

Oldbury New Nuclear Build (NNB)

Developing Policy for Inclusion in the Policies, Sites and Places Plan (PSP Plan)

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1. Project Overview

Purpose

- 1.1 National Policy Statement (NPS) EN1 sets out national policy for energy infrastructure which, when combined with the relevant technology-specific energy NPS, provides the primary basis for decisions by the Secretary of State on applications for energy developments that fall within the scope of the NPS. In its NPS for Nuclear Power Generation (EN-6), the Government has included a site near to Oldbury-on-Severn as potentially suitable for a new nuclear power station by 2025. The 420 acre (170 hectares) site is located next to the former nuclear power station and is owned by Horizon Nuclear Power which was acquired by Hitachi in 2012.
- 1.2 In response to the identification of Oldbury as a potentially suitable site for a New Nuclear Build (NNB), and acknowledgement of the need to consider Local Planning Policy in determining Nationally Significant Infrastructure Projects (NSIPs) (as referenced in National Policy Statements), Major Infrastructure Project policies CS36 and CS37 have been accepted and included in the adopted South Gloucestershire Core Strategy.
- 1.3 Policy CS36 is an overarching policy relating to all Major Infrastructure Projects whether determined by the Secretary of State, South Gloucestershire Council (SGC) or any other agency. Policy CS37 applies to nuclear related development, including that associated with the proposed new power station at Oldbury, decommissioning of the existing power station and other proposals relating to nuclear waste. Additional detail and expression will however be required in the form of a development plan document to provide a positive framework for Major Infrastructure Projects. SGC is therefore currently preparing the Policies, Sites and Places Plan (PSP Plan) to provide this detail.
- 1.4 In respect of the NNB project, Horizon's lead site at Wylfa on Anglesey is approaching significant milestones that will subsequently help the company to shape a clearer, time efficient and cost effective programme for a potential new plant at Oldbury. The programme for an application for a Development Consent Order (DCO) for Oldbury is not yet known.
- 1.5 Although substantive work on the pre-application stages of the proposed Oldbury NNB may not start for some while, it is anticipated that this will be well within the South Gloucestershire Core Strategy Plan Period (which runs up to 2027).
- 1.6 SGC therefore considers it important that a policy framework for what is likely to be the biggest development faced by the Council and surrounding communities in generations should be developed concurrently with the overall Local Plan policy framework for the South Gloucestershire area.

Approach

- 1.7 To achieve the above outputs, the Council commissioned Somerset County Council's (SCC) Major Programmes Group to facilitate a programme of work. The Major Programmes Group led on the County Council's input to the Hinkley Point C (HPC) NNB project throughout the pre-application and examination phases, and is currently preparing for full project commencement anticipated to be later this calendar year. HPC is thus far the only NNB project to be consented under the 2008 Planning Act, and the earthworks to prepare the site have already commenced under a separate Town and Country Planning Act permission that was granted in 2012.
- 1.8 Significant benefits can be gained by working in a shared services/ collaborative working arrangement with key officers at SCC who had direct experience of negotiating with the project promoter (EDF Energy) on the HPC NNB and of taking a lead role in representing their Council at Examination. This is very much consistent with the Government's expectations with regard to the new Duty to Co-operate (DtC). It is also envisaged that this will result in significant efficiencies to SGC as compared with 'reinventing the wheel' and, once in place, the focussed PSP policy will enable the Council to provide more directed input to Horizon once pre-application discussions on Oldbury are restarted.
- 1.9 This partnership approach will allow SGC to capture the experience of SCC with regard to the challenges faced and lessons learned so far in the HPC NNB project and ensure these are applied, where appropriate and relevant, to secure the best possible planning policy/ negotiation framework for South Gloucestershire. The working relationships already established through the Local Government Association New Nuclear Authorities Local Authority Group (NNLAG) are also being developed in order to share respective knowledge and expertise, particularly with respect to Anglesey, Wylfa and Sizewell, both of which are at the pre-application stage.
- 1.10 Given the scale of the project and the potential interrelationships with neighbouring Local Authorities, as well as those authorities in close proximity to the South Gloucestershire area, it is recognised that the formulation of proposals must ensure appropriate and timely co-operation, and that recommendations for policy take due account of their views and aspirations in accordance with the requirements of the DtC and the principles of good stakeholder/ community engagement. Furthermore, it will be necessary to build a productive and successful relationship with the project promoter for Oldbury NNB as it develops its proposals for inclusion in a DCO application.

Outputs and Benefits

- 1.11 To produce a recommended planning policy framework for Oldbury NNB for inclusion in the PSP Plan; the objective being to define a vision for each of the topic areas identified in Core Strategy policies CS36 and CS37, and to

provide policy expression at a conceptual level of the 'asks' to support and direct the outcomes the Council and its communities want to achieve through the Oldbury NNB project. The outputs of this work will therefore feed directly into preparing the Oldbury NNB chapter of the PSP Plan and the supporting Sustainability Appraisal. It will also provide a 'platform' that will inform the Council's pre-application discussions with Horizon in preparing the detailed technical work and proposals for a new nuclear power station at Oldbury, and against which the emerging proposals for NNB will be assessed.

- 1.12 Giving planning policy framework expression in the PSP Plan will ensure South Gloucestershire Council can actively and positively influence the development proposal while acknowledging that the procedure for the determination of consent for Oldbury NNB will be through the Planning Act 2008 and its associated processes for NSIPs, and also within the context of the National Policy Statements (and in particular EN-1 and EN-6). However it is noted that these documents contain references to the relevance of local policy in the decision making process for NSIPs.
- 1.13 The PSP Plan will provide additional planning policy guidance to support delivery of the Council's Core Strategy. In doing so it will help the local authority achieve sustainable development economically, socially and environmentally. The policy will inform the Council's pre-application engagement with the Oldbury NNB promoter, and its response to consultations, as well as informing the Council's input during the Examination of the submitted DCO by the Planning Inspectorate. In line with the recent Government announcement and South Gloucestershire's Adopted Core Strategy, the PSP policy will also inform the negotiation of community benefits in recognition of the disturbance and burden placed on local communities as a result of hosting a new nuclear power station.

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2. Process

2.1 The process was developed between SGC and SCC officers via an agreed Project Initiation Document and Stage 1 methodology. A summary of each stage is provided below.

