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| Hunterston B EIADR consultation responses |



Hunterston B EIADR consultation responses

September 2024

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## Health and Safety Executive (HSE)

HSE is a statutory consultee on specific developments under The Town and Country Planning (Development Management Procedure) Scotland Regulations 2013 and on planning applications for hazardous substances consent.

HSE gets consulted on Environmental Impact Assessments when relevant to our role as a statutory consultee on planning applications.

HSE also has a regulatory role in the health and safety system. To be clear, HSE is not responding in that regulatory role.

Our records show that the Hunterston B site is within land-use-planning consultation zones set by HSE.

The zones are based on planning consent for specified hazardous substances, deemed by the planning authority in 1993, for the Hunterston A Power Station site.

However, our understanding is that the Hunterston A power station has been decommissioned for over 30 years. This indicates no need for the specified hazardous substances to be present at the site. Therefore, if the hazardous substances are no longer present at Hunterston A there is no need to consider the effects of major accidents involving those substances at Hunterston A on the proposed decommissioning project.

Our records also show that Hunterston B Power Station has planning consent for specified hazardous substances granted by North Ayrshire Council. As HNB ceased generating in January 2022 this indicates no need for the specified hazardous substances to be present at the site. If the specified hazardous substances are no longer on site there is no need to consider major accidents involving the substances in the Environmental Impact Assessment.

HSE’s land-use-planning zones remain in place until HSE is informed by the planning authority that the relevant hazardous substances planning consents for the sites have been revoked or are otherwise extant. If you could bring this issue to the attention of North Ayrshire Council that will be much appreciated.

## Historic Environment Scotland (HES)

The Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations (EIADR) Hunterston B Nuclear Power Station Decommissioning, West Kilbride Environmental Impact Assessment (EIA) Report.

Thank you for your consultation which we received on 07 December 2023 about the above EIA report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include cultural heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings. In this case, the West of Scotland Archaeology Service (WoSAS) should be consulted.

### Our position

We do not object to the proposed development. Our comments on the Environmental Statement are included in the attached annex.

### Further information

Guidance about national policy can also be found in our ‘Managing Change in the Historic Environment’ series available online at www.historicenvironment.scot/adviceand-support/planning-and-guidance/legislation-and-guidance/managing-change-in-thehistoric-environment-guidance-notes. Technical advice is available on our Technical Conservation website at <http://www.engineshed.scot>.

### Annex

**Proposed Development**

We understand that the proposed decommissioning of Hunterston B Nuclear Power Station will involve dismantling and demolition of plant and buildings on the Hunterston B site and is to be undertaken in three phases:

* **Preparations for Quiescence Phase** – this phase is proposed to last circa 12 years and will involve the removal of all buildings (except the reactor buildings). The buildings will be removed to ground level only. During this phase, a temporary structure will be constructed around the reactor building, enclosing it. This temporary structure will be the same height as the existing reactor building.
* **Quiescence Phase** – this phase will last for around 70 years, with the reactor building remaining within its temporary structure.
* **Final Site Clearance Phase** – this phase will involve the final removal of all buildings, including the temporary structure enclosing the reactor and the reactor buildings. Demolition will be to ground level leaving the site as a brownfield site.

**Background**

We have previously provided advice on the 05 September 2023 at the scoping stage. We noted that we were content with the proposed scoped and assessment methodology presented and the nationally important heritage assets that were to be considered for detailed assessment within the subsequent Environmental Impact Assessment (EIA) report.

**Our Comments**

We welcome that the potential cultural heritage effects have been scoped into the EIA, and that the applicants approach to assessment of these effects references the HES/NatureScot EIA handbook and our Managing Change in the Historic Environment: Setting guidance.

We are satisfied that sufficient information has been supplied in the EIA report for us to come to a view on the application. We can confirm that there are no World Heritage Sites, scheduled monuments, category A listed buildings, inventory battlefields, or inventory gardens or designed landscapes within the proposed development boundary.

The cultural heritage assessment has been included in Volume I: Main Text, Chapter 13: Historic Environment with supporting appendices in Volume III: Appendices, Appendix 13A and Appendix 13B. The assessment has also been supported by a number of figures within Volume II: Figures, Chapter 13:Historic Environment. Whilst the applicant Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH Scottish Charity No. SC045925 VAT No. GB 221 8680 15 has not provided any cultural heritage visualisations to support the assessment, we note visualisations have been provided in Volume II: Figures, Chapter 14. Landscape and Visual Impact Assessment. The Marine Historic Environment assessment is included within Volume III: Appendices, Appendix 5B, Section 2. Marine archaeology.

We have reviewed the contents of the EIA report and agree with the conclusions that the impact on the setting of designated assets in our interests will be positive over the full term of the proposed development. It is possible that temporary structures used during the demolition, and the temporary structure erected around the reactor, may have a temporary negative effect, but the removal of the structures in the long term will be positive.

We note the applicant presents a marine archaeology baseline and assessment and agree with the conclusions that there are unlikely to be any significant impacts, based on the proposed work. We welcome that a Protocol for Archaeological Discovery (PAD) will be included and secured within the Environmental Management Plan. This approach will ensure the reporting and treatment of unexpected archaeological discoveries during the proposed work within the marine environment.

## Scottish Environment Protection Agency (SEPA)

Thank you for your consultation which was received by SEPA on 7 December 2023 in relation to the above application.

SEPA has no objections to ONR granting consent under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 to EDF Energy NG Ltd for the Hunterston B site. However, we have provided detailed advice in the appendices.

We would expect any ground contamination to be addressed as part of our on-going site regulation and ultimately through the surrender processes for the site’s permits under the Pollution Prevention and Control (Scotland) Regulations 2012 and Environmental Authorisations (Scotland) Regulations 2018. Any ground contamination associated with historical contamination that may fall outwith these regimes would be best addressed during the decommissioning process to address potential liabilities under other regimes. Including Part IIA of the EPA 1990.

We expect if the decommissioning activities require authorisation, or the removal of authorisation, by SEPA under any of the environmental regimes we regulate, the site operator will engage with us in a timely manner.

### Advice for the applicant

#### Regulatory advice

Details of regulatory requirements and good practice advice, can be found on the [regulations section](https://www.sepa.org.uk/regulations/water/) of our website.

#### Appendices

1. Appendix 1 - Hydrogeological review of Environmental Statement for Hunterston B decommissioning
2. Water Resources Unit File Note
3. Hydrogeological review of Environmental Statement for Hunterston B decommissioning

#### Key references

In preparing this file note, WRU have reviewed the following document(s):

1. Decommissioning of Hunterston B Nuclear Power Station. Environmental Statement. Prepared by WSP UK Ltd for EDF. November 2023. Volumes I and II, specifically Chapter 12 Soil, Geology and Hydrogeology
2. Decommissioning of Hunterston B Nuclear Power Station. Outline Environmental Management Plan. Prepared by WSP UK Ltd for EDF. November 2023.

