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South Gloucestershire Council

**Hinkley C Connection Project**

s42 Consultation Response

28 October 2013



South Gloucestershire Council

With support from: Pinsent Mason, Arup  
and JME Conservation Ltd

## Abbreviations

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Abbreviations that may be used in this report are:

BCC – Bristol City Council

The Council – South Gloucestershire Council

DCO – Development Consent Order

DPD – Development Plan Document

EA – Environment Agency

HPPC – Hinkley Point C Connection Project (the subject of this consultation response)

LIR – Local Impact Report

NPPF - National Planning Policy Framework

NPS – National Policy Statement (followed by EN-1 Overarching and EN-5 Electricity Transmission Networks)

PINS – The Planning Inspectorate, the National Infrastructure Directorate of PINS (who will be the Examining Authority for this project)

S Gos – South Gloucestershire

SPD – Supplementary Planning Document

TBC – To be confirmed

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# Executive Summary

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- (i) As is set out in more detail in the subsequent sections of this report, there are a number of significant concerns about the potential impact of the proposed Hinkley C Connections project, including the adequacy of the assessment of impact, accepting of course that the consultation is on the basis of **preliminary** environmental information and there is further work yet to be done.
- (ii) Concerns about potential impact of the proposed development on:
- The developability of land consented for development in the Severnside Enterprise Area
  - The extent and integrity of ecological offset areas within the Severnside Enterprise Area
  - The Traveller community at Aust who are located directly adjacent to the access track
  - Public Rights of way in the Severnside area
  - The Severn Way its amenity and setting and safe pedestrian and equestrian access to it at Aust
- (iii) Concerns about adequacy of impact assessment:
- Survey work and assessment is ongoing in a number of areas and disciplines and therefore the scheme design has not always been informed by appropriate findings. There is concern that the proposed work programme may not allow for this to be rectified.
  - Some of the baseline data previously provided by the Council for example regarding existing planning consents at Severnside does not seem to have informed the route alignment or impact assessment. Information and policy relating to Public Rights of Way appears to be incomplete.
  - It is not possible to determine the impact on Public Rights of way as proposals for affected routes are not clear.
  - There is insufficient information as to proposed mitigation to enable an appropriate assessment of the likely residual environmental impacts, this includes for example potential impact as a result of drainage or disturbance to the estuary designations at Aust, avoidance of impact on existing flooding problems at Aust village, traffic management to ensure avoidance of impact on residents or businesses, the potential for impact on any underlying fossil bearing geology at Aust and protection of wildlife at the rhines at Severnside. Further details are given in the following sections of this report.
  - Cumulative impacts taken together along the length of the proposed route as well as in combination with other projects have not been adequately assessed.
  - A draft Construction Environment Management Plan should be discussed and agreed with the Councils prior to the submission of the DCO. This will be important in respect of a range of potential environmental impacts during construction, including noise, air quality, drainage, biodiversity etc.
  - Detailed proposals for hours of working, construction traffic routes etc. will need to be agreed with the Council put in place to avoid impacts on communities and businesses.
  - Indirect impacts also need to be considered, including for example the proposed location of source materials used for construction of temporary access roads, pylons and sub-stations relation to vehicle impact/routing. This could be a

significant issue for South Gloucestershire given the proximity of various quarries within its boundary.

(iv) Concerns about presentation

- It is difficult to establish the impact on public rights of way as this seems to be presented in a number of different sections of the PEIR.
- It is recommended that further consideration is given to improve navigation of the document, especially for public use. Given the size of documentation errors are probably inevitable, however a significant number of cross referencing errors are found.

## Key Risks

- (v) It is accepted that discussions are ongoing with National Grid regarding a range of EIA topics, however this response is made on the basis of the Section 42 consultation material, and comments are therefore as follows:
- (vi) NPS EN-1 para. 4.2.4 requires that ‘...significant effects, including any significant residual effects taking account of any proposed mitigation measures or any adverse impacts of those measures, have been adequately assessed’, and also compliance with the EIA directive.
- (vii) It is of concern that key surveys and assessments remain to be completed at this late stage in project development. For example Landscape and Visual impact assessments are not yet complete, photo montages are awaited and discussions regarding transport proposals and mitigation particularly during construction are yet to be completed. This leads to a risk that the project proposals and associated mitigation measures may not be adequately informed by or respond to those surveys and assessments, and predicted levels of impact cannot be verified.
- (viii) At the time of writing archaeological surveys are yet to be undertaken and there is therefore a risk that project proposals are being developed that do not take account of or respond to as yet unrecorded features. This leads to a risk that conclusions being reached may be unsound or that mitigation proposed is not appropriate.
- (ix) There are similar concerns regarding the transport studies.
- (x) NPS EN-1 para 4.2.5 and 6 require the consideration of cumulative effects including in combination with other projects. Given that HCCP is some 60 km in length plus additional associated works such as substations, there is a risk that individual reporting of impact on an area by area basis (e.g. for public rights of way) does not provide an adequate picture of the impact of the scheme as a whole. There is also a concern that not all constraints have been picked up (e.g. consented development and ecological offset areas in the Severnside/Avonmouth area) and therefore a risk that an adequate picture of cumulative impact may not be provided.
- (xi) In order for the project to be able to demonstrate that ‘good design’ according with section 4.5 of NPS EN-1, it is suggested that information will need to be provided in the DCO application as to the design process and evolution.
- (xii) It is acknowledged that engagement has taken place with National Grid over a number of years; however it is of concern that up to the stage of S42 consultation little of this has focussed on the detailed alignment of the transmission route or design of associated infrastructure, including construction access and arrangements, or on mitigation. Without this aspect of pre-application engagement, there is a risk that areas of concern regarding impact on communities and the environment may endure upon submission of the DCO.

Consequently the issues that can be agreed by Councils and National Grid as Common Ground may be more limited than might otherwise be the case.

- (xiii) It is of concern that the public have not in general been consulted on mitigation proposals (except for aspects of substation design where strategic planting proposals are included in the Section 42 consultation documentation).
- (xiv) The mitigation of many impacts during construction is likely to depend on the implementation of Construction Management Plans. These are not yet available and the PEIR makes statements that impacts will be mitigated but not necessarily how. It is therefore suggested that in order for PINs to make an assessment of the adequacy of mitigation, it will be necessary for Construction Management Strategies or Plans to be available to set out the specifics of how impacts (e.g. run off into the internationally designated estuary or environmentally sensitive rhine system) will be managed. This is consistent with the advice contained in e.g. NPS EN-1 paragraph 5.2.18, which states that 'the applicant should include appropriate mitigation measures as an integral part of the proposed development'.

# 1 Introduction

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## 1.1 Purpose of the S42 response

- 1.1.1 This is a delegated officer response from South Gloucestershire Council submitted in accordance with delegations in the Council's Constitution, and following consultation with Lead Members of the Planning, Transportation and Strategic Environment Committee and with Local Members and Parishes.
- 1.1.2 In accordance with PINs guidance, this response seeks to provide input and advice to National Grid on the nature and impact of proposals and the content of the S42 consultation documentation including the project proposals, draft DCO, requirements and obligations, and the preliminary environmental information
- 1.1.3 In line with the Planning Inspectorate's advice the Council has liaised and coordinated with the other Councils affected by the proposals in order to seek to provide coordinated responses. Liaison with other organisations including Natural England and English Heritage has also taken place through National Grid organised thematic group meetings.
- 1.1.4 For ease of collation and comparison, this submission is prepared in a similar format to the other Councils, and incorporates input from relevant in house specialists, for Heritage the advice of JME Conservation Ltd, and for Ecology advice from Arup - who are also advising the Somerset and North Somerset Councils.
- 1.1.5 **Please note that detailed comments regarding the Transportation aspects of the S42 consultation made on behalf of South Gloucestershire Council are included in the Joint Council's Stage 4 Technical Review,**
- 1.1.6 **This Council's comments on the draft Development Consent Order are included in the Joint Councils' submission.**
- 1.1.7 **Both the Transport and DCO comments are incorporated the Joint Councils response that is being submitted on behalf of the Councils by Sedgemoor District Council.**

## 2 General

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### 2.1 Chapter 3 – Project Description

#### Table 3.3 Outline Construction Programme

This programme does not appear to give the dates for the proposed construction of the Aust substation. These should be included as they are necessary to provide information to assess the impact of construction and effective mitigation proposals in relation to wildlife associated with the international designations on the estuary, disruption to local residents and also any potential for in combination effects with other proposed developments in the locality (such as other National Grid works that we understand are proposed in the vicinity).

#### Para. 3.3 Limits of Deviation

Limits of deviation of 60m may be inappropriate for locations that are constrained by e.g. business uses, ecological or archaeological sensitivity, public rights of way etc., including for example in the Severnside & Avonmouth Enterprise Area. More tightly defined limits should be proposed for this area for consultation with the Council.

In order to be able to assess environmental impact and the appropriateness of the design proposals, confirmation is also needed as to what if any limits of deviation apply to the substation proposals, as the proposals drawings are currently marked as 'preliminary'. (The plans and sections shown at 3.3.1 are described as 'Preliminary Site Plan and Preliminary Elevations', and mitigation proposals as 'Preliminary Landscape Mitigation'.) The sections are not adequate to be able to assess the depth of cut slopes in the vicinity of potential SSSI related fossil deposits, and questions therefore remain as to impact.

#### Para. 3.5.48 Section G: Avonmouth

This section should reference the joint Bristol City and South Gloucestershire Enterprise Area that covers a large part of this section of the proposed route, and also the extant 1957/58 planning permission for a range of industrial and commercial uses, as well as the large areas proposed for ecological offset in relation to impacts on the international designations on the Severn Estuary. Information regarding these matters has previously been provided to National Grid.

