

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

Introduction .

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

Overall Impression

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

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

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

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

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

1 Traffic and Transport

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

2 Landscape and Visual Amenity

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

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

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

3 Surface Water and Flooding

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

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

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

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

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

5 Socio Economic

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

6 Public Access and Recreation

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

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

7 Archaeology and Cultural Heritage

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

8 Ecology and Nature Conservation

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

9 Geology, Hydrology and Soils

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

10 Consultation

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

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

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

For and On behalf of Oldbury on Severn Parish Council

B F Turner (Chairman)