Policy Title:
LPS15 - Nuclear New Build

Existing Policies Which adopted Core Strategy or Policies Sites and Places (PSP) policy would eventually be replaced	**Core Strategy Policy CS37 - Nuclear Related Development (partial)** **Policies Sites and Places Plan policy PSP46: Oldbury New Nuclear Build (NNB)**
Non-Strategic / Strategic	**Strategic**

Purpose

To inform the Council's role in respect of Development Consent Order (DCO) and Town & Country Planning Act applications relating to nuclear new build (NNB) to the north of the existing power station at Oldbury on Severn as established by National Policy Statement (NPS) EN-6. This is likely to comprise Small Modular Reactors along with associated development and infrastructure, although the national designation on the site would also allow for a large scale nuclear power station.

This policy may also inform the assessment of proposals relating to the decommissioning of the existing power station, specifically in respect of identifying any potential for reuse of existing Nuclear Decommissioning Agency assets.

National Policy Statement (NPS) EN-6 identifies an approximately 150 hectare (ha) site near Oldbury on Severn as being potentially suitable for the development of a nuclear new build power station (NNB).



Figure 5. The nominated NNB site boundary (Source National Policy Statement EN-6) and the extent of the former Magnox power station site.

The nominated site is set in a sensitive location on the eastern bank of the internationally designated Severn Estuary, with tidal mudflats and the existing power station lagoon to the west, and the historic, flat, open landscape and habitats of the Severn Levels to the east. The site is adjacent to the existing nuclear power station that is now being decommissioned (referred to in this plan as Oldbury 'A'). The NNB site was acquired by Great British Nuclear in 2024.

As a NSIP, the primary policies against which an application for NNB will be determined are the overarching energy National Policy Statement EN-1, along with technology-specific energy policy for nuclear power generation and other relevant national policy such as the NPPF. Given the designations on the estuary the Habitats Regulations will also be relevant.

A NNB project at Oldbury is likely to be a large and complex development spanning several generations and it is therefore important to have in place a policy framework that addresses the particular characteristics of and implications of planning for and delivery of a NNB and related development. Oldbury forms part of the Severn Edge initiative relating to low carbon development across the nearby sites comprising Oldbury and Berkeley, with the focus of energy generation being on the NPS designed site and education training and skills being at the nearby Berkeley campus Western Gateway Severn Edge Vision). A dedicated digital and active travel/EV transport route is envisaged to run behind the sea wall connecting the two sites.

This policy is framed to ensure NNB development at Oldbury can bring a range of socio-economic, environmental and community benefits as well as mitigate the potential for negative effects. As described in Policy LP23 - Climate Change Adaptation and Resilience it is vital that new development mitigates its contribution to the causes of climate change and in this context the policy recognises the significant contribution NNB development could make in terms of low carbon energy generation.

This policy should be read in combination with all other relevant policies in the Plan, but in particular the suite of policies relating to NSIPs, decommissioning and radioactive waste, Climate change, sustainable design and construction, Strategic Green and Blue Infrastructure and Biodiversity policies.

Policy wording

1. **The Council acknowledges the potential for NNB, as established in national policy, and will work collaboratively with a project promoter to maximise benefits and legacy for local communities and businesses.**

2. **However, given the environmentally sensitive location, scale, complexity and duration of NNB development and its potential for broad ranging negative impacts the Council will seek to ensure that:**

    a. **As a part of minimising the impact of NNB related development in line with NSIP policy LPS14, where feasible NDA assets at the existing station, such as previously developed land, facilities and materials should be reused. This will reduce the extent of greenfield land needed for NNB and minimise the scale and extent of changes in the rural Levels including the estuary landscape and seascape, and extent of built form.**

    b. **Given the uncertainties that arise due to the particular nature of NNB development, its scale, complexity and duration, a Community Impact Mitigation Fund will be necessary to address unforeseen changes in context and impacts that may arise over lengthy construction and operational phases.**

3. **The Council has identified relevant themes and associated issues, constraints and opportunities relevant to NNB development at the Oldbury site that need to be considered to ensure:**

    a. **the development of sustainable and integrated proposals for a NNB development, and**

    b. **the minimisation of impacts on our local communities and environment, and**

    c. **the maximisation of positive outcomes, community benefits and legacy.**

4. **These are set out in LPS 15 Appendix 1 - Table of themes, issues, constraints and opportunities relevant to the development of NNB proposals at Oldbury on Severn and its associated infrastructure and development.**

5. **These provide a framework to inform early engagement between the Council and a promoter of NNB at Oldbury.**

6. **The Council expects NNB related applications to comprise an integrated, navigable suite of documentation including well defined proposals and parameters defining the proposed development, and including clearly identified mitigation, monitoring and management plans demonstrating how all relevant matters identified in LP15 Appendix 1 have been taken into account and addressed.**