These factors have a significant bearing on the potential impact of the proposed route through this area. They also present a risk to National Grid's proposed alignment as due to the extant consent areas of land could be developed at any time. There are also other consents and proposals in the locality that should inform both the topic based and the cumulative impact assessments.

It is also essential that this area is visited to ensure that information on ground conditions is up to date, as significant site clearance, earth moving etc. has been undertaken in the area to the east of Seabank over recent months in the northern part of the study area. This may affect the details of impact assessment in this locality.

This section of the route crosses a Recreational Route and passes close to another. Impact on both should therefore be assessed.

### Para. 3.16 Description of the Aust Substation

The description of the site context should address the Traveller community located directly adjacent to the access road to the site, since there is potential for impact on them and a need to ensure that adequate mitigation is delivered.

This section should also consider the Severn Way long distance footpath (Local Plan Saved Policy LC12: Recreational Routes) that runs alongside the boundary of the substation compound, as well as in the wider context, Offa's Dyke National Trail that ends on the opposite bank of the Severn. Impact on these should be assessed as well as on the pedestrian access and Sustrans Route 4 (Fishguard to London) cycle route across the Severn Bridge.

## **2.2 Chapter 4: Planning Policy Context**

### National Policy

2.2.1 Although the NPSs EN-1 and 5 form the primary policy against which the HCCP will be assessed by PINs, and these documents include a range of policies relevant to this project, NPS EN – 1 paragraph 4.1.5 also makes it clear that the IPC (and by extension now PINS) '*may consider both important and relevant to its decision making... Development Plan Documents or other documents in the Local Development Framework*'. It is important therefore that National Grid considers local policy both in the planning and design of its project and also in impact assessment.

2.2.2 The Council has not undertaken an assessment of the relevant sections of policy in the NPSs that need to be considered and compliance assessed, however it is noted that these documents cover all issues as set out in the Council's response as set out below.

### Local Policy

2.2.3 National Grid's consultation documentation is incomplete as the planning policy context for South Gloucestershire is out of date. Only the South Gloucestershire Local Plan policies have been cited and there is no mention of the soon to be adopted Core Strategy, which includes relevant policy nor does it identify those Local Plan policies that are to be saved or not saved.

2.2.4 It should be noted that the South Gloucestershire Core Strategy is due to be adopted within the next few months and therefore carries significant weight in light of the stage the plan has now reached – a number of the South Gloucestershire Local Plan policies are to be replaced by the '**South Gloucestershire Local Plan Core Strategy incorporating Inspector's Draft (October 2012) and Further (March 2013) Main Modifications**'

2.2.5 Appendix 4A should also include the following policies from the South Gloucestershire Local Plan until the Core Strategy is adopted:

- **Policy E2** Severnside; and
- **Policy E4** Safeguarded Employment Areas.
- **Policy LC12** Recreational Routes (also shown on the proposals map: the Severn Way, a route crossed by the proposed pylon line at Severnside, and another is close by)

2.2.6 The South Gloucestershire Local Plan policies that are cited in the National Grid documentation policies that will no longer be saved are:

<b>D1</b>	<b>Achieving Good Quality Design in New Development</b>
<b>L3</b>	<b>Coastal Zone</b>
<b>L17 &amp; L18</b>	<b>Water Environment</b>
<b>EP1</b>	<b>Environmental Pollution</b>
<b>E2</b>	<b>Sevenside</b>
<b>E4</b>	<b>Safeguarded Employment Areas</b>

2.2.7 Relevant Core Strategy policies that should be cited and against which the proposed Hinkley C Connection Project should be assessed include:

<b>CS1</b>	<b>High Quality Design</b>
<b>CS2</b>	<b>Green Infrastructure</b>
<b>CS9</b>	<b>Managing the Environment and Heritage</b>
<b>CS35</b>	<b>Sevenside</b>
<b>CS36</b>	<b>Proposals for Major Infrastructure Projects</b> (please note that this includes NSIPs)
<b>CS37</b>	<b>Oldbury Power Station</b>

2.2.8 This section should also list relevant Supplementary Planning Documents, including the South Gloucestershire Landscape Character Assessment 2005, since this should influence the design of the proposals and mitigation measures and inform impact assessment.

2.2.9 It is also noted that the policies listed after S Gloucestershire Local Plan Policy GB1 appear to relate to West Somerset but this is not made clear in the table.

## 2.3 Chapter 5 EIA Approach and Method

2.3.1 Information regarding Public Rights of Way (PROW) appears to be split between the Preliminary Environmental Information Report sections on Transport and Socio-economic impact. This makes it difficult to assess the adequacy of information provided, or gain a clear picture regarding impact. Given that PROW is cumulatively a significant issue along the length of the route, as suggested previously we recommend that it is given its own section in the Environmental Statement.

2.3.2 We consider that while the documentation seeks to assess impacts on individual locations and localities, it does not adequately assess the cumulative impacts taken together along the length of the route, e.g. sum total of hedgerow removed or total area of tree cover affected, or number of drainage ditches and rhines crossed, PROW diverted etc. Taken together with the proposed mitigation works (details of which are yet to be seen), an assessment can then be made of adequacy of mitigation and residual impact.

2.3.3 Para 5.4.29: The opening statement states that mitigation is 'typically' used to reduce effects of 'higher' significance. This is questioned, as we expect mitigation to be provided for all significant effects and not just those of 'higher' significance. This statement implies that impacts of significance that is not considered 'higher' may be disregarded and go unmitigated. Cumulatively along the 60km length and in combination with its other associated infrastructure, this could result in significant unmitigated impacts.

## 2.4 Chapter 17: Preliminary Conclusions and next steps

- 2.4.1 Para 17.1.3: Statements are made that ‘reinstatement’ of soils, low vegetation and hedges will be undertaken, but method statements and specific proposals are needed to ensure that the proposals will adequately reinstate the features such that plants will grow, hedgerow species are appropriate, planting densities are adequate, and that significant tree cover that is lost is either reinstated where possible, or where this is not possible, trees are planted elsewhere to offset the impact. In addition off site planting is likely to be required to ensure that wider visual impacts are mitigated or offset. Proposals should be made available to the Councils for consultation prior to submission of the DCO application.
- 2.4.2 The conclusions as to levels of impact seem in a number of instances to be inadequate or possibly premature, for example Para. 17.1.9 states that impact of the substations will ‘reduce’ as planting matures, but does not seem to set out conclusions as to the level of impact on landscape character at completion and then after the 15 year establishment period referred to in the methodology. The section on Visual effects, despite its sensitivity in terms of location adjacent to the Severn Way and from the estuary, does not seem to include a conclusion as to the visual impact of the proposed substation (including the access track) at Aust. Similarly, despite the adjacency of the proposed substation to the international designations on the Severn Estuary at Aust, no conclusions seem to be included regarding impact or further work needed. It is questioned how the statement at paragraph 17.1.16 that ‘residual adverse impacts on habitats will be capable of mitigation and compensation...’ can be made when some of the basics of surveys, methodologies, assessments and development of any necessary mitigation measures are yet to be completed. Any such details need to be provided to the Council for consultation prior to submission of the DCO application.
- 2.4.3 The Preliminary Conclusions section appears to be incomplete as it does not include some of the topics included in the PEIR for assessment, including for example socio economics and noise and vibration.
- 2.4.4 There does not appear to be an assessment of the project’s alignment with relevant NPS policies, and although NPS EN-1 states the relevance of Local Development Frameworks etc., no assessment seems to have been included of the project’s alignment with local planning policy.

## 2.5 Further suggested improvements to aid navigation:

- 2.5.1 The documentation is large and complex, and as such makes a daunting prospect for review, which may be an issue for some members of the public or those not from a planning background.
- 2.5.2 It is suggested that navigation could be aided, particularly when reviewing paper copies, by colour differentiation on front covers / titles / numbers. In addition it might make review efficient and easier if for example the text for individual topic areas is presented alongside their associated figures and appendices and in a single document.
- 2.5.3 It is also suggested that cross references should cite the whole document numbers and not just the appendix or figure number. (e.g. para. 3.1.1 refers to Figure 1.1 – it would be clearer to give the whole reference as to where to find this – i.e. Vol. 2.6 Part 1 Fig 1.1)

- 2.5.4 It is acknowledged that in a package of this size that there will be errors, however problems with cross references etc. have made review of the documents somewhat more difficult and time consuming (including for example Vol 2.1 Para 3.16.1 re Aust refers to Figure 3.1.20 which shows the Hinkley Line Entries). Some documents have pages that are incorrectly collated e.g. Vol 2.6, Part 1 Figure 7.10.4 appears after 7.1 instead of at the end, similarly Vol 2.5 Chapter 17, the paragraphs jump from 17.1.10 to 17.10.1.

## 2.6 Design Commentary

- 2.6.1 There is currently insufficient information in order to assess impact and advise as to the appropriateness of the design, design quality or the need for further mitigation. Further detail as to the nature of the proposals is required, including for example proposals for:

- The nature of the modification works that may be required to the access road at Aust and whether these are temporary or permanent, plus proposals for reinstatement and landscaping, in order that impact on this visually prominent hillside may be established.
- Lighting – Again a sensitive issue at the proposed Aust substation which is located adjacent to woodland (potential bat impacts) and the Severn estuary (potential ecological and landscape impacts).
- The details of construction operations, location and timetable for work proposed at the Aust substation sufficient to determine the potential for impact on in particular the habitats and species of the international designations on the Severn estuary.
- The nature of ‘management’ proposals for public rights of way, including proposed diversion or alternative routes, safe access and protection measures for users etc.
- Plans and specifications are needed for the protection of trees, hedgerows, environmentally sensitive ditches and rhines, and any other environmental features within the construction zone that are to be retained.
- Soil strip, storage and reinstatement – methodologies are needed specific to the various types of soil encountered along the route and at the substations etc.
- Proposals that indicate any implications of excavation into the hillside at Aust to establish any impact and enable agreement of mitigation and opportunities for interpretation.
- Details of drainage proposals during construction and operation to ensure protection from flooding, including at Aust village, and also avoidance of impact on biodiversity.
- The content of Construction Management Strategies and Plans to set out how impact on various aspects of the environment, such as air quality, water, transport disturbance etc. will be mitigated.
- Figure 3.3.1 (the site plan for the proposed substation at Aust) indicates an engineered approach with seemingly little regard for or integration with the natural flowing land forms of the surrounding area. It is therefore suggested that the engineering scheme needs review in order to create a more flowing form that better integrates with the natural landform. In addition a slight ‘lip’

to the fill profile of up to 1m in height could help reinforce the screening effect of the proposed planting.

