

Copeland Borough Council
Nugen Moorside Project
Technical Evaluation of Nugen Stage
1 Consultation
- Executive Summary

0002

Issue 2 | 23 July 2015

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Executive Summary

This Executive Summary sets out Copeland Borough Council's principal recommendations in respect of an evaluation of NuGeneration Ltd.'s Stage 1 consultation documentation for the Moorside New Nuclear Project.

Copeland Borough Council welcomes the opportunity to review and appraise consultation material and submissions made by NuGeneration. As principal host community to the development, the Council recognises its' key role in assessing the proposals as they evolve in response to NuGeneration's multi-stage consultation process.

The structure of the Council's response to Stage 1 'Strategic Issues' consultation reflects an assessment of core topic areas as set out within consultation material. In addition, these topic areas represent the key issues which the Council considers to be the material considerations which will be of relevance to the Examining Authority in considering the DCO once submitted and for the Secretary of State in any grant of the DCO. Due reference has been made to all consultation material provided by NuGeneration (including an Environmental Impact Assessment (EIA) Scoping Report), supplemented by visits to consultation events.

At this Stage 1 consultation stage, the Council's response focuses on the areas of omission and gaps in information provided in the consultation material with a view to those gaps and omissions being rectified as the development proposals evolve and reflected in later stages of consultation.

In this Executive Summary, a traffic light system has been employed to summarise the key recommendations in each topic area and to guide NuGeneration in responding to the Council's consultation response. This assessment reflects the Council's current position based on the information provided to date, and will be subject to review as the project progresses. It is acknowledged that where significant omissions are identified, this may be addressed as further project information becomes available.

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	The content of the consultation material (including EIA Scoping Report) is considered appropriate and generally lacks errors or omissions. Information is considered adequate for the purpose of Stage 1 consultation with the expectation of further dialogue as the project progresses.
	Insufficient project definition, or baseline information available at this stage limits the extent to which meaningful commentary may be made on the Stage 1 material. Further dialogue required on specific areas.
	The content of the Stage 1 consultation material has significant omissions, or requires updating or reviewing to comply with recommended policy and guidance.

1 Project Definition and Strategy					
Ref	Topic Area	Specific Issue	Adequacy of Technical Information	Gap Analysis and Council Recommendations	Suggested action or mitigation delivery mechanism
1.1	Project Definition and Approach to Stage 1 Consultation	Lack of project definition for the Additional Scoping Land, and Associated Development sites. The Stage 1 consultation document and Scoping Report (as a primary source of technical information) contains relatively little baseline data which undermines confidence in the approach to EIA.		Continued dialogue in respect of project definition and strategy. Continued dialogue in respect of scoping the approach to EIA for Additional Scoping Land and Associated Development. This will be imperative to ensure that the Council and wider stakeholders are satisfied that a robust methodology is to be employed i.e. which is commensurate with the anticipated effects arising from development proposals. The commitment from NuGeneration for on-going engagement on this is welcomed and supported by the Council.	Further engagement in advance of Stage 2 consultation. Details of project strategy for Additional Scoping Land and Associated Development to be made available to the Council as soon as possible. Wider theme or topic based discussion fora with the Council and wider stakeholders recommended.

1.2	Project Definition and Approach to Stage 1 Consultation	Approach to scoping out of potential topic focussed EIA needs based on proposed and high level strategic limits of deviation at scoping stage.		The Environmental Statement (ES) should encompass the worst case effects assessment ('Rochdale envelope' approach). The Council urge caution where potential EIA needs are scoped out, before the project is sufficiently defined, limits of deviation are fully defined, or defined with a large degree of flexibility at this stage. Matters should not be scoped out from the EIA unless specifically confirmed as being scoped out by the Secretary of State in the Scoping Opinion.	Further engagement in advance of Stage 2 consultation. The Council recommends that this be linked into dialogue on further project definition when this becomes available.
1.3	Project Definition and Approach to Stage 1 Consultation	Potential for mutually beneficial outcomes and legacy benefit arising from temporary works.		Significant infrastructure enhancements are proposed as 'temporary' during construction. The Council notes the importance of temporary works and in particular would encourage dialogue with Sellafield Ltd. in the interests of securing mutually advantageous outcomes for infrastructure with an emphasis on reducing impacts and enhancing positive legacy outcomes.	On-going engagement. The Council would value an important role in working with NuGeneration and Sellafield Ltd. in assisting with the definition of these outcomes.

