

# 4

## WAY FORWARD

### 4.1 Environmental Impact Assessment

- 4.1.1 The information presented in this report is intended to identify the way forward for the assessment of the potential environmental impacts associated with the site preparation works.
- 4.1.2 In order to address the expected data requirements of any subsequent EIA, the further studies and assessment described in Section 3 are either complete or underway. The survey/study programme is being directed by EDF Energy; therefore, should refinement or extension of the proposed surveys be required as a result of further stakeholder engagement or scoping exercise, this would be developed by EDF Energy.
- 4.1.3 The subsequent EIA process will consider the potential implications of the proposed site preparation works on the environment of the study area.
- 4.1.4 An ES will be prepared to present the findings of the EIA process for the site preparation works. The ES may be supported by a series of technical appendices providing additional information on various topic areas, or detailed survey results. The ES will be submitted as part of EDF Energy's application to WSC for planning permission for the site preparation works as identified in **Section 1.2**.
- 4.1.5 The following list indicates an outline contents for the site preparation works within the ES:
- Introduction, including a statement of need for the site preparation works as part of Preliminary Works, addressing the EIA requirements associated with applications for planning permission;
  - Project description, including descriptions of the site preparation works' construction, operation and possible removal phases, and a consideration of alternatives;
  - Impact assessments for each environmental parameter, including descriptions of the assessment methodologies, baseline environmental conditions, impacts during construction, operation and possible removal, mitigation measures, and residual impacts;
  - Impact summary tables;
  - References;
  - Appendices; and
  - Non-technical summary (as a stand alone document).

### 4.2 Cumulative Impact Assessment

#### **a) Relationship between the Preliminary Works and the Hinkley Point C Development**

- 4.2.1 In addition to assessing the significant environmental effects of the proposed site preparation works, the EIA process will also assess the cumulative and other indirect effects on the environment of the other element of the Preliminary Works proposals (i.e. temporary jetty) and the Hinkley Point C Development. The jetty development will be the subject of a separate application which will be submitted to the MMO in 2010. The Hinkley Point C Development will be the subject of a separate application for a DCO, which will be submitted to the IPC later in 2010. Although EDF Energy cannot be certain that the Hinkley Point C Development will



proceed, unless and until a DCO is granted by the IPC, it is appropriate to consider the relevant cumulative and other indirect effects of the site preparation works, the jetty and the Hinkley Point C Development if and when they are subsequently consented.

- 4.2.2 It is not the function of the cumulative impact assessment to assess all of the environmental effects of the Hinkley Point C Development. A separate EIA is being carried out for that purpose in respect of the Hinkley Point C Development as a whole (i.e. including the Preliminary Works). A comprehensive ES will be submitted to the IPC with EDF Energy's application for a DCO for the Hinkley Point C Development.
- 4.2.3 The cumulative impact assessments to be undertaken with respect to the site preparation works would, therefore, take into account the possibility of the other Preliminary Works and future implementation of the Hinkley Point C Development when assessing its environmental effects. They would identify and assess the synergistic effects of these projects. In particular, the EIA will focus on those elements of the jetty and the Hinkley Point C Development that are likely to have an impact on the terrestrial environment.
- 4.2.4 These cumulative and other indirect impacts will be assessed to the extent reasonably required in order to properly assess the environmental effects of the site preparation works. The EIA will also address the cumulative impacts of any other past, present and reasonably foreseeable projects.