- The landscape approach as shown at Figure 7.10.04 is in general supported as woodland planting will integrate well with nearby existing tree cover and help to screen the substation equipment in local and wider views. However specific consideration needs to be given to mitigating the impact of the proposed substation gantry that appears to breach the skyline in views from the Severn Way.
- The species lists and seed mixes should be locally appropriate as standard lists are unlikely to be appropriate to all the contrasting landscape contexts encountered along the length of the Hinkley Connections Project.
- Firm proposals will be required for consultation with the Councils prior to submission of the DCO as to the timing of the implementation of the landscape works in each location to ensure timely impact mitigation.
- Figure 7.10.04 mentions tree protection to new planting but not for landscape features, hedgerows and trees to be retained. This information will be needed to assess whether impact mitigation will be achieved.
- The colour, design and location of the proposed fencing at the proposed substation at Aust needs careful consideration particularly in view of the 2.4-4m height and given its' location alongside the Severn Way. It is recommended that hedgerow planting is implemented outside the fencing to soften its effect and provide some screening, and that the fencing itself is of a dark colour so that it recedes into the planting. The positioning of the electric fencing is not clear, and it is suggested that this should be located inside the planted area rather than reducing the area available for screen planting.
- In addition it is suggested that a review is undertaken of the finishes on the existing sealing end compound and tunnel facility as the existing white panels draw the eye in views along and across the estuary, particularly as the facility is viewed against the relatively dark background of the hill behind.

## 2.7 Route alignment

- 2.7.1 This Council is concerned that the proposed route alignment in South Gloucestershire adversely impacts on a substantial undeveloped land parcel within the extant 1957/8 consent for Severnside, which forms a significant site within the Enterprise Area being jointly promoted with Bristol City Council.
- 2.7.2 Development of the affected land parcel in South Gloucestershire is already constrained by two existing pylon lines and a pipeline. Therefore to have a new line sweeping across the southern half of the site, would severely impact on developability.
- 2.7.3 The Enterprise Area also includes significant areas of land proposed as ecological offset and enhancement to mitigate impacts on the Severn Estuary international designations.
- 2.7.4 It is therefore important that National Grid's proposed alignment is reconsidered and alternative alignments investigated to ensure that the proposed route does not compromise either ecological or economic development objectives, and also achieve a satisfactory outcome in visual terms.

## 2.8 Associated infrastructure (including construction access)

- 2.8.1 Points regarding the substation are included in Design Commentary above. In addition:
- 2.8.2 The proposals indicate that existing hedgerows and tree cover may be affected alongside the access road to the proposed Aust substation. Given the visual prominence of this hillside it is suggested that access standards are reviewed to ensure that there is minimum loss of vegetation and minimum earthworks that could create scarring on the hillside, and that the Council are consulted on the details of these proposals. This is will also be an issue more generally across the scheme, for example where bell mouths are created for access tracks as these may impact on significant hedgerows, trees or rhines.
- 2.8.3 In addition this access route is currently used by walkers accessing the Severn Way, partly because the existing public right of way is blocked. It will be important that proposals are put forward to ensure continued safe access by walkers to the Severn Way, and it is suggested that this includes opening up /improving the existing right of way that would provide an alternative for much of this length. Additional measures would be required to ensure safe access prior to the point at which the public right of way meets the access route, and also to deter misuse of the opened up route, for example by fly tipping. Again consultation with the Council on the detail of these proposals is requested.
- 2.8.4 The proposed access road to the Aust substation also passes directly adjacent to the boundary of the Travellers' site. Children may be at play outside the Traveller site, and the Travellers currently use the access track for parking. Measures will be needed to ensure safe passage for all during what we understand may be a 20 month construction period. In addition mitigation measures including for example restricting access times need to be provided to protect the Travellers during construction. Continued consultation and engagement via South Gloucestershire's liaison officer is recommended as proposals for access are developed.
- 2.8.5 It is not clear where potential impact on the Traveller community will appear in the EIA; however it is considered that this issue is clearly and specifically addressed.
- 2.8.6 Any archaeological implications of ground disturbance arising from the associated infrastructure generally across the scheme need to be assessed and appropriate mitigation put forward.

## 2.9 Pylon location and limits of deviation

This issue is covered in section 2.1 above.

## 2.10 Pylon design

- 2.10.1 It is considered that the mixing of existing lattice towers with the proposed new 'T' pylons within the same local landscape can compound and potentially increase visual impact, and that it is therefore preferable to have a single type of pylon in any one area.
- 2.10.2 At Severnside there are already a number of pylon lines in relatively close proximity to one another. It is understood that there are no proposals to change the existing pylons in the Severnside area from lattice to T pylon.

- 2.10.3 It is therefore considered preferable in the Severnside area for the proposed Hinkley C Connection Project to use the existing lattice tower design.

## 2.11 Mitigation

- 2.11.1 This is covered in the sections above, and in more detail in the topic specific sections below.
- 2.11.2 Current proposals are considered inadequate to achieve appropriate mitigation of impact or to provide adequate justifications for the conclusions included in the PEIR.
- 2.11.3 Further discussion and liaison with National Grid is requested to discuss in advance of submission of the DCO application to develop and agree mitigation proposals across a range of issues, as summarised above and as set out in more detail for each of the technical areas in Section 3 of this report.

## 3 Preliminary Environmental Information Report and Topic Based Plans

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### 3.1 Landscape and visual effects

- 3.1.1 National Grid's documentation correctly presents Landscape and Visual effects separately. However for the sake of brevity, the Council's response is combined.

#### Baseline information:

- 3.1.2 As stated in the policy section above, due regard should be given to the South Gloucestershire Council Landscape Character Assessment. This is in line with the NPS EN-1 para. 5.9.5.
- 3.1.3 The baseline survey information needs updating for the Severnside area as recent earthworks in this area have resulted in the loss of landscape features, alteration of land levels and therefore potentially a change in potential impact as a result of the HCC project. In addition proposed and consented development will result in significant further change to the landscape character of the locality, and also result in changes to the visibility and visual context of the proposed route alignment from locations such as public rights of way, including Local Plan Policy LC12 Recreational Routes.
- 3.1.4 The public rights of way mapping in the vicinity of Aust needs checking as the length of route leading up above the Aust cliff is missing from some drawings. In addition some plans miss some of the public rights of way that would be crossed by the proposed new line on the approach to the Seabank substation. These are particularly relevant to the visual assessment and public views of the proposed substation, mitigation needs to be proposed and impact assessed.
- 3.1.5 During a visit to the consultation event at Aust, a demonstration of the 3D visualisation for the HCCP enabled officers to undertake a brief review of the potential view westwards from the Severn Way long distance footpath (an LC12 Recreational Route) towards the proposed substation at Aust. It appeared that as one moves towards the proposed substation, the proposed gantry gradually breaches the skyline, potentially increasing impact on these views. This is in a location that also forms part of the setting to the Grade 1 listed Severn Bridge – being a public view towards the bridge where the substation is proposed to sit

within its rural setting. These effects need to be assessed, mitigation considered and discussed with the Council and impact reported.

- 3.1.6 In line with NPS EN-1 paragraph 5.9.7, the baseline information should include information on the proposed lighting of the substations since this could result in visual impact both on landscape character of the estuary shoreline, night time views across the estuary and also potentially on biodiversity. The lighting strategy should form part of discussions about detailed design of the scheme with the Council.

### Methodologies

- 3.1.7 The methodologies proposed for use are generally considered appropriate and the photomontages included to date are clear and well presented, however it is suggested that greater use might be made of the 3D modelling in informing the visual assessment e.g. at Aust, including potentially the location for photomontage.
- 3.1.8 As stated above the impact of lighting and on night time views should be assessed and the detailed design of mitigation should form an integral part of the design and impact assessment process.

### Mitigation and Impact Assessment:

- 3.1.9 As referred to in section 2 above, the main areas of concern relate to the need for development of mitigation measures. Without this information, assessment or agreement as to resultant levels of impact is difficult.
- 3.1.10 Landscape input is required to inform the design of the proposed cut and fill profiles and design at the Aust substation, to ensure landforms that integrate with the surrounding landforms and minimise impacts on the character and appearance of the local landscape, particularly in the early years and until the proposed planting is well established. In addition, if the views seen on the 3D modelling are correct and the proposed gantries do breach the skyline, the adequacy of the proposed mitigation should be assessed and any residual impact on the setting to the Severn Way and of the setting to the Grade 1 listed Severn Bridge should be reported.
- 3.1.11 In addition assessment of cumulative impact resulting from the scheme as a whole needs to be assessed, as well as more locally in combination with all relevant projects and consents within the Severnside area.
- 3.1.12 Photomontages are awaited of views from the Grade 1 listed Severn Bridge (pedestrian and cycle Sustrans route), and from the vicinity of Offa's Dyke National Trail on the opposite bank, along with an assessment of impact upon completion of construction and as the vegetation matures.
- 3.1.13 The potential impact of any lighting also needs to be assessed, appropriate designs and controls proposed and mitigation proposed accordingly.
- 3.1.14 It is suggested that consideration is given to NPS EN-1's para. 5.9.23 and EN-5 para 2.8.11 advice in respect of the potential for impact mitigation through offsite planting. This may be relevant to the Severn Way, for example additional hedgerow planting alongside on the approach to the substation might help with mitigation of impact on views. It is considered important that sufficient details and proposals are included in the DCO application documentation to enable an assessment of residual environmental impact. Suggested items for inclusion are set out under 'Design' above.

