

Appraisal of Sustainability: Site Report for Braystones

EN-6: Revised Draft National Policy Statement for Nuclear Power Generation

Preface:

Appraisal of Sustainability of the revised draft Nuclear National Policy Statement

The Appraisal of Sustainability (AoS), incorporating Strategic Environmental Assessment (SEA), of the revised draft Nuclear National Policy Statement (Nuclear NPS) has been undertaken at a strategic level. It considers the effects of the proposed policy at a national level and the sites to be assessed for their suitability for the deployment of new nuclear power stations by 2025. These strategic appraisals are part of an ongoing assessment process that started in March 2008 and, following completion of this AoS, will continue with project level assessments when developers make applications for development consent in relation to specific projects. Applications for development consents to the Infrastructure Planning Commission (IPC) will need to be accompanied by an Environmental Statement having been the subject of a detailed Environmental Impact Assessment (EIA).

The AoS/SEA Reports are presented in the following documents:

AoS Non-Technical Summary

Main AoS Report of revised draft Nuclear NPS

- Introduction
- Approach and Methods
- Alternatives
- Radioactive Waste
- Findings
- Summary of Sites
- Technical Appendices

Annexes to Main AoS Report: Reports on Sites

- Site AoS Reports
- Technical Appendices

All documents are available on the website of the Department of Energy and Climate Change at <http://www.energynpsconsultation.decc.gov.uk>

This document is the Appraisal of Sustainability Site Report for Braystones.

This report has been prepared by the Department of Energy and Climate Change with expert input from a team of specialist planning and environmental consultancies led by MWH UK Ltd with Enfusion Ltd, Nicholas Pearson Associates Ltd, Studsvik UK Ltd and Metoc plc.

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Summary of Key Findings

This report considers the nomination of the site at Braystones in the North West Region of England as a possible location for new nuclear power station(s). The purpose of this Appraisal of Sustainability Report is to assess environmental and sustainability impacts on the Braystones site and surrounding area. This report also identifies the significance of those effects, and suggests possible ways of mitigation. For more information on the methodology and background to the assessment please refer to Section 1. The national policy context, which also provides a background to the assessment, is included in Section 3.

The key findings of this assessment are included below (reproduced from Section 6 for ease of reference). These key findings are supported by site characterisation and the appraisal of sustainability, details of which are included in Section 4 and Section 5 of this report. Further details on the key findings and suggested mitigation of the potential effects identified in developing a nuclear power station at Braystones are included in Section 6.

Summary of Key Findings

The Appraisal of Sustainability process has included recommendations to inform the development of the Nuclear National Policy Statement. This site report for Braystones has helped to inform the decision-making for the Strategic Siting Assessment. It has included advice as to the significant strategic effects arising from the construction of a new nuclear power station at Braystones, and suggestions for how adverse effects may be mitigated, including proposed mitigation measures which could be considered as part of a project level Environmental Impact Assessment.

A number of the strategic effects identified for Braystones will be similar across all the sites, including positive effects for employment and well being. However a number of potential strategic effects have been identified that are of particular note for the site at Braystones. These are discussed below:

There are potential negative effects on nationally and internationally protected nature conservation sites including Drigg Coast, River Ehen, Wast Water and River Derwent and Bassenthwaite Lake; visual impacts on the landscape from the power station and new power lines that could be seen from several locations, including the Lake District National Park; effects on water quality and migratory fish in nearby coastal waters due to the abstraction and release of sea water for cooling; and potential effects on erosion and visual appearance of the coastline due to the need for new flood defences and a marine landing station. These effects are significant, but mitigation opportunities could be available following further study at the project level.

Braystones forms one of a cluster of three nominated sites in the Cumbria area. The potential cumulative effects of the issues discussed above would increase if more than one power station were developed in this area.

There will be significant positive effects associated with long term employment and enhanced prosperity for communities locally and this is likely to be significant at the sub-regional level if three power stations are built in Cumbria with enhanced benefits in combination with other proposals for regeneration in the North West.

There remains some uncertainty relating to the significance of some effects and the most appropriate mitigation. It is expected that the mitigation measures will be refined iteratively as part of the development of the proposals for the Braystones site, and will be assessed further in the project level Environmental Impact Assessment.

1 Introduction

This Appraisal of Sustainability Report

- 1.1 This report considers the site at Braystones as a possible location for new nuclear power station(s). The report sets out the Appraisal of Sustainability (AoS) of the nomination of land. The nomination of land, as well as supporting information, was put forward by a developer. The AoS, which incorporates the Strategic Environmental Assessment (SEA), is a part of the Strategic Siting Assessment (SSA). The SSA is a process for identifying and assessing sites that could be suitable for new nuclear power stations by the end of 2025.
- 1.2 This report is one of the Appraisals of Sustainability that deal with individual sites. Together these reports form an Annex to the Main AoS Report,¹ which accompanies the revised draft Nuclear National Policy Statement² (NPS). The Government published the revised draft Nuclear NPS in October 2009 for public consultation. The Main AoS Report for the revised draft Nuclear NPS sets out the details of the AoS process, its methods, findings, conclusions and a summary of the appraisal of the nominated sites. The main report also includes a non-technical summary.
- 1.3 This AoS has been undertaken at a strategic level and is intended only as a high level assessment of the suitability of the site from an environmental and sustainability perspective. The AoS is part of an assessment process that started in March 2008. The revised draft Nuclear NPS lists sites that have been assessed to be potentially suitable by the Government for new nuclear power stations. Developers will be able to apply for development consent for these sites from the Infrastructure Planning Commission (IPC)³. Each application from the developer for consent to build a new power station will need an Environmental Statement with a detailed Environmental Impact Assessment (EIA). The sites included in the revised draft Nuclear NPS will also be subject to other regulatory and licensing requirements.

The revised draft Nuclear National Policy Statement

- 1.4 The revised draft Nuclear NPS sets out sites that are potentially suitable for the development of new nuclear power stations by 2025. The Government used an SSA to assess the potential suitability of nominated sites. This SSA

¹ Main AoS Report <http://www.energynpsconsultation.decc.gov.uk>

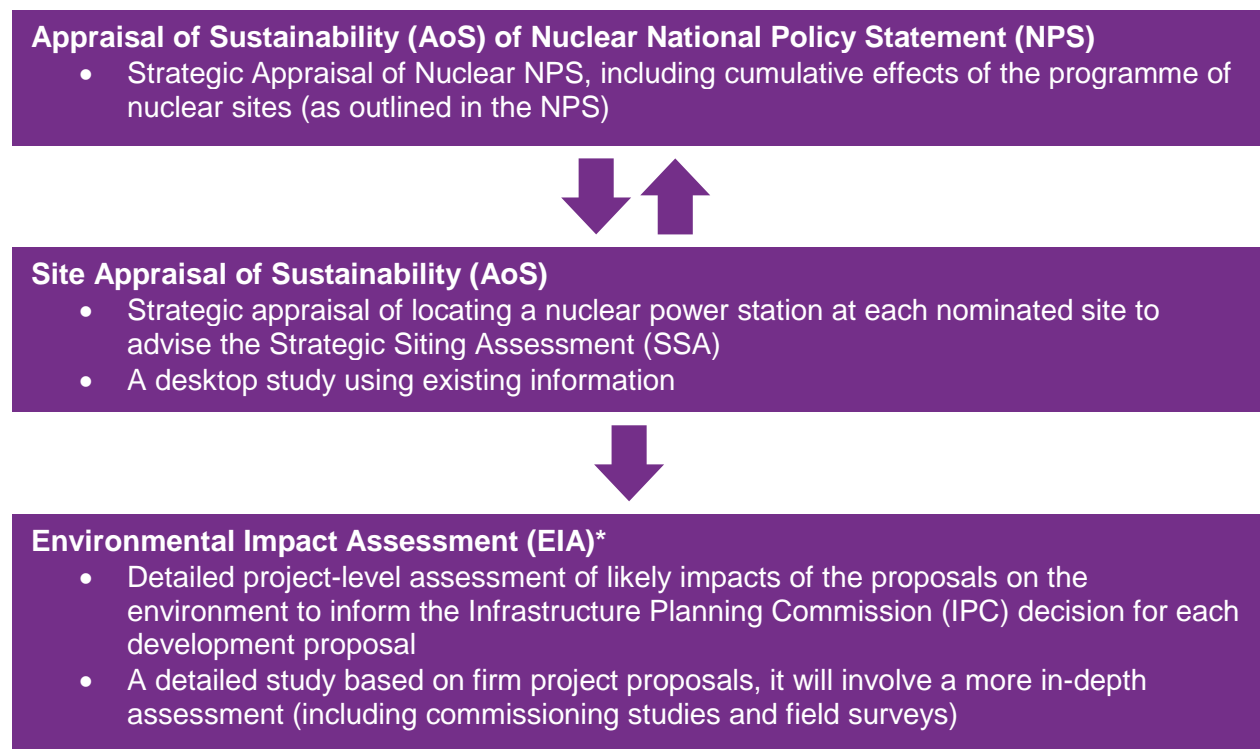
² Revised draft Nuclear NPS <http://www.energynpsconsultation.decc.gov.uk>

³ The Government announced in June 2010 its intention to amend the Planning Act 2008 and abolish the IPC. In its place, the Government envisages that a Major Infrastructure Planning Unit (MIPU) will be established within the Planning Inspectorate. Once established, the MIPU would hear examinations for development consent and would then make a recommendation to the Secretary of State. It would not itself determine applications and decisions would be taken by the relevant Secretary of State. These proposed reforms require primary legislation. Until such time as the Planning Act 2008 is amended, the IPC will continue as set out in that Act. As a result, the NPSs will provide the framework for decisions by the IPC on applications for development consent for major infrastructure projects, and under the new arrangements will provide the framework for recommendations by the MIPU to the Secretary of State.

process⁴ drew on the emerging findings of the site AoSs and the Habitats Regulations Assessment (HRA)⁵.

Appraisal of Sustainability incorporating Strategic Environmental Assessment

- 1.5 The Planning Act (2008)⁶ requires an AoS for all National Policy Statements. The purpose of an AoS is to consider the social, economic and environmental implications of the policy and to suggest possibilities for improving the sustainability of the NPS. The AoS incorporates the requirements of the European Strategic Environmental Assessment Directive⁷ which aims to protect the environment and to promote sustainable development during preparation of certain plans and programmes. This is set out in more detail in the Main AoS Report of the revised draft Nuclear NPS.
- 1.6 The purpose of this AoS is to assess environmental and sustainability impacts on the Braystones site. This AoS also identifies the significance of those effects and suggests possible ways of mitigation. The AoS for Braystones site fed into the Strategic Siting Assessment (SSA) and the preparation of the revised draft Nuclear NPS. There would be further detailed studies at the EIA stage of any construction project. The following diagram explains the relationship between the Main AoS Report, the Site AoS Report and an EIA.



⁴ Towards a nuclear national policy statement : Government response to the consultation on the Strategic Siting Assessment process and criteria, January 2009, URN 09/581 <http://www.berr.gov.uk/files/file47136.pdf>

⁵ Braystones HRA Report <http://www.energynpsconsultation.decc.gov.uk>

⁶ Planning Act 2008

⁷ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, implemented through *The Environmental Assessment of Plans and Programmes Regulations 2004*

*as required by European Directive 85/337/EEC and *Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999*

Appraisal of Sustainability Methods

- 1.7 In undertaking the AoS of each nominated site, a wide range of information was considered including the Scoping Report⁸, the Environmental Study⁹, the Update Report¹⁰, information from other Government departments, the statutory consultees and regulators, information from the nominators and other published reports. If additional local information was available, for example, an EIA scoping report or a locally relevant Strategic Flood Risk Assessment, it has been used to inform the appraisal where appropriate and referenced as footnotes.
- 1.8 The methods used for AoS/SEA are detailed in the Main AoS Site Report. The AoS uses objectives as a means of identifying and appraising the potential significant effects of building new nuclear power stations on the environment and communities. The sustainability objectives that have been agreed for the appraisal of the revised draft Nuclear NPS are detailed in Annex E of the Environmental Study and the Main AoS Report. Appendix 1 of this AoS Site Report sets out the guide questions that are used with each sustainability objective to help focus the appraisal in a more systematic way. The sustainability objectives used in the Environmental Study were grouped into themes for sustainable development in order to help focus on the key issues for appraisal. This is set out in the following table:

Table 1.1: Sustainable Development Themes and AoS/SEA Objectives

Sustainable Development Theme	AoS/SEA Objective (Numbers refer to Scoping Report ¹¹ and Environmental Study ¹²)
Air Quality	to avoid adverse impacts on air quality (12)
Biodiversity and Ecosystems	to avoid adverse impacts on the integrity of wildlife sites of international and national importance (1) to avoid adverse impacts on valuable ecological networks and ecosystem functionality (2) to avoid adverse impacts on Priority Habitats and Species including European Protected Species (3)
Climate Change	to minimise greenhouse gas emissions (13)
Communities: population, employment and viability	to create employment opportunities (4) to encourage the development of sustainable communities (5) to avoid adverse impacts on property and land values and avoid planning blight (10)

⁸ BERR (March 2008) Consultation of Strategic Environmental Assessment for proposed National Policy Statement for new nuclear power, URN08/680

⁹ BERR July 2008 Environmental Study

¹⁰ BERR January 2009 Update Report

¹¹ BERR (March 2008) Consultation of Strategic Environmental Assessment for proposed National Policy Statement for new nuclear power, URN08/680

¹² BERR July 2008 Environmental Study

Sustainable Development Theme	AoS/SEA Objective (Numbers refer to Scoping Report ¹¹ and Environmental Study ¹²)
Communities: Supporting Infrastructure	to avoid adverse impacts on the function and efficiency of the strategic transport infrastructure (8) to avoid disruption to basic services and infrastructure (9)
Human Health and Well-Being	to avoid adverse impacts on physical health (6) to avoid adverse impacts on mental health (7) to avoid the loss of access to recreational opportunities, their quality and user convenience (11)
Cultural Heritage	to avoid adverse impacts on the internationally and nationally important features of the historic environment (22) to avoid adverse impacts on the setting and quality of built heritage, archaeology and historic landscapes (23)
Landscape	to avoid adverse impacts on nationally important landscapes (24) to avoid adverse impacts on landscape character, quality and tranquillity, diversity and distinctiveness (25)
Soils, Geology, Land Use	to avoid damage to geological resources (19) to avoid the use of greenfield land and encourage the re-use of brownfield sites (20) to avoid the contamination of soils and adverse impacts on soil functions (21)
Water Quality and Resources	to avoid adverse impacts on surface water hydrology and channel geomorphology (including coastal geomorphology) (15) to avoid adverse impacts on surface water quality (including coastal and marine water quality) and assist achievement of Water Framework Directive objectives (16) to avoid adverse impacts on the supply of water resources (17) to avoid adverse impacts on groundwater quality, distribution and flow and assist achievement of Water Framework Directive objectives (18)
Flood Risk	to avoid increased flood risk (including coastal flood risk) and seek to reduce risks where possible (14)

1.9 The AoS for each of the nominated sites considered the relevant policy context at regional level, which helped identify key sustainability objectives that need to be taken into account in the appraisal and potential cumulative effects that could arise with other plans and projects. Policy context at the local government level is changing as a result of the new planning system. However, local planning policy will be required to conform to regional plans and programmes. Existing and emerging local policy documents were considered, where relevant, for the characterisation of baseline conditions and

the appraisal of effects. The regional policy context and regional baseline information is set out in Appendices 3 and 4 respectively.