2 Environmental Topic Areas					
Ref	Topic Area	Specific Issue	Adequacy of Technical Information	Gap Analysis and Council Recommendations	Suggested action or mitigation delivery mechanism
2.1	Approach to EIA	Effective and sustained consultation to date.		Informal consultation undertaken with the Council with regard to the details of the Survey and Monitoring Plans (SMPs), has supported a more robust and thorough approach to baseline data collection.	Council to be consulted on any updated SMPs and linked to survey approaches where the project is not defined at this time.
2.2	Approach to EIA	Consideration of cumulative, in-combination, and inter-disciplinary effects.		<p>The Council notes that the Scoping Report lacks topic specific detail regarding how cumulative development would be considered. The Council notes the complexity of cumulative assessment with respect to the ongoing decommissioning programme at Sellafield.</p> <p>The Council would wish to ensure that NuGeneration will fully assess any in-</p>	Further engagement in advance of Stage 2 consultation. The Council recognises the importance of dialogue on this matter, particularly as the project becomes more defined around the

				combination effects and inter-disciplinary effects, particularly those that have the potential to affect community / residential amenity.	Associated Development strategy.
2.3	Approach to EIA	Decommissioning and Legacy effects		It is acknowledged that decommissioning of the nuclear power station is scoped out of the EIA. This is consistent with the approach supported by legislation at this time. NuGeneration should clarify how it intends to address decommissioning of all other elements (such as AD) that form part of the proposed DCO. A link should be made to the prospective end (legacy) uses of sites as far as this is possible.	Further engagement in advance of Stage 2 consultation. Development of an AD Transition Plan which sets out the status of infrastructure once it has served its' immediate purpose in supporting NuGeneration's construction needs. Further dialogue is required to ensure effective outcomes, in line with the strategy identified at Ref 1.3.
2.4	Approach to EIA	Planning Strategy		Further explanation is required in respect of the development planning strategy and any sequential impacts associated with various phases of work supported under different planning regimes i.e. DCO, Town	Ongoing engagement with the Council and wider stakeholders. It will be important that effects are fully explored and appropriate /

				and Country Planning, Marine Licensing, and any permitted development.	proportionate mitigation measures agreed to address effects.
3.1	Transport	Adequacy of proposed Scoping approach to Transport assessment		The Council considers the scope of the assessment sufficient, although further detailed is expected prior to Stage 2 consultation. In particular, the Council will need to understand the relationship of the AD sites and the transport strategy from the perspective of the construction programme. The Council also highlight the need to understand the strategy for how excavated material will be dealt with. The overall excavated volumes (subject to re-use) are potentially large and could have significant transport implications.	Further engagement in advance of Stage 2 consultation. Further definition of the transport strategy linked in to the AD strategy and in particular the movement of workers, equipment and materials. Transport of excavated materials to be addressed as part of the EIA.
4.1	Noise and vibration	Assessment methodology		The Council has identified a number of concerns around the proposed assessment methodology, including compliance with assessment methodology advocated by the Noise Policy for England and the application of BS6472 Pt1. Further work is required to ensure that the impact criteria correctly interpret BS4142:2014.	EIA methodology to be further developed in consultation with the Council. The Council would support engagement on this issue in terms of wider DCO experience of noise assessment.

4.2	Noise and Vibration	Potential effects from transport movements		The Council seek clarity on the type of freight trains used for construction as to how vibration would be assessed. Receptors affected by the new rail spur should be considered, alongside those on the existing track. Quantified justification is required as to why operational phase vibration this is not assessed in the context of operational rail movement, and further definition of the number of rail movement and the management of spoil required.	Further consideration given to the assessment of vibration from operational rail movement as part of the EIA or further justification required on its exclusion.
4.3	Noise and Vibration	Potential effects and health and tranquillity		There should be a full consideration of all the receptors and resources potentially affected to properly scope the spatial scope and the methodologies. This could include places prized for tranquillity, and potential effects on health and quality of life.	To be considered as part of the EIA. The Council recognises that this would be more readily undertaken when the project is fully defined.
5.1	Air Quality and Climate	Assessment of impacts on climate		The Council would strongly encourage NuGeneration to consider carbon foot-printing for the construction stage in alignment with the Copeland Local Plan and recommendations of the HM Treasury Infrastructure Carbon Review.	To be considered as part of the EIA.