## Adequacy of information and further information requirements

- 3.1.15 The consultation material supplied requires further work as set out above, including further photomontages, detail/clarification in respect of design, mitigation and restoration proposals, and further consideration and reporting of impacts, including cumulative impacts. This information should be provided prior to submission of the DCO application, along with meaningful opportunity for consultation and discussion with the Councils.

## 3.2 Biodiversity and Nature Conservation

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### Introduction

- 3.2.1 Arup has been commissioned by South Gloucestershire Council (SGC) to provide additional commentary on the assessment of biodiversity and nature conservation impacts of National Grid's Hinkley Point C Connection project in South Gloucestershire.
- 3.2.2 This report is based on a technical ecological review of material prepared for Somerset County Council, North Somerset Council, Sedgemoor District Council and West Somerset Council (hereafter referred to as "the Joint Councils") but extended to include specific issues relevant to the South Gloucestershire section of the route plus the proposed substation at Aust.
- 3.2.3 It includes a review of Preliminary Environmental Information Report (PEIR) Document 2.3; Figures Part 1; Figures Part 2; Figures Part 3; and Appendices 8A – 8M.
- 3.2.4 The proposed works in South Gloucestershire include:
- Construction of a new 400kV substation at Aust, on land adjacent to the existing Cable Sealing End compound; and
  - New 400kV overhead line connections using lattice pylons from the south through Avonmouth Severnside running just inside the southern boundary of South Gloucestershire district.

### Overview

- 3.2.5 Although a substantial amount of data has been collected concerning biodiversity there are still surveys that have yet to be completed. Much of the data that is presented in the PEIR has not been analysed in a rigorous fashion in order to assess the impacts of the options chosen and it is unclear from the document about how ecological considerations have influenced choices concerning cable routes and undergrounding versus overhead options.
- 3.2.6 There is a particular concern at Severnside regarding the potential impact of the proposed route alignment on the ecological offset area proposed to mitigate impact of historic planning consents in this area on the designations of the Severn Estuary. South Gloucestershire Council has a joint interest in this area with Bristol City Council since they share an Enterprise Area that not only includes promoted and consented development sites, but also proposed ecological offset areas relating to mitigating the impact of development on the internationally designated habitats and species of the Severn Estuary.
- 3.2.7 In view of this joint interest, this response therefore refers to the need for survey, assessment and mitigation in both the South Gloucestershire and Bristol City Council Areas.
- 3.2.8 At Aust there is insufficient information about the proposed construction operations to be able to determine effects on species or habitats associated with the Severn estuary.
- 3.2.9 Please note that potential impacts on possible fossil bearing geology are also considered under Section 3.3 Ground Environment

## Statutory designated sites and species

- 3.2.10 There is confusion in the reporting of residual impacts as the residual effect on European Sites is reported in Habitats Regulations Assessment (HRA) terms rather than Environmental Impact Assessment (EIA) terms. The conclusion of no adverse effects on integrity on the Special Protection Areas (SPAs) within the study area requires further justification, given the absence of specific detailed mitigation measures and issues regarding the certainty of effects on bird species.
- 3.2.11 The detail of the proposed mitigation measures outlined in Table 8.16 is not sufficient to determine if the measures are adequate to alleviate the potential impacts identified. Given the inconsistencies and omissions within the baseline and assessment it is not possible to determine what significant impacts may occur and therefore what mitigation measures would be required.
- 3.2.12 The potential impacts of the section of route crossing Hallen Marsh have not been fully assessed in relation to the Severn Estuary European Site. The route across the marsh should be changed to avoid if possible, or minimise impact on this area, which has been identified by Bristol City Council and SGC to provide compensation for impacts on the Severn Estuary European Site.
- 3.2.13 The potential impacts on potential features related to the Aust Cliffs geological Site of Special Scientific Interest (SSSI) features resulting from excavations for the substation have been considered within the Ground Conditions chapter, the recommendation would be for retention of the Triassic strata if exposed during excavation.
- 3.2.14 In their response to National Grid's Scoping Report produced in May 2013, the Joint Councils recommended that there should be specific surveys to establish usage of the local hedgerow network by horseshoe bats. It does not seem that this recommendation has been acted upon and there is a risk therefore that insufficient information will be available to be able to ascertain that there will not be a significant effect on SAC bats due to the proposed undergrounding. It should be noted that many of the hedgerows that could be potentially affected are important in their own right according to surveys reported in the PEIR.
- 3.2.15 In South Gloucestershire consideration should be given to the habitat loss resulting from the construction of the new 400kV substation at Aust. Numerous bat species have been recorded during the baseline surveys at Aust and Avonmouth.
- 3.2.16 Although much of the land area along the line of the proposed route has been cleared in preparation for development, Category 1 Trees have been recorded immediately adjacent to the route within the wider Avonmouth area. Consideration should be given to the potential for limits of deviation to give rise to a need to remove these trees in whole, or in part, and this should be considered in the ecological mitigation strategy.

## Non-statutory designated sites and species

- 3.2.17 The route alignment runs over the network of Sites of Nature Conservation Interest (SNCI's) immediately south of the South Gloucestershire administrative boundary, including Moorhouse Farm and Stuppill Rhines, Salt Rhine and Moorhouse Rhine & Fields along M5.
- 3.2.18 In addition the PEIR does not provide an adequate assessment of the significance of effects or details of mitigation proposals, resulting in uncertainty as to what significant effects would occur and whether the mitigation proposed would be sufficient to reduce the impacts to acceptable levels.

## Adequacy of information and further information requirements

- 3.2.19 The information within the consultation documents does not include the full results of all surveys for protected species, nor does it provide a detailed interpretation of the results or assessment of the potential impacts of the proposed development. In addition the information on the mitigation measures that are proposed lacks sufficient detail to determine whether they are adequate to reduce the scale of any potential impacts. Whilst the status of the information as PEI is acknowledged, the spring date for DCO submission appears to be challenging in light of the residual survey data to be collected and assessed and the lack of a quantitative assessment.
- 3.2.20 Consideration should be given to species using these SNCIs such as roosting bird species affiliated with Severn Estuary SPA/Ramsar, fish species affiliated with the Severn SAC and SSSI and Water Vole listed as part of the Salt Rhine and Moorhouse Rhine designation, even though none were reported during baseline surveys in 2012. Confirmation is required as to whether Water Vole were recorded during 2013 surveys. It should be noted that Water Vole have recently been recorded in the vicinity of the Seabank Power station, and liaison with SSE is recommended so that any relevant findings can inform National Grid's proposals.
- 3.2.21 Details of the mitigation being proposed are not clear. For example Table 8.16 in the PEIR document does not mention the mitigation of hedgerow removal for undergrounding (only to create access), but does list re-instatement of habitat within the proposed mitigation. In order to determine if the proposed development is likely to result in significant effects on receptors or that the mitigation proposed is adequate to alleviate impacts, details of what re-instatement would occur in terms of species composition and habitat management regime are required.
- 3.2.22 As standard the mitigation for the scheme should include a detailed construction management plan including details of the timing of vegetation clearance, pollution control and protection of biodiversity during the construction work.

## Methodology

- 3.2.23 The surveys reported within the documents have broadly been undertaken in accordance with relevant published guidance. However the method for assessment does not explain in sufficient detail how significant impacts will be identified and therefore, which effects require mitigation.
- 3.2.24 The absence of information regarding the significance of effects within Table 8.14 of the PEIR means that it is not clear what, if any, mitigation would be put in place. As mitigation is proposed within the PEIR it is assumed that some of the impacts are deemed to be significant.
- 3.2.25 Comments have previously been made on the adequacy of the survey methodology, especially relating to dormice, and the assessment methodology as part of the Joint Councils Scoping Consultation Response to the National Grid Scoping Study and during Thematic Group Meetings. It is disappointing that these comments do not appear to have been taken on board at this stage.
- 3.2.26 Within Table 8.17 of the PEIR there is confusion in the reporting of residual impacts as the residual effect on European Sites is reported in HRA terms rather than using EIA terminology.

## Baseline

- 3.2.27 The baseline information is incomplete as some survey results are outstanding or have not been completed. Of particular note is the absence of certain legally protected and notable species surveys, especially in light of the potential Water Vole on the Salt Rhine and Moorhouse Rhine SNCI designation and also in the vicinity of Seabank. Surveys for Otter, which is a European Protected Species are also outstanding.
- 3.2.28 While Table 8.11 of the PEIR provides an indication of the habitats present within the various Route Sections (Sections A – I), it is not clear to the general readers how these relate to the actual route corridor or the zone of influence from the construction of the proposed development. A similar approach is adopted in Table 8.13 with regard to species and the same comments apply.
- 3.2.29 Whilst it is acknowledged that further information is provided in appendices to the PEIR, the level of condensing of baseline information is considered to be restrictive in terms of allowing the reader to make a detailed consideration of the potential effects. This section would have benefited from confining the information to the presence of habitats and species beneath the footprint of the development and those present elsewhere within the survey area.
- 3.2.30 Some of the protected species surveys that are reported in the PEIR were planned before information from habitat surveys was fully assimilated and analysed. For example, decisions concerning where to focus searches for Dormice were made in advance of all the information being available about the status of hedgerows along the route. The hedgerow surveys reported in the PEIR have revealed concentrations of hedgerows in some parts of the route (e.g. in the Mendips) that are species-rich or which are comprised predominantly of species favoured by Dormice. It is possible that some of the hedgerows and woodlands within the Avonmouth and Aust areas of the route could also support dormice but these habitats appear not to have been surveyed for this European Protected Species as yet.
- 3.2.31 In relation to ornithological surveys carried out for the PEIR report, wintering bird surveys appear not to have been undertaken for the construction of the new substation at Aust. The proposed substation is immediately adjacent to the Severn SPA, which includes wintering bird features as part of its designation.
- 3.2.32 A notable species for consideration is the presence of a Great Crested Newt population immediately adjacent to the site footprint and access route for the construction of the new 400kV substation at Aust. Parts of the site fall into the 50m and 200m buffer zone around the Great Crested Newt ponds. National Grid will need to outline their proposals for managing this impact as part of their ecological mitigation strategy.

