

Schedule of Responses – Appendix H.1

Sustainability Strategy Theme

When reading this schedule, it is useful to have read the following complementary documents:

- **Chapter 5 of the Consultation Report** – the main chapter which describes how EDF Energy has analysed the consultation responses and details how the schedule of responses works
- **Schedule of Responses Framework** from Appendix H – the categorisation framework used by EDF Energy when analysing the consultation responses
- **Consultee Comment Key** from Appendix H – to allow consultees who returned a response to consultation to identify which topics contain their comments

Respondent Reference	Respondent Type	Consultation Stage	Comment	Comment ID	Change	No Change	Noted	EDF Energy Response (Begins at first page of Topic)
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Accurately and Comprehensively Reflecting Baseline Conditions: While EDF Energy provide a discussion of headline baseline conditions, these would benefit from further consultation, to ensure that key issues of importance to stakeholders, are also clearly identified. We would also have wished to have contributed to the understanding of baseline conditions relating to general sustainability themes and objectives, which we consider would be material in informing the overall assessment of impacts.	89410-133-14827		/		This section responds to comments received during consultation that relate to the sustainability appraisal, which was undertaken to appraise the project's sustainability against policy objectives. Comments received can be categorised under the following three headings: <ul style="list-style-type: none"> • Baseline which relates to the initial conditions on which there could be an impact. This information is derived from technical studies. • Methodology which relates to the way in which the appraisal was undertaken. • Appraisal which relates to the findings of the appraisal itself.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	General baseline conditions are described in Section 3 of the SE. For each project element a broad summary description is described with regards to the site context in relation to the primary environmental features. We recognised that the Sustainability Evaluation is not intended to replace the Environmental Appraisal, which describes baseline environmental conditions in detail. While the nature of the baseline discussion means that there has been the need for significant generalisations with regards to a number of topic areas, given the body of documentation supporting the SE, this is considered generally acceptable. It would, however, be useful to ensure that baseline conditions were also considered in respect of the Sustainability Themes discussed in Section 6 to 17 of the SE.	89411-133-9135	/			The Sustainability Evaluation submitted at Stage 2 consultation reported the findings of a preliminary sustainability appraisal for the project, undertaken against the Government's sustainability objectives for new nuclear power stations. It also took into account relevant regional and local sustainability objectives.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid the use of greenfield land and encourage the reuse of brownfield sites With regards to the three guiding questions associated with this scheme, the majority of development associated with the scheme will be carried out on greenfield land with land at HPC and the Junction 24 Park and Ride facility site being categorised as the best and most versatile land. The HPC site also includes a comparatively large area which is managed under an environmental stewardship scheme.	89413-142-1054	/			There were few responses relating to the baseline. It draws on technical documents produced as part of the Environmental Impact Assessment, together with policy documents, particularly the Appraisal of Sustainability of the Nuclear National Policy Statement (both the main report and the site report for Hinkley Point) and the draft Sedgemoor District Council Core Strategy. The technical nature of this information provides robust baseline data. At Stage 2 consultation, a summary of the baseline conditions was provided in Section 3 of the Sustainability Evaluation. However, for the Development Consent Order application, in order to make the document more accessible, this summary has been removed and the reader is directed to the technical document itself. This is to prevent potentially inappropriate generalisations of the baseline conditions and to avoid repetition within the document. It should be noted that, where there was insufficient information available at Stage 2 consultation, because the technical studies were incomplete, a '?' was marked against the appraisal to indicate this uncertainty.

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We welcome the introduction of this new theme to complement those adopted from the AoS to the draft National Policy Statement. However, we have some concerns with regards to this theme insofar as its ability to consider the effects of waste.	89413-142-10697			/	A number of consultation comments related to the methodology EDF Energy has applied to the Sustainability Evaluation undertaken at Stage 2 consultation. It was recognised that EDF Energy needs to undertake a sustainability appraisal to meet the requirements of the Strategic Environmental Assessment (SEA) Directive. The development of a sustainability appraisal, incorporating the requirements of the SEA directive does not strictly need to be demonstrated at the project level. It is typically applied during the formulation of plans and programmes, hence has been applied during the formulation of the Government's National Policy Statements for Nuclear (Nuclear NPS). That said, EDF Energy's sustainability appraisal, submitted with the application for the Development Consent Order (DCO) does draw on elements of the SEA.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	In this respect, primary concerns relate to the Sustainability Framework and its ability to provide an accurate reflection of the sustainable performance of the scheme, as described below:	89410-135-16306			/	A sustainability framework has been developed by EDF Energy to ensure that the proposed development takes account of, and has been appraised against, a series of sustainability objectives which are relevant to the project. The framework has been built around a series of sustainability themes which were identified by the Government during the Appraisal of Sustainability (AoS) of the revised draft Nuclear NPS issued in October 2010. Under each theme, a series of sustainability objectives has been identified. To ensure consistency with the Government's AoS EDF Energy has used the same sustainability themes and objectives as a basis, although has also ensured that this is broad enough to cater for local sustainability issues.
Countryside Council for Wales	Statutory Consultee	Stage 1	<p>Sustainable Development themes and AoS/SEA Objectives</p> <p>The list of themes and objectives identified and listed appear to give a reasonably comprehensive coverage of the main environmental impacts. However, we are disappointed that, apart for the economic objectives, there is still an emphasis on avoiding adverse impacts, despite our comments on the need for more positive AoS objectives in respect of previous iterations of this document. While this may not necessarily be inappropriate, given the nature of the proposals and the requirements of the SEA Directive, it does represent a "negative" approach to the assessment process, which should also aim to identify positive contributions and look for ways to enhance them. In addition, by setting objectives which just seek to minimise harm it becomes increasingly likely that the indicators will also tend to be negative, (ie measuring the degree of negative impact) as measuring "zero change" is often extremely difficult. This is both a lost opportunity to measure the potentially positive contributions of the programme but may also be inappropriate in relation to protected sites. We would recommend that some of the objectives are amended to take on a more positive approach, for example, indicator (2) could be redrafted to say "To reverse fragmentation of ecological networks and promote ecosystem functionality".</p>	87870-135-2254			/	EDF Energy's approach to the sustainability appraisal was to use the same broad framework, but with a modified appraisal scoring criteria to ensure a better fit at the project level. The decision to modify the AoS of the revised draft Nuclear NPS has been criticised. However, the AoS was undertaken at a strategic level and therefore considers the effects at a national level. EDF Energy considered it necessary to modify the AoS to reflect regional and local perspectives and