Stage 1 – Overview and Context

2.2 Introductory workshops were held with key officers from a particular specialism (e.g. ecological advisor) and local Members/ relevant parish & town councils with knowledge of the immediate local area and also involvement in the plan process to raise general awareness and understanding of the following matters:

- Explanation of the project purpose, anticipated outputs, and expectations of their involvement
- Oldbury NNB project update and summary of likely development composition
- Overview of HPC project to help comprehension of scale and complexity, potential implications for the locality and approaches to mitigation and benefits taken in Somerset, plus reference to emerging policy context for Wylfa on Anglesey.
- Planning processes for NSIPs under the Planning Act 2008
- Scope and purpose of DCOs
- Assessment and review process for the Oldbury chapter of the PSP Plan
- Understanding of initial likely areas of concern raised by key specialist officers and Members
- Scale of joint working with SCC
- Worked examples from key topic areas that affected the HPC project (e.g. the HPC Transport Strategy) to help workshop attendees start to think about potential issues with the Oldbury NNB
- Key lessons learned from HPC NNB

2.3 A copy of the presentation that was given to both members and officers is attached at Appendix A. Dates of the workshops and a list of attendees:

Workshop	Attendees
Members/ Parish & Town Councils – 22 October 2013 (a.m.) at Kingswood Council Offices	Neil Halsall (Thornbury North)
	Shirley Holloway (Thornbury South & Alveston)
	Maggie Tyrrell (Thornbury South & Alveston)
	John Calway (Longwell Green & Leader of Council)
	Brian Allinson (Stoke Gifford)
	Pat Hockey (Frampton Cotterell)

	Chris Clifford (Thornbury Town Council)
Officer – 22 October 2013 (p.m.) at Kingswood Council Offices	Ian Steele (Economic Development)
	Angela Bence-Wilkins (Landscape Architect)
	Mike Luton (Senior Principal Planning Officer – Policy, Major Sites Team)
	David Villis (Ecologist)
	John Seddon (Transport Policy Manager, Strategic Transport Policy)
	Rob Rossiter (Transport Development Control Manager)
	Shaun Fudge (Environmental Protection)
	Tanya Smith (Planning & Policy Manager, Education)
	Tim Borthwick (Housing Enabling)
	Gill Sinclair (Legal Services, Planning)
	Natalie Field (Deputy Director Public Health, NHS)
	Patrick Conroy (Strategic Planning Policy & Specialist Advice Team Manager)
	Martin Crawford (Engineer, Transportation Development Control)

Stage 2 – Facilitated Workshops

2.4 Potential impact topic areas were grouped into themes as follows and facilitated workshops held with relevant officers to explore the following key questions:

- What are the anticipated issues for South Gloucestershire?
- How can the impacts be approached?
- What existing policy do we have?
- What existing evidence do we have?
- What strategic policy direction can be justified in the PSP?
- Interdependencies between topics?

Theme	Topics
Community, Social and Health	<ul style="list-style-type: none"> • Community Safety (including Community Cohesion) • Emergency Services (Police, Fire, Ambulance) • Civil Contingencies/ Emergency Planning • Health
Economic Development, Skills and Education	<ul style="list-style-type: none"> • Economic Development (including Tourism) • Skills • Education

Environment, Flooding and Transport	<ul style="list-style-type: none"> • Transport • Flood Risk Management • Archaeology and Historic Environment • Landscape • Ecology • Coastal Change • Public Rights of Way • Waste • Light, Noise, Dust • Quality of Life
Accommodation and Housing	<ul style="list-style-type: none"> • Accommodation/ Housing

2.5 Examples from HPC were referenced to stimulate debate and copies of the presentations that were given are attached at Appendices B – E. In addition to feedback obtained through this exercise, attendees were invited to submit subsequent to the workshops, any additional thoughts and detail, and to provide/ point to the whereabouts of supporting evidence.

2.6 Dates of the workshops and a list of attendees:

Workshop	Attendees
Community, Social and Health – 8 January 2014 (a.m.) at Kingswood Council Offices	Will Bee (Equalities)
	Ian Cousins (Avon & Somerset Police)
	Jacqui Ward (Community Engagement)
	Philippa Isbell (Anti-Social Behaviour & Community Safety Team Leader)
	Rhodri Briggs (CCTV Coordinator)
	John Hesketh (ECS)
	Mark Pullin (Stronger Safer Communities Manager)
	Katie Harwood (Interim Preventative Services Manager)
Economic Development, Skills and Education – 8 January 2014 (p.m.) at Kingswood Council Offices	Clare Medland (Head of Strategy & Development, Education, Learning & Skills)
	Tracey France (Strategic Advisor: Skills, Education, Learning & Skills)
	Stephen Chandler (Early Years & Schools Planning Officer, CA&H)
	Ian Steele (Economic Development)
	Tanya Smith (Planning & Development Manager, Strategy & Development)
	Antony Merritt (Economic Development)
Environment, Flooding and Transport – 21 January 2014 (a.m.) at Kingswood Council Offices	Dave Villis (Ecology)
	Paul Driscoll (Archaeology)
	Neil Haycock (Environmental Health)
	Sally Radwell (Environmental Health)
	Martin Crawford (Transport)
	Patrick Conroy (Strategic Planning Policy)

	Paul McNamara (Engineer, Streetcare)
	Rachel Fry (Landscape officer)
	Dinah Woolley (Environmental Health)
	Nigel Hale (Drainage Engineer)
	Guy Astley-Jones (Emergency Planning)
Accommodation and Housing – 3 March 2014 (p.m.) at Yate Council Offices	Colin Martin (Private Sector Housing)
	Karen Ross (Housing Enabling)
	Tim Borthwick (Housing Enabling)
	Patrick Conroy (Strategic Planning Policy)
	John Seddon (Transport Policy)

Stage 3 – Testing of Key Issues

2.7 The outputs of Stage 2 are reported in Section 3 below (Key Issues Identified). As can be seen, a number of key issues and potential impacts and solutions were identified. In addition, a variety of interdependencies were identified that required cross cutting discussion in order to establish potential development aspirations and priorities.

2.8 These included:

- **Transport v Accommodation:** For example, a potential transport solution for transporting construction workers to site could be siting all workers in on-site accommodation, but what would be the impact of this on any emerging SGC accommodation aspirations?
- **Transport v Environment:** For example, a potential transport solution to reducing impact on local roads could be the creation of a temporary haul road to the site, but what would be the environmental impacts.
- **Economic Growth v Transport:** For example, the implications of a potential economic strategy (such as utilising local workers) on the transport strategy.
- **Accommodation v Community Safety:** For example, the impact of potentially siting the majority of construction workers on site upon the safety of the community.
- **Education, Training and Skills v Accommodation:** For example, the accommodation strategy might consider a dispersed approach to housing construction workers, but how would this impact on providing education services to children of the workforce and being able to evidence that a dispersed approach would still require financial contributions from the developer to reduce the impact on school capacity issues?
- **Transport v Community Safety:** For example, what impacts could there be of preferred HGV routes upon local traffic, pedestrians, cyclists and horse riders?
- **Flooding v Accommodation/ Transport/ Environment:** For example, would the flood strategy impact on the preferred location for worker accommodation? What would this mean for the way in which workers and deliveries gain access to the site, and what would be the environmental impacts of any flood mitigation works?