Background to Nuclear Power Stations

- 1.10 This section provides some wider context on nuclear power stations. Nuclear power generation works in a similar way to conventional electricity generation, insofar as it depends on the creation of heat to generate steam, which in turn powers a turbine.
- 1.11 This process needs to be carefully managed because of the energy released in the process. The process is controlled by the use of a “moderator”. All reactors have sufficient moderators to shut them down completely and fail-safes to ensure that this occurs in the event of any potential incidents. The early designs of nuclear power stations in the UK used graphite as a moderator. Later designs of nuclear power stations use water as a moderator. It is likely that any new nuclear power stations built in the UK would be water moderated.
- 1.12 The nuclear reactions that take place in nuclear power stations create a high level of radioactivity in the reactor. Radioactivity occurs naturally and is a normal part of our environment, but nuclear power stations create much higher intensities that require careful management while operating and after they have finished generating electricity.
- 1.13 The UK has strict, independent, safety and environmental protection regimes for nuclear power. The Nuclear Installations Inspectorate (NII), a division of the Health and Safety Executive (HSE), and the Environment Agency (EA) regulate nuclear power stations in England and Wales. Any new nuclear power station will be subject to safety licensing conditions and will have to comply with the safety and environmental conditions set by the regulators. NII and the EA are currently assessing two new nuclear reactor designs through the Generic Design Assessment (GDA) process.
- 1.14 Generating electricity by nuclear power creates radioactive waste, some of which remains potentially hazardous for thousands of years. The storage and disposal of this waste is an important part of the nuclear fuel cycle and needs careful long-term management. In June 2008 the Government published the White Paper on Managing Radioactive Waste Safely¹³. This set the framework for managing higher activity radioactive waste in the long term through geological disposal, coupled with safe and secure interim storage and ongoing research and development. Geological disposal involves isolating radioactive waste deep inside a suitable rock formation, to ensure that no harmful quantities of radioactivity ever reach the surface environment. The White Paper also invites communities to express an interest in opening up without commitment discussions with Government on the possibility of hosting a geological disposal facility at some point in the future.

¹³ <http://www.defra.gov.uk/environment/radioactivity/mrws/pdf/white-paper-final.pdf>

- 1.15 When a nuclear power station reaches the end of its life, it has to be dismantled (normally referred to as decommissioning). This process also needs careful management. While many parts of the power station are easily decommissioned, some parts will be radioactive because they were exposed to high levels of radiation. In the UK, the Nuclear Decommissioning Authority (NDA) is responsible for the existing nuclear legacy and is decommissioning 20 civil public sector nuclear sites.
- 1.16 Operators of new nuclear power will be required to have secure funding arrangements in place to cover the full costs of decommissioning and their full share of waste management and disposal costs.

New Nuclear Power Station Designs

- 1.17 The HSE and EA are undertaking a process of Generic Design Assessment (GDA) of new nuclear reactor designs. GDA allows the assessment of the generic safety, security and environmental implications of new nuclear reactor designs before an application is made for permission to build a particular design on a particular site.
- 1.18 Given the strategic level of information required for the SSA, and the information available at this early stage, it is not intended to consider the implications of different nuclear power station designs at each nominated site. It is considered that these are better addressed at the planning application stage. Therefore in order to appraise the sites the AoS has made a number of assumptions about the generic design characteristics of new nuclear power stations, which is discussed in more detail in the Main AoS Report.
- 1.19 To provide a standardised approach to the appraisal of the nominated sites, the assumptions about generic design characteristics have been summarised into a base-case. The base-case was used to guide the assessment for each site, except in cases where a nominator has provided further detail at variance to the base case. For example, if a nominator is proposing cooling towers instead of abstracting water for cooling, this has been considered in the assessment. The key assumptions used for the site level assessments are outlined in Table 1.2, with the variations considered in the Braystones AoS provided in the right hand column.

Table 1.2: Base Case Assumptions and Variations Considered for Braystones

Base Case	Variations considered in AoS of Braystones (as proposed in nomination)
1 nuclear reactor	
Technology neutral (i.e. unknown reactor type)	
A requirement for cooling water abstraction	
Discharges of cooling water	

Base Case	Variations considered in AoS of Braystones (as proposed in nomination)
Site boundary as indicated on nomination form	
<u>Timescales:</u> Construction: approximately 5-6 yrs Operation: approximately 60 years (life extension, which is subject to regulatory approval, could mean that the operating lifetime is longer) Decommissioning: approximately 30 years Lifetime of site: approximately 166 years ¹⁴	50 year operation 100 year decommissioning
<u>No. of employees:</u> Construction: approx 4,000 (around 50% from within region) Operation: approx 500 Decommissioning: range of 400 – 800 at key phases ¹⁵ Associated employment creation: 2000	
Coastal flood and protection measures (where relevant)	
Infrastructure for transporting reactor (for example, jetty, landing facility)	Marine Off-Loading Facility (MOLF) and inlet and outfall pipe-work will be required in the coastal areas, outside the boundary. Pipe-work will extend into the open sea for up to 3km if the direct cooling water option is utilised.
Interim radioactive waste storage facilities will be capable for at least 160 years	
Highway improvements, access routes	
Associated transmission infrastructure	
Radioactive discharges will be within legal limits	

¹⁴ The site lifetime of 166 years assumes 6 years for construction, 60 years for operation and 100 years for interim storage of spent fuel after the last defueling. It is possible to envisage a scenario in which onsite interim storage might be required for around 160 years from the start of the power station's operation, to enable an adequate cooling period for fuel discharged following the end of the power station's operation. In making its assessment that onsite interim storage might be needed for 160 years, the Government took a conservative approach, to ensure that local communities are aware that it is possible that onsite interim storage might be required for this length of time. Following the public consultation, the Government has revised its position. The Government recognises that onsite interim storage might be required beyond 2130, particularly in the event that a GDF is not available to take the waste, but the Government does not expect onsite interim storage to be required for as long as 160 years. Further detail is set out in The Government Response to the consultation on the draft National Policy Statements for Energy, DECC, 2010, www.energynpsconsultation.decc.gov.uk

¹⁵ Estimates for existing nuclear power stations entering the decommissioning phase indicate up to 800 full time equivalent staff for defueling, then a minimal workforce (less than 50) during the care and maintenance phases, and a second peak of up to 600 for the final demolition and site clearance (source: <http://www.nda.gov.uk/sites>)

2 The Site: Braystones

- 2.1 The site at Braystones is located in the North West Region of England, in a coastal location north of the village of Braystones, less than 4kms north west of the existing Sellafield facilities. The location of the site is illustrated in Figure 1. Figure 2 shows the location of the site in a sub-regional context to help address any implications for cumulative effects on biodiversity and on socio-economic factors.
- 2.2 The site covers an area of approximately 75 hectares, north of the Tarnside Caravan Park, west of the River Ehen, south of Silver Tarn, Hollas and Harnsey Mosses Site of Special Scientific Interest (SSSI), and east of the Cumbrian Coastal Railway. The nomination also identifies a requirement for both a Marine Off-Loading Facility (MOLF) and inlet and outfall pipe-work, which will be required in the coastal area outside the boundary shown in Figure 1 and potentially extending into the sea for up to 3km.
- 2.3 The wider area has supported the nuclear industry since 1947 when work commenced on the construction of Windscale Piles at the Sellafield Nuclear Licensed site, located approximately 3km to the south east. The existing complex at Sellafield is owned by the NDA and managed and operated by Sellafield Ltd, a wholly owned company of Nuclear Management Partners Ltd, under contract to the NDA. It is a complex and compact nuclear site, with activities centred on remediation, decommissioning and clean up of the historic legacy. It also includes the Thorp and Magnox reprocessing plants, the Sellafield MOX plant and a wide range of waste management and effluent treatment facilities. Calder Hall reactor 1, the world's first commercial nuclear power station, began generating electricity in 1956, ceasing operation in 2003. Windscale Advanced Gas Cooled reactor operated between 1963 and 1981. The complex currently employs approximately 12,000 full-time staff; with an estimated 4,000 other jobs dependent on the site.
- 2.4 The nomination is for a nuclear power station development incorporating:
- at least one nuclear reactor
 - improvement of coastal defences and/or land raising to protect the site from flooding
 - construction stage areas and facilities
 - infrastructure and facilities related to the operation of a nuclear power station including a marine off-loading facility and cooling water infrastructure
 - interim waste storage facilities
- 2.5 The site at Braystones was nominated into the SSA process, in respect of which nominations closed on 31 March 2009. The Government is also assessing the environmental and sustainability impacts of including the site in the list of potentially suitable sites in the revised draft Nuclear NPS (through this AoS Site Report).

- 2.6 The SSA required the site nominator to supply an annotated Ordnance Survey map at 1:10,000 scale showing the boundary of the site, which is provided in Figure 3.

3 Policy Context

Introduction

- 3.1 The Main AoS Report sets out the national policy context in relation to nuclear power stations, energy, climate change mitigation, use of natural resources, environmental protection and sustainability of communities. During the scoping¹⁶ stage, a review of national plans was undertaken to help identify key sustainability objectives that need to be met and contribute to the development of the AoS Framework of objectives for appraisal.
- 3.2 This section considers the policy context at the regional level relevant to the potential new nuclear power station at Braystones and its surroundings. It aims to identify any key significant policy objectives that need to be considered for this strategic appraisal of the site. This also contributes to addressing the potential interactions and cumulative effects that may arise from the development and operation of a new nuclear power station on the site. This is covered in Section 5 of the Site AoS Reports and Section 8 of the Main AoS Report.

What are the other Key Sustainability Objectives that need to be considered?

- 3.3 The relevant policy documents are reviewed in Appendix 3 of this report and are as follows:
- Regional Spatial Strategy for the North West 2008 - 2021, Government Office for the North West (September 2008)
 - Regional Economic Strategy for North West England , Northwest Regional Development Agency (2006)
 - North West Climate Change Action Plan 2007 – 2009 (2007)
 - Cumbria Biodiversity Action Plan, UK Biodiversity Action Plan (2001)
 - Walney Island to St Bees Head Shoreline Management Plan, North West and North Wales Coastal Group (2000)
 - Sustainable Communities in the North West, Office of the Deputy Prime Minister (2003)
 - Regional Waste Strategy for the North West, North West Regional Assembly (2004)
 - River Basin Management Plan for the North West, Environment Agency (2009)
 - Strategic Flood Risk Assessment, Jacobs for Copeland Borough Council (August 2007)
 - North West and North Wales Shoreline Management Plan 2, North West and North Wales Coastal Group

¹⁶ BERR (March 2008) Scoping Report

3.4 The key objectives for sustainability from these regional policy documents can be summarised as follows:

- Enhancing biodiversity and protecting internationally important species/habitats
- Mitigating and adapting to effects of climate change
- Reducing flood risk and improving coastal defences
- Protecting and enhancing landscape, recreation, cultural heritage
- Recovering rural economy: agriculture, tourism, employment
- Improving sustainable transport and accessibility
- Increasing recycling and improving waste management
- Protecting water quality and resources
- Accommodating increased population growth
- Increasing provision of affordable homes
- Improving quality of life: employment, health and crime

3.5 The plans that are still in place may have indirect and/or cumulative interactions and this is discussed further in Section 5 Interactions and Cumulative Effects with Other Plans and Projects.

4 Site Characterisation

Introduction

- 4.1 A general description of the site at Braystones and its location is provided in section 2.
- 4.2 This section describes the general characteristics of the site at Braystones and its surrounding area relative to the key sustainability themes identified in section 3. Information regarding the local and regional environment and communities has been obtained and reviewed from publicly available sources and comparisons have been made with equivalent regional and national data sources where relevant and available. This information is summarised in Appendix 4. Key strategic networks for transport are shown in Figure 2 and key environmental constraints in Figure 4.
- 4.3 The Scoping Report identified the indicators used for baseline data collation at the national scale (used in the Environmental Study). It also set out the indicators to be used for each Site AoS following the nomination of sites, but recognised that the baseline data collation process would be refined at the site nomination stage. Therefore, following site nominations, the relevant national, regional and local data has been sourced. This has enabled a more detailed, but still strategic, assessment to be undertaken than at national SEA scoping. As this AoS is a strategic study, data that would typically be collated to inform an EIA (i.e. very site-specific data or data requiring the execution of surveys) has not been gathered. However, where relevant, information from available published reports of any previous detailed studies has been referenced to inform this strategic assessment. The scope of baseline data gathered for the AoS for Braystones is presented in Table 4.1 below.