## Impact assessment

- 3.2.33 As described above the assessment of impacts within Section 8.5 of the PEIR does not include details of the significance of impacts
- 3.2.34 The assessment of the potential for death or injury of birds from the Severn Estuary European Marine Site as being neutral does not appear to take into account the potential movement of birds between the two sites. It is acknowledged that National Grid has commissioned surveys and literature reviews to try to establish what the impacts might be of overhead power lines on birds. The PEIR acknowledges that large, local movements of birds may occur in especially adverse weather conditions yet the risk of collision is not included in the assessment of impacts.

- 3.2.35 The assessment of impacts on the Severn Estuary European Site has not taken into account the current work being undertaken by Bristol City Council and South Gloucestershire to provide alternative areas for bird species to counteract the effects of development at Severnside. Several sites have been identified to provide alternative areas for birds including Hallen Marsh which would be transected by the proposed overhead cable route. The potential impacts on birds from the estuary using this area during construction and the potential for bird collisions has not been acknowledged or assessed.
- 3.2.36 Furthermore in terms of the Habitats Regulations, it would be necessary in light of the Sweetman judgement (Sweetman v An Bord Pleanála C-258/11) to conclude beyond reasonable scientific doubt that the proposed development would not give rise to an adverse effect on the integrity of the European Sites. This issue will need to be addressed within the ES and Information for a Habitats Regulations Assessment that might be submitted to PINS as part of National Grid's submission for Development Consent.

## Mitigation

- 3.2.37 The detail of the proposed mitigation measures outlined in Table 8.16 is not sufficient to determine if they are adequate to alleviate the potential impacts. Given the inconsistencies and omissions within the baseline and assessment it is not possible to determine what significant impacts may occur and therefore what mitigation measures would be required. Paragraph 3.6.13 of PEIR Document 2.1 states in relation to reinstatement of vegetation that *"Where possible, hedgerows would be replanted or replaced although trees cannot be planted on the top of cables. Where trees have been removed from the cables swathe and planting elsewhere has been agreed, this would be undertaken."* Detailed engagement is required with the Joint Councils in relation to the planting strategy to ensure that agreement has been reached in relation to the vegetation reinstatement strategy and that this adequately mitigates both ecological and landscape impacts.
- 3.2.38 The ecological management strategy (as set out in Schedule 2, Article 10 of the draft DCO) should be consulted on prior to the submission for Development Consent, to ensure that the proposals are appropriate to the scale of impact identified within the assessment material and that they form part of an integrated landscape and ecological strategy.
- 3.2.39 Detailed mitigation will be required for the legally protected species which are present and may be affected by construction works. The effects on local wildlife sites will also need further consideration and mitigation measures to protect these important sites. Potential effects on potential strata related to the Aust SSSI should be dealt with as part of a wider geological mitigation strategy that should be included as a requirement.
- 3.2.40 In line with NPS EN-5 para.'s 2.7.4 and 2.7.1 SGC request that alternative routes are chosen to avoid the area of Hallen Marsh in order to ensure the impacts on features of the Severn Estuary European Site are minimised and avoided as far as possible, and resultant impact will need to be mitigated. It is considered to be in the interests of National Grid to adopt an alternative route in this area in order to avoid potentially complicated issues in terms of cumulative effects (EIA) and in-combination effects (HRA) between the proposed development and other developments on the Severn Estuary European Site.
- 3.2.41 With the exception of the issues relating to European Sites, there is the potential that Section 106 contributions or further mitigation may be required to address potential impacts on fossil bearing strata related to the Aust SSSI and the SNCIs at Moorhouse Farm and Stuppill Rhines, Salt Rhine and Moorhouse Rhine & Fields along M5 Hallen and to compensate for the temporary and permanent loss

of, and effects on, habitats and interests (including impacts arising from temporary access infrastructure).

- 3.2.42 The results from amphibian and Water Vole surveys that are presented in the PEIR suggest that the power line route crosses or comes close to many ditches and ponds found to support or potentially support populations of protected species (particularly of Great Crested Newts and Water Voles). It is not clear from the PEIR how this emerging information has been used in planning the precise routing of the line, but the assumption seems to be made throughout the report that potential adverse impacts upon protected species and their habitats can be mitigated for without the necessity to vary the route. It should be pointed out that in the 'mitigation hierarchy' embodied in the Chartered Institute of Ecological and Environmental Management (CIEEM's) EIA Guidance and in the National Planning Policy Framework (NPPF) avoidance of impacts is always to be preferred to specific mitigation measures. This is partly because the effectiveness of mitigation measures cannot always be guaranteed.
- 3.2.43 The PEIR lacks any truly quantified information regarding habitat loss locally or cumulatively (either permanent or temporary) that will be caused by the proposed development. For this reason, it is difficult to be sure that the mitigation measures that are proposed in outline only will be sufficient to ensure no net biodiversity loss. It is considered that some form of biodiversity offsetting is likely to be necessary to compensate for residual impacts that cannot be mitigated adequately. The 'Somerset metric' developed by Somerset County Council could be adopted to calculate any off-setting requirements that may arise due to impacts associated with the development. Off-setting and compensation is the last resort in the 'mitigation hierarchy' and, as above, avoidance of impacts is always to be preferred if possible.
- 3.2.44 Furthermore consideration should be given to the ability of the proposed development to provide localised improvements in biodiversity through the provision of native species rich screen planting which will provide habitat for a range of bird and mammal species, scrapes or water bodies in the Severnside/Avonmouth ecological offset areas, and the creation of species rich grassland areas within the ground of substations and sealing end compounds to provide invertebrate habitat. Such provision would be in keeping with current planning guidance that developments should where possible provide a net gain in biodiversity.
- 3.2.45 In line with NPS EN-5 para.'s 2.7.4 and 2.7.1 consideration should be given to the realignment of the route as far towards the edge of the proposed ecological offset area at Severnside, in the design of cross arms to deter perching and risk of electrocution. In addition the use of bird deflectors should be considered in areas used by species associated with the international designations on the Severn Estuary, including for example where it is proposed that habitat is provided for these - in the vicinity of the ecological offset areas at Severnside.
- 3.2.46 At Aust it is recommended that a requirement is imposed on National Grid to provide a mitigation strategy to address the retention and interpretation of the Triassic bedrock exposure (a feature of the SSSI designation) where applicable, and that the principles of this are agreed prior to submission of the DCO.
- 3.2.47 As stated above, draft Construction Environment Management Plan should be discussed and agreed with the Councils prior to the submission of the DCO. This will be important in respect of a range of potential environmental impacts, including noise, air quality, drainage, biodiversity etc.

## 3.3 Ground Environment

### Baseline information and methodology

- 3.3.1 Chapter 9 of the PEIR assesses the likely significant effects on the ground environment that may occur during the construction, operation and decommissioning of the proposed development. The chapter relates to effects on geology, hydrogeology, ground contamination, ground stability hazards and geological conservation.
- 3.3.2 It should be noted that there have been significant clearance and earthwork operations in the vicinity of the Severnside area, and the scheme design and environmental impact assessment and mitigation works should be based on current rather than historic ground conditions.
- 3.3.3 **Geology:** Concerns relate to the need for adequate information on the depth and extent of the potential fossil bearing geology at the proposed Aust substation site combined with the sufficient information to understand the depth of the proposed ground disturbance – including piling and earthworks excavations. This is in order to be able to demonstrate whether there will or not be impact on the potentially important fossil bearing geology.
- 3.3.4 It is suggested that sections are prepared to show the extent of proposed ground disturbance in relation to the geological strata affected by the proposals. An assessment of the significance of the affected strata in the context of the adjacent SSSI and appropriate mitigation strategy should be included.
- 3.3.5 **Ground Contamination:** The PEIR identifies potential impacts based on a site visit; a review of commercially available data sets including historic maps; available third party information and collation of information from consultees.
- 3.3.6 The PEIR describes the following methodology and approach to assessment; A conceptual model has been developed and a preliminary risk assessment has been undertaken in line with CLR11 (Model procedures for Management of Contaminated Land. A baseline report has been produced for each section of the proposed development and a desk based study using a buffer search of 250m – 2km. The desk study utilised the following sources of information:
- Ordnance survey mapping.
  - British Geological Survey maps
  - Environment Agency website
  - Environment Agency Groundwater vulnerability maps
  - Direct enquiries to the Environment Agency and Local Authority Environmental Health.
  - Review of any existing intrusive investigations.

Where relevant, prior to construction full site investigations will be carried out.

Potential land quality issues have been assessed using CIRIA 552 – Contaminated Land Risk Assessment, A Guide to Good Practice.

Relevant potential on and off-site sources of contamination have been identified. Relevant contaminants of concern have been identified.