2.9 An interdependency workshop was therefore held with representatives from each service area. The concept for the workshop was to provide an update to the topic specialists on the discussions had in the separate topic workshops undertaken at stage 2, and then to facilitate a discussion on potential interdependent problematic areas which impacted upon different topic strategies (such as the examples provided above). The date of the workshop and a list of attendees is provided in the table below:

Workshop	Attendees
Interdependency Workshop – 13 March 2014 (a.m.) at Kingswood Council Offices	Lindsay Saunders (PRoW)
	Paul McNamara (Engineering)
	Guy Astley Jones (Emergency Planning)
	Paul O’Driscoll (Archaeology)
	Paul Thorne (Avon and Somerset Police)
	Ian Cousins (Avon and Somerset Police)
	Rob Rossiter (Transport)
	Martin Crawford (Transport)
	Will Bee (Equalities Communities)
	Andy Cornelius (Demographics/ Housing/ Data)
	Dinah Woolley (Contaminated Land)
	Jacqui Offer (Public Health)
	Tracey France (Education, Learning and Skills)
	Clare Medland (Education, Learning and Skills)
	Patrick Conroy (Strategic Planning)
	Neil Haycock (Environmental Health – Noise)
Sally Radwell (Environmental Health – Air quality)	
Dave Villis (Ecologist)	
Karen Ross (Housing)	

2.10 Prior to the interdependency workshop, an update was also provided to Local Members and relevant parish/ town councils to report on the key issues that had been identified in the stage 2 officer workshops and emergent interdependencies and how this might be translated into the policy direction of the PSP Plan. Members’ views were sought on the types of issues that had been raised by Officers, whether they believed that additional issues required consideration, and the PSP policy approach. The date of the workshop and a list of attendees is provided in the table below:

Workshop	Attendees
Members/ relevant parish & town councils Workshop – 11 March 2014 (a.m.) at Yate Council Offices	Pat Hockey (Frampton Cotterell)
	Shirley Holloway (Thornbury South & Alveston)
	Maggie Tyrell (Thornbury South & Alveston)
	Roger Hutchinson (Filton)
	Brian Allinson (Stoke Gifford)
	John Calway (Longwell Green & Leader of Council)

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3. Key Issues Identified

As indicated above, Stage 2 revealed a number of key issues and potential impacts and solutions. A variety of interdependencies were also identified and tested at Stage 3. The raw outputs of these Stages are set out in the table below. The table lists matters discussed and information received during the Officer and Member workshops and additional feedback and evidence provided/ raised subsequently.

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
Transport				
Safety	<ul style="list-style-type: none"> • Very limited capacity at M5 J16 Almondsbury • Sub-standard layout at M5 J14 Falfield (but this is the closest junction on the SRN to the main site) • Constraint of M4/ M5 interchange • Additional limitations exist with access via M48 Aust • Capacity and capability of local network, especially from A38 around Thornbury and to site to accommodate the volume and type of vehicle movements associated with a NNB • Susceptibility of local roads to flooding 	<ul style="list-style-type: none"> • Upgrade of M5 J14 Falfield and identification of an 'area of search' for a new road to the site • Maximise water based deliveries – e.g. <ul style="list-style-type: none"> - Use of Sharpness docks where a dedicated rail hub already exists - Use of Avonmouth port - Use of barges to a temporary marine offloading facility at the NNB site • Extend the Tytherington Quarry rail head near Thornbury to the main site • Use Tytherington Quarry as laydown & rail/ road 	<ul style="list-style-type: none"> • Improvement at J14 and other locations could provide legacy aspiration for a Park and Ride/Park and Share facility • M49 new junction – potential opportunity to enable the creation of the proposed new access to serve Severnside Enterprise Area • Potential for remediation works to be undertaken to enable development of preferred infrastructure locations • Proposals & financial contributions should seek to maximise Enterprise Area objectives 	<ul style="list-style-type: none"> • South Gloucestershire Council Briefing Note – Oldbury Nuclear Power Station - Transport Issues (28 March 2014)
Resilience (including capacity)				
Network fragility				
Sustainability				
Deliverability				
Control				
Economic impact				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
	<ul style="list-style-type: none"> • Environmental sensitivity of locality • Increased delay to drivers and reduced highway capacity generally across the network, and the economic costs of this • Increased risk of accidents and severity of accidents as a result of the increase in traffic, especially HGVs and buses • Lack of highway resilience as there are no possible alternative routes for traffic on the approaches to Oldbury NNB • Creation of poor conditions for pedestrians and cyclists due to increased traffic flows, with HGVs in particular creating safety issues for cyclists, pedestrian delay, severance and adverse impacts on pedestrian amenity • Potential disruption to all 	<ul style="list-style-type: none"> interchange and/or aggregate source/storage • Enlarge the sea wall between the site and for the movement of construction material along it • Entirely different routes could apply for the movement of construction materials and workers • Potential for long term temporary haul road rather than a permanent road for site access during construction to take construction traffic away from local communities • Park and Rides facilities at Falfield, Aust, Stroud (M5 J13)Tormarton • Freight lay down/ consolidation/ logistics/ manufacture at Severnside • Potential use of a new railway station at Charfield (safeguarded site) for worker commuting, and legacy 	<ul style="list-style-type: none"> • Accommodation strategy will impact on volume and route of worker movements • The ecological implications of an enhanced sea wall to the north of the site would need to be assessed, but the opportunity exists for this area to benefit from 'offsetting' for ecological impacts at the main site • Landscape and heritage implications of using sea wall or a temporary haul road or flood resilient transport links • The preferred transport strategy could have significant implications for neighbouring authorities • The extent of the evacuation boundary as a result of an off-site incident is proposed to be extended to 4km - the road network needs to be able to deal with this • Vehicle tracking, monitoring and management (such as 	

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
	<p>types of journeys for existing community such as travel to work, the school run, shopping and leisure trips</p> <ul style="list-style-type: none"> • Ensuring that the mitigation is appropriately timed to ensure that infrastructure is in place prior to impacts arising • Impact upon the condition of the existing highway network, especially the need for front loaded maintenance to avoid disruption and bring surety to the construction programme • The need for the developer to evidence that it is able to control transport movements to, from and between the main and associated development sites, including staff travel and freight movements, and resourcing and processes to enable monitoring and compliance to be undertaken by the 		<p>Automatic Number Plate Recognition cameras that link to the Council's transport network management systems) could help reduce any terrorism risk</p>	