See also:

1. 20220802\_OFFICIAL\_HunterstonB\_Scoping\_WRUFilenote

### Introduction

An Environmental Statement (ES) has been prepared for the decommissioning of Hunterston B nuclear power station. There is also an Outline Environmental Management Plan (OEMP). SEPA Planning have requested that SEPA’s Water Resources Unit (WRU) review the sections relating to groundwater and provide technical comment.

This review undertaken by WRU and the comments provided focus on hydrogeological issues. WRU note that the assessment of risks to groundwater associated with radiological hazards has been scoped out of the ES to be considered instead during permitting for the decommissioning and associated activities. Thus, WRU’s review comments presented here pertain to non-radiological aspects only.

### Site overview

Hunterston B power station is located in North Ayrshire. The site was built in the 1960s and ceased generation in 1990. Decommissioning will be undertaken in three main phases:

* Preparations for Quiescence Phase
* Quiescence Phase
* Final Site Clearance Phase.

The site is located near the coast. The ground conditions comprise made ground over raised beach deposits and glacial till. The underlying bedrock is the Kelly Burn Sandstone Formation.

The site lies within two groundwater bodies:

* 150785 North Ayrshire Coastal (superficial)
* 150534 West Kilbride (bedrock).

Refer to WRU’s previous hydrogeological review at Scoping for more detail regarding the site and its hydrogeological setting.

### Key findings

The key findings of the WRU assessment are outlined below.

1. WRU do not object in principle to the proposed works.
2. It is understood that, owing to the phased nature of the proposed works, further assessments will be undertaken as the site works progress. We assume that further consultation with SEPA will be undertaken as appropriate in support of the relevant authorisations.
3. The choice to drop from the 1km zone of influence for hydrogeological features considered at Scoping to 250m in the ES has not been justified in detail. However, given the geology, topography and coastal setting, the proposed distance is not considered unreasonable.
4. The predominant groundwater flow direction is towards the northwest to the coast. Subsurface structures and services may locally influence the shallow groundwater flow regime within the site. There is potential for hydraulic connection between the shallow groundwater and surface water features.
5. There are no known potable abstractions in the vicinity of the site.
6. Potential sources of contamination have been identified and assessed as requiring further investigation and assessment. We note the intention to update the 2021 Tier 1 Preliminary Risk Assessment. We also note the ES assessment assumes in Section 12.8.1 that ground conditions have not changed significantly since the 2021 Tier 1 Preliminary Risk Assessment but recognises the risk that additional localised contamination may yet be identified.
7. We note the proposed embedded measure to regularly review the land contamination risk assessments as the works progress. A phased approach to site characterisation and assessment is considered reasonable at this site given the access constraints associated with existing structures and services. Regular review of the land contamination risk assessments is anticipated to help manage the potential risk of unforeseen ground conditions, including soil or water contamination, being encountered during the site works. The information will also help inform appropriate waste management.
8. We note that climate change effects will be taken into consideration during the land contamination risk assessments and waste management planning. Alignment with relevant industry guidance (e.g. SoBRA 2022) is considered a reasonable approach. Note also that climate change predictions for the area may change over the lifetime of the proposed works.
9. Drainage surveys are part of embedded measure 11.9. Reference is made in the OEMP to the drainage surveys and mentions confirming direction of flow. Note that flow directions within the drainage system may vary, especially during flood events.
10. We note that groundwater monitoring is already undertaken at the site. We consider it likely that ongoing groundwater monitoring will be required over the long-term whilst relevant activities are ongoing at the site. We note this embedded measure is included in the OEMP (pg. 46). Note that the scope of appropriate groundwater monitoring is likely to be wider than just that required for PPC compliance and surrender. The groundwater monitoring will also be required to facilitate validation of any remedial works and in relation to on-site re-use of wastes. It may be appropriate to vary the scope and/or frequency of the groundwater monitoring as the works progress to reflect the activities ongoing on the site during each phase.
11. Development of a Site Waste Management Plan regarding conventional wastes is proposed. We note that potential risks to soil, groundwater and surface waters will be considered when generating suitability for use criteria for the potential on-site re-use of waste materials. Even waste materials classified as ‘inert waste’ may pose a potential risk to the water environment if not managed or re-used appropriately. The same waste material may not be suitable for every usage or in every location across the site. Risks to groundwater are likely to be higher for materials being placed below the water table.
12. Table 12.7 Ref. 11.18 makes reference to dewatering assessments being a good practice measure, but Section 12.11.47 and the OEMP makes reference to 11.18 being an embedded measure.
13. We note that Section 12.10 bullet point 4 states that potential effects on infiltration, groundwater levels and hydrogeological flow regime have been scoped out on the basis that the site is coastal and the groundwater is not currently used. Note that SEPA consider the groundwater bodies beneath the site to have future groundwater resource potential in the long term, even if usage is currently constrained by on-site activities. Whilst the works may be unlikely to affect the quantitative groundwater resources available in future at the groundwater body scale, the works have the potential to locally influence the hydrogeological regime. In particular, there will be potential for any remaining artificial subsurface features to act as barriers or as preferential pathways for groundwater flow. It is noted that groundwater and precipitation are planned to be assessed further in relation to flooding (section 11.5.47).

### Recommendations

WRU recommend:

1. The groundwater monitoring plan is regularly reviewed to ensure the monitoring remains fit for purpose as the works progress.
2. The groundwater monitoring analytical suite should reflect the potential contaminants identified in the Tier 1 Preliminary Risk Assessment (and its updates) as well as the findings of the phased investigation works.
3. Regular condition surveys of the groundwater monitoring network are recommended to ensure the boreholes are all suitable for use. Any damaged boreholes should be repaired or replaced as appropriate.
4. Contingency planning is recommended as part of the Site Waste Management Plan to account for the risk of a greater proportion of the wastes than expected proving to be unsuitable for on-site re-use. This may result in the requirement for additional treatment prior to re-use and/or additional off-site disposal to appropriately authorised facilities. Regular reviews of the Site Waste Management Plan are recommended to ensure the plan remains fit for purpose as the works progress.
5. The assessment of suitability for use for re-use of waste materials should take into account the requirements to avoid direct discharge to groundwater, to prevent entry of hazardous substances into groundwater, and to avoid pollution of the water environment. It is acceptable to consider having different assessment criteria on a location/activity specific basis.
6. Note that the dewatering assessments will need to take into consideration the requirements set out in the CAR Practical Guide in relation to both the dewatering itself as well as the subsequent discharge of the abstracted water. Depending on the scope, scale and duration of the dewatering works, prior authorisation from SEPA may be required.
7. The drainage planning for the proposed works needs to account for the potential for site drainage to act as a preferential pathway for contaminant migration, both with respect to existing contamination and if a pollution incident such as a leak or spill were to occur during the site works. This should take account the potential influence of flooding.
8. The potential effects of the site works on infiltration, groundwater levels and the hydrogeological regime, including any influences relating to climate change, will need to be accounted for as part of the land contamination risk assessments, waste re-use suitability assessments, and during drainage planning.
9. As a minor stylistic comment, it would be preferable to number the rows in Table 5.1 of any future revisions of the OEMP to aid cross-referencing.