Table 4.1: Summary of Scope of Baseline Data Collated for Braystones

Sustainable Development Theme	Scope of baseline data collated in this AoS
Air Quality	<ul style="list-style-type: none"> • Regional air quality index • Location of Air Quality Management Areas
Biodiversity and Ecosystems	<ul style="list-style-type: none"> • Location and description of Special Protection Areas, Special Areas of Conservation, Ramsar sites, Sites of Special Scientific Interest, National Nature Reserves, Local Biodiversity Action Plans, Legally Protected Species
Climate Change	<ul style="list-style-type: none"> • Regional precipitation and temperatures • Greenhouse gas emissions – regional, county and local

Sustainable Development Theme	Scope of baseline data collated in this AoS
Communities and Supporting Infrastructure: Population Employment Community Viability Transport Waste and Minerals Energy	<ul style="list-style-type: none"> • Location of major settlements and areas of population • Age structure of population • Employment/unemployment and economic activity rates • Employment profile by industry • Socio-economic classification of population • Energy from low-carbon/ renewable resources: regional • Transport network and links • Landfill sites and waste management facilities
Human Health and Well-Being	<ul style="list-style-type: none"> • Index of Multiple Deprivation • Age profile • General health • Life expectancy • Infant mortality • Proximity to medical services
Landscape and Cultural Heritage	<ul style="list-style-type: none"> • Location and description of National Parks, Areas of Outstanding Natural Beauty, Heritage Coasts • National landscape Character Areas • Local landscape character areas / types • CPRE Tranquil Areas and Light Pollution mapping • Location and description of World Heritage sites, Scheduled Monuments, Historic Battlefields, Historic Parks and Gardens, Designated Protected Wrecks, Conservation Areas, Listed Buildings.
Soils, Geology, Land Use	<ul style="list-style-type: none"> • Agricultural land classification • Soil types • Geological SSSIs • Geological risks • Environmental hazards • Historic land use
Water Quality and Resources: Hydrology Quality Resources Flood Risk	<ul style="list-style-type: none"> • Location of areas at risk of flooding • State of surface and ground waters: in river basin district and catchment • Predicted water demand and availability by Water Resource Zone • Designated waters under EU Directives

Air Quality

- 4.4 Air quality in the North West is generally good. Emissions to air from major industrial sites have reduced substantially, however emissions from traffic sources (major route corridors and areas of congestion) are continuing to cause pressure on local air quality across the region¹⁷.
- 4.5 There are 47 Air Quality Management Areas (AQMAs) declared in the North West Region of England, the majority of which serve to control emissions of nitrogen dioxide and particulate matter from traffic. The site lies within the area of Copeland Borough Council and no AQMAs have been declared within this council area.¹⁸
- 4.6 The average number of days with moderate or higher air pollution in 2006 rose from 2005 levels, and was slightly higher than the average for urban sites in England, but lower than the England rural average. The increase correlates with hot, sunny weather experienced during these years, causing the production of elevated levels of ozone.
- 4.7 Traffic in the region increased by 15% between 1995 and 2005, leading to air quality problems from major route corridors, and particularly congestion areas, and at peak travelling times. Continuance of this trend will add further pressures on meeting air quality objectives.
- 4.8 The Environment Agency (EA) assesses that non-radioactive aerial emissions (sulphur dioxide, nitrogen oxides and volatile organic compounds) from nuclear power stations are extremely low compared to other regulated industries. The EA's most recent available assessment of radioactive aerial emissions for regulated nuclear power stations indicates that all fall within authorised limits.¹⁹

Biodiversity and Ecosystems

- 4.9 The biodiversity interest around the site includes a number of European designated sites and nationally designated Sites of Special Scientific Interest (SSSI). Further information on the European designated sites and their current condition is given in the separate HRA Report for Braystones.
- 4.10 The biodiversity interest within 10km of the site includes two European designated sites and 11 Sites of Special Scientific Interest (SSSI); Silver Tarn, Hollas and Harnsey Mosses SSSI, Low Church Moss SSSI, Hallsenna Moor SSSI, St Bees Head SSSI, Florence Mine SSSI, Haile Great Wood SSSI, Clints Quarry SSSI, River Calder Section SSSI, Drigg Coast SSSI, Black Moss SSSI and River Ehen (Ennerdale Water to Keekle Confluence) SSSI.

¹⁷ Environment Agency: State of the Environment – North West [online] available:

<http://www.environment-agency.gov.uk/research/library/publications/34061.aspx> [accessed 04 March 2009]

¹⁸ UK Air Quality Archive (online) available:

<http://www.airquality.co.uk/archive/laqm/laqm.php> [accessed 03 March 2009]

¹⁹ Measuring Environmental Performance: Sector Report for the Nuclear Industry (Environment Agency, Nov 2005)

Although none are located within the site boundary, all of these sites could potentially be affected by the development.

- 4.11 Silver Tarn, Hollas and Harnsey Mosses SSSI is located immediately adjacent to the site, to the north west. It comprises three separate but related features (over four units) and noted for its wetland habitats. The three closest units are described as in 'favourable' condition, the fourth as 'unfavourable'. Low Church Moss SSSI is located approximately 1.5km to the south-east.
- 4.12 Drigg Coast Special Area of Conservation (SAC) is situated approximately 7km south-east of the site. This is a significant estuarine area with extensive coastal sand dunes that support great crested newts and natterjack toad, both European protected species. The River Ehen SAC situated approximately 4.5km to the north supports important populations of freshwater pearl mussel and Atlantic salmon.
- 4.13 Legally protected species within the area include great crested newts, with records for natterjack toad, otter, red squirrel and common species of reptile falling within 10km. Nationally important invertebrate species and rare and uncommon plants are also known to occur.
- 4.14 The River Derwent and Bassenthwaite SAC is located 15km to the north and Wast Water SAC 13km to the east of the nominated site. Both SACs are located within the same catchment area as the nominated site.

Climate Change

- 4.15 The potential effects of climate change on the site, such as storm surges, coastal erosion, sea level rise and flooding, are explored in the sections on Flood Risk.
- 4.16 Cumbria has a large land mass and a sparse population. Rural populations are heavily reliant on travelling by car as the primary source of transport, and in the more rural areas of the county there is dependence on oil and coal for domestic heating. These factors make Cumbria a significant emitter of CO₂ per capita. Cumbria has the highest per capita greenhouse gas emissions (CO₂ equivalent) of the 5 sub regions in the North West region. Cumbria is also the only sub-region where transport is the largest contributing sector contributing to carbon emissions, representing 28% of the total.²⁰
- 4.17 The North West is the second largest emitter of carbon dioxide in the UK
- 4.18 The Cumbria Strategic Partnership has signed up to the Local Area Agreement indicator NI 186 to reduce per capita CO₂ emissions across Cumbria as a whole by 11.5% by 2010/11, which equates to savings of 619,000 tonnes CO₂ per year.

²⁰ NWRA Energy and Greenhouse Gas Emissions study, Aug 2007

- 4.19 Within an 80km radius of the site there are three power stations with a combined capacity of 2.6 GW. The majority (2.4 GW) of this is generated by the two nuclear power stations, Heysham 1 and 2.

Communities: Population, Employment and Viability

- 4.20 Population in the North West of England has decreased slightly over the past 25 years and there are now more than 7 million residents, the third most populated English Government Office region behind the South East and London²¹. According to the Office for National Statistics, the region's population fell between 1981 and 2006 by 1.3%.
- 4.21 The region's population is also ageing, with only three districts in the North West forecast to see a reduction in the population aged 65 years and over (Liverpool, Manchester and Salford)²². Copeland Borough, where the site is located, currently has a population aged 65 years and over, which is only slightly above that of the North West and England and Wales as a whole.
- 4.22 Employment rates for people of working age in the North West are similar to those of the UK as a whole. From July 2007 to June 2008, 74.1% of the population of the Copeland Borough Council area was employed compared with 72.1% for the North West of England and 74.5% for England as a whole.
- 4.23 Around 50% of the jobs in the district depend on the existing facility at Sellafield. This includes jobs within the facility itself, as well as those which rely on the facility. Within the North West Region, there has been a decline of around 3,500 manufacturing jobs in recent years. The decline of these manufacturing jobs has historically been masked by continued recruitment at Sellafield.

Communities: Supporting Infrastructure

- 4.24 Transport: The strategic road transport routes in the vicinity comprise the A595(T) to the north and the A595 to the south, and the A66(T) that links the A595(T) with the M6. The A595 and A66 have been recently improved. The site is accessed from the A595 by the B5345 Cop Lane and unclassified roads or via other unclassified roads from the A595 through the village of Beckermat: Morass Road, Mill Lane, Nursery Road and Braystones Road. The A595(T) is part of the Strategic Road Network but is not part of the Trans-European Network (TEN). The M6 is the closest road of national significance but is some 50km away. The motorway can be accessed via the A595(T) at junction 43, the A66 at junction 40 and the A590 and junction 36. Access using the A66 is through the Lake District National Park and Keswick, and access using the A590 is via Broughton-in-Furness along winding roads.
- 4.25 The Cumbrian West Coast railway and Braystones Station is immediately adjacent to the site. The railway currently provides transport for nuclear materials to the existing facilities at Sellafield. .

²¹ http://ec.europa.eu/budget/reform/library/contributions/pgs/20080415_PGS_65.pdf

²² An Aging Population: Impacts for the North West (Summary Document) (www.ageconcern.org.uk)

- 4.26 The nearest shipping links are located in Barrow, to the south.
- 4.27 Conventional waste²³: Cumbria County Council acts as the Waste Disposal Authority (WDA) for Copeland Borough Council. In 2006/07, 351,403 tonnes of municipal wastes were generated within the area. Of this total, 68% was sent to landfill, and the remaining 32% recycled. A relatively insignificant proportion (25 tonnes) was incinerated during this period.²⁴
- 4.28 The County Council is currently in the process of procuring a Mechanical and Biological Treatment (MBT) waste treatment plant for sites at Carlisle and Barrow (contract currently approved). Two MBT plants will be provided for the region, with a treatment capacity of 70,000 tonnes of waste each.²⁵
- 4.29 There are currently three non-hazardous landfill sites in the region. No detailed information exists as to their projected capacity. There are currently no hazardous waste landfills or treatment facilities in the Cumbrian region, although established waste management contractors are known to operate and provide services within the region.²⁶

Human Health and Well-Being

- 4.30 The site is within the Super Output Area (SOA) known as Copeland 007A²⁷. Indices of deprivation show that is a deprived area with barriers to housing and services being a particular problem. The age profile for Copeland SOA shows that there are significantly less children under sixteen and significantly more senior citizens (males over 65 and females over 60) than the English average. The profile also shows that there are slightly fewer working age people than average.
- 4.31 The most recent census (2001) found that people within the Copeland SOA generally reported good or fairly good health although the number reporting poor health was slightly higher than the English average. Other health statistics show a mixed picture in that life expectancy for males and females is slightly less than the English average, but infant mortality is comparable with the national average though higher than the regional average.
- 4.32 With regard to mental health, the Health Profile 2008²⁸ for Copeland shows that estimates of the number of people claiming incapacity benefit for mental illness in the area (35.9 per 1000 population) are higher than the English average (27.5 per 1000 population).

²³ Conventional waste means waste controlled under Part II of the Environment Act 1990

²⁴ Department for Environment, Food and Rural Affairs. Municipal Waste Management Statistics [online] available:

<http://www.defra.gov.uk/environment/statistics/wastats/bulletin07.htm>

²⁵ Urban Mines Municipal Waste Procurement webpage:

<http://www.urbanmines.org.uk/?i=1459&s=1111>

²⁶ A Joint Municipal Waste Management Strategy for Essex (2007 to 2032)

<http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/dis/gui.jsp?channelOid=16959&guideOid=43565>

²⁷ An SOA is a geographical unit, of roughly equivalent population size and smaller than a district council area, created in the UK by the Office of National Statistics to aid statistical analysis of data

²⁸ <http://www.apho.org.uk/resource/view.aspx?RID=50213>

- 4.33 Contrary to the deprivation referred to above, pupils in the Copeland Borough Council area perform better in their GCSE equivalent examinations than their peers in the rest of England.
- 4.34 As might be expected from the deprivation of the area referred to above, there are slightly more unfit houses²⁹ in Copeland Borough Council's area than either the North-west region or England as a whole.
- 4.35 Figures from the Audit Commission for 2005³⁰ suggest that the crime rate in Copeland Borough Council is lower than national average.
- 4.36 The economic well-being of the area is reasonably positive as can be seen from the local employment figures³¹ (see 'Communities: Population, Employment, Viability' above - noted here as a measure of economic well-being). From July 2007 to June 2008, 74.1% of the population of the Copeland Borough Council area were employed. However, this number compares unfavourably with figures for the North West of England region (72.1%) but is similar to England as a whole (74.5%).
- 4.37 Local access to medical services is reasonable with four general practitioner (GP) practices listed within 8km of the site. The nearest local hospital, with an accident and emergency department, is the West Cumberland Infirmary in Whitehaven (approximately 10km). Acute mental health in-patient units are available in Whitehaven, Carlisle, Kendal, and Barrow-in-Furness.
- 4.38 One of the wider determinants of health and well-being is access to local recreational facilities. In this regard, the site is not particularly well served, with only one leisure centre within 20km of the site. However, Copeland, being a rural and coastal location, offers good potential for outdoor recreational activities, such as walking, cycling and water sports since the surrounding area includes the Lake District National Park and a number of local beaches.
- 4.39 A nuclear power station on the nearby Sellafield site, located approximately 2km to the south-east, has been in operation since 1956. Therefore the necessary data exist to enable a comparative study between the incidence of cancer in the area and the average incidence of cancer in the UK population as a whole.
- 4.40 The Committee on Medical Aspects of Radiation in the Environment (COMARE), a scientific advisory committee providing independent authoritative expert advice on all aspects of health risk to humans exposed to natural and man-made radiation, has, for over twenty years, investigated the incidence of childhood cancer and other cancers around nuclear sites starting with the Sellafield site in 1986.