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Countryside Council for Wales	Statutory Consultee	Stage 1	CCW notes that the AoS objectives (with the exception of economic objectives) still place emphasis on the avoidance of adverse impacts on environmental topics, despite our comments on previous iterations of this document. While this may not necessarily be inappropriate, given the nature of the proposals and the requirements of the SEA Directive, it does represent a “negative” approach to the assessment process, which should also aim to identify positive contributions to the environment and promotion of high levels of environmental protection. In setting AoS objectives which just seek to minimise harm, it is likely that the ancillary indicators will also tend to be negative, (ie measuring the degree of negative impact) as measuring “zero change” is often extremely difficult. This is both a lost opportunity to measure the potentially positive contributions of the NPS and may also be inappropriate in relation to protected sites. AoS objectives should ideally have been amended to take on a more positive approach, for example, indicator (2) could be redrafted to say “To reverse fragmentation of ecological networks and promote ecosystem functionality”.	87860-135-1292			/	objectives. In order to provide greater transparency on the process, this approach is set out clearly in the Sustainability Statement submitted for DCO application. It was suggested at Stage 2 consultation that a ‘bespoke sustainability framework’ should have been developed to reflect the sustainability objectives and indicators relevant to the national, regional and local environments. In fact, the sustainability framework developed by EDF Energy has been based around the sustainability themes and objectives identified at the national level, but it also includes regional/local level objectives through the inclusion of relevant regional and local planning policy. This can be found in Part 4 of the Sustainability Statement . The national objectives contained in the sustainability framework have already been subject to extensive consultation by the Government through the scoping process to inform the AoS, and then through the consultation on the draft NPSs. They are therefore considered sound for the appraisal of a nuclear power station. In addition, the framework submitted for the DCO application has been amended to reflect comments received during consultation and the approach to the appraisal was presented to the councils prior to submission.
Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	<p>Observations on Approach to Sustainability</p> <p>A considerable emphasis within this section is made to the Government White Paper Meeting the Energy Challenge: A White Paper on Nuclear Power (2008). Furthermore, reference is made to the Nuclear National Policy Statement and the accompanying Appraisal of Sustainability for Hinkley. Whilst reference is made to the Nuclear NPS and Appraisal of Sustainability, the key conclusions are not referenced directly in this section of the Stage 1 Consultation document.</p> <p>Under section 5.3.2 reference is made to the commitment from EDF to a Sustainability Statement for Hinkley Point C. Whilst this is welcome, it should be ensured that the Sustainability Statement addresses all elements of the development proposals including Preliminary Works; Off-site Associated Development; Hinkley Point C and Southern Construction Areas. The UK Low Carbon Transmission Plan (July 2009) refers to the need to cut emissions through efficiency measures, in addition to the need to invest in clean energy technologies such as nuclear. Associated Development proposals would therefore be expected to meet the most stringent energy efficiency and environmental standards, which should be tested through externally certified assessment methods such as CEEQUAL, BREEAM and the Code for Sustainable Homes.</p>	88480-134-206			/	<p>The Sustainability Evaluation at Stage 2 consultation was criticised for not adequately reflecting local sustainability issues. However, while the framework is based on national policy objectives, it also includes a breakdown, analysis and discussion of objectives and policy at regional and local levels. This has been reviewed and updated throughout the design of the HPC Project, and the parallel consultation on and designation of the NPSs, to reflect changes in relevant policy. This is set out in Part 4 of the Sustainability Statement.</p> <p>EDF Energy has also received a number of responses which suggested that the appraisal objectives appear negative. The primary driver for the choice of objectives has been to remain consistent with those in the Government’s AoS. Whilst these are drafted in such a way that the majority are to avoid adverse impacts, as opposed to having a more positive outcome, EDF Energy aspires to build on these objectives wherever possible, in accordance with its corporate aspirations for sustainability. This is demonstrated in Part 2 of the Sustainability Statement, which details sustainable design measures and initiatives designed into the proposals to enhance the HPC Project’s sustainability. In many</p>
Natural England	Dual - statutory consultee and consultee with an interest in land	Stage 2	The executive summary states that Sustainable Development is about striking a balance between the three objectives, economic, social and environmental. We consider this balance has not been met and is fairly meaningless, unfortunately the approach has been taken through the document which has led to an "evaluation" that describes what will happen with the development, rather than considering what the environmental limits of the area or resource are and what the impact of the development is likely to be on them, what options are available and what mitigation will be required. As a measure of sustainability we would consider the approach taken to be pretty useless - they may have chosen the correct options, but as the assessment is against a flawed measure of sustainability, there is no way of showing that they are helping to achieve sustainable development.	89116-134-4811			/	

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Countryside Council for Wales	Statutory Consultee	Stage 2	We do not believe there is sufficient evidence to support these conclusions with respect to the European sites that could be affected at this time	89137-134-3859			/	cases EDF Energy's sustainability strategy provides for sustainability initiatives beyond impact mitigation.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Based on the Council's consideration of the Stage 2 Consultation material, we contest that the Sustainability Evaluation fails to provide evidence that sustainability has been incorporated into the project, or that principles of sustainable development will be embedded in construction, operation and decommissioning of the power plant.	89410-134-11720	/			The scoring system employed by EDF Energy adopted the general principles of the scoring system used by the Government in its AoS of the draft Nuclear NPS. The objectives are judged to have been achieved or not achieved. As previously noted, the Government's AoS was conducted at a strategic level and so, to provide an appropriate appraisal of the proposals, EDF Energy modified the scoring system to ensure the appraisal process could be effectively applied at the project level. The appraisal process has also been modified to reflect comments received by stakeholders at Stage 2 consultation. Clarification of the scoring system can be found in Part 2 of the Sustainability Statement . It was also noted that the term 'significant' had not been defined. EDF Energy has defined the term significant in the context of achieving or failing to achieve objectives.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The Councils consider that the methodology adopted fails to demonstrate a robust and transparent approach to evaluation of the sustainability of the Hinkley Point C Project. This is based on the following primary observations:	89410-134-12282			/	The Sustainability Evaluation at Stage 2 consultation considered the achievement of objectives over the short, medium and long term. As a basic system for classifying timescales, short-term relates to the period of construction, medium-term relates to the operational life of the facility, and longer term looks to the decommissioning phase and beyond. A number of responses highlight the uncertainty surrounding the achievement of objectives. At Stage 2 consultation this was due to two main reasons: first, the fact that technical studies to inform the appraisal had not yet been completed; and second, in some instances, especially the appraisal of longer term impacts, because further studies will be completed at a later date. In general, where there is a significant element of uncertainty in the appraisal, professional judgement has been used to make an informed decision over the likely impacts. Nevertheless the uncertainty was recognised by marking a '?' next to the score. It should be noted there is less uncertainty within the appraisal submitted as part of the DCO application as additional information is now available.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The Councils have significant reservations that the assessment has been developed and conducted by EDF Energy without the benefit of consultation or stakeholder engagement. The SE fails to provide any evidence of scoping in terms of consultee and stakeholder involvement in agreeing the scope or terms of reference for the Sustainability Evaluation. Particular concerns regarding the absence of consultation and the effect on the SE relate to the following issues:	89410-134-12546	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Ensuring that the Aim of the Assessment Satisfies Local Need: The aims of the SE appear ambiguous. Section 1.2 of the SE describes the primary purpose as "to describe how sustainability has been incorporated in the design of the project and how principles of sustainable development will continue to be embedded in the operation and eventual decommissioning of the power plant", while Section 5.2 describes that the Sustainability Framework has been developed to ensure that the proposed development takes account of the sustainability objectives against which they will be assessed by the IPC. In its current form we observe that the aims of the SE fails to adequately reflect the need to ensure that development satisfies local sustainability issues, and it is our opinion that further consultation on the aims of the sustainability evaluation would facilitate a coherent aim and focus for the SE.	89410-134-13014			/	Consultation responses also stated that the scoring system to assess whether an objective has been met is subjective. It is for this reason that the appraisal is supported with a narrative to describe the reasoning behind the appraisal of each objective, the aim being