<p>5.2</p>	<p>Air Quality and climate</p>	<p>Baseline assessment</p>		<p>It is considered that the monitoring survey is largely sufficient to establish baseline conditions. Clarification is sought on the rationale for why NO₂ monitoring is being undertaken at the SSSI rather than NO_x monitoring, and the absence of SO₂ monitoring.</p> <p>Assessment of emissions from all modes of transport including train, ship and vehicle emissions should be incorporated within an appropriate Zone Of Influence (ZoI).</p>	<p>Further engagement in advance of Stage 2 consultation.</p>
<p>5.3</p>	<p>Air Quality and Climate</p>	<p>Assessment methodology</p>		<p>The Council recommends that criteria to determine impact and significance provided in the revised EPUK/IAQM development control guidance should be used to determine affected roads as a result of the scheme (this also applies for AD sites). This will require amendment to the evaluation significance criteria proposed.</p> <p>The assessment of potential significant effects on nitrogen and acid deposition at ecological receptors should be given due regard under the Habitats Regulations Assessment (HRA).</p>	<p>To be considered as part of the EIA and HRA.</p>

5.4	Air Quality and Climate	Assessment methodology		The air quality and climate assessment should link to the Health Impact Assessment (HIA) and transport, noise and vibration, amenity and socio- economic assessments to provide a holistic assessment of potential community and health impacts.	To be considered as part of the EIA.
5.5	Air Quality and Climate	Assessment methodology		The air quality and climate assessment should link to the Health Impact Assessment (HIA) and transport, noise and vibration, amenity and socio- economic assessments to provide a holistic assessment of potential community and health impacts.	To be considered as part of the EIA.
6.1	Radiological issues	Baseline data		The baseline data gathering and assessment proposals appear reasonable, however the detailed locations and testing suites for radiological assessment cannot be ascertained from the information provided.	Further engagement in advance of Stage 2 consultation.
6.2	Radiological issues	Assessment methodology		The Council would anticipate the consideration of potential effects associated with dewatering and disposal of	To be considered as part of the EIA and wider regulator engagement (alongside the Council).

				<p>radiological contaminated groundwater within the ES.</p> <p>The radiological assessment considers human and non-human species effects via air, groundwater, soil and marine environment pathways and therefore has interfaces with several other proposed ES chapters. Further clarity is sought around the methodology associated with predicted radiation dose.</p> <p>In respect of issues relating the change in baseline for contaminated sediments there needs to be a clear understanding of the potential for marine cooling of the Moorside project to, in itself, change the baseline during construction and operations. This will need to be fully evaluated during the design of the cooling water systems intake and outfall structures and the associated marine environment modelling.</p>	
7.2	Soils, Geology, Agricultural Land and Land Quality	Baseline information		<p>The Council considers the baseline adequate for the purpose of Scoping. Further baseline information should include details of superficial deposits thickness and characteristics; sandstone</p>	<p>To be considered as part of the EIA. The Council notes limited definition in respect of geological conditions of AD sites</p>

	(including spoil management)			bedrock characteristics and faulting and excavated soils within the reactor footprint.	and anticipates further dialogue on this matter.
7.3	Soils, Geology, Agricultural Land and Land Quality (including spoil management)	Assessment methodology		It is unclear to the Council whether the assessment will consider all receptors (including water, environmental, ecology receptors (as well as wider consideration of invasive species) as well as radiological contamination.	To be considered as part of the EIA and across all elements of the project through continued dialogue with the Council.
8.1	Freshwater Environment and Flood Management	Assessment methodology		The Council would generally note that the Freshwater section of the Scoping Report (in support of Stage 1 consultation) is thorough and systematic although the approach to assessment of effects is presented in outline only. Detailed methodologies for assessment of potential effects have not yet been defined.	Further engagement in advance of Stage 2 consultation.
8.2	Freshwater Environment and Flood Management	Flood risk assessment methodology		A joint probability analysis of river flow and tidal boundary conditions is recommended. The Flood Risk Assessment (FRA) should align with the ES and the material supporting dialogue	To be considered as part of the EIA.