²⁹ Dwellings not suitable for occupation as defined by various criteria in Section 604 of the Housing Act 1985 (as amended)

³⁰ [http://www.areaprofiles.audit-commission.gov.uk/\(rkqonp45u4sp1o55bc5scf55\)/SingleAreaSearch.aspx](http://www.areaprofiles.audit-commission.gov.uk/(rkqonp45u4sp1o55bc5scf55)/SingleAreaSearch.aspx)

³¹ <https://www.nomisweb.co.uk/reports/lmp/la/2038431858/report.aspx?pc=IP164UR>

- 4.41 COMARE has published a series of reports on topics related to exposure to radiation. Its view is that there is no evidence for unusual aggregations of childhood cancers in populations living near nuclear power stations in the UK.
- 4.42 COMARE's tenth report considered the incidence of childhood cancer around nuclear installations. These were divided into nuclear power generating stations and other nuclear sites. The results for the power generating stations supported the conclusion that *'there is no evidence from this very large study that living within 25 km of a nuclear generating site in Britain is associated with an increased risk of childhood cancer'*.
- 4.43 In its eleventh report COMARE examined the general pattern of childhood leukaemia in Great Britain and concluded that many types of childhood cancers *'have been shown not to occur in a random fashion'*. It is also stated that *'The results of analyses ... suggest that there is no general clustering around nuclear installations.'*
- 4.44 Following the KiKK study on childhood leukaemia around German nuclear power plants, COMARE requested that a reanalysis of the UK childhood cancer data used in COMARE's tenth report be carried out using the same methodology as the KiKK study as far as possible. This reanalysis - the Bithell paper - was published in December 2008. It showed that the conclusions of the COMARE tenth report remained valid when applying the KiKK methodology and did not support the findings of the KiKK study.
- 4.45 The KiKK study gave the results on childhood cancer in the vicinity of 16 German nuclear power plants from a dataset established by the German Childhood Cancer Registry, which included over 1500 childhood cancer cases from 1980 to 2003. In comparison, the dataset used for COMARE's tenth report and the subsequent Bithell paper contained over 32,000 cases of childhood cancer from 1969 to 1993. This is a verified national database and is believed to be the largest national database on childhood cancer in the world. The size of the database used by COMARE therefore gives considerable confidence in the results of the tenth report.
- 4.46 COMARE is currently undertaking a further review of the incidence of childhood cancer around nuclear power stations, with particular reference to the KiKK study and COMARE's 10th and 11th reports. This will be published as COMARE's 14th report later this year.
- 4.47 Radioactive monitoring carried out in 2008³² found generally low concentrations of artificial radionuclides attributable to the former Calder Hall nuclear power station in water, sediment and beach samples and in meat and seafood samples taken from around the nominated site. However, the presence in the area of other nuclear activities (two fuel reprocessing plants, decommissioning and clean-up, manufacture of mixed oxide fuel and waste treatment and storage) makes the apportioning of radiological effects in the

³² Food Standards Agency (2008). Radioactivity In Food and the Environment (RIFE 14) report.

area very difficult. In addition, a significant proportion of the radiation dose arises from enhanced concentrations of naturally occurring radionuclides from former non-nuclear industrial activity in the Sellafield area, for example, from the legacy of past discharges from a phosphate processing works in Whitehaven³³. Nevertheless, from this sampling, the estimated total dosage levels to the public from all sources within the Sellafield area were assessed as being less than 47% of the dose limit for members of the public of 1mSv per year as specified in The Ionising Radiations Regulations 1999.

Cultural Heritage

- 4.48 There are no designated sites or structures of cultural heritage value within the site, although there are a number within 1km. The nearest are the Scheduled Ancient Monument associated with St. Bridget's churchyard which is located approximately 750m to the east, and the Grade II Braystones Tower, located approximately 500m to the south. The closest Grade I Listed Building is Egremont Castle, located over 3km to the north. The site is within an area that contains potential historic landscape and Prehistoric archaeology, with a five findings of flint remains recorded within the boundary.
- 4.49 The nearest Conservation Area is the Beckermest Conservation Area, approximately 850m to the east.

Landscape

- 4.50 The site is situated within the West Cumbria Coastal Plain National Character Area, which is characterised by open agricultural landscapes with extensive views to the higher fells in the east. The site is in a more open part of the coastal plain. This coastal belt area as a whole has a strong industrial history and some extensive urban fringe areas. There are large highly visible factories and manufacturing and processing plants, particularly near Workington, Whitehaven, Sellafield and Barrow.
- 4.51 At a local level, the site sits within the low farmland landscape character area. The landscape character of the site and its surroundings are recognised as being of county importance. This landscape is a mix of undulating and rolling topography with intensely farmed agricultural land and patches of woodland and tree belts. Woodland is uncommon in the western coastal areas. Fields are large with rectangular boundaries comprising hedgerow trees, fences and hedges. Views are affected by some existing pylons.
- 4.52 The existing nuclear facility at Sellafield to the south and its associated infrastructure, is a dominant feature of this area of coastline and is visible from the surrounding hills and from the Isle of Man. The boundary of the Lake District National Park is approximately 3km to the east of the site and the St. Bees Heritage Coast lies 7km to the north. The Lake District National park may potentially be nominated as a World Heritage site.

³³ RIFE Report (www.food.gov.uk/multimedia/pdfs/publication/rife2008.pdf)

- 4.53 The nearby transport infrastructure and other development means that the site does not lie within the most tranquil parts of the region, as shown by the Countryside Agency/CPRE tranquillity map.

Soils, Geology and Land Use

- 4.54 The site at Braystones is located on Grade 4 land that is not of high value for agriculture. The soils are noted to be freely draining slightly acid sandy soils of low fertility. The local surface geology comprises alluvium, till, river terrace deposits (undifferentiated) and glaciofluvial deposits from the Devensian Stage of glaciation, underlain by sandstones of the Calder Formation and St Bees Formation.
- 4.55 Land use in the area is predominantly agricultural, with tourism/leisure land uses located immediately adjacent to the south west, in the form of Tarnside Caravan Park. The Cumbrian Coastal Way also passes along the seaward side of the nomination site. The nearest industry land use is the existing nuclear facility at Sellafield, located to the south east.
- 4.56 There are no current or historical landfill sites within 1km of the site.
- 4.57 No mineral abstractions have been identified locally.
- 4.58 British Geological Society (BGS) has assessed geological risks in the local area, which include:
- Potential for shrinking or swelling clay ground stability hazard - very low risk
 - Potential for compressible ground stability hazards - moderate risk
 - Potential for landslide ground stability hazards - very low risk
 - Potential for running sand ground stability hazards - very low to low risk

Water Quality and Resources

- 4.59 The site is located in the North West River Basin District (RBD). Within this RBD, only 20% of rivers (by length) meet the requirements for good ecological status (GES) or good ecological potential (GEP). Of the 477 river water bodies in the RBD, 42% are candidate heavily modified or artificial water bodies.
- 4.60 Of the eleven estuaries/transitional water bodies within the RBD, only four have been assessed and these are classified as moderate. For the eight coastal water bodies in the RBD, only three have been classified, all as moderate. Of the 157 lakes and reservoirs, 40% are candidate heavily modified or artificial water bodies; 50% of these water bodies have not been assessed. Of the 12 identified transitional (estuary) water bodies, 9 are candidate heavily modified bodies, while for the 8 identified coastal waters, 6 are considered to be candidate artificial or candidate heavily modified bodies. The European Water Framework Directive sets a target of achieving good

ecological and chemical status for all water bodies by 2015, therefore significant improvements in water quality in the RBD are required.

- 4.61 The site is located on the Cumbria Coast, which is classified as moderate ecological status. It is also within the South West Lakes Catchment, which is nested within the NW RBD. Currently 26% of surface water bodies in this catchment are achieving either GES or GEP.
- 4.62 The nearest watercourses to the site are the River Ehen and the Kirk Beck. The River Ehen has good ecological quality and high chemical quality. The Kirk Beck has moderate ecological quality, but chemical quality has not been assessed.
- 4.63 There are no identified Shellfish Waters in close proximity to the site. The nearest identified Bathing Waters are at Seascale, 5km down the coast to the south-east.
- 4.64 22% of groundwater bodies in the RBD meet the requirements for good status. The groundwater body over which the site is located is the West Cumbria Permo-Triassic Sandstone, which is classified as good status for both quantity and quality.
- 4.65 No groundwater source protection zones are located in the immediate vicinity of the site.
- 4.66 The site is located within the Derwent, West Cumbria and Duddon Catchment Abstraction Management Strategy (CAMS) area. Within this CAMS area there are a large number of watercourses and waterbodies designated for their environmental importance, including the River Ehen, Wastwater, the River Derwent and Bassenthwaite. The rivers are designated for several species and associated habitats, including lamprey, otter, salmon, pearl mussel and water crowfoot. Wast Water is designated because it provides a special low-nutrient habitat.
- 4.67 The site is located within the South West Lakes catchment which is nested in the NW RBD. This is a mainly rural catchment, lying within the Lake District National Park. Much of the catchment consists of designated SAC and Sites of Special Scientific Interest (SSSI).
- 4.68 The River Ehen Water Resource Management Unit (WRMU) is classified as “over licensed” as a target status to 2019, with a strategy to address this based on reducing full licensed quantities. The nearby River Calder WRMU is also classified as “over licensed” to 2013, with a target status of “no water available” by 2019.
- 4.69 The site is also located on the West Cumbria Groundwater Management Unit. This is classified as “water available” to 2013, moving to “no water available” by 2019. There is no known use made of groundwater resources in the vicinity of the site.

- 4.70 The site is located within United Utilities' supply area and in the West Cumbria Water Resource Zone (WRZ). The WRZ is predicted to be in deficit through to 2032. There are plans to address this deficit by the implementation of leakage reduction and the proposed South Egremont groundwater scheme by 2014.
- 4.71 The exact water requirements for the site are not yet finalised. The nominator does not express a preference for a particular cooling process or cooling water source.
- 4.72 In terms of coastal hydrodynamic and morphology, the site at Braystones falls within the coastal cell from St Bees Head to Drigg and comprises of a multiple headland-bay system. This is a macro-tidal environment and tidal current action is the dominant process along this coastline. Tidal residual currents are directed from the west at St Bees Head and from the North West for the remainder of the coastline.
- 4.73 The geometry of the Irish Sea and the dominant west to south-westerly direction of prevailing winds and waves tends to keep sediment close up against the coastline offering a measure of protection against erosion. There is a strong, wave driven, northward longshore drift along the coast north of St Bees Head towards the Solway Firth, which helps maintain the spit at Grune point.
- 4.74 The site is characterised by a barrier beach backed by till cliffs. The Shoreline Management Plan (SMP) (Phase 1) describes the coastal processes active at the site as a projected progressive retreat of the coast at 0.2 to 0.5m/year until it is prevented by coastal defences associated with the Cumbria Coastal Railway. Such a situation would result in gradual loss of much of the fine beach material and steepening of the beach. It is further expected that storm events may then result in increased draw-down of material, resulting in increased vulnerability of the existing coastline to gradual erosion. In terms of coastline movement, the section of coastline is described at present by the SMP as experiencing 'No Movement'.

Flood Risk

- 4.75 The Braystones site is situated in a coastal location with its south-western boundary separated from the Irish Sea by cliffs and the embankment of the Cumbrian Coastal Railway, which is at an elevation lower than the site. The site lies at elevations 20m to 30m above Ordnance Datum and contains no main rivers or significant watercourses. The River Ehen, to the east, is at an elevation approximately 5m below that of the site.
- 4.76 Long term sea-level change is the result of a combination of global change in sea level (1.5mm to 2mm / year) and local change in land levels. The British Isles is slowly tilting with northern Britain rising and southern Britain subsiding. This tilting occurs because of isostatic uplift of the earth's crust following its depression under the weight of the ice sheet at the end of the last glaciation. The 'line of zero' change runs only a short distance to the south of Morecambe Bay, so the uplift tends to cancel out any rise in sea level.

However, climate change also means a possible increase in storminess, which will subject the coastline to increased wave activity and storm surge effects. Coupled with an accelerated rise in sea level that is greater than current predictions, climate change will impact on the open coastline by causing an increase in coastal erosion and increased risk to coastal flooding.

- 4.77 The coast at Braystones is undefended and comprises a shingle beach with an upper crest/berm upon which a number of residences have been constructed and lower sand/scar beach. Approximately 10m above the crest/berm is the earth embankment on which the railway line sits. The railway embankment has further localised protection with defensively placed rock armour and railway sleepers. Inland, the land rises a further 5 to 15m. Other more formal defences to the railway line include concrete revetments, rock armour revetments and masonry revetments of varying condition. The crest of the beach is used as access to nearby residential properties and is considered to be compacted.
- 4.78 The site is located entirely within Flood Zone 1 'Low Probability', but is bounded along the coastline by Flood Zone 2 'Medium Probability' as well as to the east, associated with the River Ehen, as indicated on the Environment Agency Flood map.

5 Appraisal of Sustainability

Introduction

- 5.1 This section considers the potential sustainability effects of including the site at Braystones in the list of suitable/potentially suitable sites in the revised draft Nuclear NPS. Whilst the Main AoS Report considers the sustainability effects that may arise from the construction of nuclear power stations in general, the site-level appraisal of sustainability looks specifically at the sustainability effects that could occur from constructing a new power station at Braystones, should the nominated site be listed as potentially suitable in the revised draft Nuclear NPS and should an application for development consent be successful.
- 5.2 In accordance with the strategic nature and intent of the AoS, this section focuses on potential effects that are considered to be strategically significant at the Braystones site and, where possible, suggests possibilities for mitigation. Where mitigation is uncertain or difficult, or where effects are likely to remain even after mitigation, this is made clear. Strategic significance is defined in Table 5.1 below.
- 5.3 The findings of the appraisal were used to help the SSA process to identify those sites that are potentially suitable for new nuclear power stations and will be listed in the revised draft Nuclear NPS. The detailed matrices are presented in Appendix 2 of this report and the key findings of the appraisal are discussed in Sections 5 and 6 of this report.

Table 5.1: The Assessment of Potential Significance in the Site-Level AoS

Local Effects
<p>The AoS Site Reports identify potentially significant benefits and disbenefits of locating a new nuclear power station at each of the nominated sites. Some of the effects identified are significant at the local level and are more appropriately addressed through the development consent process to the IPC. Applications for development consent will include EIA undertaken by the developer. Such local effects may include, for example, an adverse effect on a County Wildlife site or disturbances to local communities arising from increased construction traffic during the construction phase. Effects of local significance are discussed in the detailed appraisal matrices set out in Appendix 2 of this AoS Report and are available to inform the IPC and others of issues that are likely to arise at the next stage of the planning and assessment processes.</p> <p>As with any major infrastructure project, there are likely to be effects during construction that have the potential for nuisance³⁴ and disturbance to local communities, demands on local services and supporting community infrastructure, and the risk of pollution and/or damage to environmental assets, such as biodiversity and water. The significance of such effects will be investigated through the EIA process. These effects can be minimised and controlled through careful design, working in accordance with good site practices, and managed through the use of Construction Environmental Management Plans, which will be agreed with, and monitored by, the environmental regulators and planning authorities.</p>
Strategic Significant Effects
<p>Other identified adverse or beneficial effects are more significant strategically, as they are potentially of wider national, or even international, importance. These may include, for example, an effect on biodiversity of national and international value. Where an effect is considered to have significant implications for the wider region (in this case, the North West), for example, a benefit for the regional economy, this has been considered as a strategically significant effect. Effects that are primarily of concern at the local or district scale have not been considered in this category. The significance of the potential strategic effects identified for each stage of the nomination, construction, operation and decommissioning, is summarised in Table 6.2.</p>

Air Quality

- 5.4 There is potential for air quality impacts during the construction, operation and decommissioning stages of developing new nuclear power stations. However, relative to some other forms of power generation, nuclear power plants do not emit significant quantities of carbon dioxide, sulphur dioxide, nitrogen oxides

³⁴ During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and for infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. For statutory nuisance effects section 4.21 of EN-1 applies.

or particulates. Therefore, significant air pollution leading to deterioration in local or regional air quality is unlikely to arise during normal operation of the new nuclear power station. Construction and decommissioning impacts are potentially more problematic and will require control and management.