- 3.3.7 On the basis of the information provided, it is considered that the PEIR adequately covers the potential issues relevant to land contamination for the South Gloucestershire Section, and utilises the relevant methodology and is in accordance with the principles set out in the Scoping study.

## Adequacy of information and further information requirements

- 3.3.8 **Geology:** Information is needed to demonstrate the potential impact (or not) of the proposed earthworks at Aust on potentially important fossil bearing geology that may underlay the site.
- 3.3.9 **Soils:** Further information is needed as to the details of proposed soil reinstatement – methodologies for soil strip, storage, spreading and cultivation to ensure that ground conditions are suitable to sustain crops and landscape planting.
- 3.3.10 **Ground Contamination:** It is concluded that the PEIR adequately covers the potential issues relevant to land contamination for the South Gloucestershire section, and no further information requirements are identified at this time.

## Impact assessment

- 3.3.11 Information is needed to demonstrate the relationship between the proposed cut slope at Aust and the underlying geology. Without this it is considered that there is currently sufficient information to determine the impact on potential fossil bearing rocks related to the nearby SSSI.
- 3.3.12 Information needs to be provided as to the methodology for top soil strip, storage, reinstatement and cultivation to enable an assessment of impact on this resource.

## Mitigation

- 3.3.13 **Geology:** There is insufficient information to allow agreement of any appropriate mitigation strategy that may be required with respect to any potential impact on fossil bearing strata at Aust. If ground disturbance will affect geologically important strata associated with the adjacent SSSI a programme of monitoring, recording and sampling must be put forward for agreement with the Council prior to submission of the DCO.
- 3.3.14 It is agreed that as stated in the PEIR, if fossil beds are revealed exposures of interest should be made accessible. This should include interpretation and could be from the adjacent public right of way or in association with the Severn Way.
- 3.3.15 **Ground Contamination:** It is considered that adequate outline mitigation measures have been identified in South Gloucestershire.

## 3.4 Hydrology and Water Resources

### Methodology

- 3.4.1 It is unclear why throughout Chapter 10 the analysis of flood risk is made by reference to the Environment Agency Flood Zone Maps rather than the more refined analysis of flood risk available in Strategic Flood Risk Assessments (SFRA), where Flood Zone 3 is divided into Flood Zone 3a and 3b. SFRAs have been endorsed by the Environment Agency. This is of particular relevance to Severnside.
- 3.4.2 With respect to the Flood Risk Assessment for Aust Substation, there are no planning policy comments since on the basis of the information provided, the site appears on the basis of the National Grid information provided to be in Flood Zone 1, and therefore of low risk and the issue of ensuring egress from site is covered in the Flood Risk Assessment.

### Baseline

- 3.4.3 The baseline information should address the points set out in the methodology section above.
- 3.4.4 It should be noted that there have been significant clearance and earthwork operations in the vicinity of the Severnside area, and the scheme design and environmental impact assessment and mitigation works should be based on current rather than historic ground conditions.
- 3.4.5 The baseline needs to include existing flooding problems in the vicinity of Aust, as a result of water draining from the area that includes part of Sandy Lane, under the motorway bridge and to the village of Aust.

### Impact assessment

- 3.4.6 Impact assessment needs to be based on appropriate baseline information and current ground conditions as set out above.
- 3.4.7 Proposals should be discussed with the Council regarding the detail of any proposed temporary or permanent works to drainage channels and rhines, ensuring that the proposals meet both drainage and flood prevention requirements as well as being designed to protect biodiversity interests.
- 3.4.8 It is noted that significant cut and fill is proposed at Aust, which could drain direct into the estuary during construction and operation. Drainage proposals at Aust will need to protect the biodiversity interests of the international designations on the Severn Estuary. Again draft proposals should be discussed and agreed with the Council and other relevant statutory authorities prior to submission of the DCO.
- 3.4.9 Proposals for any surfacing and/or drainage of Sandy Lane should be discussed with the Council to avoid any impact on the village of Aust. This issue should be reported on in the EIA.

## Mitigation

- 3.4.10 There is insufficient information on proposed mitigation measures, and therefore at present it is not considered that the conclusions in the PEIR are adequately substantiated.
- 3.4.11 Proposals for drainage during construction and during operation should be prepared to incorporate mitigation of impact on local flooding, biodiversity including the interests related to the international designations on the Severn estuary.
- 3.4.12 A draft Construction Environment Management Plan should be discussed and agreed with the Councils prior to the submission of the DCO. This will be important in respect of a range of potential environmental impacts, including noise, air quality, drainage, biodiversity etc.

## Adequacy of information and further information requirements

- 3.4.13 The Strategic Flood Risk Assessments for Severnside should be used to inform the understanding of the baseline conditions and assessments of impact.
- 3.4.14 The proposals and EIA should be based on the recently changed ground conditions at Severnside as outlined above.
- 3.4.15 Proposals for mitigation as set out above need to be discussed and agreed with the Council prior to submission of the DCO.

## 3.5 Historic Environment

- 3.5.1 This section of the PEIR has been prepared incorporating advice from JME Conservation Ltd, and includes assessment of impacts on historic buildings, archaeology and historic landscapes from construction through to decommissioning once redundant.

### Topic summary

- 3.5.2 Section 5.8 of NPS EN-1 includes relevant guidance, including at paragraph 5.8.8 which states that where there is potential for heritage assets with an archaeological interest, appropriate desk assessments should be carried out and where this is insufficient to assess that interest, 'a *field evaluation*' should be carried out. In addition 'where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.' This is to enable PINs to assess the significance of assets and the effects on them, taking into account the desirability of sustaining and enhancing their significance. This section also points out the need to have regard to relevant local authority plans (relevant policies are set out above). The PEIR as consulted on does not adequately address these requirements.
- 3.5.3 The Connections Options Report which resulted in the selection of the current route seems to have been prepared in advance of undertaking environmental assessments of impacts on the historic environment. It is unclear how the fuller environmental information currently being gathered will be used to check that the conclusions of this earlier report were robust.
- 3.5.4 The PEIR implicitly recognises the need for an adequate assessment of the potential impacts of the proposals on the historic environment by the inclusion of undertakings to undertake further fieldwork and assessment before the November target for preparation of the final Environmental Impact Report. We have concerns also about the adequacy of the collection and interpretation of baseline data, which needs urgent review.
- 3.5.5 The fact that geophysical surveys and field investigations are yet to be undertaken within South Gloucestershire mean that the conclusions currently reached about archaeological potential are of limited weight as they appear to be based upon extrapolating from other locations. This is recognized by the undertaking to complete additional surveys but it is a concern that at the time of drafting these are still yet to be progressed.
- 3.5.6 It is unclear what the assessment of settings of heritage assets within South Gloucestershire has been based on as mapping of heritage assets beyond 2km appears to omit all Grade 2 designated heritage assets. Any potential impact of the proposed substation at Aust on the setting to the Grade 1 listed Severn Bridge should also be assessed, since the substation forms part of the setting to the bridge in views from the bank of the estuary on the Severn Way, and in the light of the photomontage proposed in the direction of the substation from the bridge itself. It appears therefore that impacts risk therefore being under reported.
- 3.5.7 The recognition that archaeological remains of unknown significance may occur is not on its own sufficient to allow potential impacts on such remains to be assessed. The inadequacy of survey information is the cause of this problem. Whilst the methodology for impact assessment is generally considered to be

acceptable, the lack of survey and assessments that take into account their findings leads to questions as to the validity of the conclusions drawn.

## Adequacy of information and further information requirements

- 3.5.8 The draft report recognises – specifically in section 11.9 of the Historic Environment Section - that additional geophysical survey geotechnical investigation and field investigation is required and this should be undertaken as a matter of urgency. It is disappointing that to date only limited work has been undertaken all on other sections of the project.
- 3.5.9 At present it appears that this additional information will exclude assessment of impacts of temporary works – access tracks and construction areas), which may in themselves have the potential to result in potentially significant impact on the historic environment. This should be addressed through additional surveys and the detail agreed with the Councils prior to submission of the DCO applications.
- 3.5.10 In addition the baseline data which was used for the assessment of settings of heritage assets should be checked for missing data and the results of the assessments reviewed. The results of the Visual Assessment and photomontages should feed into this work.
- 3.5.11 Further assessments are needed in connection with the potential for effects on geological fossil deposits might be combined with the programme of archaeological investigations.

## Methodology

- 3.5.12 The adopted EIA methodology for assessment of the historic environment is, if combined with the outstanding surveys and assessments set out in paragraph 11.9 of the Historic environment section of the report likely to be sufficient to address the Councils concerns raised in the response to the scoping report. However, this relies on completion of the additional surveys which should include assessment of the impacts of temporary works including access works. Given the passage of time it is however there is concern that this can be provided within a timescale that will enable findings to influence design and mitigation, or for preparation of the final Environmental report.

## Baseline

- 3.5.13 In theory the collected data for the initial desk-top assessment of impacts on built heritage as set out in paragraph 11.3.18 -11.3. 22 should be adequate; however we have concerns that all the collected information may not have been used in the assessment process.
- 3.5.14 It is questioned whether potential impact on the setting to the Grade 1 listed Severn Bridge has been/is to be assessed, given that the proposed substation at Aust forms part of the setting to the bridge when viewed from the Severn Way and the need to assess any potential impact of the substation in views from the bridge.
- 3.5.15 We have not been able to verify the HER data because of the way it has been presented. It appears to omit all the Grade II listed buildings - see for instance Fig 11.1.38 which only identified Grade II\* buildings in Easter Compton parish referred to as listed buildings LB 567 and 568 in Compton Greenfield. These are not referenced anywhere as far as we could see – they are omitted from the Heritage Gazetteer in Vol 3.7. It is therefore unclear which of the 7 listed buildings, (2 listed Grade II\* and 5 at Grade II) are actually being referred to and there is no indication that impacts on the settings of Grade 2 designated heritage

assets. Whilst the Council does not believe that the proposals will have any more than a slight adverse impact on the significance of the Grade II\* listed building and adjacent Grade II listed buildings, these need to be considered as part of the assessment of impacts including in relation to cumulative effects.

