure, especially on the intertidal, subtidal, reef, bird and fish features of the Severn Estuary sites,
- Non-native species, including the potential for the development to enhance conditions for invasive nonnative species during both the construction phase and the operational phase due to the increased water temperatures.
- Loss, damage and /or disturbance to the fish features of the Severn Estuary SAC, Ramsar site resulting from the construction phase and the operation phase.
- Loss, damage and /or disturbance to the fish features of the Severn Estuary SAC, Ramsar site from the construction and/or operation of the inlet structure,
- Changes to the sediment regime, including changes resulting from temporary and permanent structures and their operation
- Changes to coastal erosion and consequent demands for coastal protection works
- Flood Defences, both new and existing.

The impacts arising from the different elements of the proposals should be clearly identified. The magnitude and timing of all adverse effects should be related to the features of the sites, in particular how these effects are likely to affect the achievement of the conservation objectives of the Severn Estuary Ramsar, SPA, SAC and the management objectives of the Severn Estuary SSSI. Sufficient information should be included in the EIA to enable a decision to be made as to whether the development is likely to have a significant effect on the European sites, and how adverse impacts on the European sites will be avoided.

The EA should also be consulted for their requirements.

5.2 Impacts on the River Usk SAC, River Usk (lower Usk) SSSI and River Wye SAC, SSSI

The conservation objectives for the River Usk sites can be found at: <http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/search-results.aspx?txtSearchTerms=river+usk&submit=Go>. The conservation objectives for the River Wye sites can be found at <http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/search-results.aspx?txtSearchTerms=river+wye&submit=Go>. General information about the River Usk is provided in annex 2.

The EIA should address the potential impacts of the proposals for the migratory fish features the River Usk and River Wye.



The impacts arising from the different elements of the proposals should be clearly identified. The magnitude and timing of all adverse effects should be related to the features of the sites, in particular how these effects are likely to affect the achievement of the conservation objectives of the River Usk SAC and River Wye SAC, and the management objectives of the SSSIs. Sufficient information should be included in the EIA to enable a decision to be made as to whether the development is likely to have a significant effect on the European sites, and how adverse impacts on the European sites will be avoided

5.3 Impacts on Protected species

As outlined in Annex 1 and 2, the proposals may affect a number of species protected under both European and British law.

The EIA should consider impacts on protected species.

5.4 Impacts on Biodiversity Action Plan Habitats and Species

There should be an assessment of impacts on any habitats and species listed in the UK Biodiversity Action Plan.

5.5 Monitoring Regime

It will be necessary to be able to demonstrate that measures proposed to avoid any adverse impacts on both European designated sites and protected species are effective. In addition, some method of confirming the positive and negative impacts predicted in the assessment and during construction will be required.

We therefore recommend the inclusion of details of a monitoring programme covering all designated sites and protected species affected by the scheme relating to both construction and operational phases of the development. In addition monitoring should be linked to appropriate contingency plans. It may be necessary to amend construction procedures if the monitoring programmes identify adverse impacts linked to construction or post construction activities, including pollution incidents.

5.5.1 Severn Estuary Monitoring

Monitoring should reflect the relevant issues identified in the EIA and again be established prior to the construction period and be continued both during and post construction.

We have already provided some detailed advice to the applicants on pre-application survey.

5.5.2 Protected Species Monitoring

Monitoring requirements will depend on the results of surveys carried out as part of the EIA.

6. IMPACTS ON LANDSCAPE

We refer you to Natural England for advice on the assessment of landscape impacts.





Cyngor Cefn Gwlad Cymru Countryside Council for Wales

We refer you to the information on how to assess impacts of the proposals on the seascape of the Severn Estuary to be found at:

<http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/assessing-the-landscape/assessing-seascapes.aspx>

March 2010



Gofalu am natur Cymru - ar y tir ac yn y môr • Caring for our natural heritage - on land and in the sea

Prif Swyddfa/Headquarters

MAES-Y-FFYNNON, PENRHOSGARNEDD, BANGOR LL57 2DW FFÔN/TEL: 01248 385500 FFACS/FAX: 01248 355782

<http://www.ccw.gov.uk>

IPC

29 APR 2010

REF: _____



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Eich cyf . Your ref EN010006/Preapp/ COR663
Ein cyf . Our ref SF/JD/192/10

27 April 2010

For the attention of David Cliff

Dear Sirs

**PROPOSED NUCLEAR POWER STATION AT OLDBURY, SOUTH
GLOUCESTERSHIRE, PROPOSAL BY HORIZON NUCLEAR POWER Ltd
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263**

Thank you for your letter of 1 April 2010 to Jane Davidson AM, Minister for Environment, Sustainability and Housing, seeking identification of issues that the Welsh Assembly Government wishes to see included in the environmental statement (ES) for the above project.