				<p>with wider regulators including ONR on the Generic Design Assessment process.</p> <p>The Council notes that NuGeneration will need to assess and demonstrate that staff and visitors to the site will remain safe from the flooding effects (including residual effects) from a flood with a 1 in 1,000 (0.1%) annual probability.</p>	
8.3	Marine and Coastal Physical Environment	Potential effects on designated sites		<p>Low Church Moss SSSI requires particular consideration due to the potential sensitivity of this SSSI to changes to the hydrogeological regime (such as dewatering or in-ground barriers to groundwater flow).</p>	<p>To be considered as part of the EIA and through dialogue with the Council, Environment Agency and Natural England.</p>
9.1	Marine and Coastal Physical Environment	Assessment methodology and project definition		<p>Further design definition is required to establish the likely significant effects, and therefore comment on the suitability of baseline data and detailed methodologies e.g. details on where the in-take and out-falls will be located, type of structure present on the seabed, and location and facilities expected at the MOLF.</p>	<p>Further engagement in advance of Stage 2 consultation with the Council.</p>

				The Council notes that there is limited information on dredging and disposal operations.	
9.2	Marine and Coastal Physical Environment	Assessment criteria		An understanding of sediment transport will underpin the marine coastal assessment. The assessment criteria need to be considered further in terms of changes to the general marine physical processes and not just focussed on designated sites. Long term climate implications on physical processes require some consideration.	Further engagement in advance of Stage 2 consultation with the Council.
9.3	Marine and Coastal Physical Environment	Cooling infrastructure		The Council notes a considerable area of uncertainty in NuGeneration’s proposals for cooling at this time. Furthermore, the range of options create very different requirements in the marine and terrestrial environment.	Further engagement in advance of Stage 2 consultation as project definition is developed for the cooling options.
10.1	Landscape and Visual Impacts	Baseline information		The approach taken to capturing the baseline characteristics is judged to be adequate, subject to further refinement and further engagement as design, including the MOLF, Additional Scoping Land and AD details emerge. Due consideration	Further engagement in advance of Stage 2 consultation and as the project is more thoroughly defined.

				should be given to the relatively proximate Local Character Areas are not included within the current ZTV.	
10.2	Landscape and Visual Impacts	Mitigation		The landscape chapter does not address how mitigation and replacement planting would be considered/secured. Opportunities for off-site mitigation measures such as planting may need to be explored.	Mitigation plans to be developed as early as possible as part of the EIA with a view to SOCG with the Council and wider stakeholders. Mitigation to be secured via DCO requirements.
11.1	Historic Environment	Baseline and Approach		The Council considers the approach taken by NuGeneration to the Scoping Report (as a key source of information at Stage 1) largely appropriate. The Council would encourage NuGeneration to adopt a precautionary approach to scoping and to scope matters in where development and the nature of their effects is yet to be fully defined. The ZoI should be given consideration as the scope of development in AD is defined.	Further engagement in advance of Stage 2 consultation and commitment to adopt a precautionary approach to scoping the EIA.

<p>11.2</p>	<p>Biodiversity</p>	<p>Baseline and survey methodology</p>		<p>The Council considers that the Biodiversity SMP and baseline has been substantively developed. Further detail is recommended in respect of Ancient Woodland, Section 41 Natural Environment and Rural Communities (NERC) mammals, polecat and harvest mouse.</p> <p>The Council requests further clarity surrounding the detail of surveys relating to terrestrial invertebrates, S41 species, badger, bats, great crested newts, reptiles, amphibious mammals, breeding bird surveys, white-clawed crayfish and aquatic macro invertebrates.</p>	<p>Council to be consulted on any updated to the SMPs and during the development of the ecology strategy for the project.</p>
<p>11.3</p>	<p>Biodiversity</p>	<p>Habitats Regulations Assessment</p>		<p>The programme for HRA Evidence Plan, should align appropriately with the survey programme.</p> <p>The Council seeks clarification on whether any freshwater pearl mussel downstream from the SAC boundary are being considered as part of the SAC population or if such reaches will be treated as contributing habitat to the SAC. This will</p>	<p>Further engagement in advance of Stage 2 consultation.</p> <p>HRA matters to be considered in further dialogue with the Council and Natural England.</p>