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
	Council <ul style="list-style-type: none"> • Sustainability of the transport strategy to avoid over reliance on car travel to Park and Ride sites 			
Flood Risk Management & Coastal Change				
Existing flood zones	<ul style="list-style-type: none"> • The flood protection for the site itself needs to be sufficient against a 1:10,000 flood event, but the roads leading to the site do not necessarily need to achieve this level of protection • Existing problems at Oldbury on Severn could be compounded • Sequential tests have limited relevance for NSIPs • Site and access is within floodplain impacted by tidal, fluvial and pluvial water. Consequential impacts of this will need to be addressed • Effect upon local villages and settlements will need to be fully assessed and addressed • Community concerns about 	<ul style="list-style-type: none"> • Protect as much of the cell as possible to provide flood protection for wider area • Alleviate existing flood issues, in particular at Oldbury on Severn • Contribution to offset flood risk 	<ul style="list-style-type: none"> • On-site worker accommodation – may provide an opportunity to secure additional flood risk mitigation but concern that this could increase risk of flooding elsewhere • Transport links need to be resilient to flood incidents • Opportunity to use flooding offset contribution for protection of enterprise area depending on timing of project • Water management proposals could impact significantly upon species, habitats and heritage 	<ul style="list-style-type: none"> • A comprehensive survey and modelling of the local rhyne system was previously undertaken by EON • Strategic Flood Risk Assessment used as part of Core Strategy evidence base • Data held by Environment Agency and Internal Drainage Board • Shoreline Management Plan 2
Off-site & tidal flood risks from infilling				
Increased surface water run-off				
Bank erosion				
Existing flood defences				
Long term coastal change effects				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
	safety and flooding in a flood risk area			
Environment (Archaeology & Historic Environment; Landscape; Ecology, PRoW; Waste & Contaminated Land; and, Light, Noise & Dust)				
Archaeology & Historic Environment				
Below ground archaeology	<ul style="list-style-type: none"> The Levels landscape including the main site has the potential to contain significant archaeological potentially of national importance Increase in marine traffic would impact on landscapes and archaeology beneath the water Direct and indirect effects upon designated heritage assets (including listed buildings, scheduled ancient monuments, registered parks and gardens and conservation areas) and their settings Direct and indirect effects on non-designated heritage assets (a building, site, monument, place, landscape 	<ul style="list-style-type: none"> Where possible, design and site layout should consider the preservation of archaeology in situ Where archaeology is disturbed, it should be discovered, recorded and suitably displayed Advance landscape works to expedite screening Updated high resolution LiDAR survey to identify archaeology at early stage Land and inter-tidal geophysical survey, excavation and environmental analysis to understand the significance of the archaeology Geophysical surveys across the river, comprising bathymetric survey, sidescan sonar and sub-bottom profiling 	<ul style="list-style-type: none"> Offsite infrastructure / facilities could reduce impact in vicinity of NNB site Sensitive routing and siting of transport links and other associated infrastructure to avoid heritage impacts 	<ul style="list-style-type: none"> Geotechnical surveys have revealed significant volume of archaeology Existing Conservation Area SPD's Appeal decision APP/P0119/A/11/2154175 rejecting proposed wind farm east of Hill Lane, Oldbury on Severn Landscape Character Assessment (Review) Severn Estuary
Above ground designated & non-designated heritage assets and their settings				
Setting of built environment				
Historic landscape of the Levels				
Submerged landscapes beneath the River Severn				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
	<p>or area of significance)</p> <ul style="list-style-type: none"> • Due to level estuarine landscape and scale of NNB the scope of assessment will need to be sufficiently wide to consider impacts fully. 	<p>to establish water depths and seabed morphology, seabed sediments and sub-seabed geological horizons and subsequent modelling of these</p> <ul style="list-style-type: none"> • Vibrocore surveys to test geophysical survey data and to generate environmental samples for analysis • Grab sampling • Detailed scanning and photogrammetric recording of features identified in the Severn Estuary RCZAS • Where possible, design and site layout should avoid harmful impacts on heritage assets and/or their settings • Sensitive routing and siting of transport links and other associated infrastructure to avoid heritage impacts • Review of Conservation Areas affected and update Conservation Area Supplementary Planning Documents (SPD's) to include 		<p>Rapid Coastal Zone Assessment Survey</p> <ul style="list-style-type: none"> • Historic Environment Record • Archaeology and Development in the North Avon Levels (SPG)

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
		<p>preservation and enhancement strategies</p> <ul style="list-style-type: none"> • Where appropriate designate additional new conservation areas (in line with English Heritage guidance) • Early historic buildings appraisal of any historic buildings or structures identified for potential alteration or demolition • Landscape character is often an essential component of the setting of heritage assets, therefore see landscape solutions in the landscape section below 		
Landscape				
Character & visual amenity of local landscapes	<ul style="list-style-type: none"> • Due to flat levels and estuarine landscape there is potential Impact on views from a wide range of local and distant viewpoints • Due to its scale, the proposed NNB is likely to have a significantly greater impact on the landscape than 	<ul style="list-style-type: none"> • Advance implementation of landscape mitigation works • Use of temporary facilities such as haul roads and wharf to enable landscape restoration post construction • Integration with existing station to minimise extension of industrialisation into the rural 	<ul style="list-style-type: none"> • Although the primary landscape impacts will arise from the main site development, the transport and accommodation strategies may result in associated development which has additional and significant landscape impacts 	<ul style="list-style-type: none"> • Landscape Character Assessment SPD (Review) • Conservation Area SPD's • Appeal decision APP/P0119/A/11/2154175
Character & visual amenity of wider landscapes				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
	<p>the existing station, particularly during construction</p> <ul style="list-style-type: none"> • Impact of associated development across the wider landscape • Views may be impacted from points within the Cotswolds • Views from across and along the estuary also important • Impact on historic landscapes • Unclear if local policy relating to landscape character assessment would be applicable given the size and scale of the NNB. Concern that the assessment process will be inadequate or insufficiently robust to ensure that impacts are considered and mitigated 	<p>landscape</p> <ul style="list-style-type: none"> • Protect the more sensitive rural & tranquil areas • Careful consideration of massing and colour of physical features and structures associated with NNB 	<ul style="list-style-type: none"> • Sensitive routing and siting of transport links, facilities and other associated development 	<p>rejecting proposed wind farm east of Hill Lane, Oldbury on Severn</p>

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
Ecology				
<p>European Designated Sites, SSSIs etc</p> <p>Terrestrial and marine protected species</p> <p>Loss of habitats</p> <p>Road related mortalities</p>	<ul style="list-style-type: none"> The main site is located within a wetland area of international importance. As such a Habitats Regulation Assessment (HRA) will be required Impact upon local nature reserves A jetty would require works to the mud flats and other estuarine habitat Water management proposals could impact significantly upon species and habitats Limited opportunities exist locally to provide compensatory habitats given the extent of land options that have been acquired to compensate for other key developments 	<ul style="list-style-type: none"> Habitat creation as part of the restoration of the construction areas Mitigation could be focussed in areas with 'degraded landscape' – e.g. the land to the north of the site Local nature reserves could be the primary focus for offset mitigation as a result of landscape impacts which cannot otherwise be mitigated 	<ul style="list-style-type: none"> The ecological implications of an enhanced sea wall to the north of the site would need to be assessed, but the opportunity exists for this area to benefit from 'offsetting' for ecological impacts at the main site 	<ul style="list-style-type: none"> Currently no strategic biodiversity/ ecological offsetting policy The approach taken and evidence associated with the Severnside area could provide a useful reference point Biodiversity Action Plan - national and local Special Area of Conservation Management Plan Landscape Character Assessment (Review)