### Appendix 2 - Radioactive Substances Science Comments

The RS Science team was requested by planners to comment on the above consultation on the ONR portal. Brief review was made of the Environmental Statement (ES) Volume 1 document Chapter 12, and the Outline Environmental Management Plant (EMP), recognising that prior to the commencement of the proposed works, a detailed EMP will be prepared for consultation with ONR and other stakeholders, including SEPA, which will be subject to review and comment.

It is noted that earlier risk assessments are due to be updated by the applicant, but we confirm that no updated reports were provided as part of this present consultation, which meant that only a limited time-bound review was made of ES Volume 1, Chapter 12.

As noted in our previous response in August 2022 to the EIA Scoping Report consultation, the RS Science team reiterates that the Part IIA regulatory regime is the regime of “last resort” for radioactive contaminated land, in that it aims to address existing unacceptable exposures from legacy industrial activity, rather than forming a benchmark at which the end state can be targeted for a site just ceasing to operate. SEPA’s expectation is that all regulatory requirements will be met during the permit surrender process using relevant guidance and codes of practice, and that the guidance on the GRR-RSR specifically (Ref 1) will be followed.

#### Comments on Environmental Statement vol. 1

##### Chapter 12. Soils, geology and hydrogeology

###### Section 12.2

The tables in Section 12.2 Relevant legislation, policy and technical guidance should include the following key reference, which was not found in Tables 12.1, 12.2 or 12.3.

• The Radioactive Contaminated Land (Scotland) Amendment Regulations 2009: Statutory Guidance, Published 26 March 2010 and available at <https://www.gov.scot/publications>

###### Section 12.3.4

It would be useful to understand the implications in terms of features excluded by the change referred to in Section 12.3.4, of a reduction in the Zone of Influence (ZoI), as stated here: 12.3.4 The use of a 250 m ZoI is a reduction from 1 km in the Scoping Report, based on further review of soil and groundwater data, ground conditions and conclusions in previous environmental reports produced for the Site.

SEPA would advise that to capture preferential pathways for contaminant migration, for example drainage runs, soakaways and any higher porosity geological or man-made features, the ZoI may need to be extended back out beyond 250 metres.

###### Section 12.3.5

RS Science previously reviewed the report listed in Table 12.4 Data Sources used to inform the ES assessment: WSP Golder Associates (UK) Ltd (2021) Land Quality – Tier 1 Preliminary Risk Assessment: Hunterston B Nuclear power Station. Ref. 21468567.603/A.0, October 2021. Please refer to our previous comments in the email response dated 12 February 2023.

###### Sections 12.3.7 and 12.3.8

These sections describe the data limitations. Section 12.3.7 states that “The licensee is in the process of having the land contamination assessment for the Site updated.” and that “The updated Tier 1 – preliminary risk assessment will provide comprehensive land contamination risk assessment for the Site in its current use.”

Section 12.3.8 states that “The area of land by the Jetty and Power Station Road are not included in the 2021 Tier 1 – preliminary risk assessment.” and that “The embedded measures in Table 12.7 include a commitment to expand the land contamination risk assessment to include all land within the Works Area.”

SEPA supports the intended updates to the ES risk assessments, and expansion of the area subject to a land contamination risk assessment to include the land by the jetty.

###### Section 12.4.3

This section includes the consultation responses provided by statutory consultees for soils, geology and hydrogeology. SEPA provided a number of comments, for which the relevant aspects are to be addressed through updating the assessments within the ES:

*“The ongoing update to the Tier 1 Preliminary Risk Assessment (expected Q4, 2023) will include review of data obtained by the licensee since the 2021 report was produced to provide an updated assessment.”*

SEPA recognises the need for revision of work plans on the basis of additional information and data, once demolition works get underway and buildings, hardstand and services are broken up and subsurface conditions are revealed. It will be important to build in review points supported by radiological monitoring and sampling of soils and water into the timelines to enable sufficient opportunity for decision making as information comes to light.

The RS Science team would be happy to continue to provide advice and support to the ONR as required when consulted in due course on the above mentioned intended updated reports.

###### Reference:

1.*Management of radioactive waste from decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation Version 1.0: July 2018*

### Appendix 3 - Flood Risk comments

We have **no objection** to this application on the grounds of flood risk.

#### Reasoning:

Based on the information submitted we would make the following comments.

Review of the SEPA Flood Maps indicate parts of the site are at potential flood risk from coastal and surface water flooding. We have no records of historical flooding in the area.

The approximate coastal flood level for the area is 4.5mAOD including an allowance for climate change. The flood level is derived from the 0.5% Annual Exceedance Probability (AEP) still water level based on the Coastal Flood Boundary Method which does not account for the effects of wave action, funnelling or local bathymetry. The applied recommended sea level rise for the area by 2100 is based on the latest UK climate change predictions published in 2018 as outlined in SEPA’s guidance. Given the nature of the use it is noted that the Environmental Statement (ES) considers the 0.01 AEP event for all flood sources.

As part of the ES it is noted that a site walkover has been undertaken along with use of several previously undertaken modelling studies including the Japanese Earthquake Response (JER) study. These have not been reviewed by SEPA. But it is assumed that these are based on good practice and subject to robust model audit and quality assurance (QA) process. It is noted that modelling assumptions made are acceptable. Such as no joint probability between surface water and coastal flood events. Along with no consideration of drainage infrastructure during extreme events. The design life of this proposal is approximately up to 2121. Climate change has been considered in line with good practice. It is also noted that further flood modelling is proposed in 2024.

We have reviewed the key outputs such as rainfall accumulations and coastal flood levels relative to key risk receptors on site such as the reactor building and turbine hall. The studies are thought to be based on appropriate methods and the representation of flood risk at the site is in line with all other evidence that is currently available.

In terms of mitigation a number of measures are proposed through the various development phases in addition to the existing coastal flood defences and site levels. These include floodplain avoidance approach where possible, surface water management measures, emergency planning and on-going monitoring and review.

Given all these considerations we are satisfied that the flood risk has been assessed and will be subject to further assessment and review over time. The proposal is therefore viewed as compliant with the principles of NPF4.

#### Caveats

Please note that we are reliant on the accuracy and completeness of the information supplied at the time of providing our advice.

## NatureScot (1)

### Summary

#### Southannan Sands Site of Special Scientific Interest

There are natural heritage interests of national importance at Southannan Sands Site of Special Scientific Interest (SSSI) close to the proposed development site. However, we advise that with the implementation of the mitigation measures detailed in the application these will not be affected by the proposal.

We provide advice on measures that would help ensure impacts on other natural heritage interests are minimised.

### Background

EDF Energy Nuclear Generation Limited is applying for consent from the Office for Nuclear Regulation (ONR) to decommission the Hunterston B Nuclear Power Station (HNB).

Nuclear Liabilities Regulation Specialism The Office for Nuclear Regulation Redgrave Court Merton Road Bootle, L20 7HS.

We understand that the decommissioning project will involve a three-phase process and will take approximately 100 years to complete before the land is left as a brownfield site for potential redevelopment use.