- 3.5.16 The lack of survey / field assessment information has already been commented on.

## Impact assessment

- 3.5.17 Because the archaeological evaluation of areas affected by the construction and associated works has not been completed, it is impossible to adequately assess the impact on archaeological potential, or to propose appropriate mitigation prior to submission of the DCO. In addition the questions regarding the assessment of impacts on settings of all the affected designated heritage assets must throw into doubt on the basis for the current impact assessment. The assessment of impacts needs to be robust and based on adequate baseline data, and clarification provided about the heritage assets that have been included in the assessment. Where assets have been excluded the criteria for exclusion should be made clear if they fall within the previously stated areas of assessment.
- 3.5.18 Once the additional survey and fieldwork has been completed, the impact assessment needs to be revised to take account of the findings in terms of the HCCP itself, but also in combination with other development in the locality. This then needs to inform the development of mitigation proposals as appropriate. This should be the subject of consultation and agreement with the Councils.

## Mitigation

- 3.5.19 Whilst the Section of 11.7 of the Historic Environment section of the report sets out a wide range of mitigation measures, these need to be reviewed to include further survey and assessment that is needed to inform agreement of specific mitigation proposals.
- 3.5.20 Specifically the proposed mitigation strategy needs revision once more information has been obtained on the significance of affected heritage assets and any effect on their setting has been assessed. The Council cannot therefore comment meaningfully on mitigation proposals at this time. The proposed reliance on field-work or watching briefs by way of condition (requirements) is insufficient given that it is likely that additional survey information will still be outstanding once the November deadline is reached.

## 3.6 Traffic and Transport

- 3.6.1 The consultation response from South Gloucestershire Council has been prepared by JMP and agreed by South Gloucestershire Council and is included within the joint Councils' response that is being submitted on the Councils' behalf by Sedgemoor District Council.

## 3.7 Air Quality and Emissions

- 3.7.1 Chapter 13 of the PEIR assesses the likely significant effects on air quality that may occur during the construction, operation and decommissioning of the proposed development.

### Topic summary

- 3.7.2 The PEIR adequately covers the relevant pollutants that could arise from the proposed development i.e. particulate matter from construction activities and nitrogen oxides from construction vehicle exhausts. On the basis of the information provided, the appropriate guidance has been followed.
- 3.7.3 With the exception of the need to use the most up to date available air quality information and the need to ensure that cumulative impact assessments takes account of all relevant planned and consented developments in the local area, the methodology is acceptable. A desk-based air quality impact assessment has been carried out in order to determine the potential air quality effects on receptors arising from construction and decommissioning of the proposed development. Current air quality conditions are considered.
- 3.7.4 The effects at relevant receptors are assessed against appropriate guidelines to determine their significance. The significance of the construction impacts before mitigation is considered to be moderate adverse for the South Gloucestershire sections. The increase in traffic on local roads due to construction activities is not considered sufficient to require a quantitative assessment. There are no operational impacts, as established during scoping, so these are not assessed, although the use of SF<sub>6</sub> at substations (as proposed at Aust) is included.
- 3.7.5 With the exception of the need to agree the principles of the Construction Environment Management Plan prior to the submission of the DCO (to enable robust environmental impact conclusions to be reached) it is considered that on the basis of the information provided adequate mitigation is proposed. The significance of construction phase fugitive emissions is likely to be slight adverse for the South Gloucestershire sections of the proposed development, with effective mitigation applied and temporary during the construction phase.

### Adequacy of information and further information requirements

- 3.7.6 A draft Construction Environment Management Plan should be discussed and agreed with the Councils prior to the submission of the DCO. This will be important in respect of a range of potential environmental impacts, including noise, air quality, biodiversity etc.

### Methodology

- 3.7.7 The adopted EIA methodology at paragraph 13.3 is in accordance with the principles set out in the scoping study and addresses concerns raised in the Scoping Consultation response.

### Baseline

- 3.7.8 The approach to the baseline data collection is appropriate.

- 3.7.9 However, the year of the estimated background data provided in Appendix 13A is not stated. Also the review of the latest available air quality report for South Gloucestershire Council (paragraph 13.4.6) refers to the 2012 Air Quality Action Plan. More recent Air Quality Review and Assessment reports are available and can be provided, and these should be used as the basis for assessment.

## Impact assessment

- 3.7.10 The approach to impact assessment is appropriate. The impacts at relevant receptors are assessed against appropriate guidelines to determine their significance. Although the cumulative impacts are considered in light of other planned developments, as stated elsewhere in this report the PEIR provides an incomplete picture, as it misses a number of other planned or consented developments in the Severnside area. The significance of the construction impacts before mitigation is considered to be moderate adverse for the South Gloucestershire sections (part of G and I). With mitigation, the impacts are predicted to be reduced to slight adverse. On the basis of the information provided, there is no reason to disagree with this as being an appropriate conclusion; however this will be dependent on the inclusion of appropriate mitigation measures in the Construction Environmental Management Plan.
- 3.7.11 On the basis of the NG predictions for increased in traffic on local roads due to construction activities it is not considered that further quantitative assessment (i.e. dispersion modelling) should be required. This is in line with recognised guidance, and on the basis of the information provided the conclusion seems appropriate.
- 3.7.12 While operational impacts have been scoped out, NG acknowledge that some leakage of the greenhouse gas SF<sub>6</sub> may occur from substations (such as the one proposed at Aust) during the operational phase. However it is understood that the equipment is designed and tested to minimise such leakage, and therefore that the magnitude of leakage is likely to be low. On the basis of the information provided, there is no reason to disagree with this.

## Mitigation

- 3.7.13 The proposed mitigation of the potential impacts from the construction phase is appropriate for the South Gloucestershire sections, which includes the construction of Aust substation. The requirement for a Construction Environmental Management Plan (CEMP) to be approved by the relevant planning authority before the commencement of any stage of the proposed development is set out in the Draft Development Consent Order at Schedule 2, Requirement 11. However in order for robust conclusions to be reached regarding impact assessment, this document should be provided in draft for consultation with the Council prior to submission of the DCO.

## 3.8 Noise and Vibration

- 3.8.1 Chapter 14 of the PEIR assesses potential noise and vibration of the construction, operation and decommissioning of the various components on the proposed development.

### Topic summary

- 3.8.2 The PEIR identifies potential impacts based on a combination of desk-based and site-based survey techniques for the construction and decommissioning of the proposed development and the operation of the proposed substation and overhead line. However it is noted that the findings with respect to Noise and Vibration have not been carried forward to the Preliminary Conclusions section. It is recommended that this topic is included in the Conclusions section of the ES.
- 3.8.3 The PEIR has been divided into the following sections for noise impact assessment, and on the basis of the information provided the Council considers that the methodologies and findings appear to be appropriate:

#### Construction Noise

- 3.8.4 The study area for construction noise effects includes all residential receptors within 150m of the proposed overhead line, cable routes and substation. The assessment of construction noise has been predicted using method provided by British Standard 5228.
- 3.8.5 The construction noise assessment at Aust substation indicates a negligible upon the nearest noise sensitive receptors.
- 3.8.6 The construction traffic assessment for noise sensitive properties in South Gloucestershire indicates a negligible effect, however as requested elsewhere in this response it is requested that specific consideration is given to mitigating impact on the Traveller community at Aust.
- 3.8.7 In the receptors closest to the substations, noise from construction activities is considered likely to give rise to a negligible effect.
- 3.8.8 The assessment considers there to be a negligible effect from construction activities for overhead line installation and removal of existing lines.

#### Substation Noise

- 3.8.9 Due to the type of plant being used at Aust substation it is understood that the noise output will be practically quiet during normal operation and therefore this has been scoped out of the assessment. A project noise criteria of 0dB(A) above the background noise level has been adopted for the substation.

#### Overhead line operation noise

- 3.8.10 A desk based assessment of sensitive receptors within 200m of the centreline of the proposed overhead line route has been undertaken, by the use of aerial photography. The assessment includes predicting noise from the overhead lines in both dry and wet conditions as highest noise levels generated by the overhead line generally occur during rain. British Standard 4142 has been used to assess overhead line noise in dry conditions using 5 minute spot measurements taken along the proposed route and night-time ambient background level,  $L_{A90,5min}$

- 3.8.11 This assessment cannot be used in wet weather conditions because the rainfall on the ground increases background noise levels. Therefore National Grid's TR(T)94 method has been used. A project noise criteria of 0dB(A) above the background noise level has been adopted for overhead line dry noise. This is increased to +5dB(A) for overhead line wet noise.
- 3.8.12 It is understood from the information given that there will be a negligible effect from both predicted dry and wet noise in South Gloucestershire.
- 3.8.13 Information cannot however be found in the assessment that refers to noise effects due to surface grease or other substances on the conductors. If there is the likelihood that grease used on the conductor could lead to this noise, or any other substances such as dust accumulation over time then information on and a commitment to conductor cleaning or replacement should be provided.
- 3.8.14 The PEIR utilises the relevant methodology including British Standards where necessary.
- 3.8.15 The PEIR identifies and addresses the relevant impacts. There are negligible implications in South Gloucestershire for overhead line operation and Aust substation operation.
- 3.8.16 On the basis of the assessment provided, mitigation measures are not considered to be required in South Gloucestershire in respect of noise

## Adequacy of information and further information requirements

- 3.8.17 It is noted in Chapter 17: Preliminary Conclusions, that there is no overview of Noise and it is recommended that this is included.
- 3.8.18 A draft Construction Environment Management Plan should be discussed and agreed with the Councils prior to the submission of the DCO. This will be important in respect of a range of potential environmental impacts, including noise, air quality, drainage, biodiversity etc.
- 3.8.19 Further information should be included in the ES to assess impact on the Traveller community at Aust and mitigation proposed as appropriate.