7. **To support engagement throughout the planning and implementation stages for a proposed NNB, the Council will:**

8. **Work collaboratively with a project promoter to agree survey and assessment methodologies relevant to the particular socio-economic circumstance of the wider and local area and this ecologically, archaeologically, heritage and visually sensitive location and ensure delivery of an appropriate evidence base to inform the development of sustainable NNB and associated development proposals that also addresses policies LP 23 -Climate Change Adaptation and Resilience, LP25 - Embodied Carbon LP 28 - Ecology and Biodiversity Net Gain and LPS 11 – Strategic Green and Blue Infrastructure regarding climate change, green and blue infrastructure and biodiversity, and**

    a. **Work collaboratively with the project promoter, Nuclear Reclamation Services and the local community on the preparation of an overarching Strategic Masterplan for the two sites that ensures that the needs of decommissioning are met, environmental and amenity assets protected and enhanced, and sustainability and design quality for nuclear new build are delivered.**

9. **Given the length of time that radioactive waste is likely to be stored on sites and before decommissioning takes place, and the potential for changes in circumstance and socio economic and environmental circumstance, the Council will expect to see the preferred principles for radioactive waste storage and disposal plus power station/s decommissioning set out along with the firm plans for the construction and operational phases.**

** For the purposes of this Policy, and in recognition of the potential for large scale NNB to have wide ranging effects, the Council considers the following are 'neighbouring or relevant local authorities' : Bristol, Bath & North East Somerset, North Somerset, Wiltshire, Somerset, Sedgemoor, Mendip, Stroud, Gloucestershire, Cotswold, Forest of Dean, Monmouthshire, Gloucester City, Taunton Deane and West Somerset.*

Supporting text

1. A NNB new facility in accordance with National Policy Statement EN-6 would be expected to comprise very substantial development including nuclear reactors, cooling infrastructure, interim spent fuel, radioactive waste stores, other associated buildings plus grid connections, and additional construction land.

2. Associated development may include a range of both permanent and temporary works and facilities such as:

    a. Flood defences for the site and the surrounding area;

    b. Transport infrastructure including road, sea, and rail;

    c. Modifications to the electricity transmission infrastructure;

d. Training facilities, a visitor/ reception centre and off-site emergency facilities;

e. Extensive landscape, visual and biodiversity mitigation areas.

3. Depending on the scale of development and numbers of construction workers, accommodation related development may need to be considered.

4. NNB development would also be subject to legislation relating to hazardous sites including a Detailed Emergency Planning Zone, within which the Emergency Planning implications of new development would need to be considered.

5. Issues of potential relevance that are likely to require assessment and consideration in planning for NNB at Oldbury are set out in the table in the LPS 15 Appendix 1.

6. Key to maximising benefits and minimising impacts across a range of topic areas relevant to NNB will be the early agreement and potentially the advance and/or early delivery of a range of strategies and mitigation measures, defined triggers for implementation, along with systematic and clearly defined monitoring to ensure effectiveness and identify any need for adjustments. For example, given the need to raise awareness of business opportunities to ensure that local companies can meet the requirements of the nuclear industry; as well as the need to ensure the availability of suitably qualified workforce both for construction and operation, early engagement in the pre-application phase will be required in respect of eduction, training, skills and supply chain strategies. Similarly for biodiversity, where alternative habitats may be required to accomodate displaced species, and for archaeology where advance agreement and implementation of Written Schemes of Investigation, early agreement and implementation of strategies may be required. Where visual screening is required for construction operations, advance planting schemes may be required. In order to avoid impacts on social, health and community services and facilities serving existing communties, early delivery may be needed. Transport infrastructure may need to be delivered early in the NNB implementation phase, in order to avoid unacceptable impacts on existing infrastructure.

7. The site would fall within the requirements of the Radiation Emergency Preparedness & Public Information Regulations (REPPIR) 2019 and would require off site arrangements to be put in place in the event of a release of radiation (Note: Regulations are continuously reviewed and the status of the site may change in future).

8. Whilst this table sets out a range of issues known at this time, with such long construction and operational phases, it is recognised that there may be changes in the wider and/or local socio economic and environmental context of a NNB project, and also that aspects of the project design may evolve. Mechanisms therefore need to be put in place to accommodate flexibilities while also ensuring that mitigation measures can be adapted or modified to address any impacts arising from those changes. The establishment of agreed design parameters, and well defined, effective and long term monitoring arrangements, mechanisms and KPIs are key to this.

