



Department for Environment and Community Services

Date: 15 March 2018
Your Ref: New Nuclear NPS Siting
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Dear Sir or Madam

South Gloucestershire response to the BEIS consultation on the siting criteria and process for a new national policy statement for nuclear power with single reactor capacity over 1GW beyond 2025

Please see below the response of this Council to the above consultation, which is the subject of a key decision by the Cabinet Member for Planning Transport and Strategic Environment made on 15 March 2018. This decision was made following consultation with all Members of the Council and all South Gloucestershire Parishes.

Please note that this decision is subject to a call in period to 23 March 2018. We will notify you only if there is any change to the Council's response arising from this.

1. Introduction

1.1 South Gloucestershire Council has in place adopted policy that is of importance and relevance to the current BEIS consultation. This includes not only the Adopted Core Strategy 2013 and the recently examined and adopted Policies, Sites and Places Plan 2017, but also the West of England Combined Authority Deal with Government, and the emerging sub regional Joint Spatial Plan and the Joint Transport Plan. The emerging South Gloucestershire is also relevant. A number of the issues raised in these documents are important not just to South Gloucestershire but also to the sub-region and to the wider UK.

1.2 A statement as to policy basis for the SGC response to the BEIS consultation is appended to this letter (Appendix A), along with a summary of the comments received from Parishes is also appended (Appendix B). Relevant policy and input received as a result of consultation have informed the Council's response.

1.3 While significant time has elapsed since the Government's consultation on the 2010/11 draft National Policy Statements for energy that included the nomination of Oldbury as a potentially suitable NNB site, the reality is that proposals for a new nuclear power station Oldbury remain at a very early stage of development and there is currently no substantive engagement with South Gloucestershire Council on the nature of development of proposals at this site. The main issue on which progress has been made is the approval of the Generic Design for the proposed reactor, and Horizon's stated commitment to lower height hybrid cooling towers instead of natural draft cooling towers at Oldbury.

1.4. Since 2011, the importance of growth to the West of England area and in turn to the wider UK has been reflected in the West of England Deal with Government, and the Council has set out its specific concerns about issues that will need to be overcome in local planning policy. South Gloucestershire Council's concerns remain largely as they were in 2011, and therefore the overall position remains as set out in paragraph 48 below.

1.5 The following response to BEIS on the proposed siting criteria and process for nominating sites for nuclear new build power stations takes into account relevant West of England and South Gloucestershire Council planning and transport policy.

1.6 The Council's overall position in relation to the nomination of Oldbury as a site being potentially suitable for the development of a new nuclear power station is as follows.

While the potential for a new NNB power station to make a positive contribution to the economy of the area and for job education, training and job opportunities is recognised, there is not sufficient information available to demonstrate that the significant environmental, social, economic and infrastructure concerns of such a project can be overcome. As was the case in 2011, South Gloucestershire Council is therefore still not in a position to judge whether or not the nomination of a site at Oldbury for a nuclear new build power station would be acceptable in principle.

2. Response to BEIS consultation questions:

Question 1 Chapter 2: Do you agree that the proposed exclusionary and discretionary criteria are appropriate for the assessment of a site's suitability at a strategic level?

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Question 2 Chapter 2: If not, how should the criteria be changed to achieve this objective and, specifically, are there any additional criteria that should also be used?

In general it is agreed that all the proposed criteria listed are appropriate for the assessment of a NNB site's suitability at a strategic level, however there are a number of significant concerns and omissions that need to be addressed.

Concerns are as follows:

- a) **The use of the term 'discretionary' in relation to the NNB site selection criteria is questioned**, as the use of this word implies that there is a choice about whether these factors need to be considered. BEIS goes on to explain

that the 'discretionary' factors are those for which further information is needed in order to determine whether a site should be included on the list of nominations.

While support the inclusion of flooding as a site selection criterion, we are concerned that it may be confusing to describe this factor as 'discretionary', rather than 'exclusionary'. Since the nominated NNB site at Oldbury is located within a Flood Zone 3 area of the Severn Levels, adequate flood protection is essential for the development of a new nuclear power station. We are of the view that if a developer cannot demonstrate that a site can in principle be protected from flooding, then this surely would be an 'exclusionary' not a 'discretionary' factor?