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Providing Acceptable Evaluations of Sustainable Performance</p> <p>For each sustainability theme, a narrative discussion is provided against performance of the project and a performance score provided against each of the Sustainability Objectives. While we disagree with a number of performance scores we observe that this is partially a consequence of the highly subjective nature of scoring and also the absence of consultation in with local and regional stakeholders in agreeing appropriate performance scores.</p>	89410-134-15332			/	<p>to provide a transparent as well as robust approach. This has been further clarified in the Sustainability Statement submitted for the DCO application.</p> <p>It was recommended that measuring and monitoring criteria be included as part of the sustainability appraisal. The Government objectives which form part of the AoS of the revised draft Nuclear NPS will be monitored by the Department of Energy and Climate Change in line with a monitoring framework set out in the AoS Monitoring Strategy. It is not intended that EDF Energy directly monitor the achievement of Government objectives. Nevertheless, EDF Energy has established key performance indicators for a series of sustainability opportunities which assist in meeting the objectives. These will be monitored by EDF Energy at an appropriate timescale following their implementation. Further, Consultation responses also identified the need for clear delivery plans for each strategy and key actions which will give clarity on the outcomes. EDF Energy has developed action plans for a number of the socio-economic strategies proposed. It has also identified some clear sustainability measures, designed to promote sustainable design and construction and how these will be implemented by EDF Energy. Part 2 of the Sustainability Statement identifies the sustainability opportunities proposed.</p>
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>In addition to concerns relating to the absence of consultation with regards to the SE, which have resulted in the approach and execution being determined and conducted by EDF Energy without regard to stakeholder input, the Councils also consider that the approach itself does not fully and accurately represent the performance of the Hinkley Point C Scheme in terms of the Sustainability Framework.</p>	89410-134-15903			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Use of an Inappropriate Sustainability Framework</p> <p>Paragraph 1.2.1 of the SE describes how 'to ensure consistence with the Government's [Appraisal of Sustainability], EDF Energy has used the same sustainability themes and objectives'. While we understand the relationship between this scheme and the Appraisal of Sustainability (AoS) of the draft National Policy Statement (NPS), we consider that this relationship forms an inappropriate basis for a Sustainability Framework for this scheme. While paragraph 2.1.1 of the AoS of the draft NPS identifies that "The main purpose of an AoS is to examine the sustainability effects of the developing NPS"; and the draft NPS itself states that it "provides the primary basis for decisions taken by the Infrastructure Planning Commission (IPC) on applications it receives for the energy infrastructure" (paragraph 1.1.1), it is considered that adoption a similar Sustainability Framework is currently unjustified. The Sustainability Framework which guided the AoS of the draft NPS was developed based on the 2008 Scoping Report (34) which describes "the purpose of the SEA is to provide for the high level protection of the environment and to enable environmental considerations to be fully integrated into the development of a plan or programme". While such a framework may be appropriate for AoS of the draft NPS, we consider that an accurate evaluation of sustainability of the preferred option for development at Hinkley Point C should be supported by a bespoke Sustainability Framework which reflects sustainability objectives and indicators relevant to the national context, but also to the regional and local environments. While the AoS for the draft NPS was developed to consider sustainability on the basis of assessment of strategic sites for development; EDF Energy's current preferred proposals relate to a clearly identified development proposals at a number of disparate sites located around West Somerset and Sedgemoor District.</p>	89410-134-16498			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Failure to Reflect Local Sustainability Issues The Authorities consider that the SE Framework affords insufficient consideration to local sustainability themes, policies and priorities.	89411-134-0			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Paragraph 5.2.2 describes that "The Sustainability Framework has been informed by regional and local planning policies and guidance documents, to ensure that the NSIP has been developed, where possible, to take into account the policy direction of the South West, and also Sedgemoor and West Somerset Councils". This statement is unsubstantiated, unjustified and, without the benefit of additional supporting material, should perhaps be omitted. The Sustainability Framework, presented in Part 2 of the SE, reflects that developed for the AoS of the NPS together with the addition of text describing some local policy drivers, which has not, on the face of it, contributed to development of the Framework. Particular areas of concern include the following:	89411-134-192			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Consideration of local policy objectives is limited. Policy objectives are identified at only a very high level within Part 2 of the SE, however the full range of local vision and policy issues relating to each sustainability objective and theme is not identified. This summary approach, affording attention primarily to headline policies in the local plans, fails to capture and take into account the full extent of local sustainability objectives that should be reflected in an appraisal of sustainable performance of the scheme.	89411-134-952			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- There is no evidence that the Sustainability Objectives accurately reflect local, regional and national objectives for sustainable development. To provide confidence that the Sustainability Framework reflects the such policy objectives, we would expect to see a clear and transparent appraisal of policy compliance, comparing material policies and issues from all relevant tiers of administration, to demonstrate that the Sustainability Objectives satisfy these and identify areas of conflict.	89411-134-1489			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Absence of Transparent Sustainability Criteria or Indicators A fundamental gap in the Sustainability Framework is the absence of any transparent measurement and monitoring criteria relating to the Sustainability Objectives, against which a clear and transparent assessment of the likely performance of the scheme could be provided.	89411-134-1988		/		

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Given that the Sustainability Objectives adopted from the draft NPS AoS are not directly measurable or quantifiable in themselves, the SE's approach to assessment focuses on providing narrative commentary against a series of guiding questions. Summary scoring of the performance of the scheme against each of the Sustainability Objectives is then provided, supported by a brief narrative statement. This absence of clear, measurable objectives or indicators, requires that performance of the scheme against the individual Sustainability Objectives is described in a subjective manner.	89411-134-2326		/		
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Unsubstantiated Modifications to NPS Sustainability Framework Notwithstanding comments described above, relating to the view that adoption of the draft NPS AoS Sustainability Framework is inappropriate, the authorities are further concerned at the unqualified decision to modify the draft NPS approach, through inclusion of additional Sustainability Objectives relating to Materials and Conventional Waste and also through adoption of a different approach to scoring performance against Sustainability Objectives.	89411-134-2914			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Unlike the original AoS for the NPS, modifications to the Sustainability Framework are not justified by any form of consultation or transparent policy review process, further demonstrating the need for a transparently defined sustainability framework, appropriate for the Hinkley Point C Site. While we acknowledge that issues relating to waste and materials are importance considerations in evaluating the sustainability of proposals we consider that appropriate consideration of these also demands to be considered in light of the robustness of the Sustainability Framework as a whole. The omission (Table 5.1) of radiological waste is a particular example of this, which demands further justification.	89411-134-3434			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We also note that the Key to Appraisal presented in Section 18 and also in Section 3.1.3 of Part 2 to the SE, differs from that proposed by the SEA Scoping Report and by the Appendices to the Appraisal of Sustainability Site Report for Hinkley Point published in support of the draft NPS AoS. Primary observations are as follows:	89411-134-4142			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Use of a tick mark, in terms of meeting the objective, may be considered misleading. This is particularly notable in the context that while two ticks denote "exceeding the objective", "not meeting the objective" is afforded only one cross.	89411-134-4475	/			