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
Public Rights of Way (PRoW)				
Short term, long term and permanent closures	<ul style="list-style-type: none"> Potential closure/ diversion of Severn Way coastal path (current route runs between existing station and estuary) 	<ul style="list-style-type: none"> Rationalisation of PRoW to better match local demand and long term management 		<ul style="list-style-type: none"> Appeal decision APP/P0119/A/11/2154175 rejecting proposed wind farm east of Hill Lane, Oldbury on Severn
Disturbance to users	<ul style="list-style-type: none"> Small number of PRoW cross the proposed NNB main site 			
Tourism	<ul style="list-style-type: none"> More dense network in wider landscape Offa's Dyke (national trail) on opposite bank 			
Waste & Contaminated Land				
Tangible and perceived adverse impacts of storing radioactive material	<ul style="list-style-type: none"> Impacts may arise as a result of the perceived risk associated with the long term storage of radioactive material on site (planning assumption is that all sites must plan for 160 years of on-site waste storage) 	<ul style="list-style-type: none"> Need for clear and accessible public information on proposals and management Guidance on the Councils expectations on waste management 	<ul style="list-style-type: none"> Controlled by Office for Nuclear Regulation and associated Health and Safety Regulations 	<ul style="list-style-type: none"> Minerals & Waste Local Plan 2002 Joint Waste Core Strategy
Municipal Solid Waste and Commercial and Industrial Waste arising from the construction of the new nuclear build, its associated				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
development and the operation of these sites				
Addressing contaminated land impacts on preferred sites	<ul style="list-style-type: none"> • Impact on environment • Impact on health • Regeneration initiatives 	<ul style="list-style-type: none"> • Sites brought forward in accordance with industry standards, regulations and guidelines • Use of existing site would require appropriate assessments 	<ul style="list-style-type: none"> • Accommodation & transport strategies 	<ul style="list-style-type: none"> • SGC Contaminated Land Inspection Strategy & appendices (November 2001)
Light, Noise & Dust				
Construction works	<ul style="list-style-type: none"> • Land based impacts • Impacts on the estuary 	<ul style="list-style-type: none"> • Ensure HRA considers estuary impacts 	<ul style="list-style-type: none"> • Impacts on ecology 	<ul style="list-style-type: none"> • Review needed of guidance on soft piling
Traffic	<ul style="list-style-type: none"> • Impacts from housing construction workers 	<ul style="list-style-type: none"> • Landscape Character Assessment to address tranquillity, noise and light • Double glazing for properties impacted by construction and transport • Insistence on use of low emissions vehicles (Euro IV) • Agree working hours for construction activities • Housing of workers in suitable locations and not pre-existing family areas • Use of broadband “hush 	<ul style="list-style-type: none"> • Impacts on local population of increased noise • Impacts on health of local population from increased noise, dust and transport emissions 	<ul style="list-style-type: none"> • Contaminated land strategy

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
		power” reversing alarms for all commercial vehicles		
Community (Community Safety & Cohesion; Health & Quality of Life)				
Community Safety & Cohesion				
Impact of migrant workforce on community cohesion (cultural, language differences & income disparity)	<ul style="list-style-type: none"> • Concern that migrant workers may not integrate into the community • Actual and perceived problems relating to night time economy, victimisation, social exclusion, crime, anti social behaviour, resentment, etc 	<ul style="list-style-type: none"> • Agreement and implementation of community safety management plans • The accommodation strategy could address issues with existing landlords 	<ul style="list-style-type: none"> • Accommodation Strategy • Wider use of systems to monitor construction traffic • Links with approach to policing and emergency services • Transport Strategy 	<ul style="list-style-type: none"> • Perception of crime statistics are collected • Evidence and experience exists of working with a local developer and a gypsy/ traveller community re. development of Bristol City FC stadium that could be applied in NNB context
Impact of actual & perceived levels of crime and disorder	<ul style="list-style-type: none"> • Actual and perceived terrorism risks 	<ul style="list-style-type: none"> • Solutions should seek to avoid a scenario that ‘tips the balance’ in communities 		
Impacts on vulnerable individuals and communities adjoining concentrations of non-home based workers	<ul style="list-style-type: none"> • Income disparity and related implications (e.g. consequence of increase in house prices and rents) • Exacerbation of problems with existing landlords • Street cleaning and street scene • Street traders and licensing controls 	<ul style="list-style-type: none"> • Require public transport services to be provided as part of the transport strategy for the construction period – to connect accommodation centres to neighbouring communities 		
Impact on other community and	<ul style="list-style-type: none"> • Social exclusion arising from 			<ul style="list-style-type: none"> • Alveston Parish Plan due to be completed soon • Oldbury Parish Plan complete • Community Profiles

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
local authority services relating to influx of construction workers and their families	reduced availability of public transport			<ul style="list-style-type: none"> • Historic police records of development impacts arising from Berkley and Oldbury power stations, and the Second Severn Crossing • Hinkley experience indicated that robust evidence can be difficult to establish for this subject area
Health				
Impact on Healthcare Services	<ul style="list-style-type: none"> • Potential for increased pressures on public health and general health services • Potential for additional pressures on drug and alcohol services and mental health services • Potential for additional pressures on local GPs etc • Impact on community well 	<ul style="list-style-type: none"> • On site health care for construction workers including out of hours • Health and safety regulations cover radioactivity levels • Use of low emission vehicles to transport workers and materials (Euro IV) • Mitigation of construction impacts 		<ul style="list-style-type: none"> • Limited amount of evidence from other major infrastructure project or recent NBBs. • Joint Strategic Needs Assessment
Radiological Exposure				
Impact on Mental Health				
Impact on physical health due to loss of				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
open space and facilities for recreation and amenity Environmental Impacts – e.g. air quality, noise, water pollution Socio-Economic health benefits from income and employment	being resulting from 10 year construction period <ul style="list-style-type: none"> Impacts on health of local population and amenity from increased noise, dust and transport emissions. 			
Emergency Services (Emergency Planning; Police; Fire)				
Emergency Planning				
Emergency planning during construction Protest incidents – Emergency management Protest incidents – Humanitarian Assistance	<ul style="list-style-type: none"> Uncertainty over future arrangements for emergency planning distances with regard to detailed emergency plans and extendibility arrangements that are currently under review The Detailed Emergency Planning Zone (DEPZ) for Oldbury B would come into force once the site comes under the nuclear licence conditions – this could be 	<ul style="list-style-type: none"> Road improvements to ensure 4km evacuation zone can be deployed effectively Early consideration of the impact of a change to the DEPZ from a circular area to geographical/boundary based area needs to be given in the PSP Plan 		

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
	<p>some years in the future, but it is considered prudent to include this in planning at an early stage so that developments in the affected area could be controlled and residents are included from the outset</p> <ul style="list-style-type: none"> • Susceptibility of local roads to flooding • Potential for the Council to require additional emergency response capability in respect of specific incidents including protest incidents due to the controversial nature of the development • Traffic incident and congestion impacts on emergency services response times as well as increased demands on the emergency services 			