The omission of the Assembly Government from the consultation carried out in response to the request for a scoping opinion is regretted, given the obligation on the Commission to consult Consultation bodies before issuing an opinion. Nevertheless, the Assembly Government welcomes the opportunity now provided by this further consultation by the IPC to identify matters for inclusion in the ES.

Under the Government of Wales Act 2006 the Assembly Government has responsibilities in respect of Wales for a range of public health and environmental related issues. The proposed nuclear power station at Oldbury has the potential to affect adversely public health and the environment in Wales, and the ES will need to respond to this.

Parc Cathays
Caerdydd
CF10 3NQ

Cathays Park
Cardiff
CF10 3NQ



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE

Ffôn • Tel: 029 2082 3235
GTN: 1208 3235
Ffacs • Fax: 029 2082 5137
Ebost • Email: robert.jt.williams@wales.gsi.gov.uk

- The above points relate to radioactivity, however, construction, operation and decommissioning of the power station will create a range of non-radioactive wastes, emissions and discharges from and in relation to the site including those caused by transport to and from the site, and also including noise from the site and related transport during its construction, operation and decommissioning. The ES should include a full assessment of the potential harm to human health and the environment of these non-radioactive issues, and how this will be prevented or mitigated.
- There are a number of European, UK and local nature conservation designations in the Severn estuary, including cross-border Ramsar, Special Area for Conservation (SAC) and Special Protection Area (SPA) sites. In addition there are a number of Welsh coastal terrestrial sites across the estuary from the power station, and substantial marine protected areas to the west. Unprotected marine areas can also be habitat for significant populations of marine European Protected Species, Biodiversity Action Plan (BAP) priority marine species, and birds. The ES should give full consideration to the potential impacts of the proposed development on these protected sites and species as well as the risks of long-term accumulation of all emitted radioactive and non-radioactive contaminants in this relatively enclosed ecosystem

There has been much public perception of risk associated with living adjacent to a nuclear power station. Following this public concern, the Committee on Medical Aspects of Radiation in the Environment (COMARE) has issued a number of public statements in relation to the North Wales Coastal area. Similar concerns can be expected to arise in South Wales over Oldbury B. This highlights the importance of ensuring full and open public engagement and consultation in relation to any proposals.

It is Welsh Assembly Government policy to ensure that Health Impact Assessments (HIA) are undertaken to inform decisions on major developments. Whilst we appreciate that HIA is not a statutory requirement for current energy applications, the Assembly Government would strongly advocate its use in relation to the proposed Oldbury development.

HIA must be conducted openly and in partnership with those affected by, or with an interest in, the project and its outcomes. The Assembly Government has supported the development of the Wales Health Impact Assessment Support Unit over the past 5 years. The robust methodology they have developed offers a sound basis on which to build. An HIA would complement and not replace an EIA in the assessment of potential impacts on human health and wellbeing. The Assembly Government considers that an HIA should be prepared for Oldbury B, or that the equivalent information should be presented in the ES followed by an equivalent public engagement process.

Further information is available from the Wales Health Impact Assessment Support Unit website at the following link -

<http://www.wales.nhs.uk/sites3/home.cfm?OrgID=522>.

Our Ref: SC/15.04.10/AM549/201410
Your Ref: EN010006/PREAPP/COR661
Date: 15 April 2010
Email:



95 Kilbirnie Street
Glasgow
G5 8JD

David Cliff
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol, BS1 6PN.

Fax:

IPG

19 APR 2010

REF: _____

Dear Sir / Madam,

Re: Oldbury, .