- 5.5 The construction of a nuclear power station on the site is likely to have some localised adverse effects on air quality in the short term (5-6 years), including dust and emissions from construction vehicles, HGVs, and traffic movements generated by the construction workforce. This has the potential to affect residential properties along local access/haul routes in the immediate surrounding area. Similar local impacts may arise during the decommissioning phase of the project, at the end of the plant's operational life.
- 5.6 During operation, the traffic generated by the operational workforce has the potential to create longer-term adverse effects on air quality. Traffic and air quality assessments will be undertaken as part of the detailed EIA process, and likely mitigations may include highway improvements, traffic and construction management plans and the use of rail and port facilities where possible.
- 5.7 Whilst important at a local level, impacts on air quality arising from construction and increased traffic movements during operation and decommissioning are not considered to be of strategic significance. There is a very low risk that increased concentrations of airborne pollutants or nutrients could have an adverse effect on adjacent sites of nature conservation interest. This is discussed further in the Biodiversity and Ecosystems sections.
- 5.8 Radioactive releases to air, which could have a detrimental effect on local and regional air quality (in the event of a significant release), are strictly controlled in accordance with limits laid down in authorisations issued under the Environmental Permitting (England and Wales) Regulations 2010 and subject to monitoring and reporting. Further consideration of the control of radioactive discharges to air is given in Section 7 of the Main AoS Report.
- 5.9 There is a very low risk of an accidental release of radioactive emissions from the site at Braystones, which could have a significant strategic effect on air quality. The HSE/NII and the EA will consider this matter during their risk assessments, which will be carried out as part of the consenting process to ensure that risks to public health and safety through accidental release of emissions is within acceptable limits. Whilst the risk is very low, the potential for a significant population to be adversely affected means that, at this stage of assessment, the potential for strategic adverse sustainability effects has been identified.
- 5.10 Strategic Effects on Air Quality: The AoS has identified that the potential for transboundary effects from any accidental release of radioactive emissions from the Braystones site has a potentially strategic effect on sustainability. However, it is noted that there is a very low risk of such an event occurring. Prevention measures include existing risk assessment and regulatory processes. The HSE/NII will need to be**

satisfied that the radiological and other risks to the public associated with accidental releases of radioactive substances are as low as reasonably practicable and within the relevant radiological risk limit.

Biodiversity and Ecosystems

- 5.11 Throughout the construction, operation and decommissioning phases of a nuclear power station, the potential exists for the accidental release of pollutants into the environment, which could have significant impacts on biodiversity. However, the risks of accidental releases would be minimised by the existing risk assessment and regulatory processes that are referred to in the sections on Air Quality and Water. Construction activities, such as earthworks, new buildings and infrastructure could lead to direct habitat loss, increased noise disturbance and impacts on air and water quality, which, in turn, could affect sensitive ecosystems. During operation, cooling and discharge of heated water and routine discharge of radioactive material could affect aquatic habitats and species. Similarly, the abstraction of surface or groundwater could affect habitats and the species they support. However, abstraction will be subject to licensing by the Environment Agency, which is designed to ensure abstraction rates will not adversely impact important habitats and species.
- 5.12 Of greatest concern are activities which might lead to detrimental effects on coastal, estuarine and river habitats associated with the Drigg Coast and River Ehen SAC/SSSI sites, the Wast Water SAC and River Derwent and Bassenthwaite Lake SAC and the species utilising these habitats, such as great crested newt, freshwater pearl mussel, lamprey and migrating and spawning Atlantic salmon. Indirect impacts to Silver Tarn, Hollas and Harnsey Mosses SSSI may occur, as this ecological site is located immediately to the north west of the nomination site boundary, particularly with regard to construction impacts such as surface water run-off, dust, noise and visual disturbance. Indirect impacts may also occur at a number of other SSSIs in close proximity to the site, including Low Church Moss SSSI which is significant for its wetland habitats.
- 5.13 Biodiversity could also be impacted at the local level if important habitats/species (for example UK Biodiversity Action Plan habitats/species or legally protected species) are present within or in close proximity to the site.
- 5.14 Further studies carried out by the nominator through the EIA process will be required in order to fully understand the potential effects on designated sites and on biodiversity in the area as a whole. Design and mitigation measures should in the first instance seek to avoid and minimise loss of habitat and avoid disturbance of legally protected species. Once defined, mitigation measures could be implemented through an ecological mitigation and management plan or similar document. Opportunities for biodiversity enhancement may be possible.

- 5.15 A separate report documenting the Habitats Regulation Assessment (HRA) for Braystones³⁵ has been undertaken. This report should be referred to for further information relating to the effects of a new nuclear power station at Braystones on European-designated habitat sites.
- 5.16 **Strategic Effects on Biodiversity and Ecosystems:** The potential for adverse effects on the sites and species considered to be of UK-wide and European nature conservation importance (Drigg Coast, River Ehen, West Water and River Derwent and Bassenthwaite Lake SACs, Silver Tarn, Hollas and Harnsey Mosses SSSI, Low Church Moss SSSI, St. Bees Head SSSI, Drigg Coast SSSI, River Ehen (Ennerdale Water to Keekle Confluence) SSSI, Haile Great Wood SSSI, Black Moss SSSI, Hallsenna Moor SSSI) means that significant strategic effects on biodiversity cannot be ruled out at this stage of the appraisal. There is, however, potential for the mitigation or compensation of biodiversity effects, including the minimisation of indirect impacts to Silver Tarn, Hollas and Harnsey Mosses SSSI through the careful siting of the development and construction activities within the nomination site boundary. There is also potential for the mitigation or compensation of biodiversity effects, including the creation of replacement habitat for UK designated sites³⁶. Detailed baseline studies will form part of the project level Environmental Impact Assessment. The Habitats Regulations Assessment for Braystones should be referred to for further details and advice on the internationally designated sites.

Climate Change

- 5.17 The establishment of a new nuclear power station will contribute positively to local and national climate change objectives. Short term increases in greenhouse gases during the construction and decommissioning phases of a new nuclear power station will be outweighed by the savings in overall emissions during the lifetime of the facility compared to fossil-fuel powered stations of equivalent output.
- 5.18 A new nuclear power station at Braystones may result in emissions from the transport of goods and labour throughout the construction, operation and decommissioning phases. However, there is some potential for the nominator to promote increased use of public transport through provision of appropriate transport links to the power station.
- 5.19 Complementary carbon emissions mitigation measures should include sustainable design and construction, sustainable and low carbon technologies and transport, and potential increased investment in public transport and renewable energy services infrastructure.

³⁵ Habitat Regulations Assessment Pilot Braystones: HRA Screening and Appropriate Assessment Report.

³⁶ For European Sites, compensation measures, such as creation of replacement habitat, may only be considered if it has been established that there are no alternative solutions and the plan or project is necessary for imperative reasons of overriding public interest

- 5.20 Strategic Effects on Climate Change: A new nuclear power station on the site would have positive long-term effects on climate change during the operational stage compared to conventional sources of energy, contributing positively to local and national climate change objectives.**

Communities: Population, Employment and Viability

- 5.21 Whilst likely to have significant positive effects for employment and local economy, there is some potential for short term negative effects during the construction phase. For example, the influx of construction workers will boost the local economy through the use of local support services, such as accommodation, local shops and leisure facilities; however, they will also put additional pressure on local services which may already be over-stretched.
- 5.22 The magnitude of these effects is reduced at a regional and national scale. Construction on the site may lead to a shortage of construction workers to meet the needs of other industries and major projects within the region.
- 5.23 Increased labour demand within the region could lead to improved provision of education and training for the local population. Upskilling of employees and contractors associated with the new nuclear power station would also be beneficial to the region as a whole.
- 5.24 There could be positive cumulative effects of a new nuclear power station at Braystones for the region as a whole when considered with nominations for additional nuclear power stations in the North West. This could contribute to the regional economy and employment, with potential for a specialist nuclear industry hub.
- 5.25 It is commonly perceived that proximity to a nuclear facility such as a power station would have an adverse effect on property values. However, the evidence for this is inconclusive and contradictory. A study of effects in America³⁷ found that property values were actually increased in the vicinity of nuclear facilities, although the authors caution that this finding is subject to several caveats including being based on a small sample and may be unrepresentative. It is suggested that in relatively poor areas, or where the local economy is depressed, the income generated by employment at a new nuclear facility may have a positive effect on local property values. For the present appraisal, any effect on property values is not considered to be strategically significant because it is limited to the local area.
- 5.26 Strategic Effects on Communities: Population, Employment and Viability: Positive effects of regional economic significance may occur when the project is considered cumulatively with other projects within the North West. A potential negative effect of regional significance is the project leading to a shortage of local construction labour available to other industries.**

³⁷ Bezdek, R.H. and Wendling, R.M. (2006) 'The impacts of nuclear facilities on property values and other factors in the surrounding communities', Int. J. Nuclear Governance, Economy and Ecology, Vol. 1, No. 1, pp.122–144

Communities: Supporting Infrastructure

- 5.27 Transport: There is potential for negative effects on local and strategic road infrastructure through increased congestion/disruption of traffic on the A595(T), particularly north of the site towards Whitehaven where traffic is known to travel slowly during peak periods. In addition, some local settlements along the A595(T) and nearby may be negatively impacted as a result of the construction, operation and decommissioning traffic, for example, affecting access to local services. An increase in accident rates, involving both vehicles and pedestrians, may arise resulting in a measurable human health effect. Notwithstanding this, the effect of a nuclear power station at this site on the local road network can likely be mitigated, throughout all stages of the development, through transportation plans, green travel plans, road safety improvements and consideration of alternatives to road, such as the existing coastal rail line or sea transport, for the transport of aggregates and other construction materials.
- 5.28 Conventional waste: Waste material will be generated during construction, operation and decommissioning of a development. Local impacts may be expected upon local and regional facilities, including sewage treatment plants, however the scale of operation is not considered to be significant in the long/medium term. Waste management facilities will be available to deal with construction projects for the foreseeable future and waste/recycling sites should not be detrimentally impacted. Good site practices and the site-specific EIA should look to further mitigate these risks and many impacts may be positive such as the generation of significant quantities of secondary aggregate during demolition.
- 5.29 Radioactive waste³⁸: The operation of a new nuclear power station at the site would require the interim storage of spent fuel and intermediate level waste on site for a period of up to 100 years after operation has ceased. Nominators were asked that when nominating a site for the SSA, they make provision within the area of land nominated for the safe and secure storage of all the spent fuel and intermediate level waste produced through operation and decommissioning until it can be sent for disposal in a geological disposal facility. The detailed design and location of the storage facility within the nominated site boundary will be determined at the project level, within the design submitted by the developer. The generic process for dealing with all types of radioactive and hazardous waste arising from the operation and decommissioning of new nuclear power stations (including gaseous and liquid radioactive discharges) are appraised in Chapter 7 of the Main AoS Report.
- 5.30 Electricity transmission: The development of a nuclear power station at Braystones would require new power lines to be built to connect the facility with the National Grid. The potential impact of new power lines will be considered in a separate Networks National Policy Statement (NPS), due to be published by the Government in October 2009.

³⁸ Radioactive waste is waste regulated under Environmental Permitting (England and Wales) Regulations 2010.

- 5.31 Strategic Effects on Communities: Supporting Infrastructure: There is the potential for adverse effects on supporting infrastructure, including conventional waste, transport and basic services. These effects are of local significance and mitigation opportunities are likely to be available.**

Human Health and Well-Being

Radiological Health Issues

- 5.32 Radiation occurs naturally in the environment. The Health Protection Agency (HPA) which regularly reviews the radiation exposure of the UK population, has calculated that the overall average annual dose to a member of the general public from all sources of radioactivity is 2.7 millisieverts (mSv, a measure of dose) per year, about 84% of which is from natural sources and about 15% is from medical procedures. The HPA calculates that the average dose to a member of the public due to radioactive discharges from the nuclear power industry is less than 0.01% of the annual dose from all sources.³⁹
- 5.33 By law the radiation to which members of the public are exposed by the operations of a nuclear power station is limited to 1 mSv per year.⁴⁰ This limit applies to all members of the public, including those who receive the highest doses as a result of the location of their homes and their habits of life. It also applies to the cumulative effects of planned exposures from all sources of radiation, excluding medical exposures of patients and natural background radiation. Therefore, the exposures of people living near to a new nuclear power stations have to be less than the dose limit taking into account exposures from any other nearby sites and any past controlled releases. This statutory dose limit is reinforced by the concept of ALARP (As Low As Reasonably Practicable), which is used by the nuclear regulators to reduce doses to as low as is reasonably practicable.
- 5.34 The environment agencies run monitoring programmes to provide an independent check on the impacts of radioactive discharges. In 2008 they published a report covering 2007, showing that radiation doses to people living around nuclear sites remained below the statutory dose limit of 1 mSv per year.⁴¹ In England and Wales, the main regulatory bodies are the Nuclear Installations Inspectorate (NII), a division of the Health and Safety Executive and the EA. These agencies regulate radioactive discharges from nuclear power stations and have responsibilities for ensuring that workers, the general public and the environment are protected against exposure to radioactivity.

³⁹ Ionising Radiation Exposure of the UK Population: 2005 Review HPA-RPD-001

⁴⁰ This is through the Ionising Radiations Regulations 1999 <http://www.statutelaw.gov.uk> (which includes all activities carried out under a nuclear site licence granted by the Nuclear Installations Inspectorate under the Nuclear Installations Act 1965) http://www.opsi.gov.uk/RevisedStatutes/Acts/ukpga/1965/cukpga_19650057_en_1, the Radioactive Substances Direction 2000 <http://www.defra.gov.uk/ENVIRONMENT/radioactivity/government/legislation/pdf/rsd2000.pdf> and the Radioactive Substances (Basic Safety Standards) (Scotland) Regulations 2000 <http://www.opsi.gov.uk/legislation/scotland/ssi2000/20000100.htm>

⁴¹ Radioactivity in Food and the Environment, 2007 RIFE-13, Environment Agency, Scottish Environment Protection Agency, Food Standards Agency, Northern Ireland Environment Agency 2008 http://publications.environment-agency.gov.uk/pdf/GEHO1108BPPH-e-e.pdf?lang=_e (see Table S.1 "Radiation doses due to discharges of radioactive waste in the United Kingdom, 2007" of this publication).