				<p>clearly be an important matter for inclusion / discussion with the HRA.</p> <p>A mechanism to include other new projects within the in-combination assessment that may come forward between now and the application date would be helpful.</p>	
12.1	Countryside Recreation	Assessment methodology		<p>It is accepted that the methodology is currently high level, therefore details will need to be agreed regarding the scope of assessment, assessment methodology, and how mitigation will be identified and secured.</p> <p>The Council stress the importance of appropriate consideration of the future baseline (e.g. the proposed England Coastal Path). Nugeneration should consider the potential effects during construction including those on the recreational coast and bathing water standards. Potential impacts associated with the MOLF and AD sites require further consideration, along with an appropriate mitigation strategy.</p>	<p>Further engagement in advance of Stage 2 consultation including Copeland Borough Council and Cumbria County Council.</p> <p>Ongoing consideration as part of EIA.</p>

13.1	Socio-Economics and Human Population	Baseline characterisation to inform a supply chain strategy.		<p>The Council wish to be consulted further on baseline information including the supply chain and employment. A baseline analysis should identify gaps in the supply chain and skills and inform a supply chain strategy and should be supported by a robust quantitative data.</p> <p>The Council require more detail on the precise mechanisms for NuGeneration's commitments to the local supply chain to ensure that such measures are agreed, investment is secured and a linkage made to the long term legacy benefits arising from the project, including social infrastructure provision.</p>	<p>Further engagement in advance of Stage 2 consultation.</p> <p>Supply Chain Strategy to be developed to inform the DCO with underpin DCO Requirements and Obligations.</p>
13.2	Socio-Economics and Human Population	Scope of amenity assessment.		<p>Further detail should be provided on how an amenity assessment will be undertaken. NuGeneration's approach to the socioeconomics / human population sections of the ES are primary areas where cumulative environmental effects will be assessed.</p>	<p>Further engagement in advance of Stage 2 consultation.</p>

13.3	Socio-Economics and Human Population	Accommodation Strategy		An accommodation strategy should be provided, based on a robust baseline should identify displacement effects, tourism impacts and the potential for legacy benefits.	Further engagement in advance of Stage 2 consultation.
13.4	Socio-Economics and Human Population	Social and cultural infrastructure		Further detail should be provided as to potential impacts and legacy benefits for community social and cultural infrastructure provision. The demand for religious facilities currently assumes Christian provision only. Nugeneration should provide evidence to support key assumptions.	Further engagement in advance of Stage 2 consultation.

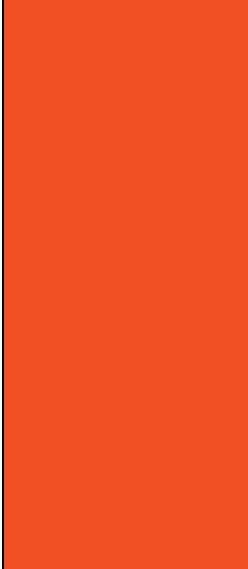
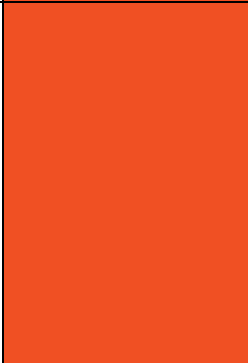
3 Economic, Societal and Community Topics

Ref	Topic Area	Specific Issue	Adequacy of Technical Information	Gap Analysis and Council Recommendations	Suggested action or mitigation delivery mechanism
14.1	Health Impact Assessment (HIA)	Scoping of HIA.		<p>NuGeneration propose to provide an HIA and this is welcomed by the Council. However, it is unclear when this document will be provided and what the intended content is.</p> <p>Healthcare provision for workers including the potential for ‘supporting local leisure and health services’ should be linked back to the anticipated worker needs and any balance of provision which might be accessed by the community clearly articulated in the HIA. Nugeneration should also consider post-construction implications of sustained infrastructure provision.</p>	<p>Further engagement in advance of Stage 2 consultation. A draft of the approach to the HIA should be shared with the Council and wider stakeholders prior to its’ formulation.</p>