As well as terrestrial aspects of the works, marine components include the removal of the intake and outfall structures to seabed level, and the demolition of the HNB jetty. We provided scoping advice to the ONR by letter on 16 September 2022.

### Appraisal of the impacts and advice

#### Nationally protected sites

##### Southannan Sands Site of Special Scientific Interest (SSSI)

The Southannan Sands SSSI is approximately 0.2 km north of the proposal site and is designated for its nationally important Intertidal marine habitats, saline lagoons and sandflats that extend over 4 km along the coast. Southannan Sands SSSI is subdivided into three discrete areas, which together support one of the best examples of intertidal sandflats habitat within the entire Clyde coastline. See NatureScot’s SiteLink for more detail1 .

We note there is no spatial overlap between Southannan Sands SSSI and the proposed works area (EIAR -section 9.5.4).

We welcome the mitigation proposed in sections 11.6 & 8.10.6 of the EIAR designed to minimise any potential negative impacts on the SSSI and its notified features from water and airborne pollution. We advise that this mitigation should be approved by the ONR in consultation with SEPA and fully implemented as part of any consent granted to the application.

We note, sections 10.10.13-10.10.17, that the potential impact of the works to effect coastal processes, including flooding of the site, is considered negligible. We further note that the proposed removal of marine infrastructure is considered to be likely to have a very low magnitude impact on sediment transport and therefore negligible impact on the Southannan Sands and Kames Bay SSSIs. (EIAR section 10.10.8)

##### Kames Bay SSSI and Ballochmartin Bay SSSI

Kames Bay SSSI and Ballochmartin Bay SSSI are located 2.1 km to the northwest and 3.5 km to the north of the proposal area respectively. The notified features of these two sites are the flora and fauna of the intertidal area. We advise that the measures to protect Southannan Sands SSSI will also protect the notified features of these SSSIs.

#### Protected species

##### Cetaceans, migratory fish & mobile Priority Marine Features (PMFs)

##### We advise that the following European Protected Species (EPS2 ): harbour porpoise, bottlenose dolphin, common dolphin and minke whale, and PMF species: harbour seal, grey seal and basking shark are all found within the Firth of Clyde. Due to the potential for 1 https://sitelink.nature.scot/site/10261 22 These EPS are also PMF’s. 3 disturbance and auditory injury impacts via noise during decommissioning, the impact of the development was evaluated. We agree that the application correctly identifies the lack of impact pathways with a potential to significantly impact these receptors. (EIAR 9.10.48)

##### Non- mobile PMF

We note that the native oyster and sea grass beds, both Priority Marine Features (PMFs), are found within the nearby Southannan Sands SSSI. PMFs do not have legislative protection, but the basis for protection of their national status across Scottish waters is included in the National Marine Plan. The EIAR contains sufficient detail in order for the impact of these proposal to be assessed as not significant. (section 9.10.8).

##### Other protected species

We note that otters, badgers, birds and bats have the potential to be affected by this proposal and we welcome the steps outlined to mitigate any risk to these and other species (EIAR table 8.18).

The majority of the surveys for these species were carried out in 2019 with a verification survey carried out in December 2022. Whilst the 2019 survey data is no longer valid for assessment purposes and the verification survey was caried out at a sub optimal time of year, we do not consider additional assessment is necessary given the lack of change in baseline conditions and the commitment to carry out preconstruction surveys (Table 8.12 - Embedded Mitigation Measures). We welcome this commitment and advise that our current guidance is followed 3. The timing of pre-construction surveys depends on whether it is possible to survey a species at any time of year (e.g. otter and badger) or if there is restricted window within which a survey can be undertaken (e.g. breeding birds and bats). For species that can be surveyed at any time of year, pre-construction surveys should be undertaken as close to the construction period as possible, and no more than 3 months before the start of works. For species that have a restricted survey window the pre-construction surveys should be undertaken as close to the start of works as possible, and always within the most recent survey window.

##### Wider Countryside Birds-breeding

The EIAR details the breeding birds found within the terrestrial and marine footprint of the site and details robust mitigation (table 8.12) to protect these species. We welcome the preparation of a Bird Protection Plan which will include working practices to minimise effects on ornithological features.

We also recommend that should consent be granted the applicant should follow our guidance on Dealing with construction and breeding birds 4 . (March 2016).

The EIAR (Table 8.11 and Appendix 8H5 ) identifies that a minimum of 5% of Ayrshire’s breeding population of black guillemot were found on marine structures associated with HNB, one of which is to be dismantled.

The main limiting factor for these birds is access to secure nesting places. Black Guillemots nest in burrows or crevices but have also been shown to take readily to wooden nest boxes

Works within the area of potential impact to breeding black guillemots and other breeding birds should be avoided throughout the core breeding bird season. If this is not possible, a suitably experienced ecologist should check the development site before work commences to determine the presence of any nesting birds. If demolition is to be undertaken during the breeding season, mitigation will be required to ensure that all potential black guillemot nest sites are excluded prior to work starting on the structures to be demolished. Where possible, plywood should be securely fixed/nailed over cavity entrances to prevent access. Where this is not possible, metal mesh should be used to tightly pack the cavities and secured in place to prevent the birds from attempting to remove the mesh. To prevent injury to or entrapment of birds, the mesh should have a small hole size (approximately 13mm). If nesting birds are found, a suitably sized buffer zone should be set up around the nest and no work within this zone should commence until the young have fledged or the nest is no longer in use.

This will ensure that no nests are destroyed during the site construction works and no offences are committed under the Wildlife and Countryside Act 1981 (as amended).

The EIAR concluded7 that the black guillemot assemblage is of County level importance. We recommend that the incorporation of black guillemot nesting boxes / crevices in the remaining marine structure is an appropriate method of compensation, and ideally enhancement, for this species.

##### Wider Countryside Birds - non-breeding

Intertidal survey data provides a clear picture of non-breeding bird use of the proposal area (EIAR Table 8.11). We would support ongoing monitoring of bird numbers and behaviour by the ECoW to ensure that the proposed works do not unnecessarily cause excessive levels of disturbance and displacement of these species. Invasive non-native species (INNS) and Biosecurity Management.

##### Invasive non-native species (INNS) and Biosecurity Management.

The marine decommissioning elements have the potential to increase the spread of INNS into the surrounding marine environment including the adjacent SSSI. We welcome the implementation of a Biosecurity Management Plan for the proposed marine and terrestrial elements of the work as part of the Environmental Management Plan. Landscape and Visual Amenity

##### Landscape and Visual Amenity

We recognise that significant landscape and visual impacts are likely to arise as a result of this application (EIAR 14.9.9) and there may be scope to reduce these impacts through appropriate design mitigation. However, our approach to advising on applications is to focus upon impacts on Scotland’s landscapes that potentially raise issues of national interest (i.e. as identified in our guidance8 ). In this case, we do not consider that the landscape and visual effects of the proposal will raise natural heritage issues of national interest, and therefore we are not providing specific advice.