Regulation of all disposals, including discharges to air, water and land, of radioactive waste off or on nuclear sites is regulated under the Environmental Permitting (England and Wales) Regulations 2010⁴². This regulatory system will apply to a potential new nuclear power station at Braystones and should ensure that permitted radioactive discharges do not cause unacceptable risk to health.

Regulatory Justification

- 5.1 European Council Directive 96/29/Euratom of 13 May 1996 (the Basic Safety Standards Directive)⁴³ requires Member States to ensure that, in advance of being first adopted or first approved, all new classes or types of practice resulting in exposure to ionising radiation are justified by their economic, social or other benefits in relation to the health detriment they may cause. This process is known as Regulatory Justification and the Secretary of State for Energy and Climate Change has decided, after public consultation, that two nuclear reactor designs, Westinghouse's AP-1000 and Areva's EPR, should be Justified⁴⁴.
- 5.35 The Government believes that the regulatory regime will effectively limit and minimise the radiation dose and release of radioactivity from new nuclear power stations, until they have been fully decommissioned, to very low levels, and that the health detriments associated with the operation of new nuclear power stations will be very low

Construction and Operational Effects

- 5.36 During the operation of a nuclear power station, there is a risk of unplanned radioactive discharges into the environment which could potentially lead to adverse health impacts. However, the risk of such an accident is judged to be very small because of the strict regulatory regime in the UK. The HSE site licensing process will also ensure that accident management and emergency preparedness strategies are prepared and that all reasonably practicable steps have been taken to minimise the radiological consequences of an accident.
- 5.37 The transportation of radioactive materials to and from a nuclear power station increases the possibility of an accident resulting in an unplanned radioactive discharge. However, the safety record for the transport of nuclear material suggests that the risks are very low. Data from the Radioactive Materials Transport Event Database (RAMTED) for the period 1958 to 2008 showed that of the recorded 913 events associated with the transport of

⁴² Environmental Permitting (England and Wales) Regulations 2010

http://www.opsi.gov.uk/acts/acts1993/ukpga_19930012_en_1

⁴³ Council Directive 96/29/Euratom of 13 May 1996, laying down basic safety standards for the health protection of the workforce and general public against the dangers of ionising radiation. Official Journal of the European Communities (OJ L 159, 29.6.1996, p.1)

http://ec.europa.eu/energy/nuclear/radioprotection/doc/legislation/9629_en.pdf

⁴⁴ www.decc.gov.uk

radioactive materials no 'significant dose events' were associated with the nuclear power industry⁴⁵.

- 5.38 The scale of construction work associated with a potential new nuclear power station at Braystones may result in higher risk of health and safety incidents at the site. Construction would be subject to the Construction (Design and Management) Regulations and other relevant regulations applicable to construction.
- 5.39 During the operation of a potential nuclear power plant at Braystones, activities will be regulated in accordance with the Health and Safety at Work Act 1974, Nuclear Installations Act 1965 and the Ionising Radiations Regulations 1999. The potential operator must have a Nuclear Site Licence from the NII prior to the construction commencing and this licence will only be granted if the NII is satisfied that the power station can be built, operated and decommissioned safely with risks being kept to 'as low as reasonably practicable' (ALARP) at all times. The licence will, therefore, have conditions attached to it which will allow the NII to monitor safety risks throughout the lifetime of the project.
- 5.39 There is no existing nuclear power station at Braystones, therefore new electricity transmission lines will be required to link its output to the National Grid. The potential impact of new power lines will be considered in a separate Electricity Networks National Policy Statement, due to be published by the Government in autumn 2009. Given the current uncertainty regarding the health effects of prolonged low level exposure to electromagnetic fields (EMFs) it is recommended that, in keeping with HPA advice⁴⁶, a precautionary approach is adopted to the routing of any required power lines.
- 5.40 The presence of, and more particularly the construction of, a new nuclear power station at the Braystones site will increase community disturbance to some degree. Such disturbance may include noise and vibration, dust in the construction phase and increased traffic in all phases, including an increased risk of traffic accidents. To mitigate construction phase disturbances an environmental management plan should be developed, implemented and monitored for effectiveness throughout the construction period. Potential traffic issues in all the project's phases can be mitigated through the adoption of a transport plan aimed at minimising community disturbance whilst also promoting 'green' travel and road safety.
- 5.41 Noise emissions will arise from both the construction and operational phases. Construction noise will arise from plant/activity and transportation sources. Similarly, operational noise levels will arise from both fixed installation and mobile transport sources. Construction noise will be variable and transient in nature and will need to be mitigated by the use of good construction practice, regulation and timing of construction operations, the use of noise controlled plant and equipment and noise and vibration monitoring. These would be strategically managed through the construction management plan procedures.

⁴⁵ <http://www.hpa.org.uk/HPA/Publications/Radiation/HPARPDSeriesReports/>

⁴⁶ http://www.hpa.org.uk/web/HPAweb&HPAwebStandard/HPAweb_C/1195733817602

- 5.42 Noise emissions from nuclear power stations are relatively low. Minimisation of operational noise emissions would require consideration at the design/layout stage of the scheme. In particular, significant benefits would result if potential sources of noise emissions could be reduced through a combination of engineering design solutions. These could include the careful siting of noise emitting plant within the overall facility (at high or low level and in relation to local noise sensitive locations) and careful selection of trafficking routes and access points. Particular emphasis would need to be taken of any low frequency and constant emission sources. Overall, noise background and prediction assessment following relevant international (ISO) and British (BS) standards would need to be applied so that the noise impact of the proposals could be determined for planning purposes. Given the relatively lightly populated locality, it is considered that noise and vibration impacts would not be a significant issue and pose a constraint to development at Braystones.

Local Health and Recreation

- 5.43 With regard to recreation, there is a potential impact associated with the Cumbria Coastal Way⁴⁷, which passes the site to the west. It is likely that this path may need to be closed during some phases of power station construction, particularly should direct water cooling be used, but this effect will be temporary and can readily be mitigated by providing a bypass path around the site.
- 5.44 There is a possibility that the influx of workers required for the construction and operational phases of the proposed new power station may put a strain on local health and other services and lead to community integration and conflict issues. In order to realistically gauge whether or not this will be a problem, a review should be carried out during the planning process to determine the need for additional health service capacity and community assistance in the area. This review could comprise a Health Impact Assessment (HIA). However, whilst this may be considered good practice it is noted that HIA is not a statutory requirement for current energy applications. The applicability of an HIA may be considered on a case by case basis.
- 5.45 It is possible that the presence of a nuclear power plant may lead to increased stress levels in certain individuals, due to potential perception of risk associated with living or working near a power station. However, there is little literature available on this potential impact which suggests that it has not been a significant problem in the past. In any event, in the case of the nominated site, people living and working nearby have had a long time to get used to there being an adjacent nuclear plant so this is unlikely to be a problem at this location.
- 5.46 It is probable that building, operating and decommissioning a new nuclear power station at Braystones will lead to an increase in employment,

⁴⁷ This path might in future form part of an English coastal route, in accordance with the objectives of the Marine and Coastal Access Act 2009.

community wealth, housing stock and other associated neighbourhood infrastructure. These positive effects on the community are likely to be much more significant than any potential negative consequences of the project assuming there are no adverse effects on the health of the local population.

- 5.47 Strategic Effects on Human Health and Well-Being: The rigorous system of regulation of routine discharges from the proposed nuclear power station at Braystones should ensure that there are no unacceptable risks to the health of the local population when the plant is operating normally. There is also a very small risk of adverse health impacts arising from an accidental release of radiation but the multiple safety features within modern nuclear plants makes such an event exceedingly unlikely. It is possible that the presence of a nuclear power plant may lead to increased stress levels in certain individuals although this is less likely at this site where there is a history of nuclear power generation. Overall, the likely enhancement in employment, community wealth, housing stock and other associated neighbourhood infrastructure should improve community well-being and health generally.**

Cultural Heritage

- 5.48 The main effects of the development would be local and within the footprint of the proposed facility. However, any physical effect on the historic landscape could be of regional importance. Potential setting effects upon scheduled monuments, the conservation areas and listed buildings could be of regional or national importance, depending on distance and sight lines. Opportunities for mitigation could include appropriate planning and design of construction activities and operational facilities, including adherence to the principles of good design⁴⁸. Detailed assessment, including consultation of the Cumbria Historic Landscape Characterisation, will be required at the project level EIA stage.
- 5.49 In addition there may be potential off-site effects on cultural heritage assets caused by an increase in traffic and the development of new infrastructure. Detailed assessment will be required at the project level EIA stage.
- 5.50 An unknown archaeological (buried) resource is potentially present within the nominated site. Detailed investigations (including consultation with Local Authority Archaeologist, geophysical survey, trial trenching etc.) may be required to inform the project level EIA. Depending on the results this may lead to an excavation prior to construction and/or a watching brief during the construction phase (during ground preparations and excavations).
- 5.51 Strategic Effects on Cultural Heritage: The AoS has identified potential adverse effects on the settings of cultural heritage features of regional and national importance, as well as on buried archaeology of potentially high importance. However, there is a possibility that these effects can be mitigated. Further detailed assessment at project level will be required.**

⁴⁸ Adherence to good design is outlined in Planning Policy Statement 1: Delivering Sustainable Development

Landscape

- 5.52 During construction and operation, the main direct impacts on landscape from a new power station and its associated infrastructure would be local, for example the loss of farmsteads, farmland, hedgerows and tree belts and areas of buffer planting. However, there are likely to be long lasting adverse indirect landscape and visual impacts on the surrounding area, including the setting of the Lake District National Park, with limited potential for mitigation. The existing nuclear facilities at nearby Sellafield already make a prominent feature in views from western areas of the National Park and more distant high fells, such as Scafell Pike. Further development is highly likely to lead to a perceptible deterioration in some views, which could not be mitigated, given the scale of possible new buildings.
- 5.53 In light of the scale of any new power station on the nominated site, fully effective mitigation of adverse effects during the construction and operational phases is unlikely. The decommissioning of the facilities may allow some landscape restoration of previously developed areas in the long term. However, long term land uses for the restored areas are difficult to predict.
- 5.54 **Strategic Effects on Landscape: The AoS has identified potentially significant adverse effects on landscape at a national level from new buildings and associated infrastructure. These include long lasting indirect and direct adverse landscape and visual impacts on the surrounding area, including a wide area of the Lake District National Park and St Bees Head Heritage Coast. These impacts will be highly likely given the existing undeveloped nature of the Braystones site, the scale of new development and the potential need for associated off-site grid connection infrastructure. Direct effects on local landscape character in and alongside the site, which is of County importance, will be significant in the short term with some potential for mitigation in the longer term.**

Soils, Geology and Land Use

- 5.55 The construction of a new nuclear power station within the nominated site will result in the loss of Grade 4 agricultural land. It will also have likely cumulative impacts, in association with the nearby existing Sellafield nuclear site, on tourism in the area, leading to a loss of this type of land use.
- 5.56 Construction at Braystones and the associated infrastructure (including transmission lines/towers) could lead to the direct loss of soil structure. This may include impacts on soils that maintain terrestrial habitats (see the biodiversity appraisal of this AoS Report). Effects could be mitigated through limitation of the footprint of the development, thereby reducing the area of soils affected.
- 5.57 The development of the Braystones site may result in the increased risk of pollution and potential contamination of soils and controlled waters. These risks can be mitigated by the use of Environmental Management Plans during

the construction and decommissioning stages of the site redevelopment. Any decommissioning would be required to meet specific clean-up criteria approved by the regulators.

- 5.58 Blight of land is a likely effect of the development of a new nuclear power station on the site, but is considered of local or district significance. Likewise, effects on existing land uses, including surrounding tourist areas, are considered to be of local impact.
- 5.59 **Strategic Effects on Soils, Geology and Land Use: The AoS has identified potential, indirect, adverse effects on soils that may support terrestrial habitats. However, there is the potential for mitigation through careful planning of construction and operational facilities.**

Water Quality and Resources

- 5.60 It is not envisaged that the site will require extensive coastal protection measures that will interfere in any detrimental way to the sediment transport pathways that could impact on the estuarine sediment dynamics that are host to the protected flora and fauna.
- 5.61 The site at Braystones identifies a requirement for both a Marine Off-Loading Facility (MOLF) and inlet and outfall pipe-work, which will be required in the coastal area potentially extending into the sea for up to 3km. Any marine loading facilities that might be required would need to consider the impact on coastal processes carefully. Any structures situated across the beach face from the site, will greatly impact on the longshore sediment transport processes and reduce the amount of sediment input to other sections of the coastline. Sand will most likely pile up on the up drift side of the structure causing a deficit of sediment on the down drift side of the structure which if unaided would severely reduce the amount of sediment reaching the down drift areas. This is one of the primary mechanisms for shoreline erosion. These processes if disrupted by any proposed coastal engineering works will directly impact on the existing natural defence barriers and can result in changes in vegetation composition or loss of habitat to other sensitive areas. In the case of the cooling water facilities, a detailed sediment transport model should be incorporated to assess the impacts that the proposed engineering works would have on the sediment transport regime and surrounding areas that may also include marine and estuarine/terrestrial protected areas.
- 5.62 Cooling water is likely to be abstracted from coastal waters, under Environment Agency licence. In addition to cooling water, there may be a requirement for potable water from freshwater sources, potentially sourced at some distance from the nominated site. Any abstraction will require a licence from the Environment Agency, which should ensure that there are no significant adverse impacts on sites of conservation importance.
- 5.63 Returning cooling water off the Cumbria Coast at elevated temperatures could potentially bring significant environmental and ecological impacts, particularly on aquatic biodiversity. Cooling water would be required to be discharged at a

suitable location and temperature to ensure the dispersion of cooling water plumes without significant effect on marine ecology and to avoid entrainment and recirculation of discharged cooling water via the abstraction intake. Consideration of the disturbance of existing radioactive seabed sediments associated with the nearby Sellafield site would also be required.