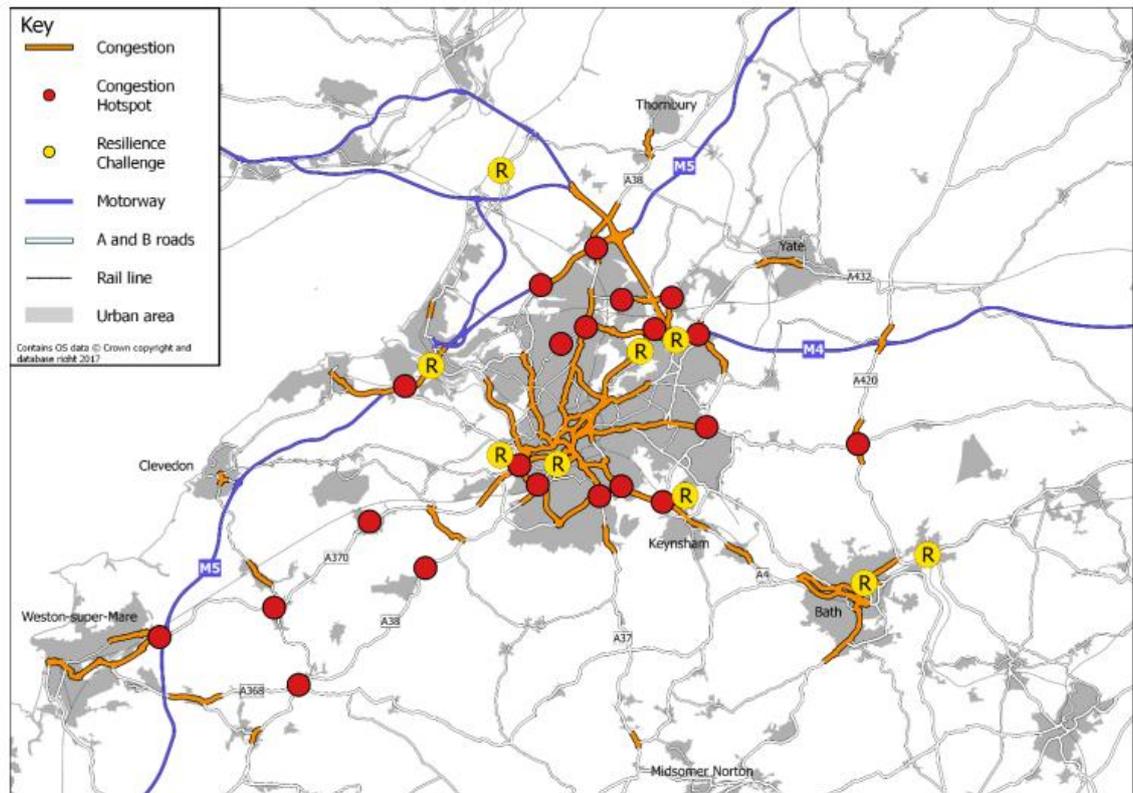
It is suggested therefore either that the terms 'discretionary' and 'exclusionary' are omitted, or that alternative terminology is used, that makes it clear that other critical factors such as flooding, societal, economic, infrastructure, coastal processes, ecology, heritage, landscape all require in principle assessment at the site selection stage. As set out below, we do not consider that the current list of factors included in the BEIS consultation document is complete.

- b) It is important that the NNB site nomination process utilises the latest climate change projections.** This year will see the publication of the DEFRA commissioned UK Climate Projections (UKCP18) which will provide detailed updated projections on sea level rise. These will inform the Government's Climate Change Risk Assessment. This revised and updated information from the UKCP18 should be used to inform the Strategic Assessment of Sustainability and therefore the nomination process for new nuclear sites.
- c) The demographics assessment proposed by BEIS must take account of ongoing and planned growth in the area around nominated sites such as Oldbury.**
- It is understood that Government will be undertaking the assessment of NNB sites with respect to demographics. We agree that this should be done.
 - However, given the long timeframes for NNB development, it is vital that Government assesses not only the existing demographics of the area as they are in 2018, but they must also take into account future planned growth up to 2035. Government should take these numbers from adopted and emerging planning policy documents. Further information on planned locations for demographic growth is available on the West of England web site, or can be provided direct to BEIS upon request. Government should also consult other local authorities within the relevant wider area around the nominated NNB sites.
 - It is important that a NNB site meets the demographic criterion when a site is nominated. It is presumed that this criterion should also be met throughout the life of the power station?