### Enhancing biodiversity

We refer you to our revised pre-application guidance 9 which includes advice on enhancing biodiversity in a Scottish context, and links to relevant guidance The Scottish Government draft planning guidance on biodiversity and NatureScot’s Developing with nature Guidance.

Section 8.4 of the EIAR commits to using the BNG metric to calculate the BNG baseline (biodiversity units) and the anticipated loss of biodiversity units due to the Proposed Works. We could find no evidence to show that this has been submitted as part of the EIAR. We note that the delivery of opportunities for biodiversity enhancement form an objective of the proposed Interim State Landscape Plan (see Appendix 14G) based on the planting of a range of native and non-native tree and shrub species. However, there is insufficient detail included to determine if these measures are compensation for lost habitat or a mixture of compensation and enhancement. There is considerable opportunity to create areas rich in nature throughout the site, rather than limit the current proposal for proposed nature provision to act primarily as screening for the site.

Consequently, opportunities to demonstrably improve overall biodiversity in and around this important site should be explored in more detail and taken where appropriate, these include the following:

* Additional Woodland and hedgerow creation
* Coastal grassland and species rich grassland creation
* Terrestrial wetland creation
* Seagrass, saltmarsh and oyster habitat expansion and restoration
* Installation of bat and bird boxes.

### Concluding remarks

This advice is provided by NatureScot, the operating name of Scottish Natural Heritage. I hope that this response will assist you in your consideration of this Application.

## NatureScot (2)

Many thanks for your consultation of 10 January 2024 requesting our comments on the Habitats Regulations Appraisal Report for the above proposal and for providing us with a copy of the Appraisal report. (WSP Environment & Infrastructure Solutions UK Limited for EDF Energy – June 2023)

### Background

EDF Energy Nuclear Generation Limited is applying for consent from the Office for Nuclear Regulation (ONR) to decommission the Hunterston B Nuclear Power Station (HNB).

Under regulation 4 of EIADR, ONR is required to ensure that assessments under the Habitats Regulations and the environmental impact assessment under the EIADR are coordinated. Consequently, the ONR are liaising with NatureScot to check if we have carried out any assessments relevant to the HNB decommissioning project that should be taken into account.

Related to this, Regulation 48 of The Conservation (Natural Habitats, &c.) Regulations 1994 requires that an appropriate assessment is carried out by the Competent Authority (ONR) on plans or projects which are likely to have a significant effect on a European site or European offshore marine site. EDFE has provided the Habitats Regulations Appraisal Report relating to this which concludes ‘that there are no likely significant effects on any qualifying interest features of any European Sites’. ONR will assess this report, but would welcome comments on the report from ourselves.

We understand that the decommissioning project will involve a three-phase process and will take approximately 100 years to complete before the land is left as a brownfield site for potential redevelopment use.

### Advice

Our advice on the appropriateness of the HRA appraisal report is as follows-

#### European site or European offshore marine sites.

The appraisal report (sections 4.1.6-4.1.9 and tables 4.1 & 4.3) accurately identifies the European sites and European offshore marine sites to be assessed for potential impacts, through a comprehensive assessment of possible impact pathways, likely to arise from the proposed development.

Table 5.1 provides an authoritative review of the possible impacts of the development on this suite of protected sites. We are in complete agreement with the conclusion of the HRA screening stage that the proposal will not result in any Likely Significance Effects on these sites, either alone or in combination with other projects.

We welcome the wide-ranging approach taken in compiling this HRA screening and in particular we note the work undertaken to determine that the lesser black backed gull and herring gull winter and summer bird records for this site do not belong to the nearby Ailsa Craig Special Protection Area (SPA) where both of these species are qualifying features of the SPA.

We also note the approach taken within the HRA appraisal report to include all relevant European sites and to include all Mobile designated features of European Sites (i.e. breeding seabirds, fish or marine mammals) which may interact with the proposed works when remote from the relevant European Site. This comprehensive methodology provides us with a high degree of confidence in the conclusions reached in the report.

Whilst we broadly agree that there will be no significant in-combination effects arising from this proposal we note that two large proposals within 3km of the site were not included in the otherwise comprehensive review of relevant projects (Appendix 4A). These projects are as follows and should be taken into account when planning the project to determine if additional steps are required to minimise the overall effects of these projects on the identified marine receptors.

* *Environmental Impact Assessment (EIA) scoping for upgrade of the existing Hunterston Construction Yard. 23/00757/EIA*
* *Marine (Scotland) Act 2010, Part 4 Marine Licensing 00009702 - North Ayrshire Council - Construction of Coastal Protection, Millport, Great Cumbrae. 2022 [ Currently in construction]*

Given our understanding of the project scope and scale we have no current plans to carry out an independent assessment of the impact of the proposal on European designated sites in order to inform your appropriate assessment required under the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the “Habitats Regulations”)1 .

### Concluding remarks

This advice is provided by NatureScot, the operating name of Scottish Natural Heritage. Our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if it is subsequently submitted as a formal application. I hope that this response will assist you in your consideration of this Habitats Regulations Appraisal Report.

## Hunterston Site Stakeholder Group (HSSG)

We thank the Office of Nuclear Regulation for the opportunity to respond to this proposed decommissioning project.

We thank the B site director and his team, who have conscientiously consulted at local public events regarding the proposed decommissioning plans.

Whilst members of the public attending have been somewhat frustrated by the high level nature of the presentations and the lack of detail, we are now having a large amount of information presented to us.

The local event consultations have been quite general in nature, compared to the comprehensive and lengthy consultation documents we are now considering.

### Comment from West Kilbride resident who attends SSG meetings

*The document as it stands is difficult to fault. It is detailed and demonstrates to the Regulator that serious thought, whether right or wrong, has been put into the consequences of each stated option.*

*In some cases it states exactly what the Company does at this moment in time.*

*The EIADR Report does not say how they will decommission the station and therefore cannot be an Environmental Impact Statement*

*Each plant part has a number of possible options, where they try and state the risks and possible environmental, safety, financial, time constraints, legal and compliance  aspects associated with that option.*

*As we know, things evolve and in ten years time none of the quoted options may be valid.*

HSSG, from experience, realises that the proposed plans are EDF e`s,  but that these will likely change once B site becomes the Nuclear Decommissioning Authority`s liability.

HSSG is acutely aware of the escalating costs of nuclear decommissioning, that Sellafield and Dounreay hazards are rightly prioritised, that the pressure of work on inspectors in other areas like GDF, GDAs, SMRs and new nuclear build could deplete the ability of the Regulators to carry out timely due diligence of civil reactor decommissioning plans and work. This is of great concern.

The  NDA will likely have a difficult job in securing sufficient funding and suitably skilled workforces for those sustained decommissioning projects that offer the best options for communities with decommissioning civil nuclear reactors, such as ours.

