

## NDA Social Impact and Communities Strategy Consultation Nov 2023: delegated officer response.

### 1. Introduction

In line with South Gloucestershire Council's Constitution in respect of Government consultations, this is a delegated Officer response to the Nuclear Decommissioning Authority (NDA) in respect of the above. This is submitted following consultation with relevant Executive Members, as well as with the Member Representative on the LGA Nuclear Legacy Advisory Forum. This response will be published on the National Infrastructure Project page of the South Gloucestershire website.

### 2. Assessment of the NDA Draft Social Impact and Communities Strategy (SICS) 29 November 2023

- 2.1 The Social Impact and Communities Strategy states that NDA's understanding of their sites is underpinned by research into the social and economic impact of their activities on their host communities, including as set out in [their economic impact assessment of Magnox sites \(2022\)](#)
- 2.1.1 It is disappointing to note that this 2022 assessment looks primarily at economics, rather than a **socio**-economic assessment. It is therefore strongly suggested that for the strategy fulfil its function as a 'Social Impact and Communities Strategy', it needs be based on an understanding of the social as well as the economic characteristics and needs of host communities. South Gloucestershire Council has provided relevant 'socio' information (included at the Appendix to this response) and it is requested that this is taken into account in the finalisation of this strategy.
- 2.1.2 It is further suggested that for future reviews of this strategy, that the NDA commissions '**Socio** Economic' assessments rather just economic assessments.
- 2.1.3 The baseline for the economic assessment should relate to employment **now** compared with when the station **was operational**. As power stations are decommissioned employment numbers fall and therefore the significance in the local economy diminishes, and the level of impact on host communities falls. The current methodology for assessment may therefore result in underplaying the significance of effects on host communities.

- 2.1.4 The Strategy's focus on the proportion of jobs compared with the whole local authority area, for places like Oldbury and its largely rural hinterland is likely also to underplay the significance for communities most local to the power station.
- 2.1.5 It is suggested that it is important to also assess any reduction in training and/ apprenticeship opportunities arising during decommissioning, and recommendations should be made to address this. It is further suggested that this would be beneficial to NRS in helping to improve their pipeline of skills, as well as to communities such as those surrounding Oldbury where there is a history of underachievement at secondary school level, as well as issues relating to aspiration.
- 2.1.6 We note that the analysis of Oldbury and Berkeley is considered separately in the 2022 Economic Assessment. This does not fit with the draft SICS, and in view of Oldbury and Berkeley sharing strongly overlapping communities, it is important that the cumulative effects of the reduction in social and economic impacts are considered, including for example the number of jobs, apprenticeships, supply chain etc. These will be more significant when considered together and relative to the host area (for the NDA Covid scheme, local communities were considered to be within 15km of the sites), rather than separately and in the context of two relatively large local authority areas.
- 2.1.7 It is recommended that NDA assessments should take account of the fact that Oldbury and Berkeley sit on the edge of their respective local authority areas (South Gloucestershire and Stroud in Gloucestershire) and in relatively rural locations. It is therefore suggested that socio economic assessments should be undertaken in terms of impact on the actual community area that hosts the power stations – again NDA's suggestion of a 15km radius (as per the Covid grant scheme) would seem appropriate.

## **2.2 NDA Draft SICS**

### **Strategic Themes**

- 2.2.1 We support the themes set out, but strongly suggest that they should also include reference to the words 'training' and 'apprenticeships'.

We have in the past heard a presentation from the Site Director of Hinkley A who explained the success of the apprenticeship scheme there and its outreach into local schools. We strongly recommend that the SICS should recommend the roll out of this scheme across the fleet and suggest that given its history of underperformance at secondary level that Oldbury's host communities (shared with Berkeley) should be a priority for delivery.

- 2.2.2 We query whether 'Sustainable incomes' is the right heading for improving aspirations and access to work - as employment is not solely about income. Access to high quality jobs is also about aspiration (as noted in the SICS subtext), job satisfaction, fulfilment and other social benefits. We suggest that this theme should be retitled 'High quality employment opportunities'.

## **Social Value through procurement**

- 2.2.3 We support the priorities identified but suggest that these should include 'boosting local supply chains. This would better reflect the stated commitment to considering local job creation and give a clear commitment to seeking to ensure socio-economic benefit to the communities that host NRS sites.

## **Outcomes and monitoring**

- 2.2.4 It will be important for NDA to assess and monitor the full range of socio as well as economic outcomes as set out in paragraph 2.1 above.