The NPS should therefore also make it clear whether the nomination of a NNB site has any bearing on planning for future growth in the population of the surrounding area beyond 2035.

- In the interests of transparency of process, it would be helpful if the demographics criterion could be explained in plain English terms.
 - Within this assessment project promoters should also be required to demonstrate how unacceptable impacts on communities can be avoided (see point d. i. below).
- d) Related to (c) above, **It is suggested that the national siting criteria do not adequately address all 3 pillars of sustainability, and should therefore also include the socio economic factors set out below.**
- It is noted that although ‘...promot(ing) a strong economy...’ is identified as a sustainability issue on page 49 of the consultation document, this is not reflected in the national criteria for NNB site selection. Given the importance of the West of England to the UK economy it is suggested that the NPS national criteria should include socio economic issues. These factors will also require further consideration by PINs in the relevant stages of the NSIP process.
 - Given that a strong economy is also dependent upon the adequate provision of homes and supporting infrastructure, project promoters should be required to make high level submissions that demonstrate how in principle NNB unacceptable impacts on the following will be avoided:
 - i. **Economic wellbeing and growth:** As an area and sub region that is a net contributor to the UK economy, it is imperative that a NNB does not compromise economic wellbeing and growth, including the growth of other sectors and access to skills.
 - ii. **Communities:** There is significant potential for effects on communities (negative and positive). The local and wider area around the nominated NNB site at Oldbury is relatively well populated, there are a significant number of existing communities, significant growth is taking place and further significant growth is planned.
 - iii. **The infrastructure that supports economic wellbeing, growth and communities, including transport.** Oldbury located in an existing growth area and at a strategically important and congested motorway junction that is of importance to the wider country (see Figure 3-5 below). It is acknowledged by both the West of England Deal with Government and the Joint Transport Study that if unaddressed, congestion threatens wider economic growth. There is a risk that NNB would further compound this, and a commitment to improving public transport and highway related infrastructure is needed.

Figure 3-5 Congestion in the West of England



e) **It is questioned why some of the factors identified as ‘National’ are not carried forward as ‘Matters flagged for detailed consideration by PINs etc’.**

- For example even if it can be demonstrated that in principle flood protection can be achieved, further examination of the detailed flood protection measures will be required in order to determine that the measures are both effective and do not themselves result in unacceptable environmental, social or economic impacts.
- This applies to all other factors also listed as ‘national’: all will require detailed examination by PINs, the Environment Agencies and/or the Office for Nuclear Regulation and therefore all should be listed in the PINs detailed factors list.
- We therefore suggest that the ‘national’ factors listed, should also be carried across to the ‘matters flagged for detailed consideration column’.

f) **There are concerns about the realism of NPS statement about the storage of radioactive waste on site and the implications of climate change.**

- Paragraph 4.11 of the consultation document states that developers need to demonstrate that the site area can accommodate a range of facilities, *‘including the safe and secure storage of spent fuel and intermediate level waste produced on the site through operation and decommissioning of the*

station for several decades until it can be sent for disposal in a geological disposal facility.'

- Given the early stage of progress towards identifying and the time needed to build such a facility site (as set out in the current consultation on a GDF siting process), it is questioned whether the suggestion that spent fuel and radioactive waste will remain on a NNB site for a 'few decades' is realistic. The BEIS community consultation documents seems to suggest about 40 years from first formal engagement with communities, and we are some way off from that. It would seem that there is a risk that it may be significantly more than 'several decades' before a GDF is up and running, particularly if communities are hesitant in coming forward or pull out during the process.
 - Given the coastal location of the proposed NNB sites, the low lying nature of sites such as Oldbury and the potential for significant climate change and sea level rise, it is imperative that a precautionary approach and the ability of a site to remain safe into the future must be categorically assured. This an issue of local and national concern. In addition there needs to be certainty for NNB host communities as to how long they are to host the storage of spent fuel and higher activity radioactive waste.
- (g) The Severn Estuary is a landscape of national renown over which there are extensive views from very large tracts of land in both England and Wales, and that also forms the wider setting to the Grade 1 listed Severn Bridge. It is suggested therefore that the nomination of Oldbury for NNB should be contingent upon the use of lower hybrid cooling towers of a similar height to the existing station, rather than highly intrusive and damaging natural draft towers that could be up to 200m in height. This is compatible with Horizon's stated preference for these lower hybrid cooling towers:
<https://www.horizonnuclearpower.com/our-sites/oldbury/faqs> _