### Comment  from Fairlie Community Council

*It looks more and more likely that Hunterston will be left with ugly, decaying buildings, housing redundant reactors, intermediate level waste stores containing some poorly characterised radwastes.*

*Our pleas for height reduction of buildings and suitable cladding to mitigate visual impact will likely fall by the wayside due to financial constraints.*

*It`s difficult to see that NDA will prioritise our community`s  wishes, when it has, until recently, ignored the intolerable risk that West Cumbrians live with daily and will continue to live with for the next decade at least.*

*Our expectations pale into insignificance when we set them against the complex waste problems and risks at Sellafield and Dounreay.*

*However, we do live on one of the most beautiful waterways in Northern Europe that has two SSSIs and a population that values its natural assets.*

*HNB and HNA Decommissioning plans should encompass this, and the NDA/NRS should ensure future projects help sustain a skilled workforce, minimise discharges to the environment and improve the area`s visual amenity.*

HSSG, which has the five local Community Councils represented, as well as North Ayrshire  Councillors, a National Farmer`s Union representative, Hunterston Estate representative  and  trade union representatives, hopes for an outcome that will fulfil the high expectations of our communities with regard to health, safety and protection of environmental and visual amenity.

The Hunterston B site is within 5km of two mainland villages, West Kilbride to the south east and Fairlie to the north. The hamlet of Portencross, on the Hunterston Peninsula, is closer, but on the opposite side of  Goldenberry  Hill. The village of Millport on the Isle of Cumbrae is 3.5km due west of the site. The town of Largs is 8km to the north.

The nuclear sites A and B are very obvious from the sea, from parts of the coast and from the hills.

The site is adjacent to two SSSIs. Portencross Woods and Southannan Sands as well as close to a National Scenic Area.

We have had almost 20 years of SSG interaction with NDA, Energy Solutions, Magnox (now Nuclear Restoration Services).

Decommissioning Progress has been steady and slow. The site directors at both stations have been ready to engage meaningfully with us.

Over the past two decades, there is a lack of progress in improving visual amenity at the HNA site.

We have been consulted on various types and colours of cladding for the A site reactor buildings for all these years.

The public had wanted cladding that blended into the background better, but we still have the white “temporary” cladding with no sign of that changing, hence this comment from a Fairlie resident who attends HSSG.

*There is only one viewpoint of the B site from Fairlie, ie at Allanton Park Terrace, when in reality half the village lies elevated and looks down on the site.*

*Pointless to do detailed study for B station when promises regarding the A station cladding have just been ignored .*

The waterway (River Clyde) is where liquid radioactive discharges are released  from A (decommissioning) and B (defuelling) nuclear stations.

They currently share the same discharge pipe, and we assume the B station cooling water pumps are still ensuring large volumes of water going out, to  help dilute and disperse radionuclides.

HNB, when defuelling is complete, or maybe even before, intends to stop the pumps and drastically reduce the current abstracted seawater output.

This is of concern to us, as we are unconvinced, that the discharge pipe is in deep enough water or far enough from the shore to dilute or disperse the radioactivity from the numerous treatment and disposal options that will be ongoing, not only at the B site but also at the A site.

We have concerns about the radionuclides which have not been dispersed, but lie in the sediment around the discharge pipe which is uncovered at low tide.

#### HSSG Comment

*We are pleased that ONR, in its  Pre Application Opinion has questioned EDFe about monitoring of the sediments.*

*Like ONR , we would wish to see more consideration go into, and get more information regarding potential for cross contamination from other radioactive sources outside the current site boundary, including a closed landfill ( ?does this refer to the  High Volume Very Low Level Waste pits on the foreshore or somewhere completely different? ) and in respect to the 39” outfall and its two associated lagoons .*

*In addition, the Environmental Statement should provide further details on the interactions with Hunterston A regarding receptors and co polluters  and the interactions with potential sources of radioactive contamination. The assessment should also consider the risks posed by existing contamination and how the contamination may change over time .*

HSSG  is interested in finding out if any of the plutonium released into the waterway, or contained ( hopefully in very small amounts ), in the ILW store has changed into Americium and how, if happening, this is being factored in.

As Hunterston is the first to have two nuclear sites decommissioning, HSSG would like to see enhanced monitoring of liquid discharges and a long term study initiated to ascertain where liquid discharges are likely to migrate to during the decommissioning period for the two sites. Any results of monitoring of the sediments at varying distances from the discharge outlet and local health data should be collected over the long term.

We prefer, unless convinced to the contrary, that the tidal window for discharges is maintained, so that any future discharges do not go out at low tide.

HNB has already asked SEPA that the water outlet flow is reduced and discharges can be made during any tidal state.

We note from the Consultation Document that Table 4.1 , WFD Screening in or out for EIA, the discharges we refer to are to be screened out.

EDF`s rationale is that these are already authorised under existing CAR licensing and changes in these discharges are characterised within the baseline and are thus out of scope.

They will go out via the new Active Effluent Discharge Line. It is proposed that it will have its outlet where the outfall is currently located.

HSSG is disappointed that these are to be screened out and would like further justification of this if the ONR agrees to this.

As shown in the Environmental Statement Volume 3 Appendices maps,

our waterway is used for leisure pursuits, wild swimming, sailing, canoeing, paddleboarding, diving and fishing. The area with its waterway and backdrop of hills is particularly beautiful and any decommissioning plans should consider impact on visual amenity.

As health and safety are the overriding  priorities, our focus has and is on discharges to the environment and exposure of the workforce and public to radioactive aerial and liquid discharges as well as discharges from any radwaste stores and reactor breathing.

Whilst HNB no longer generates electricity and thus some radwaste discharges are negated or reduced, the ongoing decommissioning work with its different waste streams will produce different radioactive discharges and we are hopeful that the need for any Environmental Impact Assessment from these, will be reviewed as detailed plans evolve. We do not want those scoped out aspects to remain scoped out, if plans evolve which need Environmental Impact Assessment to be a consideration.

Will there be reviews?

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“During removal of marine structure, there is potential for nearby sediment to be disturbed and suspended in the water column. It is not clear if any sampling of the sediment has been undertaken to understand the potential for mobilisation of existing contamination in the sediments. Consideration of changes in water quality due to suspended sediments should also be included in the Environmental Statement,”

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“There is potential that explosives could be used in the marine environment. This may result in disturbance to marine fauna as a result of underwater noise and vibration. The impact of noise and vibration on Marine Fauna and physical harm/damage to marine habitats and species as a result of the use of explosives should be assessed along with the possible disturbance to sediment and potential contaminant release.”

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Potential spread of non native species.

The above are all concerns for the local communities and the HSSG

HSSG is unsure as to whether these issues have been adequately assessed in the EDFe report and ask ONR to maintain scrutiny of these issues and potential impacts on our marine environment, flora and fauna.

#### With regard to Noise and Vibration

HSSG does not consider that 2km radius from site is a wide enough zone to provide protection for us.

Noise carries more readily over water and wet land.

The villages of Fairlie (mainland ) and Millport (Isle of Cumbrae) are separated by the waterway and from past experience we know that noise is more of a problem for those of us separated by water rather than land.

We ask that ONR consider this.