## Methodology

- 3.8.20 The adopted EIA methodology at paragraph 14.1 of the PEIR is in accordance with the principles set out in the scoping study and addresses concerns raised in the Scoping Consultation response.

## Baseline

- 3.8.21 On the basis of the information provided, with the exception of the need to consider disturbance to the Traveller community from intermittent disturbance from construction traffic, the approach to baseline data collection is considered to be satisfactory. It is suggested that this issue should be able to be adequately assessed and addressed without the need for additional surveys or monitoring.

## Impact assessment

- 3.8.22 With the exception of the issue of grease and/or dust on the wires as questioned above, on the basis of the information provided, and the need to assess impact on the Traveller community, the approach to impact assessment is generally considered appropriate, and the level of significance of effects is generally considered appropriate.

## Mitigation

- 3.8.23 On the basis of the information provided, the approach to mitigation is generally considered to be appropriate, however it is questioned whether mitigation measures should be required to prevent increased noise resulting from grease or dust on the lines or intermittent disturbance from construction traffic.
- 3.8.24 In addition specific mitigation measures may be necessary to control the effects of construction traffic noise on the Traveller community at Aust.

## 3.9 Socio-Economics and Land Use

- 3.9.1 The primary concerns for South Gloucestershire relate to potential impact of the proposed route alignment through the Severnside / Avonmouth, which is designated jointly by South Gloucestershire and Bristol City Councils as an Enterprise Area.
- 3.9.2 Comments in relation to impact on and information relating to Public Rights of Way are included in this section, although it is noted that the PEIR includes assessment information for PROW in a number of chapters, including on transport and socio-economics as well as landscape in relation to views. This makes review of effects on PROW, which cumulatively along the length of the scheme may be significant, difficult to review and understand.
- 3.9.3 The response on Transport submitted on behalf of the joint Councils also includes feedback on PROW.
- 3.9.4 Please also see the joint Somerset and North Somerset Council's response in relation to Socio economics also includes feedback relevant to South Gloucestershire.

### Topic summary

#### Severnside

- 3.9.5 The information presented in the PEIR appears to be inadequate as it does not include mapping, information or assessments of potential impact on a number of consents and planned projects in the vicinity of and along the line of the proposed route. Most notably the 1957/8 consent appears to be missing from plans, and impact assessments and cumulative impact assessments.
- 3.9.6 The proposed methodology needs to be implemented in full to ensure adequate assessment of the proposed development on business uses, ecological offset areas and public rights of way in South Gloucestershire and in combination with the wider Enterprise Area that is shared with Bristol City Council.
- 3.9.7 Impact assessment is currently inadequate as it does not address the effect of the proposed route alignment at on the Enterprise Area at Severnside on either the undeveloped land parcels or on the proposed ecological offset land that is proposed to mitigate impact of development in the area on the European designations related to the estuary.

#### Public Rights of Way

- 3.9.8 Plans variably show the public rights of way in the vicinity of the route alignment, some showing all the PROW and others not. For example Figure 15.4 appears to show all the PROW, but Document 3.5 does not show the S Gloucestershire PROW at Severnside, and omits to show the continuation of the Severn Way as a public right of way up and parallel to the cliff edge at Aust.
- 3.9.9 The documents do not seem to refer to Local Plan Policy LC12 Recreational Routes, plot these on the baseline mapping or assess impact and the need for mitigation for these.
- 3.9.10 The issue of safety of access to the Severn Way from Aust needs to be addressed during construction, when the access track that is currently used by

the public and by the adjacent Traveller community will be in use for up to 20 months by construction traffic.

- 3.9.11 It is suggested that the existing PROW (bridleway) that has become overgrown is opened up in a way that allows access to legitimate users but also prevents unauthorised access and use including e.g. fly tipping.

## Adequacy of information and further information requirements

### Sevenside

- 3.9.12 A full review needs to be undertaken of the current position regarding consents and planned developments in the Sevenside Area.
- 3.9.13 There is serious concern about the potential impact of the proposed alignment on a significant as yet undeveloped land parcel that could be developed at any time under the extant 1957/8 consent. This has not been reported in the PEIR and further discussions are requested to continue with National Grid and Bristol City Council to seek to establish a route that avoids impact on this land parcel as well as avoiding or minimising impact on the ecological offset area relating to the international designations on the Severn estuary. Mitigation proposals will be necessary if impact cannot be avoided.

### Public Rights of Way

- 3.9.14 The PROW affected mapping does not seem to assess potential effects on bridleway OAY101 at Hallen and the two footpaths OAY111 and ORN27, also at Hallen. Even if there is no need for any temporary closure they should still be listed and mapped, so that the basis for impact assessment is clear. There needs to be consistency of approach, including consideration of impact on both the routes themselves, and also their amenity and settings.
- 3.9.15 The Local Plan LC12 Recreational Routes have not been and should be plotted on mapping, policy should be included in the baseline information, and impact should be assessed against the policy and mitigation proposed.

### General

- 3.9.16 The Conclusions section of the PEIR needs to include a section on Socio Economics.

## Methodology

### Sevenside

- 3.9.17 The methodology in respect of businesses is not adequate as it does not adequately address impact on the Enterprise Area and undeveloped land parcels and ecological offset areas that are proposed to mitigate impacts of the 1957/8 consents on the international designations on the Severn estuary.
- 3.9.18 The methodology needs to acknowledge and consider the cumulative effects of the proposals on the Enterprise Area as a whole, as well as on individual land parcels.
- 3.9.19 We understand that some further survey work and engagement may be taking place with the business community and is taking place with affected land owners. The findings of this need to be fed into the design process in order that an alignment is proposed that minimises impact both on individual land parcels but also on the Enterprise Area as a whole. Cumulative impact assessment must therefore inform scheme design.

## PROW

- 3.9.20 It appears that the user surveys of PROW and promoted routes such as the Severn Way were of 1 day's duration. This is not adequate to inform an assessment of either the importance of a route or impact on it. Neither is this relevant to local plan policy promoted long distance routes such as the Severn Way. The findings of this survey should therefore be disregarded when assessing either the impact of the proposals or the need for mitigation.

## Baseline

- 3.9.21 As set out above, the baseline information relating to the Severnside Enterprise Area is inadequate. The baseline survey seems to have focussed on the tourism sector. This is not relevant to Severnside, although has some local relevance to promoted long distance routes such as the Severn Way.
- 3.9.22 Baseline data regarding the business sector at Severnside should be a primary and significant factor for consideration, but also interweaved with this are ecological offset areas relating to the international designations on the estuary. Relevant baseline data should be provided including the findings of surveys of businesses in the vicinity that can inform the detailed design of a route that avoids where possible impact on developable and consented land parcels. The views of the Councils that are promoting the Enterprise Area are also relevant.
- 3.9.23 The baseline information for PROW network and for Recreation Routes in S Gloucestershire is also incomplete.
- 3.9.24 The information provided does not therefore comply with NPS EN-1 paragraph 5.12.4 which states that applicants should 'describe the existing socio-economic conditions in the areas surrounding the proposed development and ... refer to how the developments socio economic impacts correlate with local planning policy'.

## Impact assessment

- 3.9.25 In view of the above, the impact assessment relating to the effects on consented land parcels and existing and proposed development at Severnside is inadequate and incomplete, as is the assessment for public rights of way.
- 3.9.26 The assessment of cumulative impacts of development set out in table 11.17 omits the substantial development permitted under the 1957-8 ICI consents. This needs to be considered along with any impact on other proposed or consented development in the locality, both locally and cumulatively across Severnside and if relevant along the length of the proposed route.
- 3.9.27 The undefined nature of the proposed 'management' works to public rights of way means that impact on these routes cannot currently be determined. Appendix 12A is not clear as it refers to the footpaths and "Closure points" but there appears to be no explanation for this, especially as there do not appear to be any proposals for temporary closure (or not) of PROW in South Gloucestershire.

## Mitigation

### Sevenside

- 3.9.28 Realignment of the route is requested to avoid impact on the developability of consented land parcels and the integrity and functionality of the proposed ecological offset areas at Sevenside. Options should be produced for discussion and agreement with Bristol City and South Gloucestershire Councils.

### PROW

- 3.9.29 The nature of the proposed 'management' works affecting the PROW and Recreational Routes is not yet defined and therefore it cannot be established whether mitigation is appropriate. Proposed mitigation should be discussed and agreed with the Council prior to finalisation of the DCO documentation.
- 3.9.30 Safe access for PROW and bridleway users' needs to be provided at Aust, including by opening up the currently blocked PROW as an alternative to part of the existing access track. Safe access also needs to be provided for the remainder of this route up to the service area, including for the Traveller community and taking account of any particular needs of for example children playing.
- 3.9.31 It would appear that the proposed landscape works at Aust set out a principle of woodland and hedgerow planting that that is considered appropriate. However more detailed proposals need to be agreed to ensure mitigation of impact on the setting and amenity of the Severn Way, including in respect of earthworks, fencing, soil conservation etc., all of which have the potential to affect the immediate setting to and amenity of this section of this long distance route. Mitigation proposals will need to be informed by the findings of the landscape and visual assessment, which should make use of the findings of the 3D modelling.

## 4.0 Other Documents

### **Draft Development Consent Order**

The Pinsent Mason response on behalf of the joint Councils covers the high level concerns of South Gloucestershire Council.