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Although Sustainability Objectives are broad, non-specific and not directly measurable, scoring criteria relate directly to achievement or otherwise of the Sustainability Objective. The subjectivity required to afford a score to the Objective can distort the findings of the SE.	89411-134-4720			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Scoring criteria rely on subjective use of the undefined term "significant".	89411-134-5004			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>We consider that a transparent approach would have been to adopt the approach provided in the AoS conducted for the draft NPS, as described below.</p> <p>Scoring System Adopted for draft National Policy Statement Appraisal of Sustainability</p> <p>Key: Significance and categories of potential strategic effects</p> <p>Major positive (plus plus): Development would resolve an existing sustainability problem; effect considered to be of regional/national/international significance</p> <p>Minor positive, (plus): No sustainability constraints and development acceptable: effect considered to be of regional/ national/international significance</p> <p>Neutral (0): Neutral effect</p> <p>Minor Negative (minus sign): Potential sustainability issues, mitigation and/pr negotiation possible: effect considered to be of regional/national/international significance</p> <p>Major Negative (minus minus): Problematical because of known sustainability issues; mitigation of negotiation difficult and/or expensive; effect considered to be of regional/national/ international significance</p> <p>Uncertainty? : Where the significance of an effect is particularly uncertain, for example because insufficient information is available at the plan stage to fully appraise the effects of the development or the potential for successful mitigation, the significance category is qualified by the addition of the symbol"?"</p>	89411-134-5086			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Having not been consulted with regards to the Sustainability Framework or proposed deviations from that adopted by the draft NPS AoS, we neither support nor challenge the framework, however we consider that it is not a transparent or fair reflection of the sustainability objectives that should be considered.	89411-134-6460			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Absence of Commitment to Ongoing Monitoring and Reporting In Paragraph 2.1.2 of Part 2 of the SE, EDF Energy describes that the Sustainability Framework is considered to be a living document that will be periodically reviewed and updated as scheme options are developed. It would be useful if the framework were to specify the mechanism for reviewing and updating the framework. It would also be useful if the framework were to be reviewed, monitored and implemented throughout development and operation of the scheme, so that performance could be measured against key indicators.	89411-134-6773			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Section 2 to the SE describes EDF Energy's corporate policies and objectives relevant to the project, together with a series of project level objectives (Table 2.1). While we recognise many of these are reflected in the sustainability objectives considered in the SE, it might also be useful to demonstrate the correlation between the project level objectives and the sustainability objectives considered through the body of the SE document.	89411-134-7601			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	It would also be useful to see the project level objectives clearly reflected in Masterplan documents and strategy documents (not provided with Stage 2 Consultation material). Connecting EDF Energy's objectives to an understanding of the adopted strategies, designs and details, would support demonstration of commitment to EDF Energy's sustainability goals.	89411-134-8046			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We particularly note that while Table 5.2 describes the Key Technical Studies which have informed the Sustainability Evaluation, a number of these, notably the Socio-economic Study, the Area Wide Transport Strategy, the Freight Logistics Management Strategy, the Integrated Waste Management Strategy and the Combined Heat and Power Study have not been included within the Stage 2 Consultation material. Consideration of issues addressed by the SE would benefit from access to these documents, and cross-referencing between statements provided within the SE to technical reference documents would also allow a more transparent substantiation to be communicated.	89411-134-8454			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The uncertainty associated with tourism and boating should also be reflected in the short-term score afforded to the sustainability objective.	89412-134-14821			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on the internationally and nationally important features of the historic environment We note, from Section 22 of Volume 2 of the Environmental Appraisal, that a number of further identified features are expected to experience Moderate Adverse effects prior to mitigation. We are, however concerned that there is sufficient evidence provided to support the evaluation of residual, post-mitigation impact to the various features. It may be argued that 'preservation by record' still ultimately results in the loss of a number of a number of features identified. Furthermore, the effectiveness of the Monument Management Plan also remains uncertain and the residual effect unsubstantiated.	89412-134-15011			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on nationally important landscapes In general, and reflecting the specific guiding questions, we would expect that the scheme would potentially result in adverse effects on the surrounding landscape, and in particular on the Quantock Hills AONB. While operational effects would be viewed in the context of the Hinkley Point A and B stations, consideration of the effect of HPC should be supported through reference to verified photomontage material, while extent of construction effects, and the effects prior to maturity of mitigation strategies should also be reflected in the SE.	89412-134-17620			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- With regards to the guiding question "will it adversely affect Heritage Coast or Preferred Conservation Zones", the discussion provided in Section 2 is unsupported by evidence.	89412-134-19298			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Given the discussion above, there is a case to argue that during construction, operation and decommissioning, this objective could be scored as not met. The lack of evidence-base behind the qualification for the assessment also supports identifying the assessments as uncertain.	89412-134-19480			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	With regards to the guiding question "will it affect the levels of tranquillity in an area" we welcome the recognition of the significant effects on the tranquillity of Combe Wharf.	89412-134-20360			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Given the loss of 760m of cliff exposure and the potential value that these have, we consider that there is a case that in the short-term, during construction, this sustainability objective would not be satisfied.	89413-134-837			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on surface water hydrology and coastal geomorphology Consideration provided in Section 15.3 of the SE provides no insight into performance of the scheme with regards to this sustainability objective. Section 14 of Part 2 to the SE identifies the potential for the scheme to generate significant quantities of sediment which will be managed "where possible by adopting working practices through an EMMP". A number of measures for control are proposed by the SE, although no confidence is provided to the extent to which control measures would be effective.	89413-134-4230			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The SE also fails to address changes that would be expected with regards to surface hydrology. In the short-term, construction activities may result in increased discharge to surface waters including the Holford Brook and the Bum Brook. The Holford Brook, which currently runs across the site will become culverted and run below the 'landscaping bund'.	89413-134-4843			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Effects are also possible with regards to activities associated with construction of the sea wall, construction and decommissioning of the jetty and construction and operation of the cooling water system.	89413-134-5984			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Reflecting the uncertainty associated with the potential effectiveness of the EMMP in preventing accidental discharges and effects on groundwater quality, we would consider that that during construction, satisfaction of this objective would be uncertain. Acknowledging the predicted minor effect on Bridgwater Bay and the Severn Estuary in terms of temperature uplift and biocide effects, we consider the sustainability objective may be met during the medium-long term.	89413-134-6764			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: Sustainability Objective: To avoid adverse impacts on the supply of water resources A primary feature of the scheme is that it is associated with high demand for water during construction and operational phases. During construction, water will be required to support construction activities, for example concrete batching and to support the requirement of on- site accommodation and workforce. Operation will require abstraction of significant demands of freshwater for cooling and make-up, although as this will be drawn from the Severn Estuary, no further consideration is necessary with regards to this criterion.	89413-134-7237			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on groundwater quality, distribution and low and assist with achievement of Water Framework Objectives Section 15.3 of the SE does not provide any discussion of this sustainability objective. What is not addressed explicitly is the significant dewatering that would be expected during construction and the effects that this may have during the construction phase. Given that dewatering will, during construction, affect groundwater flow regimes and that this issues is not addressed by the SE, we consider that scoring of this element within the SE should reflect this uncertainty.	89413-134-8257	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To Promote the Sustainable use of Materials Scoring of the criterion is open to some ambiguity. For instance, while use of sustainable materials would understandably result in a generally low score for construction, owing to the need for significant quantities of resource demanding materials such as concrete, "sustainable use of materials" may be interpreted differently. In this respect we would expect to see commitment from EDF Energy in terms of its procurement process in terms of ensuring that whole life impacts of materials employed by the scheme would perform sustainably.	89413-134-10942	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Use of KPIs to monitor materials procurement would only be useful if the KPI's reflect standards accepted as reflecting sustainable materials usage, and would be influential in ensuring delivery of a scheme utilising sustainable materials usage.	89413-134-12351			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	It is notable also, that the BREEAM scoring systems do not necessarily require performance in terms of sustainable materials usage.	89413-134-12981			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We observe however, that EDF Energy's commitments for waste management go little beyond statutory requirements of site waste management plans and exploring opportunities for waste management. Given the scale of construction works associated with construction, we consider that while construction waste may be minimised, and reflect principles of the waste hierarchy, the scale of construction materials involved would be expected to be reflected in significant quantities of construction waste.	89413-134-14730	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Construction entails a range on enabling works and associated development. Notwithstanding aspirations for legacy use, waste resulting from cessation of use of park and ride facilities, accommodation campus's and other works need to be considered and may arguably be addressed in terms of construction waste.	89413-134-15303	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Given the main issues identified above, it is considered unreasonable to score performance against this criterion as meeting the objectives. Development and implementation of an effective waste management plan / strategy may contribute to achievement of the objective, although no commitment is provided to build confidence that this would be the case.	89413-134-16311			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Furthermore a fundamental consequence of the scheme is that it will result in generation of significant quantities of waste. Whether or not this can be argued as exceeding minimal waste generation, this should also be included in the SE.	89413-134-16667			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	While we recognise the need to accommodate national sustainability policy issues, providing opportunity for consultation with local and regional bodies would have allowed relevant local policy objectives to be clearly identified in partnership with local policy makers allowing their inclusion within the Sustainability Evaluation.	89410-133-14492			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	While we agree that aggregating performance against these objectives is complex owing to the need to aggregate different impacts to varied habitats and species, we do also note that the sustainability objective focuses on avoidance of impacts rather than net gain and should therefore be scored in that regard. Recognising that, the Environmental Appraisal does conclude that there will be a number of adverse effects on a number of habitats and species. The significance of these may be reduced through the mitigation and compensation proposed, and would be reliant on the effectiveness of mitigation proposed. It is also expected that mitigation and compensation measures may not be effective during the short- term construction, but may be realised only during the medium term. The effectiveness of mitigation and compensation, and the extent to which benefits can exceed the adverse impacts realised at construction, would also be reliant on the effectiveness of management and implementation, and this is not currently understood. In the long-term, proposals for the site are not understood.	89411-142-14536			/	