HSSG is unsure about the Regulations quoted by EDFe`s consultant, as to whether, the stated regulations will adequately protect against all potential noise nuisance. From past experience, Infrasound Low frequency Noise (ILFN) ie frequencies below 20 Herz have proved to be detrimental to health.

HSSG asks that ILFN is considered as part of any Noise and Vibration baseline or monitoring programme.

This is to ensure people are not subjected to noise nuisance as decommissioning work continues.

#### With regard to construction traffic

The A78 trunk road through Fairlie is barely fit for purpose.

Like parts of the A78 through West Kilbride/ Seamill, the road is very narrow.

In Fairlie, one part of the A78 is so narrow, that two buses or heavy goods vehicles passing each other have to mount the pavement.

In the past, North Ayrshire Council have included in Planning Consents, a Planning Condition that says that construction traffic has to avoid Fairlie and approach Hunterton sites from the south.

Whilst this benefits Fairlie, it does nothing to alleviate the pressure on the route via West Kilbride/ Seamill.

The road infrastructure to the Hunterston Nuclear Sites and Hunterston PARC sites (Peelport) is inadequate. This can only be exacerbated with decommissioning of HNB and the increase in heavy construction vehicles.

HSSG notes that rail and sea transport impacts are currently not to be assessed for environmental impact, however, if used in the future for decommissioning purposes, then we wish to point out that the rail link from the mainline to Hunterston Parc (where the spent fuel flask crane is located) is not electrified and when this was used in the past for coal trains, the diesel trains idling at the Hunterston Parc site, which is the nearest access point for anything from HNA and HNB sites, were extremely noisy. Due to the single line nature of the railway mainline, transport from Hunterston Parc railhead was usually overnight to accommodate passenger trains during the day. So noise was a problem, especially at night.

#### With regard to the A station ILW Store

HSSG is not opposed to this being used for B station ILW, so long as safety and security are not compromised in any way.

We are not opposed so long as it has sufficient capacity and does not stop future A station ILW being stored.

We are concerned about SEPA`s discontent with the characterisation already done for the radwaste from the five old vaults at HNA.

We would ask for reassurance that the lack of adequate characterisation of the waste already in the ILW store, does not pose a problem.

Specifically, we ask if any plutonium contaminated items, which might have been in the old vaults and transferred into the stainless steel boxes already, pose a problem in any regard.

We are aware that if Plutonium (alpha) is there, it can change into Americium , a gamma emitter and we ask if this has implications that need assessing.

#### With regard to the Solid ILW Encapsulation Plant

HSSG is as yet not aware what HNA based facilities will be utilised with regard to HNB decommissioning.

The fact that the KUKA robot has been abandoned and human intervention will be needed with associated revised radwaste protection measures within the SILWE Plant, we are concerned about its prolonged and extended use and welcome assessment of what it means to our ongoing aerial discharges.

On a final note, and HSSG is sure ONR already has this in its sights, with the start of decommissioning at HNB and the current decommissioning of HNA, with all the facilities either to be deconstructed, constructed or utilised, all the different waste streams and work areas to be considered, we cannot stress enough just how important we feel it is, for the management of the combined sites to have an overall knowledge of the sites and a clearly marked pathway of decommissioning to be taken.

## NHS Ayrshire & Arran

### Air quality

The proposed desk-based approach seems proportionate for this assessment. However, a list of monitoring stations that were used for this would be helpful. As there are no Air Quality Management Areas within North Ayrshire, it would be useful to know how air quality is going to be monitored throughout the different phases of the decommissioning process and where samples will be taken. This is not only from the perspective of direct human health impacts but also in relation to the agriculture surrounding the site (given possible food chain contamination). This will also be useful in terms of feedback to local residents who are already concerned about the decommissioning process and have raised concerns about air quality and dust. Evidence suggests that environmental, man-made hazards within a person’s local surroundings can have indirect negative health impacts e.g. loss of sleep, stress related exacerbations, other psychosocial effects. Sharing air quality monitoring results may aid in alleviating some of these anxieties.

### Climate change

We note that in section 5.2.3, the non-technical summary mentions UK Government target of 2050 for net zero – but climate change policy is a devolved matter and the Scottish Government net zero emissions target date is 2045.

Current guidance and targets may shift over the length of this decommissioning, therefore, we recommend plans going forward strive for ongoing / continual decreases in the carbon impacts of the decommissioning activities as new technologies become available as well as monitoring over the long term based on current standards.

We welcome the embedded measures outlined on page 19 of the Environmental Statement Non-Technical Summary and would suggest that in addition to using locally sourced construction materials where available, tendering and contract allocation decisions should take into account providers/suppliers’ own carbon reduction plans. Opportunities for local providers and suppliers to be involved in this are welcome and in line with Community Wealth Building principles.

### Coastal management and water quality

Expertise and regulation for this topic sit mainly with SEPA. Human health concerns would be related mainly to the two designated bathing waters which are situated within the Study Area. Given the increase in outdoor water-based recreation (such as wild swimming), this should be a priority. Are there plans to potentially communicate with water users and/or where necessary limit access to these areas whilst any works that could potentially affect the water quality are carried out?

Embedded measures outline water testing prior to release to ensure it meets environmental standards – it would be useful for this to be extended to human health standards (SEPA bathing water quality standards). In addition, will testing of the water, particularly from the bathing sites, be incorporated after any significant discharge, localised work within the study area or any other major works that could result in run-off etc?

### Soils

Likewise with coastal management and water quality, SEPA will hold the expertise here in terms of the plans in place to monitor, remediate and prevent land / water contamination. We note the previous occurrences of contamination and proposals for ongoing monitoring. Again, it would be useful to know the outline of this and if this information will be shared with the local community, particularly when discussing future uses of the site.

### Landscape and visual

As well as the technical assessments being carried out we would also welcome assessments which take into account local perceptions of the landscape. We recommend carrying out engagement and consultation with local communities to learn more about their views and concerns about potential changes to the local landscape. Local people are most likely to have a sense of pride in their surroundings and we ask that potential impacts on people’s mental health and wellbeing are considered through meaningful engagement. The Locality Officers who work with the Connected Communities Team in North Ayrshire Council are likely to be able to assist with engaging local residents.

As well as long term landscape and visual changes to the site itself, we also recommend that consideration be given to any landscape and visual impacts that construction compounds, activities, machinery may have on the local population and what action may be taken to mitigate these.

### Noise and vibration

Previous noise monitoring has returned acceptable results but it is recognised that this is likely to increase during the Preparations for Quiescence phase. Work taking place during working hours only will decrease the impact on human health.

### Traffic and transport

The document states that there will an increase in HGV traffic into and out of the site, and that at the peak level this could result in up to 24 additional movements per day. Though these were deemed to be low in the EIA, we remain concerned that this may have significant impacts on local communities. We recommend that these impacts are limited as far as possible by combining and rationalising HGV movements.

The document states that there are no cycle routes within the site, however, other roads which will be used by this HGV traffic are used for cycling and active travel as detailed in Appendix 1. This may therefore have a knock-on impact on the real and perceived safety of local community members using active travel modes.