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
Police				
Impact upon general policing, community safety and possible increase in crime from work force population & associated transient population	<ul style="list-style-type: none"> • Security of the site and associated presence of the Civil Nuclear Constabulary. • Impact of protest disruption to construction programme • Community perception of policing is declining due to financial cuts • Impact on the local transport network and NNB construction programme as a result of traffic incidents or unplanned road closures 	<ul style="list-style-type: none"> • Resources to monitor & manage compliance with management plans • Incident planning and intelligence gathering 	<ul style="list-style-type: none"> • Community safety and perceptions • Concerns of local communities • Segregation of construction traffic and local traffic 	
Increase in need for equipment and facilities				
Protest and disturbances				
Resources to monitor & manage compliance with management plans/ arrangements				
Poor/ non existent Airwave communications				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
(The Airwave Network is a mobile communications network dedicated for the use by the emergency services in Great Britain)				
Increase in Road Traffic Accidents & associated traffic delays requiring police presence				
Fire				
Impact on response times from construction traffic	Not yet considered			
Increase in number of incidents attended				
New risks that				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
personnel may have to be trained for (e.g. maritime incidents)				
Increase in fire safety enforcement				
Increase in proactive community and prevention safety work				
Economic Development, Skills & Education				
Economic Development & Skills				
The development does not maximise the potential for local employment	<ul style="list-style-type: none"> • Potential for boom and bust arising from NNB • Need to give new nuclear greater recognition in the West of England Local Enterprise Partnership (LEP) Plan. • Need to give new nuclear greater recognition in the South Glos Economic Strategy does 	<ul style="list-style-type: none"> • Support to enable local business needs to diversify and gain nuclear accreditation to enable them to participate in the new nuclear supply chain - any business providing services will need to ensure that all staff are suitably qualified to work on a new nuclear construction site • West of England LEP Plan & 	<ul style="list-style-type: none"> • A direct relationship exists between the transport, education and economic strategies 	<ul style="list-style-type: none"> • South Gloucestershire Apprenticeship Strategy (2013 – 2016) being developed • Local Skills Plan • LEP Skills Plan • Avonmouth/ Severnside evidence for
Limited positive impact for deprived communities in the wider area, both in short and long term				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
Leakage of skills and training benefits	<ul style="list-style-type: none"> • Promote new nuclear as an addition to currently well promoted 'defence' industries • Ensuring that the benefits do not leak out of the area • Negative impact on the tourism sector associated with traffic congestion, noise and visual impacts and perception linked to hosting a new nuclear power station and waste storage 	<ul style="list-style-type: none"> • South Glos Economic Strategy to reflect a greater importance of Oldbury NNB • Joint working across boundaries is needed to deliver shared benefits/ aspirations • Adult workforce and skills – although LEP wide actions are important, a particular focus is needed within South Glos to maximise opportunities for local workforce and benefits to the local economy • Proposals & financial contributions should seek, where possible, to support Enterprise Area objectives • Focus, however, should be upon supply chain development to address potential for boom and bust, rather than necessarily use contributions to directly mitigate the development impacts • Opportunity for a local 		<ul style="list-style-type: none"> • Core Strategy • The Developers Guide (January 2010) • South Gloucestershire Raising Participation Strategy (2013 – 2015) • Employability & Skills Steering Group (December 2013) • SGC information on skills & employability 16 to adulthood • South Gloucestershire Education Commission Final Report (January 2014) • Partnership for Children & Young People
No educational legacy is secured				
Resultant recruitment and retention difficulties among existing businesses during construction				
Limited or no intervention to raise aspirations in local education provision				

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
		<p>Innovation Centre to be set up in order to create a place where businesses can collaborate and explore new opportunities which could enable them to participate in the new nuclear supply chain</p> <ul style="list-style-type: none"> • Encourage local supply of aggregate where this accords with extant planning policy objectives 		<p>Plan (2012 – 2016)</p>
Education				
<p>School capacity</p> <p>Early Years</p> <p>School Transport</p> <p>English as Additional Language</p> <p>Special Educational Needs</p> <p>Teaching & facilities for non-mainstream provision</p> <p>Disruption from</p>	<ul style="list-style-type: none"> • SGC is already at full capacity in early years provision especially in some key localities. New Government initiatives for greater childcare entitlements is creating additional pressure in the system • Thornbury – existing school capacity will soon be used up • In year issues will arise associated with physical and teaching capacity as a consequence of the arrival of 	<ul style="list-style-type: none"> • Priority could be given to neighbourhood areas • Delivery of the recommendations arising from the South Glos Education Commission which pointed to the need to centralise post 16 provision • Potential role of South Gloucestershire & Stroud College • Potential link to or learning from Bridgwater College role on HPC 	<ul style="list-style-type: none"> • Accommodation strategy will determine, to some degree, where workers and their families are likely to be located though worker families are likely to exercise choice over their place of residence 	<ul style="list-style-type: none"> • Commissioning of School Places Strategy 2012 – 2016 • SGC Childcare Sufficiency Assessment (September 2013) • SGC Developers Guide (January 2010) • Achieving 2 Year Olds (A2YO)

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
<p>churn</p> <p>Further and higher education opportunities</p>	<p>significant numbers of worker families in communities where surplus capacity does not exist and could not be predicted</p> <ul style="list-style-type: none"> • Colleges may work independently and often compete for students. A centrally managed approach to post 16 education provision does not therefore exist • The influx of worker families will increase pressure on children and youth programmes • Temporary v permanent impacts given the lengthy construction timetable • FE provision over reliant on extended secondary provision 	<ul style="list-style-type: none"> • Potential role for local Universities in providing nuclear related opportunities • Delivery of essential basic need early years and school place requirements arising from influx in workers families to the area – which will be highlighted and referred to in the Commissioning of School Places Strategy beyond 2016. 		<p>Expansion Strategy (undated)</p> <ul style="list-style-type: none"> • Education Commission Report (January 2014) • Admission to Primary Schools in South Gloucestershire – a Guide for Parents & Carers (September 2014 – August 2015) • Admission to Secondary Schools in South Gloucestershire - a Guide for Parents & Carers (September 2014 – August 2015)

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
Accommodation and Housing				
Local residents are marginalised or displaced in the housing market	<ul style="list-style-type: none"> • Affordability and availability of accommodation in the local area • Displacement of people from the private rented sector into affordable housing • Potential for an increase in number of HMOs resulting in an imbalance of housing stock to meet local needs • Limited capacity of private rented sector to absorb additional demand • Limited scope for workers to use latent tourism accommodation • Problems exist in small defined locations with particular landlords and in particular locations • Migrant workers are also vulnerable to being marginalised and displaced within the community 	<ul style="list-style-type: none"> • A proportion of workers are likely to need to be accommodated at the main site due to project requirements. What proportion this should be will need to be agreed. Option to house all workers on site should be assessed along with more dispersed options • Encourage investment in the existing or expanded private rented housing sector (e.g. through expansion of Wessex Loans Scheme) • Scheme to bring empty homes back to use • Potential for the developer to take out private tenancies for its workers which would enable direct control over development impacts • Link to energy efficiency initiatives 	<ul style="list-style-type: none"> • Accommodation strategy has strong relationship to transport strategy • Potential for accommodation strategy to unbalance or be perceived to unbalance existing small communities – relationship to community safety • Potential for integration with the Council’s wider regeneration and strategic planning aspirations including enterprise areas. • Cross boundary impacts given likely travel to work area • Accommodation at site/ elsewhere in Severnside area would require resolution of flooding risk • Consideration of potential spatial options to be tested through Local Plan review process. 	<ul style="list-style-type: none"> • A shortage of rented accommodation already exists with statistical evidence to substantiate tenant concerns and issues with securing a home to rent • Evidence exists that rental costs are increasing disproportionate to general wage inflation • South Gloucestershire Council Housing Strategy (2013 – 2018)
Capacity of existing Council	<ul style="list-style-type: none"> • Additional demands for accommodation generated by 	<ul style="list-style-type: none"> • Encourage the developer to work in partnership with house 		