I write with reference to the above site, please note that Southern Gas Networks do not cover this area and your enquiry has been forwarded to:

Northern Gas Networks, 1 Emperor Way, Doxford International Business Park, Sunderland, SR3 3XR

Wales West Utilities, Spooner Close, Celtic Springs, Newport, NP10 8FZ

National Grid, Plant Protection, Block1, Floor 2, Brick Kiln Street, Hinckley LE10 0NA

National Grid, Asset Protection Team, PO Box 3484, Warwick, CV34 6TG

Regards,
Alison Mair
Support Assistant
0141 418 4093

COR771

Mr David Cliff
IPC
Temple Quay House
Temple Quay
Bristol
BS1 6PN

IPC
09 APR 2010
REF: _____

Our reference: WD/314
Your reference: EN010006/Prespp/
Date: 8 April 2010 COR 661

Dear Mr Cliff

JNCC co-ordinates nature conservation advice at a UK level and advises UK Government on scientific and policy matters relating to nature conservation internationally. Within each UK country the separate statutory bodies are responsible for nature and landscape conservation these being: Natural England (NE), Countryside Council for Wales (CCW), Scottish Natural Heritage (SNH) and the Council for Nature Conservation and the Countryside Northern Ireland (CNCCNI).

JNCC has responsibility for the provision of nature conservation advice in the offshore area. 'Offshore' is defined as beyond 12 nautical miles (nm) from the coastline to the extent of the United Kingdom Continental Shelf (UKCS). Within territorial limits (<12 nm) nature conservation advice is the responsibility of the relevant country agencies.

This development proposal is not located within the offshore area, does not have any potential offshore nature conservation issues and is not concerned with nature conservation at a UK level, therefore JNCC does not have any comments to make on the consultation.

With kind regards

Yours sincerely



Mrs Wendy Dalton
Business Planning Officer



Your Ref. EN010006/Preapp/COR661
Our Ref:

For the attention of David Cliff

Infrastructure Planning Commission
Temple Quay House
Temple Quay
BRISTOL
BS1 6PN

Chief Executive's Office

Millennium House
17 - 25 Great Victoria Street
Belfast
BT2 7BN

Direct Line: 028 9025 6511
Date: 12 April 2010

By Email and Post

Dear Sirs

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263
PROPOSED NUCLEAR POWER STATION AT OLDBURY**

Thank you for your correspondence of 1 April 2010 regarding the scoping opinion relating to the ES for the proposed project.

I can confirm that the Northern Ireland Planning Service has no comment to make in relation to this exercise. I would point out that Planning Service is an agency within the Department of the Environment which is the Planning Authority for Northern Ireland and I am responding solely on behalf of the agency.

Please contact me at the above address or by email to simon.kirk@doeni.gov.uk if I can be of any further assistance.

Yours faithfully


Simon Kirk
Professional Services Manager
(Operations)



ROCKHAMPTON PARISH COUNCIL

To: Mr David Cliff
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

From: Mr J Snowden (Clerk)
Green Acres
Church Road
Rockhampton
South Gloucestershire
GL13 9DX

Dear Mr Cliff,

28th April 2010

Proposed Nuclear Power Station at Oldbury on Severn
Comments on Scope of Environmental Impact Assessment

Thank you for your letter of 1st April 2010. Although Rockhampton Parish Council is clearly not in a position to provide informed technical comment on specific details of the Environmental Impact Assessment produced by Horizon Nuclear Power, we do wish to make the following more general points:-

- i) The report appears to identify all the major environmental aspects that will need to be taken into account by the IPC, but it is noted that most aspects will be assessed against the requirements of various 'Guidance Documents'. It is likely therefore that the acceptability of the development will inevitably involve a number of qualitative judgements. We would expect those judgements to be readily supportable.
- ii) Given that there is insufficient water available at this site for direct cooling of a major power plant, and that the flood risk for this area is relatively high, the overall suitability of this site must already be classed as 'marginal'. On this basis we would expect approval to be given for this development only if compliance with each and all of the relevant Guidance Document can be readily demonstrated, ie the cumulative dis-benefit of the proposal must be recognised.
- iii) The nature and scale of the environmental impact from this development will, in a number of respects, be proportional to the scale of the development itself. We would therefore expect visible consideration to be given to the potential reduction in environmental impact associated with a reduction in the capacity of the plant, ie for consideration to be given to building only one or two reactors. Any commercial arguments made as a counter to any such reduction should be fully substantiated.
- iv) We would expect consideration to be given to removal/reversal of any major infrastructure required only for construction – including new roads if appropriate.