9. Given the proximity of 'Oldbury A' and the proposed NNB site, and the potential for close interrelationships between multiple factors, the Council will continue to work with the Nuclear Decommissioning Agency, the operators of Oldbury 'A' and NNB promoters in respect of decommissioning plans and the potential for integration with NNB. These discussions will contribute to the Council's preparation of a pre-engagement position statement or SPD for NNB, as set out above. Early discussions have also contributed to the development of policy LP31 relating to decommissioning.

10. To facilitate effective and timely pre-application engagement with a developer the Council, in conjunction with relevant parties, will produce the following documents:

    a. A Pre-engagement Position Statement

        i. This will consider the experience of other NNB projects in the particular context of Oldbury. It will address the issues set out in the table above, providing where appropriate the Council's initial views on constraints and where possible potential planning, design, mitigation, legacy and community benefit opportunities that align with wider strategies, objectives and policies for the Council area.

        ii. It will be informed by early duty to co-operate engagement including with neighbouring Councils, advice from statutory bodies, and engagement with the project promoter. By providing an early view on potential constraints and opportunities, this will inform the preparation of an evidence base to underpin the preparation of an SPD, the development of positive and sustainable development proposals for the NNB and its associated development.

    b. A SPD for Oldbury NNB

        The SPD may be adopted in advance of formal pre-application consultation by the project promoter, to:

        i. help inform the scheme development;

        ii. provide a basis for the Council's assessment of the project proposals and associated delivery plans; and

        iii. provide the Planning Inspectorate and Secretary of State with guidance which may be 'material' to decision making.

11. Although the principles of decommissioning will be agreed at the project planning stages, due to the long timescales involved, flexibility will be required in how these are met. Relevant aspects of Policy LP31 on decommissioning will be expected to inform the establishment of those principles.

Questions	
Key evidence	The Office of Nuclear Regulation land use planning advice.
Other relevant policies to cross-reference?	LP 23 - Climate Change Adaptation and Resilience LP25 - Embodied Carbon LP 28 - Ecology and Biodiversity Net Gain LPS 11 - Strategic Green and Blue Infrastructure

Tables relevant to the development of NNB at Oldbury on Severn

Table of themes, issues, constraints and opportunities relevant to the development of NNB proposals at Oldbury on Severn and its associated infrastructure and development.

Notes:

- The order of themes, issues constraints and opportunities set out in the table below does not at this stage infer relative priority at this stage
- In order to ensure the sustainability of development proposals and appropriate impact assessments, themes, issues and schemes should be considered 'in the round' and cumulatively across the different topic areas set out on the next page.

Theme	Issue/Constraint	Opportunities
Flood & Flood Risk Management (incl. Coastal change)	• Flood zone 3 across the Levels • EA requirements for levels of protection for NNB and access routes • Potential for development to increase risk elsewhere • Existing flood risk in local settlements	• To address flood risk problems at Oldbury on Severn and the Levels • Contribute to delivery of the Shoreline Management Plan
Transport including for example: construction materials, equipment, abnormal indivisible loads and workers	• Capacity of the local and national road network including junctions • The safety, amenity and access needs of local communities • The environmental sensitivity of the locality • Emergency access requirements in times of flood	• Utilise non-road transport solutions including sea and rail • Potential use of temporary transport infrastructure • Capturing worker movements where they will result in least impact on the road network • Maximising use of public transport, cycling and walking • Separation, control and enforcement of necessary NNB road traffic and parking from the local road network • Addressing congestion on the strategic road network increase capacity at local motorway junctions • Contribute to delivery of JLTP, through legacy transport links and Park and Ride/ Park and Share facilities

Construction worker accommodation	• For operational reasons construction workers may need to be accommodated on site
	• Location of NNB site in Flood Zone 3 (see above)
	• Significant proportion of workers may seek functional low-cost accommodation
	• Potential commuting zone – up to 90 minutes
	• Pressure on local private rented sector
	• Limited tourist accommodation in South Glos.
	• Ensuring local communities are not unbalanced or overwhelmed
		• Workforce surveys during construction could enable mitigation adjustments if needed
		• Contributing legacy in terms of:
		  ○ Serviced sites or housing in line with the Local Plan and Housing Market Assessment
		  ○ Amenity or recreational facilities for community use

Environment (archaeology & historic environment, landscape & visual, ecology)	• NNB construction in and/adjacent to environmentally sensitive Severn Levels and Estuary • International, national and local biodiversity and heritage designations, species and assets • A currently tranquil landscape with dark skies • Requirement for Habitats Regulations Assessment • Historic Severn Levels landscape with high archaeological potential • Extensive PRoW network including the Severn Way running along sea wall • Advance archaeological, biodiversity and visual assessments to inform site selection and planning • Even with rigorous approaches to impact avoidance / mitigation, there may be the potential for significant residual impacts	• Maximise the use of brown field land at the existing power station to minimise both use of green fields and visual impact • Advance landscape and biodiversity works to minimise NNB construction impacts • Requirement for Biodiversity Net Gain • Off-site compensatory habitat creation and planting to contribute to Green Infrastructure Strategy & 'String of Pearls' proposal along Severn Estuary and mitigate visual impact • Phasing to restore any temporary use areas as soon as it is no longer needed