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
services to manage accommodation issues exceeded	<p>the Project</p> <ul style="list-style-type: none"> • Potential for increase in housing and planning enforcement activity Local authorities are expected to identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. Also there is potential need to investigate “unauthorised” development and also “breaches” of planning permissions. 	<p>builder(s) to ensure a supply of legacy housing (should that be required) that will be available for the workforce but which also meets strategic housing aspirations to be led through the council’s Local Plan review process.</p> <ul style="list-style-type: none"> • Consider whether opportunities exist to dovetail a preferred Oldbury accommodation strategy with the Council’s wider regeneration and strategic planning aspirations, especially the enterprise area 		
Inappropriate development sites being brought forward	<ul style="list-style-type: none"> • Exacerbated pressure on further growth of Thornbury. There are already limited sites available for development and Greenfield development will be strongly discouraged. • Risk that purpose built accommodation could overwhelm or unbalance local communities 	<ul style="list-style-type: none"> • Potential to link with UWE/ Bristol University and/ or other South Gloucestershire based colleges for housing that could be retained post-completion for student use, or any other on-going use for campus style accommodation • Potential for workers to be accommodated in latent/ underused units e.g. is there 		

Impact areas	Impacts Identified	Possible solutions	Interdependencies	Policy and evidence
		<p>capacity at Beachley Barracks, Chepstow or at redundant MoD sites near Newport?</p> <ul style="list-style-type: none"> • Potential for infrastructure to be provided at Avonmouth/Severnside for campus housing that could be retained as a potential “legacy” • Is there potential to expand private rented sector for duration of construction period as is being promoted on Anglesey? • HMOs – potential for project specific discretionary licensing scheme 		

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4. Workshop Outputs

- 4.1 Having tested the various key issues and interdependencies at Stages 2 and 3, a potential vision or policy direction emerged. The outputs of this exercise are shown in the table below.
- 4.2 Throughout the various stages of the engagement with South Gloucestershire’s Members and Officers it became clear that there is a need to consider the relative priority, or as a minimum, the sequence by which topics should be discussed. At this early stage it would not be appropriate to state definitively the matters that will have an overriding influence on the final design of the scheme. However, it is suggested that any policy document should provide an indication of the topics that should be assessed early in any engagement with the NNB promoter in respect of the design of its proposals for the main site and associated development.
- 4.3 The order of topics set out below does not at this stage therefore infer priority of issues for consideration. However the order of the topics in the table does suggest a sequence in which topics may need to be assessed, informed by feedback from SGC officers at Stage 3.

Topic	Issue	Policy Direction
Transport	<ul style="list-style-type: none"> • Strategic Road Network (SRN) around Bristol is congested and limited capacity exists at key motorway junctions • Local roads are not adequate for the number and type of vehicle movements that will be necessary to construct the development, and no possible alternative routes exist • The conditions for pedestrians and cyclists may be severely impacted due to increased traffic flows, yet the opportunity exists to enhance sustainable transport options and reduce car dependency • Established port facilities exist at Avonmouth and Sharpness, but nothing adjacent to the site • The Severn deep water channel runs close to the site • Limited capacity and a sub-standard layout exists at M5 	<ul style="list-style-type: none"> • Delivery of key infrastructure is a priority in advance of commencement of development including site preparation works. Early implementation of transport link to the site to avoid impact on local communities • Encourage site access from the SRN north of M4/ M5 interchange to maximise the length of journeys that are made on the SRN rather than the local highway network • Enhance capacity at key junctions e.g. J14 of the M5 • Maximise opportunities for water based deliveries, with appropriate infrastructure to facilitate this • Recognise the role which local ports could play • Maximise opportunities for rail based deliveries and worker access, with appropriate enhancement to existing infrastructure to facilitate this • Worker movements should be captured at key nodes in locations

Topic	Issue	Policy Direction
	<p>J14 but this is the closest junction on the SRN to the main site</p> <ul style="list-style-type: none"> • Strategic transport aspirations exist for Park and Ride/ Share facilities at Falfield and Tormarton • The travel to work area will include South Wales so there is a need to capture worker movements as close as possible to the Severn Bridge/ Crossing • A key focus for economic growth is the Avonmouth and Severnside Enterprise Area and is in close proximity to the main site. The Oldbury NNB needs to dovetail with these plans • Limited rail infrastructure exists in the locality, though rail access does exist to the local quarry at Tytherington (east of Thornbury) and port facilities to the north at Berkeley • Potential use of a new railway station at Charfield for worker commuting, and legacy 	<p>which dovetail with the Council's strategic transport aspirations (including for junction improvements and Park & Ride) and the preferred accommodation strategy for Oldbury NNB</p> <ul style="list-style-type: none"> • A sustainable solution for the movement of workers and materials from the SRN to the main site which minimises disruption to local communities • Development of sustainable transport options which minimises car dependency • Co-locate Park & Ride and laydown/logistics at motorway junctions e.g. Falfield (M5 J14), Aust (M48), Tormarton (M5 J18) and Stroud (M5 J13) • Strategic connectivity between the main site and the Avonmouth and Severnside Enterprise area to capture the opportunities for Oldbury NNB and facilitate the movement of goods, services, and workers to the main site • Freight lay down/ consolidation/ logistics/ manufacture at Severnside • Consider the use of temporary infrastructure (both marine and land based) for the duration of the construction period to overcome local difficulties with and resilience of the minor road network inside the motorway box, and disruption and disturbance to local communities • Potential use of Tytherington quarry for rail access, lay down, logistics and/or aggregate source/ storage
<p>Flood Risk Management & Coastal Change</p>	<ul style="list-style-type: none"> • The main site and its access are within the floodplain and impacted by tidal, fluvial and pluvial water. • The flood protection for the site itself needs to be 	<ul style="list-style-type: none"> • Protection of as much of the 'cell' as possible to provide flood protection for wider area and alleviate existing flood issues, while also delivering the flood resilience required for the site and

Topic	Issue	Policy Direction
	<p>sufficient against a 1:10,000 flood event, but the roads leading to the site do not necessarily need to achieve this level of protection</p> <ul style="list-style-type: none"> • Existing flooding issues exist within villages surrounding the main site • Community concerns about safety and flooding in a flood risk area 	<p>its access</p> <ul style="list-style-type: none"> • A need to clarify the baseline conditions associated with any survey • The project promoter will need to provide reassurance to local communities about safety and flood resilience
Accommodation & Housing	<ul style="list-style-type: none"> • A number of workers are likely to need to be accommodated at the main site for operational reasons • Risk that purpose built campus accommodation housing large numbers of construction workers could overwhelm or unbalance local communities • A significant proportion of the workforce is likely to want functional, low cost accommodation which could displace people into affordable housing need • The travel to work area will include adjoining authority areas, including South Wales • A key focus for economic growth is the Avonmouth and Severnside Enterprise area and is in relatively close proximity to the main site. The Oldbury NNB needs to dovetail with these plans • Legacy housing is an aspiration but cannot be required through the DCO under the terms of the Planning Act 2008 • The private rented sector is not currently considered able to meet the scale of accommodation required by the development and only relatively limited tourism 	<ul style="list-style-type: none"> • Further assessment on potential impacts is required to inform the policy direction. SGC will need to be clear what role it expects Thornbury to play in meeting the project's housing needs taking into account the need for a long term sustainable approach to the town • A general preference for an integrated approach to worker accommodation rather than a large single campus • A mixed economy of provision that blends campus style accommodation with investment in expanding the private sector housing that helps to resolve existing shortcomings, provides legacy, and is consistent with future strategic housing aspirations and testing of spatial options through the Local Plan review process. • Any temporary campus accommodation within or relatively near to the main site should be of a relatively modest scale and must not impact on the well-being of existing local communities • Off-site campus accommodation may be appropriate on sites that <ul style="list-style-type: none"> - are regeneration sites that are yet to be developed - utilise latent units if available - facilitate a potential legacy use including at universities and colleges