- 5.64 A more detailed appraisal is required at the project EIA level to assess the implications of any proposed thermal discharge. In addition, there are already existing discharges from the nearby Sellafield facilities. Any future thermal discharge will require an Environmental Permit⁴⁹ from the Environment Agency and will need to meet existing regulatory standards and the requirements of the Water Framework Directive, including the objective of no deterioration in ecological status (whichever is the most stringent). In addition to the thermal effects from direct cooling, there are other potential water quality issues, for example from discharge of radioactive or non-radioactive materials, such as anti-fouling agents, associated with the cooling water process. These discharges will also be subject to permitting by the EA.
- 5.65 The Marine and Coastal Access Act 2009 makes provision for the production of Marine Policy Statements. It is intended to produce a Marine Policy Statement (MPS) that, for the first time, brings together the policies for all UK administrations. The second stage in the new planning system will consist of a series of Marine Plans. The Marine Management Organisation (MMO) set up under the Marine and Coastal Access Act, is responsible for preparing marine plans for the English inshore and offshore regions according to the policies and objectives set out by the Government. Similar plans will be produced for Welsh marine waters. The MPS will interact with National Policy Statements and, in reaching its decisions, the IPC must have regard to the MPS but, subject to certain exceptions, must decide in accordance with the relevant National Policy Statements.
- 5.66 To maintain water quality standards, any future discharges from the power station will need to be considered as part of the Environmental Impact Assessment for the proposed development. This process will include an assessment of the impacts of any discharges to the aquatic environment, including impacts on specific designated sites under both the Habitats and Shellfish Directives.
- 5.67 The development of a new nuclear power station on the site may have the short-term effect of increasing water demand during the construction phase, due to an increased population. The potential magnitude and duration of increased water demand will depend upon the timing and size of the final plant. Similar comments apply to wastewater production from the site.
- 5.68 It is unlikely that any water resources from Wast Water, which currently supplies the Sellafield site, would be available for use at the Braystones site. Although the West Cumbria Water Resource Zone does have a significant

⁴⁹ The Environmental Permitting (England and Wales) Regulations 2010 came into force on 6 April 2010 and cover all water discharge activities. Water discharge consents will become Environmental Permits, and applications for new discharges will fall under the new regulations.

deficit, the water companies will try to satisfy additional requirements for water demand from large industrial clients. In addition United Utilities West has a number of schemes in place to address the projected supply demand balance deficit through to 2032, including leakage reduction and the implementation of the South Egremont groundwater scheme. The magnitude and timing of water supply needs through any development of the site will need to address these regional water resources issues. A more detailed appraisal of the options of supply and the likely requirements of water of potable quality is required at project EIA level.

- 5.69 There is no known use made of the groundwater resources underlying the site for water supply, but springs on the beach are fed by groundwater and groundwater may also flow into the lower reaches of nearby rivers. There may be some disruption of local groundwater flows during construction, but in the long term impacts are expected to be minimal.
- 5.70 **Strategic Effects on Water Quality and Resources: The AoS has identified potential, adverse effects on water. Direct effects on water resources could be brought about through increased demand, particularly during construction. Indirect effects, of potentially wider significance, on nationally and internationally designated habitats, including from the thermal impacts of cooling water discharges, have also been identified. Any new engineering works at the coastline will interfere with the stability of the coastline and the sediment transport regime and could cause accelerated erosion at the sites, cause erosion up or down drift of the site and possibly impact on the marine protected areas.**

Flood Risk

- 5.71 Development of the site is not likely to increase the risk of flooding. In addition, the flood risks associated with climate change and sea level rise, over the lifetime of the development are considered to be minimal as the site is afforded some protection from the beach, the coastal cliffs and the railway embankment. The site is not currently situated in an area that the Environment Agency considers to be at risk from coastal flooding, but upgraded defences to the Cumbrian West Coast railway line may be required to counteract coastal retreat as a result of longer term climate change impacts on sea-level rise.
- 5.72 At the site, Ordnance Survey topographic information indicates that the lowest ground elevations lie in the order of 15 to 19m Above Ordnance Datum (AOD). In order to ensure resilience to coastal flooding from sea level rise, storm/tsunami surge and wave overtopping, it is suggested that a minimum foundation level for the site should be in excess of 11.8m Above Ordnance Datum (AOD). Based on previous investigations carried out using Ordnance Survey topographic NEXTMap information, the current ground level elevations at the Braystones site are entirely above 15.0m AOD, making the nominated site resilient to coastal flood risk, without the need for further mitigation.

- 5.73 In the absence of any formal or informal defensive works, the coastline is expected to remain relatively stable. While storm events would be expected to draw-down shingle from the beach crest, erosion rates would remain low, although the beachside properties at the foot of the railway embankment may become damaged. It is anticipated that long term sea level rise may impact the coastline, resulting in some observable coastal change, and exposure of the railway embankment to wave action. With continued present management practices the SMP predicts that defences will continue to protect and maintain the railway embankment, although further extension to defences may be required.
- 5.74 The North West England and North Wales Coastal Group are currently preparing a revised Shoreline Management Plan (Phase 2) for the coast between Great Orme's Head and the Scottish Border, taking in the coastline potentially affecting the nominated Braystones sites. The revised SMP will provide assessments of existing defences and the residual life of assessment along the shoreline in the event of no active intervention and with continued present management and also an assessment of shoreline stability taking into account projections derived from the UK Climate Impacts Programme (UKCIP). It will be advisable when the report becomes available to reassess the stability of the present coastline at Braystones in order to reassess whether there is a need for coastal protection measures against coastal erosion.
- 5.75 Strategic Effects on Flood Risk: The AoS has identified a relatively low risk of flooding risk due to rising sea levels. It is likely that this can be mitigated in the long-term through the provision of further defences with appropriate design and construction, taking account of coastal processes, hydrodynamics and sediment transport.**

Key Interactions between Sustainable Development Themes

- 5.76 Interactions and synergistic effects can occur between the different topics or sustainable development themes being appraised. A number of interactions and potential interactions have been identified for the AoS Site Reports. For example, rising sea levels and increased predictions for coastal flooding due to climate change will require new coastal defences. Construction of coastal defences could have adverse effects on water quality and biodiversity through changes to hydrology, sedimentation and loss of habitat.
- 5.77 Where applicable, key interactions have been considered in the topic-specific paragraphs above.

Interactions and Cumulative Effects with other Key Regional Plans, Programmes and Projects

- 5.78 Interactions and cumulative effects can occur between the plan or proposal being appraised and other key plans and policies. This AoS has identified other relevant plans and programmes with sustainability objectives, which

need to be considered. These are reported in Section 3: Policy Context and Appendix 3: Plans and Programmes Review. The key plans that might lead to cumulative effects when combined with the revised draft Nuclear NPS and the nominated site at Braystones were identified as follows:

- Cell 11d Walney Island to St Bees Head Shoreline Management Plan, North West and North Wales Coastal Group (2000)
- River Basin Management Strategy for the North West, Environment Agency (2009)
- Cumbria Biodiversity Action Plan, UK Biodiversity Action Plan (2001)

5.79 Other key projects that might have significant interactions with the proposals for a new nuclear power station at Braystones were identified as follows:

- The operation and decommissioning of the existing nuclear facilities at Sellafield, and also at Drigg.
- Nominations for new nuclear power stations at Heysham (located to the south, on the Lancashire coast - see Figure 1), Sellafield and Kirksanton (located short distances to the south, on the Cumbrian coast).
- Existing and proposed offshore wind farm projects – Walney I and II (operational and approved), Ormonde (approved), West of Duddon Sands (under construction), Solway Firth/Robin Rigg A and B (under construction), plus Round 3 Potential Development Zone 9 (Irish Sea)
- Major projects listed within Cumbria’s revised Economic Strategy and Sub-Regional Action Plan (February 2009), including:
 - Britain’s Energy Coast™ Masterplan - a £2 billion package of regeneration projects to establish West Cumbria as a centre of excellence for nuclear and other energy technologies including wind power, tidal, oil and gas⁵⁰. The presence of at least one new nuclear power station within Cumbria is a key component, and driver, of the Masterplan;
 - Academy Schools – Barrow, Carlisle, West Cumbria and Energus, in Lillyhall
 - Waterfront Business Park and Marina Village, both part of the Waterfront Barrow-in-Furness
 - Carlisle Airport
 - New hospital and health campus in West Cumbria
 - Housing Market Renewal – Barrow and West Cumbria
 - Carlisle Northern Development Route
 - M6 Employment Sites – Junction 44

5.80 The appraisal of cumulative sustainability effects arising through interactions between the Braystones nomination and other key plans, programmes and projects is presented in Table 5.2.

⁵⁰ www.britainsenergycoast.com

Table 5.2: Interactions with Other Key Regional Plans, Programmes and Projects

AoS Sustainable Development Theme	Interactions and Cumulative Effects
Biodiversity and Ecosystems	<ul style="list-style-type: none"> • Coastal and inland designated areas are likely to be affected by other energy proposals including tidal, wave, biomass and wind farm proposals as part of the wider Britain's Energy Coast™ Masterplan, plus other potential new nuclear power stations within Cumbria and the region. The cumulative effects on biodiversity could be significant • Potential conflicts with the Cumbria Biodiversity Action Plan which aims to protect habitats and species in the area
Climate Change	<ul style="list-style-type: none"> • Coastal defence requirements of other projects and/or nominated sites may have adverse cumulative effects on coastal processes, hydrodynamics and sediment transport • Reductions in greenhouse gas emissions, resulting from the cumulative benefit of a nuclear power programme, will have positive long-term effects during the operational stage when compared to fossil fuel powered plants • Locating a new nuclear power station at the nominated site could have a positive multiplier effect on the further investment and implementation of renewable (low carbon) energy sources in the region (as proposed within the Britain's Energy Coast™ Masterplan)
Communities and Supporting Infrastructure	<ul style="list-style-type: none"> • Construction workforce supply shortages may result, particularly with regard to specialist workers required for possible multiple builds within the region as part of the nuclear new build programme. Transient workforces may put additional strain on local services and infrastructure • Interactions with Britain's Energy Coast™ Masterplan and other major projects, including activities at Sellafield, may result in improvements in transport links, in rail, air, road and freight movements, and the range of housing types available within the area. Other positive benefits to the community are also likely to be generated • New and/or improved supporting infrastructure likely to be required in areas with no existing infrastructure or where there is insufficient capacity. Interaction impacts likely with regard to biodiversity and landscape
Human Health and Well-Being	<ul style="list-style-type: none"> • Enhanced prosperity and long-term employment benefits resulting from the plans are likely to have positive effects on health and well-being, including positive multiplier effects on other proposed economic investment projects, for example Waterfront Business Park, Carlisle Airport, M6 employment sites
Cultural Heritage	<ul style="list-style-type: none"> • Cumulative effects on the historic environment if other nominated sites are developed

AoS Sustainable Development Theme	Interactions and Cumulative Effects
Landscape	<ul style="list-style-type: none"> • The coastline, adjoining lowland and upland landscape areas are likely to be affected by other energy proposals including other nominated and existing nuclear sites, tidal, wave, biomass and wind farm (onshore and offshore) proposals as part of the wider West Cumbria Energy Coast Masterplan • Potential for in-combination adverse direct effects on the character and views within the Lake District National Park from associated off-site grid connectivity infrastructure works carried out by National Grid
Water Quality and Resources	<ul style="list-style-type: none"> • Water supply issues may result during the construction stages when large increases in local population are likely • The impact of this on a regional scale could be compounded with successful nominations for other nuclear power station new builds at Sellafield and Kirksanton • Impact on water supply could be significant, particularly with successful nominations for other nuclear power station new builds and if the source of cooling water is not the Irish Sea. Interaction impacts possible with regard to biodiversity

6 Summary Appraisal of Sustainability, Key Findings and Possible Mitigation

- 6.1 This Section summarises the key findings of the AoS assessment and explores possible mitigation which could be undertaken to reduce impacts. Table 6.1 presents a summary of significance of potential effects, and Table 6.2 provides a more detailed breakdown of the potential effects and possible mitigation.
- 6.2 The AoS has explored adverse and beneficial potential effects of building a new nuclear power station at Braystones. Both beneficial and adverse effects were identified as potentially significant at the local level and it is recommended that these need to be further considered by the developer, regulators and the decision-maker (the IPC), during project level assessments.
- 6.3 The AoS process has included recommendations to inform the development of the revised draft Nuclear NPS. This site report for Braystones has helped to inform the decision-making for the SSA. It has included advice as to the strategic significant effects arising from the construction of a new nuclear power station at Braystones, and suggestions for how adverse effects may be mitigated, including proposed mitigation measures which could be considered as part of project level EIA.

A number of the strategic effects identified for Braystones will be similar across all the sites, including positive effects for employment and well being. However a number of potential strategic effects have been identified that are of particular note for the site at Braystones. These are discussed below:

- 6.4 There are potential negative effects on nationally and internationally protected nature conservation sites including Drigg Coast, River Ehen, Wast Water and River Derwent and Bassenthwaite Lake; visual impacts on the landscape from the power station and new power lines that could be seen from several locations, including the Lake District National Park; effects on water quality and migratory fish in nearby coastal waters due to the abstraction and release of sea water for cooling; and potential effects on erosion and visual appearance of the coastline due to the need for new flood defences and a marine landing station. These effects are significant, but mitigation opportunities could be available following further study at the project level.
- 6.5 Braystones forms one of a cluster of 3 nominated sites in the Cumbria area. The potential cumulative effects of the issues discussed above would increase if more than one power station was developed in this area.
- 6.6 There will be significant positive effects associated with long term employment and enhanced prosperity for communities locally and this is likely to be significant at the sub-regional level if 3 power stations are built in Cumbria with enhanced benefits from the revised draft Nuclear NPS in combination with other proposals for regeneration in the North West.

- 6.7 There remains some uncertainty relating to the significance of some effects and the most appropriate mitigation. It is expected that the mitigation measures will be refined iteratively as part of the development of the proposals for the site, and will be assessed further in the project level EIA.
- 6.8 Table 6.1 provides an overall summary of the significance of the environmental and sustainability effects for the Braystones site. Each sustainable development theme and each development stage has been considered. The symbols and colours used are explained in the key.