We recommend EDF consider if there is potential to work with the local authority to support safe active travel opportunities (e.g., segregation from traffic) on the A78 and other roads which may see increased traffic and HGVs.

Other embedded measures we would recommend considering in order to mitigate increased traffic associated with the decommissioning process (in particular during Preparation for Quiescence):

* Provision of active & sustainable transport planning and support for staff
* Car sharing schemes

Involvement of North Ayrshire Council’s Active Travel Workplace Engagement Officer may be beneficial.

### People and communities

The report makes note of potential impacts on mental health and wellbeing but no actions / mitigations have been identified at this time. Stakeholders including the Public Health Department and the Health and Social Care Partnership will be able to offer input to both site staff and the local communities regarding mental health promotion and protective factors.

We note that significant effects on local employment rates and individual workers are anticipated. It is important to recognise that local-level impacts on employment and loss of skilled workforce from the closure of a major employer can be very important to health and wellbeing outcomes for individuals, families, and communities, even if these changes appear to be negligible on larger geographical scales (such as at local authority level). The report also states that EDF do not anticipate people will be out of work long term, however, we would question this assumption and request further information on the evidence on which it is based. Any resultant unemployment may negatively impact the local economy and the health of communities, families and individuals and potentially exacerbate already high levels of inequalities and child poverty which are experienced in North Ayrshire.

The report makes reference to Ayrshire Growth Deal plans but we are unsure of timescales in terms of people moving out of EDF employment and future Ayrshire Growth Deal opportunities becoming available.

Further consideration should be given to potential impacts on people should they need to travel further for work than they already do as we are aware of transport poverty and transport issues in North Ayrshire and also any potential impacts should people need to retrain for work in other industries.

To mitigate these impacts, we suggest engaging at an early stage with the Local Employability Partnership (LEP) as a key stakeholder in terms of employability, to ensure that affected workers are provided with support for job search and applications as well as skills development that reflects their individual needs and the local labour market. Clear communication with staff to minimise uncertainty around the transition is also an important part of mitigating potential negative health and wellbeing impacts. We would also recommend ensuring that affected workers (and their household members) are connected with local financial inclusion services which may be able to support them in the transition. Additional support may be needed for groups of workers particularly vulnerable during such times of transition, such as older workers, unskilled workers, and those whose skills do not meet local labour market demand: again, work with the Local Employability Partnership will be crucial here. It may be valuable to invite representation from the Local Employability Partnership onto the Site Stakeholder Group.

As part of the community benefits programmes operated by EDF, Magnox Ltd and NDA, we would recommend that funds are targeted towards mitigating the social, economic, and health impacts from the decommissioning process, for example through:

* Community-led prioritisation of funding e.g. through Participatory Budgeting
* Investment into local employability projects.
* Wellbeing/psychosocial support for affected workers and their families/households
* Opportunities for social connection, community cohesion and peer support (which may otherwise be lost through changes)
* Community initiatives which recognise and build on the shared identity and heritage of Hunterston employees

Where new staff are joining the workforce during the decommissioning process, we would welcome information for site staff and workers being made available on local shops, hospitality and opportunities for local activities as part of their induction, in order to facilitate community integration.

### Major accidents and disasters

We note that the guidance documents make reference to theEmergency Preparedness Guidance on part 1 of the Civil Contingencies Act 2004 document produced by the Cabinet Office – however, this is only applicable to certain agencies in Scotland specifically national UK agencies, namely the Maritime and Coastguard Agency, the Health and Safety Executive and the British Transport Police. All other agencies work to the Preparing Scotland suite of guidance documents.

### Conventional waste

We note that conventional waste procedures are already in place. We welcome the proposals for re-use of materials (non-hazardous) on-site and that minimal additional waste generated during the Preparing for Quiescence phase will be removed via conventional routes. We would welcome the chance to review the Site Waste Management Plan when it becomes available.

### Cumulative Effects Assessment

We remain concerned that the cumulative effects of changes in employment, noise, traffic, air quality during preparation for quiescence may have significant adverse effects on the health and wellbeing of local communities. The mitigating measures rely heavily on replacement of employment opportunities via the Ayrshire Growth Deal but it is not clear that the timelines or labour market opportunities will align sufficiently to provide the degree of mitigation expected – and heavy reliance on a single initiative to mitigate a range of cumulative impacts seems problematic.

We would therefore request careful consideration of the other recommendations made here regarding potential mitigations (particularly relating to communities and employment) and would propose that a health and health inequalities impact assessment be carried out, led by health professionals, utilising the Place and Wellbeing Outcomes for Scotland ([Place and Wellbeing Outcomes | Improvement Service](https://www.improvementservice.org.uk/products-and-services/consultancy-and-support/planning-for-place-programme/place-and-wellbeing-outcomes)), and involving a range of stakeholders on a participatory basis, This is something that we can consider supporting – please contact us to discuss further.

### Appendix 1. Local active travel routes which may be affected by the decommissioning process

A current cycle path / core path route goes directly into the Hunterston site from Largs and from West Kilbride. The core path plan can be accessed here:

[CorePathsPlanMap11 (north-ayrshire.gov.uk)](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.north-ayrshire.gov.uk%2FDocuments%2FCorporateServices%2FLegalProtective%2FLocalDevelopmentPlan%2FCorePathsPlanMap11.pdf&data=05%7C02%7Clindsey.murphy5%40aapct.scot.nhs.uk%7C832c03191933496ba68f08dc1367a391%7C10efe0bda0304bca809cb5e6745e499a%7C0%7C0%7C638406583057234901%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Iq%2BZyhsJLbMd6WcJDV68RqwCoGkkzqlxlFHXWhoryTo%3D&reserved=0)

From Largs on the above map you have the NC21; NC22; and NC 61, this is a 99% traffic free route directly into Hunterston, the only section that is on road is between Fairlie Bowling Club and the car park prior to Peel Ports, as shown below:



From Seamill & West Kilbride there are routes that will take you away from the A78 and directly into the Hunterston site.

Again, this plan will provide some guidance: [CorePathsPlanMap11 (north-ayrshire.gov.uk)](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.north-ayrshire.gov.uk%2FDocuments%2FCorporateServices%2FLegalProtective%2FLocalDevelopmentPlan%2FCorePathsPlanMap11.pdf&data=05%7C02%7Clindsey.murphy5%40aapct.scot.nhs.uk%7C832c03191933496ba68f08dc1367a391%7C10efe0bda0304bca809cb5e6745e499a%7C0%7C0%7C638406583057234901%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Iq%2BZyhsJLbMd6WcJDV68RqwCoGkkzqlxlFHXWhoryTo%3D&reserved=0)

The NC60 isn’t a route for cycling due to the nature of the path and is more of a walking route as it forms part of the Ayrshire Coastal Path route

The NC39 is a route that starts at the Waterside Restaurant and takes you into West Kilbride, it then brings you out at Portencross Road at the junction of the A78, from here you would then go onto the NC38 to which you then take the NC111 and then onto the NC36 and NC61 directly into Hunterston.

## References

There are no sources in the current document.