Yours Faithfully,

J Snowden.

THORNBURY TOWN COUNCIL

Response to

Consultation by the Department of Energy and Climate Change on the National Policy Statements on Energy

1. 200 Metre Cooling Towers

It is understood that these proposed towers are amongst the highest in the world and will have a huge negative impact on the area. They will be visual from Thornbury, the Cotswolds, the Forest of Dean, Chepstow and Gloucester. It is also understood that, of the ten sites being considered as possible nuclear power station locations, Oldbury will be the only one that will require cooling towers because the water in the Severn estuary lacks the depth required for cooling in other ways. In these times when energy conservation is of great importance, has consideration been given to harnessing the enormous amount of heat that will just be dispensed into the atmosphere from the towers?

2. Noise

The noise generated by the cooling towers will reach unacceptable levels and have an enormous impact on the amenities of residents living close to the station.

3. Traffic Movements

There is considerable concern about the increase in traffic along narrow country roads leading to the Site. It is almost certain that there will be a huge number of lorries travelling to the site on a daily basis. The building of a wharf to allow materials to be brought to the construction site by water has not been explored sufficiently for it to be considered as a viable alternative. The existing road route to the M5 will take traffic along residential roads on the edge of Thornbury.

4. Flooding

The possibility of flooding around the site if the levels of the proposed station and access roads are raised is a real cause of concern.

5. Socio-Economic Effects

Has consideration been given to the socio economic impact of a possible combination of a deep dock at Avonmouth, a power station at Oldbury and a Severn barrage? It is understood that the Environment Agency does not think that the area could support three such large projects. It seems apparent that the building of the Power Station would almost certainly preclude the building of a Severn barrage.

6. Health Issues

It is considered that there are possible health issues for families living around nuclear power stations particularly as a recent German study concluded that there was a demonstrable increase in cancers and leukaemia in young children living near German reactors.

7. Nuclear Waste

It is apparent that the matter of the disposal of nuclear waste has not yet been resolved.

8. Wild Life

The impact on wild life in the area will be significant and due consideration has not be given to this aspect of the development.

In conclusion, it is the view of Thornbury Town Council that the apparent bias in the National Policy Statement towards a new power station at Oldbury has meant that the issues listed above have been given insufficient attention and weight. They are dismissed with vague statements that imply that they can be easily mitigated and it is the view of members that adequate mitigation may prove impossible. The work undertaken to produce the Oldbury section of the National Policy Statement for Energy Infrastructure was inadequate and paid far too little attention to ecological, environmental and visual impacts.

From: Morgan Barbara [mailto:Barbara.Morgan@networkrail.co.uk]
Sent: Wednesday, May 05, 2010 3:31 PM
To: IPC Enquiries
Subject: FW: Ref: EN010006/Preapp.COR661



Network Rail
3rd Floor
Bristol Temple Point
Bristol
BS1 6NL

Ask : Barbara Morgan
for : 0117 3721118
Tel :
My Ref : CP/TP10/0124/BM
Your :
Ref : EN010006/Preapp/COR661
Date : 5th May 2010

Dear Sir/Madam

**PROPOSED NUCLEAR POWER STATION AT OLDBURY ('the project')
PROPOSAL BY HORIZON NUCLEAR POWER Ltd ('the applicant')
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2253 ('the EIA Regulations')**

I refer to the scoping consultation sent to Network Rail with regard to the proposed development at the above.

Network Rail has a statutory obligation of ensure the availability of safe train paths and as such we are required to take an active interest in any development adjacent to our infrastructure that potentially could affect the safe operation of the railway.

When you formally consult Network Rail we need to be satisfied that there will be no adverse safety issues arising as a result of the proposed development to users of the railway. Can we therefore suggest a section be added in the environmental statement to demonstrate that the railway infrastructure will not be compromised and be adequately protected.

Although the main proposal may not compromise the safe operation of the railway, we would also need to understand the implications on any ancillary development proposed such as overhead power lines and connections into the National Grid, construction compounds and delivery routes for materials.

Network Rail would need to be consulted on any planning application submitted as our primary concern is the safety of the adjacent railway.

Please feel free to get in contact if you have any questions.

Yours sincerely,

Barbara Morgan
Town Planning Technician (Western)

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