Topic	Issue	Policy Direction
	<p>accommodation exists in the area</p>	
Environment	<ul style="list-style-type: none"> • The main site is located within a historic Levels landscape with direct relationship to international designations on the Severn Estuary. As such a Habitats Regulation Assessment will be required that may shape the preferred transport and accommodation strategies • Both land and marine based impacts will arise, the nature of which will be different and may require alternative solutions • Uncertainty as to opportunities that exist to provide local compensatory habitats given the extent of land options that have been acquired to compensate for other key developments in the area • The main site is within an area of high archaeological potential and may contain assets of national importance • Potential for impact on above ground designated and non-designated heritage assets (including their settings) • Potential impact to submerged prehistoric landscapes in the Severn Estuary • Both near and distant views, across an open flat and estuarine landscape, will be affected with impacts upon local, historic and designated landscapes • Impact upon surrounding historic built and natural environment arising from new infrastructure and traffic movements 	<ul style="list-style-type: none"> • Early production of a Habitats Regulation Assessment and for this to inform the design of the scheme. Appropriate compensatory habitat to the north of the site • New habitat creation and ecological offsetting policy/intent with areas of search where offsetting could take place • Early investigation of buried archaeology to establish nature of interest that may be affected • Early investigation of tidal and inter-tidal zones employing geophysical seismic surveys to understand the submerged prehistoric landscapes that will be affected by marine movement and infrastructure • Where possible, design and site layout should consider the preservation of archaeology in situ but where archaeology is disturbed, it should be discovered, recorded and suitably displayed • Early identification and investigation of designated heritage assets affected (listed buildings, scheduled ancient monuments, conservation areas, registered parks and gardens) and non-designated heritage assets, to establish significance of asset, including setting, and potential impact on that significance. • Review of Conservation Areas affected and update conservation area SPD's, to include preservation and enhancement strategies, to provide up to date evidence base • Where appropriate designate additional new conservation areas (in line with English Heritage guidance) to afford these areas appropriate status and protection

Topic	Issue	Policy Direction
	<ul style="list-style-type: none"> • A number of PRoW will need to be diverted with potential long term impacts for the Severn Way coastal path and for Offa's Dyke on the northern bank • Noise disturbance, light pollution & air quality impacts on the environment and amenity 	<ul style="list-style-type: none"> and provide up to date evidence base • Early historic buildings appraisal of any historic buildings or structures identified for potential alteration or demolition • Early application of a landscape character and visual assessment to determine appropriate mitigation for local and wider environment impacts and which addresses tranquillity, noise & light • Early implementation of key environmental mitigation measures including landscape works to reduce construction impact and maximise screening • A local and wider landscape mitigation package which addresses near and distant impacts of both the main site and also for associated infrastructure • Rationalisation of PRoW to better match local demand and long term management, and protect amenity of long distance routes • Protection of more sensitive rural and tranquil areas • Careful consideration of massing and colour of physical features and structures associated with NNB to integrate with estuary landscape • Re-instatement and enhancement of landscapes post construction and following removal of any temporary infrastructure
Economic Development, Education & Skills	<ul style="list-style-type: none"> • A key focus for economic growth is the Avonmouth and Severnside Enterprise Area and is in close proximity to the main site. The Oldbury NNB needs to dovetail with these plans • Opportunities to maximise economic growth should be balanced against the impact that arises 	<ul style="list-style-type: none"> • Policy to be linked to the LEP Plan and SGC Economic Strategy • A policy is needed which ensures that the impacts upon education provision associated with large scale construction projects is recognised • Focus upon local supply chain development to address risk of boom and bust and provide lasting legacy

Topic	Issue	Policy Direction
	<ul style="list-style-type: none"> • Potential for boom and bust • Leakage of skills and training benefits and local labour to NNB at expense of existing local businesses, and leakage of benefits from the impact area • The provision and funding of sufficient education and teaching capacity to meet need arising from the influx of worker families • Limited coordination of post 16 education provision across the area • Need to maximise local employment and business opportunities and benefits • Long timeframes and lead in times if education and training opportunities are to be realised for Oldbury NNB • Realise potential of existing education partnerships 	<ul style="list-style-type: none"> • Promotion of integration of NNB with Enterprise Area objectives and delivery • Ensure that Oldbury NNB does not out-compete existing local businesses for labour and skills • Early intervention in local schools to raise aspirations and to promote STEM – to dovetail with the future needs of NNB construction and operation • Early development of links to local training providers including South Gloucestershire and Stroud College and the University of the West of England and Bristol University • Development of a policy framework that ensures education capacity exists for non-residential developments that have long term but nevertheless temporal impacts • Centralisation/ more effective coordination of post 16 education provision • Encourage local supply of aggregate and other materials/ services where this accords with extant planning policy objectives
Community, Social and Health	<ul style="list-style-type: none"> • Actual and perceived impacts may arise primarily as a result of the large influx of workers, many of them migrant, and related to construction traffic and works • Concern about pressure on local health care and community facilities • Health care and services required in the event of an on-site emergency 	<ul style="list-style-type: none"> • An assessment of impacts and definition of mitigation should be undertaken once the preferred transport and accommodation strategies have been defined • Design of the development to take into account the Detailed Emergency Planning Zone boundary. • Ensure that existing communities are not unbalanced by an influx of construction workers • Community safety monitoring, management and enforcement plans • 24 hour on-site dedicated healthcare and “worker community” facilities for workers on site and in dedicated

Topic	Issue	Policy Direction
		accommodation

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5. Next Steps

- 5.1 It is the intention for the policy direction set out above to be further developed to define a policy expression at a conceptual level of the 'asks' to support and direct the outcomes the Council and its communities would like to see delivered through the Oldbury NNB project. This will include objectives to ensure that any impacts are mitigated, whilst ensuring a positive outcome for the local community is also achieved. This policy expression will be articulated in the Oldbury NNB chapter of the PSP Plan.
- 5.2 The outputs of this work and PSP Plan will provide a 'platform' for Horizon to prepare the detailed technical work to deliver the Oldbury Development Consent Order (DCO). To ensure the Council is additionally prepared for pre-application discussions to be restarted, it is recommended that further work is undertaken to develop an evidence based assessment matrix working closely with our neighbouring local authorities and prescribed bodies in accordance with the DtC where appropriate and relevant, as well as our local communities. This matrix would expand upon each policy aspiration and develop specific measures under each particular topic area to include a summary of supporting evidence and/ or policy, status and quality of evidence at this stage and where applicable a recommendation as to how any issues could be addressed.