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Highways Agency	Statutory Consultee	Stage 1	With regard to new infrastructure having a long-term, sustainable 'legacy' the Agency would seek further clarification as to the methods in place for securing this.	88860-135-7465	/			A number of comments were received which objected to the findings of the Sustainability Appraisal, which formed part of the Sustainability Evaluation presented at Stage 2 consultation. These objections were based on three main concerns, namely uncertainty from incomplete technical studies, uncertainty over the ability to predict long-term impacts and a general disagreement with the reasoning behind the appraisal outcome. More broadly, concerns were also raised as to how mitigation would be applied to ensure the sustainability could be achieved, and how far the appraisal process was able to influence the sustainability of the scheme.
Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	<p>Whilst the range of issues discussed within the proposed Sustainability Statement (economic diversification and employment; socio-economic renewal and environmental benefits) are welcome in broad terms, it is recommended that these be tied into specific key performance indicators which allow a mechanism for measuring the active pursuit of sustainability initiatives. It is strongly recommended that these be evaluated to ensure alignment with the Regional Spatial Strategy Sustainability Appraisal Framework including the Sustainability Appraisal (SA) objectives and indicators therein. Furthermore, this should reference SA objectives for the Sedgemoor District Council and West Somerset Council Local Development Frameworks (LDF).</p> <p>The authorities are particularly concerned to ensure that the construction of Hinkley will not worsen their performance against National Indicators included within the refreshed Somerset Local Area Agreement (March 2009):</p> <ul style="list-style-type: none"> - NI 185 - CO2 reduction from LA operations - NI 186 - per capita CO2 emissions in the LA area <p>It is anticipated that per capita CO2 emissions will increase substantially once the construction of Hinkley Point C commences and therefore mitigatory measures will be required. These could include financial support for the retrofitting of existing residential developments with energy efficiency measures and the establishment of local-scale heating and energy networks.</p> <p>Reference is made in section 5.3.6 that there is an expectation that the draft Nuclear NPS will provide guidance on the sustainability of a national scale nuclear programme. This is not explicit within the draft NPS and it is recommended that EDF demonstrate the sustainability objectives for the Hinkley Point C proposals in the context of national initiatives for the development of a national supply chain; economic renewal; educational initiatives; environmental stewardship; carbon reduction and security of supply.</p>	88480-135-1539	/			<p>With regard to incomplete technical studies, it is important to note that the Stage 2 consultation was based on preferred proposals and therefore the documents submitted for this stage of consultation were based on initial findings of the technical studies at that time. It was necessary to base the appraisal on the preliminary results to provide an indication of potential impacts and mitigation measures. In turn, this process has also informed sustainability opportunities available to the project.</p> <p>For the Development Consent Order (DCO) application, the appraisal is based on finalised technical studies and additional information that has become available since Stage 2 consultation. Consequently it is now considered that there is less uncertainty in the appraisal. Since Stage 2 consultation, EDF Energy has undertaken extensive work in updating the sustainability appraisal, building on the findings of the Sustainability Evaluation that was first published at Stage 2 consultation. It has been updated with additional information from the Environmental Impact Assessment (EIA), socio-economic workstreams, community based strategies and additional design detail.</p> <p>It was noted that there was uncertainty in the appraisal on certain impacts or on the effectiveness of their mitigation. This was due to two main reasons: first, the fact that technical studies to inform the appraisal had not yet been completed. This included the proposals set out in the Environmental Monitoring and Mitigation Plan (EMMP) and the Subject Specific Mitigation Plans (SSMP), annexed to the Environmental Statement (ES). Second, with regard to comments received relating to the sustainability outcome judged to occur over the longer</p>
Tractivity 60822	Public	Stage 1	In summary it would seem that development decisions are being made using neo-classical economics that will not necessarily deliver sustainable solutions, that is solutions that are economically and environmentally viable, environmentally and socially bearable, and socially and economically equitable. Sustainable development and engineering should be based on a systems approach developed through Ecosystems Economics and first consider the ecosystems limit for sustainable scale when developing the electricity power supply solution that is appropriate for sustainable Somerset.	9402-135-4749			/	

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Sedgemoor District Council, West Somerset Council and Somerset County Council Joint Councils Response	Dual - local authority, statutory consultee (Somerset) and consultee with an interest in land (Somerset and Sedgemoor)	Stage 2	In addition to the strategies, we would like to see 'delivery plans' for each strategy and key actions which will give clarity on how the outcomes, key performance targets and indicators will be funded and delivered over what timeframe.	10275-135-4137			/	term, it was made clear that in certain instances, further studies will be completed at a later date which will assist to reduce the uncertainty of the outcome. However at Stage 2 consultation, not all long term outcomes were considered to be uncertain. The performance of certain sustainability objectives is considered possible to be judged with sufficient accuracy at this stage. In general, where there is a significant element of uncertainty in the appraisal, professional judgement has been used to make an informed decision over the likely impacts. Nevertheless the uncertainty is recognised by qualifying the performance of the objective with a '?' next to the score.
Natural England	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>The executive summary states that Sustainable Development is about striking a balance between the three objectives, economic, social and environmental. We consider this balance has not been met and is fairly meaningless, unfortunately the approach has been taken through the document which has lead to an "evaluation" that describes what will happen with the development, rather than considering what the environmental limits of the area or resource are and what the impact of the development is likely to be on them, what options are available and what mitigation will be required. As a measure of sustainability we would consider the approach taken to be pretty useless - they may have chosen the correct options, but as the assessment is against a flawed measure of sustainability, there is no way of showing that they are helping to achieve sustainable development.</p> <p>We would suggest that they replace with wording from the UK Sustainable Development Strategy regarding the five principles of sustainable development, restructure the document and reappraise what the impacts will be in light of the five principles, using objectives informed by local constraints and factors. http://www.defra.gov.uk/sustainable/government/what/principles.htm</p> <p>Within the objectives only the High Level and Transport objectives (p.9-10) mention the environment, the assessment is not therefore attempting to measure sustainable development in the areas of procurement, accommodation, training, etc. In particular the accommodation strategy has the potential to impact on the natural environment, through the design and location of the accommodation and the potential for enhanced habitats.</p>	89116-135-4811	/			<p>Various consultation comments were raised in relation to the approach taken to the Sustainability Appraisal, including the scoring criteria applied. General comments were received that the appraisal should mirror more closely, the approach taken by the Government in its Appraisal of Sustainability for the National Policy Statements for Energy. In response to this, where possible, the appraisal process has been modified to reflect comments received by stakeholders at Stage 2 consultation. Clarification of the methodology can be found in Part 2 of the Sustainability Statement, and this is supported with a narrative to describe the reasoning behind the appraisal of each objective, the aim being to provide a transparent and robust approach.</p> <p>It was noted during the Stage 2 consultation that the Sustainability Evaluation did not provide evidence of sustainability having been incorporated into the Hinkley Point C Project (HPC Project), and EDF Energy was criticised for a lack of firm commitments. In fact, the Sustainability Evaluation submitted at Stage 2 consultation was based on preferred proposals and EDF Energy's aspirations for sustainability. The appraisal was undertaken of the project as a whole and at a high level; therefore it was</p>