Question 3 Chapter 3: *Do you have any comments on the process to designate potentially suitable sites in the new NPS for nuclear set out in paragraphs 3.1-3.14?*

- a) Subject to modifying the criteria as set out above, we consider the site selection process is appropriate.
- b) In order for the public and Councils to be able to comment on the nomination of NNB sites in future BEIS consultations, it will be important that they have an adequate understanding of the basis for these nominations and also of the information behind the appraisals of sustainability. We therefore request that the developer submissions in support of site nominations are made public and shared with the Local Authorities.

Question 4 Chapter 4: *Do you have any comments on the process for future site nominations set out in paragraphs 4.4-4.18?*

- a) **We are concerned that the timeframes suggested for a proposed NNB nomination window in the 2020's are unrealistically short, and do not allow for meaningful engagement with potential host communities and local authorities.** .

- These timeframes should therefore be significantly extended.
 - It seems sensible that the new NPS looks beyond the proposed designation of sites up to 2035 and sets out a process for inviting, accepting and assessing further NNB sites.
 - However the timeframes proposed at paragraph 4.5, to publicise a forthcoming nomination window for 'at least 1 month', and then for that window to be just 8 weeks long does not seem practical. During this time there would need to be local engagement and collation of relevant information to inform a strategic assessment of a site seems impractically short. It seems doubtful that effective engagement could be organised, appropriate notice given, undertaken and reported on in this time period. This is in addition to the other studies and documentation that must be put together.
- b) It is suggested that at least 6 months' notice should be given of the intention to open a nomination window, enable project promoters to mobilise and undertake the necessary preparatory studies and consultations. The nomination window should be open for at least a further 6 months, in order for project promoters to make the necessary arrangements, collect and collate the required information and to give notice for, hold and respond effectively to public engagement. This will also enable local authorities and parishes to engage with the project promoter, as well as to undertake the consultations, assessments and make the decisions needed to give an informed response.
- c) Since NNB related development would be likely to be of an unprecedented scale for affected communities, it is agreed that project promoters must demonstrate adequate and effective public engagement. However, it is suggested that public events will be vital if community engagement is to be effective. It is therefore suggested that the NPS should be revised to state that events to engage with the local community are 'required' instead of just 'considered'.

If you have any questions or require any further information, please do not hesitate to contact us.

Yours faithfully



Gillian Ellis-King
Strategic Projects Manager
Transport & Strategic Projects

South Gloucestershire Council: Statement as to the relevance of sub-regional and local policy to the national siting criteria for new nuclear power stations.

West of England (WoE) Combined Authority: Deal with Government

1. The economic importance of the West of England, with its population of over 1 million people and over 43,000 businesses, as a net contributor to the UK economy is acknowledged in its' deal with Government, secured in early 2017. This resulted in devolution and infrastructure investment to boost economic growth and is an important and relevant consideration in the context of Oldbury NNB. Unlike some other NNB sites, the Oldbury site is set within a growth area, and the effects of NNB development must be considered in this context, there being the potential for significant effects both positive and negative.
2. For example, having adequate and functioning transport infrastructure and access to skills is vital to the WoE's success in boosting growth as set out in the WoE Deal with Government. It is clear from observing the ongoing NNB development at Hinkley, that there is a risk that scale of pressure on infrastructure and the need for human and business resources could result in impacts on the transport infrastructure and businesses that are vital to support the wider growth of the WoE area.
3. Relevance to national policy
Proposals for NNB development must therefore ensure that they do not compromise the health and growth of other business sectors and that they realise their potential to make a positive contribution to overall local and national growth.

West of England Joint Spatial Plan (JSP) Publication Document November 2017

4. The emerging JSP identifies strategic development across the WoE sub region. The nomination of the NNB site at Oldbury is acknowledged in its' Policy 4 identification as a proposed 'Key strategic infrastructure employment location'.
5. Of potential relevance to a NNB development at Oldbury, the plan also proposes that Local Plans allocate a number of 'Strategic Development Locations' where a significant number of new dwellings are proposed. These will alter the demographics of the area. Locations for new or extended communities include most locally at Buckover and Thornbury and Charfield (where reopening of the train station is proposed), as well as a range of locations in the wider South Gloucestershire and West of England area.
6. It is important that Government assessment of demographics takes account not only the existing population but also proposed growth up to 2036 (the Joint Spatial Plan period).
7. The JSP policy 6 re-emphasises the need for transport and flood infrastructure to address existing challenges and make the necessary infrastructure improvements to facilitate economic and housing growth.