## **NDA SICS: Appendix A – NDA Funding**

- 2.2.5 Given the above assessment, we suggest that the NDA should refine the socio-economic assessment of the particular characteristics and needs of the local communities that host the NRS stations.

This will in turn inform the identification of priorities for initiatives and funding and ensure that these are appropriately identified and targeted to address the particular and distinctive needs of each host community.

## **Berkeley and Oldbury (Page 16)**

- 2.2.6 Given that these sites share overlapping host communities we welcome the presentation of Berkeley and Oldbury together in this section of the strategy.
- 2.2.7 However we strongly recommend that the underpinning assessment must be refined to support this and must assess and respond to the particular characteristics and needs of these particular host communities.
- 2.2.8 Please correct the opening paragraph to state that Oldbury is in South Gloucestershire, which is a Unitary Council. Berkeley (not Oldbury) is in Gloucestershire, which is a separate County Council.
- 2.2.9 We welcome the inclusion of the reference to Severn Edge at paragraph 2, and suggest a link is included to the now agreed Western Gateway Vision<sup>1</sup> that encompasses Oldbury and Berkeley.
- 2.2.10 We strongly suggest that the site-specific sections of the SICS would be the place for the Social Impact and Communities Strategy to set out the priorities for each local area, including Oldbury and Berkeley, and include a commitment for the strategy to direct funding to support relevant locality specific priorities. The Severn Edge Vision sets out strategic priorities, which may be helpful in informing this.
- 2.2.11 For Oldbury's host communities, particular priorities include education training and skills opportunities for local communities particularly at secondary school level, as well as areas of deprivation. Information to underpin these needs is provided in the Appendix to this response.

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<sup>1</sup> [Severn Edge | Western Gateway \(western-gateway.co.uk\)](https://www.western-gateway.co.uk)

If there are any questions or comments on the above consultation response or in respect of the Appendix, please contact the author.

## Contact information

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## Appendix

Information submitted to inform the assessment of the host communities for Oldbury:

- South Gloucestershire Council's history of under-attainment at secondary level relative to the national average. This is reflected in the Government's 2022 proposals to transform education and opportunities for the most disadvantaged that listed South Glos in the 55 areas most in need of investment, support and action to help young people of all backgrounds to succeed. [Package to transform education and opportunities for most disadvantaged - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/package-to-transform-education-and-opportunities-for-the-most-disadvantaged) The provisional 2022/23 DfE performance figures (Excel spreadsheet attached) continue to reflect under-attainment relative to the national picture.

It is therefore requested that the NDA socio-economic strategy should reflect this area of 'socio' need that of course also has economic implications for the people affected and also areas of skills shortage. We suggest that the Strategy should promote measures in this host community area that would complement these Government measures, including for example in the areas of STEM, education, training and apprenticeships.

- In terms of deprivation, the latest available report is dated 2019 (copy of S Glos profile attached), and an update is not expected until 2025 [We are updating the English Indices of Deprivation - OCSI](#) . It is suggested that the NDA SE Strategy for Oldbury should reflect and address the particular profile of the host communities for Oldbury and respond positively to these particular circumstances and needs, including for example:
  - Areas and pockets of South Gloucestershire showing deprivation in respect of Education, Training and Skills (not surprising given the above) including in the 20% most deprived nationally
  - Pockets of income deprivation in the top 20-40% nationally, and
  - Employment deprivation pockets in the 20% and 20-40% most deprived nationally

- Similarly pockets of multiple deprivation (also reflected in the ONS 2021 census tool [census mapping tool](#) This combines health, education, employment and housing but the tool does not allow splitting out to find out which indicator applies to which locality)
- In terms of forward-looking local policy and strategy relevant to the NDA SE Strategy:
  - Both adopted and emerging planning policy for South Gloucestershire acknowledge the programme of decommissioning at the Magnox power station as well as the national designation of Oldbury for nuclear new build, and seek to ensure that benefits and legacy are maximised and impacts minimised including in respect of socio economic considerations. [Planning policies | BETA - South Gloucestershire Council \(southglos.gov.uk\)](#)
  - The Magnox site at Oldbury is adjacent to the designated National Policy Statement EN-6 nuclear new build site, and adopted policy promotes integration of the two, including the beneficial reuse of existing NDA assets that are not needed for decommissioning. This is also reflected in both adopted ([Policies, sites and places plan November 2017 \(southglos.gov.uk\)](#) policy 46 and accompanying text and table) emerging local plan policy (see above link). The beneficial reuse of Magnox assets has potentially beneficial economic implications, and also reducing impact on the local area and its communities.