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Natural England	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>P.38 Why are the references to the requirements of individual acts and government policy have been included here, and certainly not in this level of detail - it suggests cut and paste from the AoS, where as this assessment is supposed to be at the site level. For 4.2.23 PPS9 does not just apply to Local Planning Authorities!</p> <p>Diagram 5.1.1 makes no reference to Appropriate Assessment, it also only makes reference to "identifying further sustainable development 'opportunities'", which we would suggest lacks ambition to alter the way that the project is delivered and implies that the purpose of the document is to add on sustainability, rather than it being integral.</p> <p>7.3.6 The text sites an "example of how EDF has taken measures to meet this objective..." As this is an assessment of sustainability, shouldn't the document include the precise details of what action has been taken to avoid environmental damage and meet the Biodiversity objectives of the NPS. Loosely referencing examples without any detail or measure does not provide an adequate assessment.</p> <p>7.3.8 Again the information and conclusions that are contained within these reports should be produced as part of the assessment.</p> <p>7.3.13 There is no information on how these measures have been arrived at, what they will achieve and what the total number of interventions or actions will be - less of a mitigation strategy and more of a loose wish list.</p> <p>7.4.1 Summary - have we been approached about the judgement that there will be no impact on the favourable condition of the European Sites - if this judgement is open to challenge, we should challenge it.</p> <p>Part 2 Sustainability Evaluation - I'm disappointed that the evaluation has not added to the objectives used at the AoS, with local indicators. The objectives derived for the NPS are generic because they are expected to apply to a strategic document at a national level. For site based assessment they are too wide ranging and open to interpretation.</p> <p>P.118 Summary again only indicative examples are quoted, no specifics, no information on what they will do to mitigate.</p> <p>P.119 No need to repeat the policy drivers here that were already quoted (unnecessarily) in full in section 1.</p> <p>Section 3. Presumably this will be the conclusions summary when it is written?</p>	89116-135-6495			/	<p>not possible to provide detailed design measures and firm commitments at that stage of the planning process.</p> <p>Since Stage 2 consultation, EDF Energy has undertaken work to integrate further sustainability commitments into the project. This includes the development of a sustainability opportunities register which has resulted in a number of specific, positive sustainability opportunities being included in the project. These have been complemented by the development of delivery mechanisms and key performance indicators to ensure the opportunities are implemented and monitored by EDF Energy. The Sustainability Statement at the stage of the DCO application provided more clarity on the commitments towards sustainable design measures and the site specific design measures, which are further detailed in the Design and Access Statements (DAS).</p> <p>Comments were made as to the level of detail available within the Sustainability Evaluation and how it cross-referred to other documents, such as the EIA. It was noted that the document did not provide a full discussion or evidence base and it was suggested that technical findings and mitigation measures should be cited in the Sustainability Statement. It is not necessary and impractical to duplicate this information, and hence the reader is referred to the relevant technical reports where appropriate. The purpose of the Sustainability Statement, of which the appraisal forms a part, is to identify the environmental, social and economic benefits of the project by demonstrating compliance with a series of sustainability objectives. The sustainability appraisal is informed by findings of the EIA and other technical studies. It is therefore necessary to summarise elements of this information in the Sustainability Statement.</p> <p>The Sustainability Evaluation at Stage 2 consultation was criticised for not adequately reflecting local sustainability issues. This is not considered accurate. The Framework with which the appraisal is based on includes reference not only to national policy objectives, but also to a breakdown, analysis, and discussion of regional and local policy. This has been</p>
Stogursey Parish Council	Statutory Consultee	Stage 2	[Executive Summary] The sustainability appraisal may well show that the development proposals meet or exceed Government objectives. However, as is clear from the many detailed concerns below, they do not meet any local objectives or needs.	89293-135-2278			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	For each Sustainability Theme discussed in Section 6 to 17 of the SE, a planning policy sub-section is presented relevant to the theme. These either afford no, or only partial consideration to the key local and regional sustainability issues associated with Somerset, Sedgemoor District and West Somerset. As a consequence, the Sustainability Appraisal sub-section which follows this also fails to demonstrate that the project has been developed with regards to local or regional sustainability issues.	89410-135-13986			/	reviewed and updated throughout the design of the project to reflect changes in relevant policy. These are now fully set out in Part 4 of the Sustainability Statement . Further, local sustainability issues of relevance have been addressed by EDF Energy in the development of the sustainability opportunities register. This has been used for example to address recurring sustainability opportunities raised through the consultation exercise.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on air quality We accept that proposals for HPC and for elements of associated development will need to comply with statutory limits. Nevertheless we do consider that the potential effects need to be reflected in the assessment of sustainability over the construction period and while construction may not result in statutory exceedances of air quality objectives, adverse effects would still be expected owing to increased vehicular traffic and associated emissions, and through dust effects. Furthermore, while Section 6.3 describes that EDF Energy is "considering a series of measures to limit impacts on air quality", there is no confidence provided that measures will be implemented and effective in ensuring that there would be no adverse impact on air quality.	89411-135-10115	/			In addition to general comments received regarding the Sustainability Appraisal as a whole, a number of comments were received which related to specific topics such as legacy benefits, air quality, employment, materials and waste and CO ₂ . These are discussed below. Legacy Benefits It was noted that EDF Energy has the potential to maximise long term legacy benefits for the project, and methods for securing the legacy were requested. Legacy developments will be designed and constructed to higher sustainable design standards (such as BRE Environmental Assessment Method (BREEAM) and CEEQUAL) to reflect the permanent nature of the development. Information on this can be found within the site specific DAS . Furthermore, the use of greenfield land is mitigated with a restoration plan which aims to return land to its original state upon de-construction of temporary developments. Likewise, the significant investment in socio-economic components of the project will deliver legacy benefits in training and employment opportunities. Further information is provided within the Socio-Economic Chapters of the ES . Air Quality Comments were received in relation to emissions and dust impacts arising from the project and the link to sustainability. Due to the scale of works required for the project, it is recognised that there will be an increase in emissions of air pollutants during construction. Information on the mitigation measures can be found in the SSMP: Air Quality and summarised within each Air Quality Chapter of the
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	In terms of off-site associated development, all of these are expected to result in construction dust impacts and air quality effects as a result of changes in local traffic flows. We also note, from Section 5 of Part 2 to the SE, that there is no commitment to measures, for the Bridgwater campuses, that will result in reduction of air quality impacts. Proposals such as siting and low NOx/SOx technologies are discussed, although the Environmental Appraisal describes that BRI-A will be built to a BREEAM good standard, with BRI-C built to BREEAM excellent. Commitment to BREEAM 'good' for BRI-A does not provide confidence that the scheme will minimise air quality impacts.	89411-135-10940	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- With regards to the Guiding Question "Will it affect other statutory or non-statutory wildlife sites", we note recognition of the potential loss of important hedgerows, and also 60% of the County Wildlife Site at the existing power station complex. The SE and the Environmental Appraisal provide extensive discussion of the range of opportunities for habitat "enhancement" (or compensation), although the commitment to these, together with proposals for monitoring of the effectiveness of these in terms of compensating for losses experienced are not fully described.	89411-135-13441	/			