#### **b) Scoping Cumulative Impacts of the Site Preparation Works and the Main Build Project**

- 4.2.5 To scope the potential cumulative impacts of the site preparation works in relation to the Hinkley Point C Development, both temporal and spatial boundary factors need careful consideration.
- 4.2.6 Temporally, since the site preparation works are required for the construction of the Hinkley Point C Development, these would take place before the Hinkley Point C Development. The site preparation works would essentially be complete prior to construction of the Hinkley Point C Development. This would mean that some construction phase effects would continue (e.g. localised air and noise quality changes associated with construction activity). In this instance, the continuation of some impacts would not constitute a cumulative effect as the initial impact would represent a phase in the overall works. The potential exists, however, that some impacts could gain or decrease in significance moving from the site preparation works into the Hinkley Point C Development.
- 4.2.7 Spatially, there is no overlap in terms of effects with the Hinkley Point C Development, as the area over which the site preparation works would occur is the site upon which construction would continue as part of the main development. Some impacts generated during the site preparation works would continue through into the Hinkley Point C Development (e.g. loss of vegetation, re-routing and diversion of footpaths). For some impacts, further modification of the site may be required moving through into the main power station build and effects associated with the works would then either cease or be altered in line with the modifications required during the main build. Such aspects include potential modification to the drainage system (i.e. a change from a temporary to a permanent network) and changes to the landscape as a result of further construction work.
- 4.2.8 Taking into account the above, initial scoping indicates that there are a number of areas where some cumulative effects may be expected to occur. These include:
- The presence of stockpiled material in the southern part of the site and the visual and landscape influence of this with respect to the planned layout and visual appearance of the proposed nuclear power station;

- Potential overlap in usage of the site access road between the end of the site preparation works and the start up of the main build project; and
- Further need for closure/diversion of the PRow network.

4.2.9 The ES for the works will fully consider the potential for the above noted effects to occur and also assess any further impacts associated with the works that may have the potential to interact with the effects of other planned or ongoing projects.

### **c) Relationship between the Preliminary Works and Other Projects**

4.2.10 The cumulative impacts of any other identified past, present or reasonably foreseeable projects will also be assessed together with the Preliminary Works. Consultation will be undertaken with WSC, MFA, the Environment Agency, Natural England and other government agencies to identify and agree the projects that will be included within the cumulative impacts assessment.

4.2.11 At present, the following projects are likely to be included:

- existing Hinkley A and B stations;
- proposed deep sea container terminal at the Port of Bristol.

4.2.12 It is felt that mooted projects such as a Severn tidal range power scheme and new nuclear build at Oldbury are insufficiently progressed to be considered in the cumulative impacts assessment. However, their inclusion for cumulative impact assessment might be appropriate if these develop into reasonably foreseeable projects in the course of the EIA for the Preliminary Works, and they would have an overlap, temporally and spatially with the environmental effects of the site preparation works.

## **4.3 Appropriate Assessment**

4.3.1 The site preparation works could interact with the Severn Estuary's Natura 2000 sites and its Ramsar site (see **Table 4.1**) in that construction and operation activities could have an effect upon designated features (e.g. outfall construction on the foreshore, surface water drainage to the foreshore, noise and lighting disturbance). The following paragraphs set out some of the key issues relating to the proposal and the potential for Appropriate Assessment.

### **a) Wintering Birds**

4.3.2 The Severn Estuary SPA and Ramsar site lie along the northern edge of the site preparation works development area adjacent to the proposed site (i.e. Built Development Areas East and West). The SPA was classified under the EU Wild Birds Directive on the basis of its wintering and migratory bird interest. Qualifying features of the SPA are the wintering numbers of Bewick's swan, curlew, redshank, dunlin, pintail, and shelduck, and the large numbers of ringed plover that use the area on passage. The SPA also qualifies by regularly supporting an assemblage of over 20,000 waterfowl. A number of wintering species forming the cited interest of the Severn SPA and Ramsar site regularly occur within 1km of the site, at Steart Flats.

4.3.3 Surveys have shown that many of the bird species occurring in areas adjacent to the proposed site are common species or individuals occur in low numbers. Inter-tidal WeBS data indicates that several species forming part of the cited interest of statutorily designated sites occur on the Steart Flats immediately to the east of the main survey area at Hinkley Point, with very few birds recorded in low tide sectors adjacent to the proposed site.



4.3.4 Equally, the surveys to support the EIA process have provided no evidence to suggest that the fields or adjacent upper inter-tidal habitat are regularly used by large numbers of roosting or foraging birds.