Relevance to national policy

It is considered important that the proposed NPS criteria consider whether in principle the nomination of sites can meet the demographic test while taking account of proposed growth as set out in sub regional and local policy and into the future. Also that national policy ensures the functioning of the Strategic Road and the delivery of strategic flood protection that re needed to sustain local and national economic growth.

West of England Joint Transport Study (JTS) approved October 2017

8. This document recognises the existing challenges of congestion on the transport infrastructure in the West of England area, including the strategic road network (SRN), and the M4 and M5 motorways, as seen on figure 3-5 of the West of England Joint Transport Study approved October 2017 (see diagram at paragraph 51 (d) iii below). In addition there are challenges on other A and local roads. This already congested road network is vital to the infrastructure of the UK, providing east/ west and north / south connections including to Wales, as well as to the regional, sub regional and local economy. The development of NNB at Oldbury would place further pressures on this network.

9. The JST states that ‘The growing economy has meant an increase in the volume of travel, resulting in congestion, delays and accessibility challenges. There is a risk that these problems could reduce productivity and competitiveness of the region and constrain future growth.’ ‘Slow journeys also reduce accessibility to jobs and businesses and act as a barrier to the competitiveness of the city region’. In addition it points out that incidents including on the motorway network are already seen to have widespread congestion and long traffic delays across the WoE due to lack of alternative routes, and modelling indicates that incidents will have increasingly serious implications both for strategic and local connectivity.

10. The JTS also identifies the environmental and wellbeing implications of pressures on the transport infrastructure, including on air quality. Addressing these challenges is identified as a priority.

11. Planned growth is already predicted to result in further pressures an increase in average road travel delay of up to 40% up to 2036, placing increasing strain on the network. The JTS also identifies the development of NNB at Oldbury would generate significant traffic demand, and the need for transport mitigation to be planned.

12. While a range of measures are proposed in the JTS Transport Vision to achieve modal shift, it is recognised that ‘Significant investment will be required to unlock new development, tackle congestion blackspots and re-route traffic onto new transport links...’ Measures include proposed new railways stations, significant lengths of ‘smart motorway’ and improved motorway junctions.

Relevance to national policy

13. The functioning of the Strategic Road Network in the WoE area is vital locally, regionally and to the UK. This network is already heavily congested. It is important therefore, both to the wider UK economy and the region that prior to inclusion in the list of nominated sites, sufficient high level information should be provided to

demonstrate in principle that NNB development at Oldbury could be achieved without compromising economic growth and the functioning of the transport network in the surrounding area.

14. Knock on effects on the wider sub regional, regional and UK economy must also be considered.

South Gloucestershire Core Strategy (CS) Adopted December 2013

15. In addition to a range of policies of relevance to NNB, the CS includes Major Infrastructure and Oldbury specific policies (CS36 and 37) that seek to ensure the minimisation of impact and the maximisation of benefits from an NNB development at Oldbury. These policies cover a range of issues including several that are potentially relevant to wider site selection issues including flooding, transport, biodiversity, landscape and visual as well as the potential for integration with the existing station.

16. CS policies also allocate growth areas that will alter the demographics of the area that need to be considered in the Government's assessment prior to any decision as to which sites should be nominated as being potentially suitable for NNB development.

South Gloucestershire Policies Sites and Places Plan (PSP) Adopted November 2017

17. In addition to a range of policies of general relevance to NNB development at Oldbury, policy PSP46 relates specifically to NNB. This policy document has been the subject of rigorous examination by the Planning Inspectorate and was very recently adopted.

18. Policy PSP46 identifies a range of themes and issues relevant to the development of sustainable development of the NNB site. This includes economic development and sustainable growth, effects on communities, flood and flood risk management, landscape and visual, transport including congestion and capacity limitations on the strategic route network. The need to address public and road transport infrastructure issues, including motorway junction improvements and congestion reducing measures such as Park and Rides and the limitations of existing public transport are also identified. Also included in PSP46 are environmental issues including international designations on the Severn Estuary, the need for Habitats Regulations Assessments, landscape and visual impacts, and the potential for integration with the existing Magnox station in terms of reuse of facilities, land, buildings and or materials.