15.1	Community Benefit	Community benefit proposals		The Council seeks NuGeneration’s commitment to a community benefit package of measures (informed by dialogue with the community and representative organisations).	On-going engagement. Community Benefits package to be secured by way of Planning Obligations agreement.
16.1	Economy, Gross Value Added, Wages, Sectors, Tourism Economy & Employment	Employment and Supply Chain		There is limited information in the Stage 1 material which adequately addresses the anticipated employment programme, workforce, and economic characteristics/ trends and supply chain. In particular, the Council notes that the baseline is not detailed in respect of the anticipated reliance / scope of the supply chain (numbers; sectors; size and location). Work force displacement, including from other sectors and pathways for employment in line with regional strategies (such as LEP) should form part of an integrated strategy.	On-going engagement and provision of more detailed strategy in respect of positively influencing Employment and Supply Chain opportunities.
16.2	Economy, Gross Value Added, Wages, Sectors, Tourism	Education, skills and employment		Further information is required regarding a strategy for up-skilling, and re-skilling of the existing workforce, and pathways for youth employment, the under-employed and the unemployed. The Council advocates a sector wide approach, to be	Further engagement in advance of Stage 2 consultation as part of a strategy programme.

	Economy & Employment			run in accordance with the LEP framework.	
16.3	Economy, Gross Value Added, Wages, Sectors, Tourism Economy & Employment	Tourism		<p>The Council is encouraged that there are a range of proposed studies identified which makes provision for existing businesses and tourism.</p> <p>This will be important in terms of demonstrating an understanding of occupancy issues.</p> <p>Nugeneration should give further consideration to long term impacts on visitor perception, supported by a robust evidence base.</p>	Continued engagement in advance of Stage 2 consultation.
16.4	Economy, Gross Value Added, Wages, Sectors, Tourism Economy & Employment	Worker accommodation		<p>The Council anticipates reaching a level of understanding from NuGeneration on the facilities and operation of the worker accommodation within the AD sites. The Council would urge NuGeneration to consider spatial recommendations in the Local Plan at the centre of its' AD Strategy. This should link to a coherent</p>	Further engagement in advance of Stage 2 consultation.

				<p>and appropriate Transport Strategy to mitigate effects.</p> <p>Further consideration should be given to the longer term legacy associated with worker accommodation, linked to the growth expectations highlighted through the Centre of Nuclear Excellence and links with existing sectors.</p>	
16.5	Economy, Gross Value Added, Wages, Sectors, Tourism Economy & Employment	Displacement effects		<p>Whilst the existence of transferrable skills might be regarded as a bonus, this could also come at an economic cost to the existing network of nuclear industry/ infrastructure providers at least during the peak construction stage of the programme (the scale of operational labour is more likely to be manageable).</p> <p>This should consider all employment sectors affected, wider than the nuclear industry and infrastructure providers, linking to migration and social infrastructure provision.</p>	Further engagement in advance of Stage 2 consultation.

<p>17.1</p>	<p>Transport (see also Ref 3.1)</p>	<p>Transport strategy</p>		<p>The Council notes there may be an opportunity to explore shared benefits from transport interventions with Sellafield and other major employers.</p> <p>More detail is required on the sensitivity of the trip generation forecasts to changes in the assumed parameters relating to items such as staff numbers, location of staff accommodation and freight modes.</p> <p>The rail strategy should demonstrate an ability to secure and deliver necessary improvements and a sustainable project legacy.</p>	<p>Further engagement in advance of Stage 2 consultation to inform development of transport strategy in agreement with Copeland Borough Council, Cumbria County Council and wider stakeholders.</p>
<p>17.2</p>	<p>Transport (see also Ref 3.1)</p>	<p>Scope of assessment</p>		<p>Community impacts associated with any;</p> <ul style="list-style-type: none"> • Removal of spoil; • transport of nuclear materials; and • decommissioning; <p>Require further consideration in consultation with the Council.</p>	<p>Further engagement in advance of Stage 2 consultation.</p>

<p>18.1</p>	<p>Countryside Recreation (see also Ref 12.1)</p>	<p>Scope of assessment</p>		<p>The Council would note the value of defining exactly which areas / resources and users are considered within this section as it is taken forward to the ES. The amenity assessment is important as this and NuGeneration’s approach to the socioeconomics / human population sections of the proposed ES are primary areas where cumulative environmental effects will be assessed.</p> <p>Ref 12.1 also highlights the consideration of potential additional receptors and effects, beyond those identified by Nugeneration in the consultation material to date.</p>	<p>Further engagement in advance of Stage 2 consultation.</p>
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