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To create employment opportunities There is no guarantee that local job opportunities within areas of need will be generated, as this is likely to be dependent on the implementation of a range of initiatives and programmes (with adequate funding support) for skills development and training. We also consider that a key aspect of employment opportunities, is that jobs are developed in areas of need, and would encourage the SE to provide further discussion to build confidence that job creation will develop in particular geographic areas of need, based on adequate provision of skills and training to empower target communities.	89412-135-2354	/			ES. In many cases, these measures not only provide emissions reductions but may also provide benefits elsewhere. For example, EDF Energy will trial hybrid buses during construction and this may lead to benefits for air quality and noise. Although at Stage 2 consultation it was stated that there was no confidence that measures to protect air quality would be implemented, firm commitments have been made as part of the DCO application, and EDF Energy has placed a number of requirements on contractors through the procurement process to ensure that these are met.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We consider that the SE judgement that the scheme will significantly exceed the objective of creating employment opportunities requires further justification, particularly in terms of the locations where opportunities will be created and in terms of the sustainability of the employment opportunities.	89412-135-3017	/			Biodiversity Concerns were raised about the schemes impacts on statutory and non-statutory designations. In the Sustainability Evaluation at Stage 2 consultation a brief, but sufficient, commentary was provided to illustrate the potential impacts on such sites and in turn the performance against the objective. Narrative was also provided for the proposals to enhance such sites. Additional detail is provided within the ES .
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Recognising the measures described in Chapter 9 of Part 2 to the SE, we consider that the scheme will adversely affect the capacity of transport infrastructure and increase congestion and pressure on the road network. While the nature of the preferred proposals presented may be informed by the need to encourage sustainable transport initiatives and to reduce the adverse effect on the road transport system, specific observations include those described below:	89412-135-7085			/	Further commentary was also raised in relation to the performance against nationally and internationally designated sites, particularly given that at Stage 2 consultation. The Habitats Regulations Assessment (HRA) was not finalised at that stage, see further details in the Hinkley Point C Project Report to inform Habitats Regulations Assessment . Accordingly, at Stage 2 consultation the performance was qualified with a '?' to reflect this.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	While noting the discussion in Section 10 of Part 2 to the SE which states that in light of the potential employment opportunities "the IPC should give significant weight to the effect of employment on human health and well-being", we consider this evaluation would benefit from further justification of the health benefits facilitated by employment during construction, and the sustainability of these benefits following cessation of construction activities.	89412-135-10897	/			Cultural heritage Specific commentary was provided on impact associated with Pixies Mound. Concerns were raised that the 'importance' of the project was considered within the appraisal, which consultees stated is not relevant in the context of a Sustainability Appraisal which should consider the ability to achieve sustainability objectives equally. The validity of this comment is noted. The importance of a scheme may however be considered as a material consideration by the Infrastructure Planning Commission when assessing the HPC Project's impacts. More broadly, comments were received on the performance of the objectives, particularly over the short term because of impacts from construction on nationally important historic assets. Additional survey work has been
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We also note the potential for noise impacts to affect the mental health of nearby communities may be particularly acute given the rural setting elements of the scheme, notably the HPC site and Comwich Wharf. As Section 10 of Part 2 to the SE suggests that impacts on nearby communities are subject to ongoing assessment, this should be reflected as uncertainty within the SE.	89412-135-12591			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	With regards to offsite associated development, discussion provided in the SE is generally high level. However it is clear that Scheduled Monuments and listed buildings will be affected in Cannington, and this is reinforced by the statement provided in Section 11 of Part 2 to the SE, that "the impacts are broad however will generally result in the setting of the historic asset being affected", further supports the case to question the robustness of the scheme as satisfying the sustainability objective.	89412-135-16010			/	undertaken since Stage 2 consultation to ensure that the assessments are accurate. Landscape Concern was raised that the performance of the project against objectives for important landscape designations would be better supported with photomontages and evidence that the scheme is difficult to see from the Exmoor National Park. Comprehensive photomontages have been developed for the DCO application which justifies these findings. These are provided within the ES .
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	With regards to the summary discussion provided in Section 12.4, we also note the statement that "considering the importance of the proposed development relative to the impacts, this objective is largely supported, especially over the medium and longer term". We consider this statement to be inappropriate in the context of the SE. The importance of the proposed scheme is not a material factor in regards either to the sustainability objective or to the sustainability theme, which jointly address cultural heritage assets.	89412-135-17071			/	The Sustainability Evaluation was also identified to underplay impacts on the Quantocks, particularly during construction. The Sustainability Appraisal summarises the impacts post-mitigation identified within the EIA. Geology
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- With regards to the guiding question "will it adversely affect landscapes within or immediately adjacent to a National Park", the SE correctly identifies the proximity of the site to Exmoor National Park. While we generally accept the mitigating effect of the distance, discussion that the power station will be "difficult to see" would be better supported through reference to verified photomontages and viewpoints. Discussion of potential effects of AD sites would also be supported through an evidence-based discussion.	89412-135-18258			/	Concerns were raised that the loss of geology arising from the construction of the sea wall was underplayed, because of the abundance of this geology locally. The proliferation of this rock formation does not diminish the fact that it will be lost, however its relative abundance reduces the impacts of the HPC Project and its relative significance as a sustainability issue. Soil functions
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- With regards to the guiding question "will it adversely affect landscapes in or immediately adjacent to an AONB or National Scenic Area", while the proximity of the site to the Quantock Hills and the Mendip Hills AONB is recognised the discussion does not however fully reflect the potential adverse effects of the scheme during construction and operation on the Quantock Hills. In this respect, the SE underplays the potential adverse effect on landscape during construction and operation of the scheme.	89412-135-18788			/	Concern was raised that the long term assessment of sustainability cannot be made for the HPC development site, given the uncertainty following decommissioning. This point is noted. Water quality and resources
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on landscape character, quality and tranquillity, diversity and distinctiveness Section 13.3 of the SE accurately identifies the potential visual impact of energy infrastructure on visual receptors and the need to reduce the impacts through careful design. While the majority of narrative in Section 13.3 describes the measures and strategies employed to seek to limit the visual impact, specific issues associated with the potential performance against this sustainability objective are described further in Section 12 to Part 2 of the SE.	89412-135-19762			/	Some consultation responses also queried the effectiveness of mitigation measures in assisting to achieve the objectives for water quality. At Stage 2 consultation, limited information was provided on the mitigation strategy, which has since been defined more accurately through the EMMPs and SSMPs . Consultation responses were also received on the water consumption of the project, which is high, and the ability of local water supplies to meet this demand without adversely affecting supply. Significant work has been undertaken with Wessex Water, the statutory undertaker for the site, which will include new pipelines and upgrades to an existing reservoir. Wessex Water is in agreements with EDF Energy to