Climate Change & Sustainability	• Although nuclear power generation is low carbon, construction methods vary in sustainability • Need to ensure climate change resilience (see also Flooding theme above) • Adjacent nuclear decommissioning and NNB sites	• Potential for integrated solutions between the decommissioning station and NNB including reuse of brownfield land and flood mitigation • Maximise sustainable transport and construction methods • Integrate Sustainable Drainage solutions into NNB site design • Facilitate the use of waste heat from NNB for e.g. agriculture, industrial, business and/or residential use.
Economic Development (also links to Education, training and skills below)	• NNB should benefit host community both residents and businesses • Potential for impact on local businesses due to displacement of staff and skills • Long NNB lead in/ build times may increase risk of changed local economic conditions • Potential for boom and bust	• Set local targets and encourage, enable and support local supply chain to engage with NNB procurement • Raise aspirations and offer training and upskilling opportunities for local people to help meet NNB needs • Surveys during implementation to understand the wider effects of NNB including on local businesses and inform any necessary adjustment to mitigation
Education, Training & Skills (also links to Economic Development above)	• History of underachievement in secondary level education for South Gloucestershire relative to the national average. • NNB need for STEM related and support skills, and long lead in times required. • Potential for leakage of skills from local businesses • NNB demand for education, training and skills likely to be beyond current capacity and offer of local colleges • Capacity of existing nurseries, pre-schools and schools to meet needs of incoming NNB families	• Early investment in local colleges including South Gloucestershire Stroud College at Berkeley Green to deliver high quality local skills and training opportunities for local people • Initiatives to raise aspirations and attainment in local schools • Active and wide promotion of STEM subjects from young age in local schools

Community health and safety, community benefit and quality of life (including environmental health)	• Close proximity of dwellings to the NNB site • Local people have ready PRoW access to the countryside and along the estuary • The existing environment around the NNB site is rural, tranquil and peaceful • By its very nature NNB development will have wide ranging effects on local people • An influx of construction workers could place pressures on local infrastructure and services and result in concerns about community safety • There is a need to understand effects on the wellbeing of communities during implementation	• Dedicated provision of facilities and services for construction workers to prevent impacts on local communities • Surveys of local people during implementation can help understanding of wellbeing issues • Provision of amenities for construction workers could become long term legacy for local communities • Maintain Severn Way along shoreline route • Enhancements to the PRoW network to compensate for any unavoidable losses.
Emergency Planning[5]	• ONR regulations covering arrangements for the surrounding area • Potential public perceptions regarding safety • Relationship to Emergency Planning arrangements for the existing power station	• Pro-actively address issues of public concern both actual and perceived. • Ensure dovetailing of arrangements between the existing and NNB power station sites. • Consider NNB Emergency Planning in the context of recent and proposed development in the surrounding area.

[5] The Office of Nuclear Regulation land use planning advice in respect of emergency planning around nuclear sites including Oldbury may be found at: http://www.onr.org.uk/land-use-planning.htm

Flexibilities, monitoring and management	• Due to the timeframes for NNB projects, there is the potential for changes in the socio economic or environmental context of the project • Detailed design of NNB facilities potentially continues after DCO consent, therefore it may be that design parameters are set to future proof plans • A precautionary approach to impact appraisal ensures that worst case scenarios are assessed, • However, the duration of construction impact is also relevant to acceptability • Due to the complexity of NNB development it is possible that unanticipated impacts may occur during construction and/or operation. • Public concerns about NNB may arise during the planning process and implementation	• Advance delivery of education, training, skills and supply chain initiatives to ensure both meeting NNB needs AND opportunities for local people and businesses • Ensure public confidence through early establishment of a NNB focussed public reporting and questioning forum (pre-application through to operation and decommissioning) • The timely delivery of impact mitigation and infrastructure can be secured through works, phasing plans and triggers • Transparent monitoring of effects, and building in flexibilities in delivery and mitigation to ensure responsiveness to unexpected effects. • Contingency Funding enables mitigation of unanticipated effects • Publishing regularly updated monitoring information on a public web site. • A Community Impact Mitigation Fund can facilitate offsetting of unavoidable impacts that cannot be mitigated • Community Benefits are a way of recognising the burden and disturbance of a development of the complexity, scale and duration of NNB that is borne by the host community