Table 6.1: Summary of the Significance of Potential Strategic Sustainability Effects

Sustainable Development Themes	Significance of potential Strategic effect at each Development Stage:		
	Construction	Operation	Decommissioning
Air Quality	-	- ?	- ?
Biodiversity and Ecosystems	-- ?	-- ?	-- ?
Climate Change	-	++	-?
Communities: Population, Employment and Viability	+?	+?	0
Communities: Supporting Infrastructure	- ?	- ?	- ?
Human Health and Well-Being	+	+	+
Cultural Heritage	-	-	-
Landscape	--	--	0 ?
Soils, Geology and Land Use	-	-?	-
Water Quality and Resources	-	-	-
Flood Risk	-	-	-
Key:			
Significance and Categories of Potential Strategic Effects			
++	Development would resolve an existing sustainability problem; effect considered as being of regional/national/international significance		
+	No sustainability constraints and development acceptable; effect considered as being of regional/ national/international significance		
0	Neutral effect		
-	Potential sustainability issues, mitigation and/or negotiation possible; effect considered as being of regional/national/international significance		
--	Problematical because of known sustainability issues; mitigation or negotiation difficult and/or expensive; effect considered as being of regional/national/ international significance		
Uncertainty			
?	Where the significance of an effect is particularly uncertain, for example because insufficient information is available at the plan stage to fully appraise the effects of the development or the potential for successful mitigation, the significance category is qualified by the addition of '?'		

- 6.9 Potential environmental and sustainability effects considered to be of a wider strategic significance were also identified. These are summarised in Table 6.2. This table includes a summary of how the potential adverse effects may be mitigated and includes possible feasible suggestions for mitigation to be considered at the project level. Some of these mitigation options could be addressed by the HSE, EA, HPA and others when they consider the development consent application stage. Other mitigation options could be proposed by the developer as part of the project design process and through EIA. However, mitigation measures can in themselves produce impacts and these would need to be assessed at the project level.
- 6.10 At this strategic level of appraisal, there are some uncertainties on the significance of some impacts and the effectiveness of suggested mitigation measures. Further detailed studies should therefore be carried out by the developer and the regulators at the project level stage.
- 6.11 Mitigation measures should be considered in all stages of the project with the aim to develop a strategy that avoids impacts, and if they cannot be avoided, to reduce them. The suggested mitigation measures shown in Table 6.2 include examples from all levels of the mitigation hierarchy that comprises:
- Enhance
 - Avoid
 - Reduce
 - Repair
 - Compensate
- 6.12 Options for mitigating through project design or management should firstly consider avoidance, addressing impacts at source before considering impacts at the receptor, and ensuring that a commitment is made to implementing and monitoring the effectiveness of the proposed mitigation. For European Sites, compensatory measures to offset damage to biodiversity and ecosystems and ensure coherence of the Natura 2000 network may only be considered if it has been established that there are no alternative solutions and the plan or project is necessary for imperative reasons of overriding public interest.

Table 6.2: Summary of Potential Strategic Significant Effects and Mitigation Possibilities (for Adverse Effects)

Potential Strategic Significant Effects (adverse and beneficial effects)	Suggested Mitigation for Adverse Effects and Recommendations for the revised draft Nuclear NPS and IPC
Air Quality	
<p>Adverse Effects:</p> <ul style="list-style-type: none"> • Potential for related effects on national and European-designated wildlife sites due to increase in airborne pollutants and nutrients during construction 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> • Preparation of an environmental management plan for construction, operation and decommissioning should include methods to reduce airborne pollutants.
<ul style="list-style-type: none"> • Potential accidental release of radioactive emissions could have a significant strategic effect on air quality 	<ul style="list-style-type: none"> • The nuclear regulators will need to be satisfied that the radiological and other risks to the public associated with accidental releases of radioactive substances are as low as reasonably practicable and within the relevant radiological risk limit.
Biodiversity and Ecosystem Services	
<p>Adverse Effects:</p> <ul style="list-style-type: none"> • Noise, visual and light disturbance during construction on fauna and protected species 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> • Further studies required to be undertaken by the developer to fully assess impacts; careful design of the nominated site to avoid entering sensitive areas (for example Silver Tarn, Hollas and Harnsey SSSI); • Construction environmental management plan • Habitat replacement if required/ appropriate • Ecological mitigation and management plan
<ul style="list-style-type: none"> • Loss, damage or alteration of marine and terrestrial habitats and subsequent disturbance to protected and/or important species due to new buildings and essential infrastructure, including potential offshore infrastructure and coastal defences 	<ul style="list-style-type: none"> • Further studies required to assess operational impacts of new build and essential infrastructure, to be undertaken by the developer

Potential Strategic Significant Effects (adverse and beneficial effects)	Suggested Mitigation for Adverse Effects and Recommendations for the revised draft Nuclear NPS and IPC
Climate Change	
<p>Adverse Effects:</p> <ul style="list-style-type: none"> • Potential short term increases in emissions during construction and decommissioning 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> • Monitor greenhouse gas emissions
<ul style="list-style-type: none"> • Emissions from the transport of goods and labour throughout construction, operation and decommissioning phases 	<ul style="list-style-type: none"> • Green travel plans • Further investment in public transport
<p>Beneficial Effects</p> <ul style="list-style-type: none"> • A nuclear power station on the nominated site would result in lower greenhouse gas emissions during the operational stage compared to fossil fuel sources, with positive long-term effects on climate change 	
Communities: Population, Employment and Viability	
<p>Adverse effects:</p> <ul style="list-style-type: none"> • Pressure on basic services from likely large scale in-migration of construction workers 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> • Measures to manage potential negative effects on local communities; enhance employment capacity through training; provision of services for staff and local community
<ul style="list-style-type: none"> • Project may lead to a shortage of local construction workers to meet the needs of other industries and major projects in the region 	<ul style="list-style-type: none"> • Measures to manage potential negative effects on local communities; enhance employment capacity through training; provision of services for staff and local community
<p>Beneficial Effects:</p> <ul style="list-style-type: none"> • Short to medium-term positive effects due to creation of new jobs for local and regional populations • Provision of education, training, up-skilling for employees and contractors in the region • Positive multiplier effects as income from new population of workers will help support local economy • Potential for property values to increase within vicinity of nominated site, based on previous studies 	

Potential Strategic Significant Effects (adverse and beneficial effects)	Suggested Mitigation for Adverse Effects and Recommendations for the revised draft Nuclear NPS and IPC
Communities: Supporting Infrastructure	
<p>Adverse effects:</p> <ul style="list-style-type: none"> Potential significant impacts on national road infrastructure due to increased congestion/traffic movements 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> Further studies required to assess impacts on road infrastructure, including risk of accidents Transport Management and Green Travel Plans to minimise effects Consideration of port and rail transport options
<ul style="list-style-type: none"> Potential for significant impacts regarding radioactive and conventional waste 	<ul style="list-style-type: none"> Conventional waste: good site practices, implementation of waste hierarchy (reduce, reuse recycle) and waste management Radioactive waste: appropriate storage and management
Human Health and Well-Being	
<p>Adverse effects:</p> <ul style="list-style-type: none"> Possibility of local and regional health risks from authorised discharges 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> Adherence to the UK's strict regulatory framework, to restrict both routine discharges from nuclear power stations and direct radiation exposures to workers and the general public, should reduce potential health impacts to acceptable levels and ensure that radiation doses are well within internationally agreed limits.
<ul style="list-style-type: none"> Possibility of local and regional health risks from accidental discharges 	<ul style="list-style-type: none"> Adherence to the Nuclear Installations Inspectorate (NII)'s regulatory regime for the safe operation of nuclear power stations, including the Nuclear Site licensing Safety Assessment Principles and the continual monitoring by NII of safety risks throughout the lifetime of the station.

Potential Strategic Significant Effects (adverse and beneficial effects)	Suggested Mitigation for Adverse Effects and Recommendations for the revised draft Nuclear NPS and IPC
<ul style="list-style-type: none"> The potential requirement for appropriate additional health service capacity for the influx of both construction and operational workers 	<ul style="list-style-type: none"> The developer should carry out a review of local health provision to ensure it is adequate for the expected influx of power station workers
<ul style="list-style-type: none"> The construction and operation of the proposed nuclear power station may lead to unacceptable community disturbance 	<ul style="list-style-type: none"> The developer should ensure a Construction Environmental Management Plan and all-phase Travel Plan are produced, observed and monitored
<p>Beneficial Effects:</p> <ul style="list-style-type: none"> Likely positive effects on health via increase in employment, community wealth, additional housing and other associated neighbourhood infrastructure. 	
<p>Cultural Heritage</p>	
<p>Adverse effects:</p> <ul style="list-style-type: none"> Immediately surrounding the nominated site there may be potential effects on the settings of historic assets 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> Appropriate landscape/planting schemes Application of principles of good design in accordance with PPS1
<ul style="list-style-type: none"> Potential effects on unknown buried archaeology of high importance 	<ul style="list-style-type: none"> Further consideration at project stage EIA, for example detailed investigations
<p>Landscape</p>	
<p>Adverse effects:</p> <ul style="list-style-type: none"> Potential for longer-term adverse direct and indirect landscape and visual impacts on the surrounding area, including western areas of the Lake District National Park and the St Bees Heritage Coast 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> Potential to mitigate for the significant impacts on designated landscapes is very limited. Decommissioning may allow some landscape restoration of previously developed areas in the long term Application of principles of good design in accordance with PPS1

Potential Strategic Significant Effects (adverse and beneficial effects)	Suggested Mitigation for Adverse Effects and Recommendations for the revised draft Nuclear NPS and IPC
Soils, Geology and Land Use	
<p>Adverse effects:</p> <ul style="list-style-type: none"> The construction of a nuclear power station and associated infrastructure could lead to the direct loss of soil structure. This may include impacts on soils that maintain terrestrial habitats, including designated nature conservation sites, considered further in the biodiversity sections of this report 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> Limitation of the footprint of the development reducing the area of soils affected Avoidance of any soils within designated sites of ecological importance
<ul style="list-style-type: none"> Potential loss of tourism land uses 	<ul style="list-style-type: none"> Potential to mitigate may be difficult at the local scale, but is not deemed of regional or national significance
Water Quality and Resources	
<p>Adverse effects:</p> <ul style="list-style-type: none"> New coastal defences could have potential effects on coastal processes, hydrodynamics and sediment transport, and potential indirect effects on nationally and internationally designated habitats 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> Further investigations into possible impacts will be required during the design of coastal and defence works Suitable design and location of coastal and fluvial flood defence works and marine landing station, may include use of sustainable drainage systems (SUDS) Selection of appropriate construction methods Sediment transport modelling
<ul style="list-style-type: none"> Works to abstract cooling water and subsequent discharge of cooling water could have potential effects on coastal processes, hydrodynamics and sediment disturbance/transport, and potential indirect effects on nationally and internationally designated habitats 	<ul style="list-style-type: none"> Further investigations required Selection of appropriate construction methods
<ul style="list-style-type: none"> Thermal impact of cooling water discharges, potential indirect effects on nationally and internationally designated habitats 	<ul style="list-style-type: none"> Further investigations required Abstraction of water and thermal discharges will be subject to EA permitting

Potential Strategic Significant Effects (adverse and beneficial effects)	Suggested Mitigation for Adverse Effects and Recommendations for the revised draft Nuclear NPS and IPC
<ul style="list-style-type: none"> Increased demand for water during construction stage. Magnitude and duration dependent on timing of activities at the existing nuclear power stations. Similar comments apply to wastewater production 	<ul style="list-style-type: none"> Further investigations required Appraisal of water resource options and alternatives Detailed planning and study to determine whether the capacity of water supply and wastewater options available is adequate to meet estimated demand Appropriate management
<ul style="list-style-type: none"> Potential impact on local groundwater through construction disturbances. Impact on rivers and beach springs fed by local groundwater body 	<ul style="list-style-type: none"> Further investigations into local groundwater bodies and potential pathways. Ongoing monitoring of impacts Suitable design to mitigate potential adverse effects
Flood Risk	
<p>Adverse effects:</p> <ul style="list-style-type: none"> Sea level rise could be a threat to nearby defences during the latter stages of the operational and decommissioning phases 	<p>Mitigation Possibilities:</p> <ul style="list-style-type: none"> Further flood/coastal defence measures may be required

Abbreviations

AA	Appropriate Assessment
ALARP	As Low As Reasonably Practicable
AOD	Above Ordnance Datum
AoS	Appraisal of Sustainability
AoS Site Report	Report setting out environmental and sustainability effects of the Nuclear NPS. It will incorporate the requirements of the SEA Directive
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BGS	British Geological Survey
BS	British Standard
CAMS	Catchment Abstraction Management Plan
CO ₂	Carbon Dioxide
COMARE	Committee on Medical Aspects of Radiation in the Environment
CPRE	Campaign to Protect Rural England
DECC	Department of Energy and Climate Change
Defra	Department for the Environment, Food and Rural Affairs
EA	Environment Agency
EIA	Environmental Impact Assessment
EMF	Electromagnetic fields
EU	European Union
GEP	Good Ecological Potential
GES	Good Ecological Status
GP	General Practitioner
GW	Giga Watt
GWMU	Groundwater Management Unit
HRA	Habitats Regulations Assessment
HSE	Health and Safety Executive
IPC	Infrastructure Planning Commission.
ISO	International Organisation of Standardisation
LAQM	Local Air Quality Management
NDA	Nuclear Decommissioning Authority
MBT	Mechanical Biological Treatment
MOLF	Marine Off Loading Facility
MRF	Materials Recycling Facility
mSv	Millisievert
MWe	Mega Watt (electrical)
MWt	Mega Watt (thermal)
NCA	National Character Area
NDA	Nuclear Decommissioning Authority
NII	Nuclear Installations Inspectorate
Revised draft Nuclear NPS	The proposed National Policy Statement for new nuclear power stations
NPS	National Policy Statement
OSPAR	Oslo and Paris Conventions
PWR	Pressurised Water Reactor
RAMTED	Radioactive Materials Transport Events Database

RBD	River Basin District
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SEA	Strategic Environmental Assessment
SMP	Shoreline Management Plan
SOA	Super Output Area
SPA	Special Protection Area
SRF	Solid Recovered Fuel
SSA	Strategic Siting Assessment
SSSI	Site of Special Scientific Interest
TEN	Trans European Network
UKCIP	UK Climate Impacts Programme
WDA	Waste Disposal Authority
WFD	Water Framework Directive
WRMP	Water Resources Management Plan
WRMU	Water Resources Management Unit

Appendices Available Separately

- 1 Sustainable Development Themes and AoS/SEA Objectives
- 2 Appraisal Matrices
- 3 Plans and Programmes Review (Regional)
- 4 Baseline Information (Regional and Local)

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