**Table 4.1 Summary of Potential Project Effects on *Natura 2000* Sites at Hinkley Point**

Designated site	Main features	Proximity of jetty to SPA / SAC
Severn Estuary SPA designated under the EC Wild Birds Directive 79/409/EEC	The large tidal regime results in plant and animal communities typical of extreme physical conditions of liquid mud and tide swept sand and rock. The unique physical environment gives rise to sparse benthic communities. Supporting features are considered important at a European level (e.g. sub-tidal <i>Sabellaria</i> reef). The SPA is also designated for its bird interest since its extensive inter-tidal mudflats provide important habitats for passage and wintering wildfowl. Important species include Bewick swans, white-fronted geese, shelduck, gadwall, dunlin, and redshank. Migratory birds can number upwards of 20,000 wildfowl and waders in a wintering period.	Potential encroachment into designated foreshore due to surface water drainage outfall(s).  Potential disturbance to birds using the foreshore and adjacent fields as a result of noise and human activity during construction works.
Severn Estuary SAC designated under the EC Habitats Directive 92/43/EEC	Nominated for the immersed sandbanks, extensive mudflats and Atlantic salt meadows.	Potential encroachment into designated foreshore due to surface water drainage outfall(s).  Discharge of surface water (freshwater) onto the foreshore and localised changes in salinity and flow regime.
Severn Estuary Ramsar site designated under the Ramsar Convention on Wetlands of International Importance	Extensive inter-tidal mudflats provide important habitats for passage and wintering wildfowl. The site is also designated for its bird species, as described for the SPA.	Potential encroachment into designated foreshore due to surface water drainage outfall(s).  Potential disturbance to birds using the foreshore and adjacent fields as a result of noise and human activity during construction works.

## b) Assessment of Likely Significant Effects

4.3.5 Plans or projects that are likely to have a significant effect on a European site (i.e. a SPA or SAC) require ‘Appropriate Assessment’ (AA) to be undertaken in accordance with Regulation 48(1) of the Habitats Regulations 1994 (meeting the requirements of Article 6(3) of the Habitats Directive). Natural England, as statutory advisors to Government on nature conservation, will advise on the need or otherwise for AA, which, if required, would be undertaken by the relevant competent authority, as a separate exercise to the EIA process. Such an assessment considers the implications of the proposals in view of the conservation objectives of relevant designated sites and aims to determine whether an adverse effect on site integrity would arise. Should this be the case, then the project would only be able to proceed if it can be demonstrated that no

alternative solutions exist and that the project must be carried out for imperative reasons of overriding public interest. In this case, compensatory habitat would also have to be provided.

- 4.3.6 If the site preparation works have the potential on their own or in combination to have a likely significant effect on interests of the Severn Estuary SPA / Ramsar site and the Severn Estuary SAC (see **Table 4.1**) then the potential need for Appropriate Assessment arises. The requirement for and content of any AA would be considered in close consultation with key stakeholders, including Natural England.
- 4.3.7 Should AA be required for the site preparation works, it is intended that all information necessary to assist the competent authorities in undertaking this assessment will be provided and will be identified separately from the main ES (although it will draw on, relevant data and findings of the ES). This will include in-combination assessment of the proposed development with other plans or projects, as required by Article 6(3) of the Habitats Directive. The aim of this assessment is to determine whether the combined impact of the works could potentially have an adverse impact on integrity of the designated sites. It is, therefore, necessary to consider the potential impacts of past, present and future plans or projects for which sufficient information is available, as well as the relevant cumulative effects of the Preliminary Works with the Main Build Project for Hinkley Point C.
- 4.3.8 Schemes that have already been constructed will be taken into account in describing the baseline environment. The in-combination assessment will then consider those plans or projects for which relevant information is in the public domain.

## 4.4 Consultation

- 4.4.1 Stakeholder engagement is an essential part of the EIA process and has already helped to inform the requirement for and focus of, specialist surveys, the assessment of impacts and the development of mitigation measures.
- 4.4.2 This scoping document forms an integral part of the formal EIA process as it provides a report on the environmental studies now being undertaken for the proposed development as part of the impact assessment process.
- 4.4.3 Informal consultation will take place with WSC, statutory consultees, other interested parties and the public.
- 4.4.4 The information, views and comments received as part of this consultation process will be important in informing the overall EIA process, as an accurate EIA will limit the potential of negative effects on the nature conservation sites and protected species present at the site. These comments will be considered and incorporated where necessary in the production of the final ES and will accompany the formal planning application.





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