Relevance to national policy

19. It is considered that the PSP Plan raises a number of key issues of both local and national significance, including economic growth and development, community, transport, landscape and visual, and ensuring sustainable growth are not adequately addressed as site selection criteria in the NPS consultation document.

South Gloucestershire Local Plan Consultation Document February 2018

20. The consultation document acknowledges a range of issues relevant to NNB, including the need/s:

- for housing for workers that would arise during the construction of a new nuclear power station at Oldbury,
- to meet the long term needs of key sectors of the economy including new nuclear build,
- to address road congestion and accessibility issues, including by the provision of new public transport and non-car access aligned to new development
- to protect and enhance all aspects of the environment,
- to mitigate and adapt to climate change and build resilience into new development including to tidal, fluvial, groundwater and surface water flooding.

21. Part 3 of the Consultation Document includes a proposal that the Local Plan will include strategic policy relating to a range of issues including Nationally Significant Infrastructure Projects. This will update and as appropriate amend existing Core Strategy and Policies Sites and Places policy including in relation to the proposed NNB development at Oldbury. The introduction of new policy in relation to decommissioning (including promoting integration with NNB) and radioactive waste (including sharing storage facilities with NNB) is also being considered.

Relevance to national policy

22. Although at a relatively early stage of preparation, the Local Plan raises issues of relevance to the national criteria for siting NNB power stations including flood resilience, environmental considerations, the need to address congestion and provide non road alternatives, and the need for accommodation for nuclear construction. The promotion of integrating NNB with the existing nuclear power station is also relevant.

APPENDIX B

Summary of comments received from Parishes

Parish	Summary of Comments
Oldbury Parish Council DRAFT comments	Flooding, tsunami and storm surge should be exclusionary criteria
	Coastal processes should be an exclusionary criterion.
	Housing development has a much shorter timeframe than NNB. If a site meets the demographics criterion at nomination, then future development needs to be restricted to ensure it still meets that criterion.
	The Environmental Protection section neglects hydrology, hydrogeology, soils, geology, geomorphology, coastal ecology and ground water. Assessment of these factors is needed to

	<p>understand impact on those who live and work in that environment.</p> <p>Cumulative impacts of Hinkley and Oldbury need to be considered in relation to the Severn Estuary Ramsar site, Special Area of Conservation and Site of Special Scientific Interest</p> <p>The effects on the human population of the surrounding area is inadequately considered.</p> <p>The local population does not have sufficient voice and their interests are not properly taken into account.</p> <p>Local, regional and national road and rail networks are inadequate to support NNB development and may need considerable modification and/ or investment to cope with additional traffic.</p> <p>Community facilities are similarly inadequate to cope with incoming people.</p> <p>Having a site adequate in size to accommodate NNB should be an exclusionary factor, and this should include construction needs. Developers should be required to justify any additional land. There needs to be certainty for local people as to the size of the project.</p> <p>The effect of cooling facilities on the landscape and people living in sight of NNB is so dramatic that this should be an exclusionary factor.</p>
Pilning & Severn Beach	<p>Encourage the building of new Nuclear plants on existing sites.</p> <p>Question the need for new nuclear when renewables are available and less costly, electricity storage will provide base load, provide more job opportunities. Nuclear needs imported investment and expertise. Its cooling systems contribute to global warming. Need to consider legacy for future generations.</p> <p>SGC should not engage with this consultation as this will imply acquiescence with NNB.</p>
Yate Town Council	<p>While the proposed criteria recognise environmental and physical impacts but do not recognise the impacts on the local economy and on people, the other two pillars of sustainability.</p> <p>Propose 2 additional criteria to ensure site considered in context of its' wider hinterland, which for Oldbury is already under intense development transport pressure:</p> <ul style="list-style-type: none"> • Capacity of area to accommodate short and long term changes in its economy without adding further 'heat' • Availability of good public transport to existing large residential area so that staff

	can be recruited locally and avoid massive additional pressure on highways and for housing
South Gloucestershire Parish Forum 22 January 2018	Concerns were raised about the Government proposal for new nuclear power stations and that renewables have less impact and are more cost effective.
	The importance of considering biodiversity in the site selection process was emphasised.