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	It may also be argued that the final statement in the summary to Chapter 12 of Part 2 to the SE is potentially misleading. Whether or not "the most important objective under this theme: to avoid adverse impacts on nationally important landscapes will be met", the summary discussion provided addresses a different objective, which we consider may not be met.	89412-135-20548			/	supply a secure supply. Flood risk and drainage Commentary was received in relation to Sustainable Drainage Systems, and the scoring of objectives based on aspirations to include these features where possible in design. At Stage 2 consultation there was always intention to integrate these into the scheme in accordance with policy; hence no uncertainty was assigned to the evaluation. Further detail is now available on the Flood Risk Assessment which indicates the sustainable drainage measures proposed.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Notwithstanding the commitment to a landscape strategy and design standards in light of the responses to guiding questions, it may be argued that during construction, the scheme would perform significantly below this objective, particularly given the rural nature of the site, and of elements of associated development, and given the proximity to and potential effect on the Quantock Hills AONB.	89412-135-20910			/	Employment and Health Consultation responses were received in relation to the schemes performance against employment objectives. At Stage 2 consultation, concerns were raised that there is no guarantee that the development would provide local job opportunities, as this is dependent on a number of initiatives being implemented. This has clear links with sustainability. EDF Energy is committed to operating a policy to promote the training and recruitment of local people, and is currently working with Jobcentre Plus and investing in local colleges to provide people with access to vacancies and the skills they need to secure jobs on the project. This is further detailed within the Sustainability Statement . Further information on the potential impacts and mitigation measures are detailed in Socio-economics Chapters of the ES and the Economic Strategy .
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid damage to geological resources We support recognition that the scheme, which will require significant earthworks and construction of the sea wall which will obscure the exposed foreshore pavement. While it is acknowledged by the SE, and in Chapter 14 of Volume 2 of the Environmental Appraisal, that the cliff exposures which will be lost to the sea wall are of value, it is however cited that the presence of similar accessible geological features at locations surrounding the site causes the value of the feature to be low. We are however, concerned that the loss of 760 m of geological exposure is afforded due consideration given the validity to assessing the value of particular features through consideration of the value of other surrounding features.	89413-135-37			/	Commentary was also provided on a desire to see a greater degree of clarity linking employment with health benefits. There is recognised links between employment and health. The Health Impact Assessment provided with the DCO application identifies these in further detail. Materials and Waste In terms of the use of sustainable material, EDF Energy has developed a materials policy which is based upon accepted standards from the BRE Green Guide. This will be issued to contractors and EDF Energy will require that compliance is demonstrated. It is recognised that the use of BREEAM does not necessarily require performance in terms of sustainable material usage; however, the use of a materials policy, which will be developed by EDF Energy demonstrates a commitment to this. Further
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid the contamination of soils and adverse impacts on soil functions We consider that Para 14.3.6 provides a limited discussion of performance of the scheme in terms of the sustainability objective, although we note that these are afforded discussion in Section 13 to Part 2 of the SE. Notably, construction of the main site and of associated development sites will involve movement and storage of significant quantities of soil.	89413-135-2904			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We consider that in the long-term, given that proposals for decommissioning of the site are not provided in detail, there remains too much uncertainty to provide a long term assessment of sustainability.	89413-135-3984			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Based on the discussion provide within the SE and the points highlighted above, we consider that control of adverse effects on surface water hydrology would not necessarily be avoided during construction.	89413-135-5199			/	information can be found in the Sustainability Statement . In terms of waste, EDF Energy was criticised for not going beyond statutory limits for waste management. A Waste Management Implementation Strategy , annexed to the ES , has been developed which details how the UK waste hierarchy can be promoted throughout all stages of the HPC Project. The highest level of the waste hierarchy (waste prevention) is promoted by EDF Energy: for example, modular construction will be utilised for accommodation campuses, whereby the buildings are manufactured under controlled conditions off-site. As a consequence, there is a reduction of waste at both the factory and site location.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on surface water quality, including coastal and marine water quality, and assist achievement of Water Framework Directive objectives Primary issues that may result in effects on water quality during construction are identified as sediment input from earthworks and contamination from accidental spills. While the SE considers that these would be reliant on effective control, implemented through effective operation of an EMMP, the EMMP no confidence is provided to the extent to which control measures would be effective.	89413-135-5407			/	Commentary was also provided that the waste arising from temporary associated development sites should be considered as construction waste, i.e. short term as opposed to waste arising in decommissioning. This is noted and the assessment has been modified accordingly.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Section 14 of Part 2 to the SE identifies the potential effect if discharge of cooling water on temperature. It is noted that beyond the most stringent limits water framework directive objectives are expected to be met with regards to temperature uplift, while the effects of biocides would only exceed environmental quality standards over a small area at the surface (Environmental Appraisal, Volume 2, Section 17).	89413-135-6344			/	CO₂ Emissions Commentary has also been provided as to the performance against national indicators 185 and 186, which relates to local area agreement indicators for carbon emissions. The HPC Project's carbon assessment (Environmental Product Declaration, which is a reference to the Sustainability Statement) has been undertaken which identifies the carbon emissions anticipated to arise from HPC Project. Whilst increases will occur during construction, there will be significant benefits once the power station is in operation.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Although the SE recognises that the site is not in a water stressed area, no further indication is provided as to the confidence that water demands can be met without adversely affecting supply. The uncertainty with regards to quantities and sources of water required during construction would result in uncertainty over the short term achievement of this objective.	89413-135-7886			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We further note the addition of the Guiding Question "will it incorporate SuDS" which has been included in the SE and is additional to other elements that have been drawn from the draft nuclear NPS AoS. While we support adoption of appropriate and effective sustainable drainage elements in site drainage strategies, we question the validity of commentary provided. Given the uncertainty associated with Flood Risk Assessments at this stage, and the stated aspiration that "Associated Development will adopt SuDS strategies where appropriate and technically feasible" we consider that scoring should be modified to reflect the current uncertainty.	89413-135-10015			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Discussion provided in Section 16 to Part 2 of the SE also considers the procurement of materials and states "EDF Energy is committed to the sustainable procurement of materials and is exploring opportunities for maximising the sustainability of these materials." However, noting the wording of the Sustainability Objective, it further states that "at this stage, consideration is give to basic procurement, including delivering materials to the site and opportunities to maximise sustainable materials as part of the project". In general though, discussion is provided to support this it does not provide confidence of the approach or commitment to sustainable procurement, nor to the measures that will be enabled to ensure that procurement reflects EDF Energy's aspiration. In summary, EDF Energy further state that proposals for material use will further evolve as the project develops.	89413-135-13288			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Reflecting the concerns outlined above, we would consider that there is insufficient confidence, at this time, to afford the score proposed within the SE at this time. We would further suggest that affording a score which suggests that the sustainability objective will be met is unjustified, based only on a project aspiration.	89413-135-14182			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Overall we consider the summary finding, in Section 17.4, unjustifiable, insofar as EDF Energy's commitments, as communicated by the SE and we have concluded that it fails to provide sufficient commitment to meet the sustainability objectives described. We further consider that the sustainability objectives also fails to represent the highest level of the waste hierarchy, that of prevention of waste.	89413-135-16908			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Recognising the measures described in Chapter 9 of Part 2 to the SE, we consider that the scheme will adversely affect the capacity of transport infrastructure and increase congestion and pressure on the road network. While the nature of the preferred proposals presented may be informed by the need to encourage sustainable transport initiatives and to reduce the adverse effect on the road transport system, specific observations include those described below:	89412-135-7085			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- We further note the discussion of the potentially most significant elements issues associated with off-site associated development as being effects at Combwich Wharf and the Cannington Bypass. For these and for other associated development sites, some protected survey results are still incomplete. Given the incomplete information available at this stage it remains conceivable that further effects on species may be realised and we consider that this uncertainty should perhaps be reflected in the scoring adopted.	89411-142-14014			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	We further consider that, notwithstanding the effectiveness of mitigation, there will be an impact on nationally important features of the historic environment, and therefore the scheme may fail to satisfy the sustainability objective described above.	89412-142-15755			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid adverse impacts on the setting and quality of built heritage, archaeology and historic landscapes Discussion of the potential effects summarised in Chapter 22 of Volume 2 of the Environmental Assessment and in Table 12.1 suggests that at a number of sites, subsurface archaeological remains will be lost (albeit preserved by record). Affects on listed buildings and conservation areas further reinforce the extent to which this sustainability objective is correctly judged not to be met during construction.	89412-142-16521	/			

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Tractivity 403	Public	Stage 1	2. Any other ideas or comments? While creation of wildlife sites combined with woodland is important, sustainable agriculture must be a top priority to feed the growing population which in turn is to benefit from the power produced at Hinkley C.	9086-142-638			/	A number of comments were received which could not be easily allocated into a particular topic. These reflect the broad nature of sustainability as an issue.
Tractivity 450	Public	Stage 1	2. Any other ideas or comments? All of the above are important both for the well being of flora and fauna and the lives of the nearby population. Especially farmers and those who work in the local areas.	9128-142-851			/	Comments were received which related to sustainable use of land, particularly the importance of agriculture to the rural economy. EDF Energy recognises the importance of the natural landscape and as a result, has endeavoured to mitigate potential impacts wherever possible. This has been addressed through a masterplan design, see the Design and Access Statements (DAS) , which has reduced the size of the development through an iterative design process and has therefore reduced the area of land required for permanent development. This is supported with a landscape strategy and landscape restoration plan which is designed to integrate Hinkley Point C (HPC) into the wider landscape setting, and which enables parts of the construction area to be re-instated for agricultural purposes. EDF Energy has also demonstrated its commitment to reduce the use of greenfield land, and where possible, makes use of existing brownfield sites where practical and possible.
Tractivity 476	Public	Stage 1	2. Any other ideas or comments? It may prove to be an opportunity to rebalance the region especially for sustainable aspects such as increasing areas of woodland both for permanent scenic reasons and to provide a continuing source of timber supply in the future. Wildlife habitats both past and future, are crucial to the future of Somerset so this should be high on the list of priorities. Bear in mind the future of the tourist industry and farming issues affected by any nuclear waste.	9152-142-1101			/	
Landowner - The Wyndham Estate	Consultee with an Interest in Land	Stage 2	Preference: The Estate holds the strong conviction that there is far greater potential to satisfy both the stated needs of edf for off-site accommodation and parking on alternative sites within the Williton/Watchet/Washford triangle. The Estate is also firmly convinced that such alternatives possess the genuine potential to accord with the rural regeneration goals of West Somerset Council, without attracting substantive objections on grounds of either (a) sustainable transport and development strategy, (b) highway safety, (c) flood risk, (d) ecology and/or (e) archaeology.	10251-142-2071		/		It was enquired as to whether EDF Energy would publish the sustainable legacy benefits for specific areas. For the Development Consent Order (DCO) application, EDF Energy submitted a Planning Statement which provides details of the legacy benefits of the HPC Project, as well as the provision of a community fund which is to be distributed throughout the region.
Stogursey Parish Council	Statutory Consultee	Stage 2	[1.2.4] Will EDF say what sustainable legacy benefit there will be specifically for the residents of the parish of Stogursey, who will suffer the worst of the disruption?	89289-142-3056		/		EDF Energy were criticised for not including rainwater harvesting in the proposals at Stage 2 consultation. Since Stage 2 consultation, EDF Energy has been considering a number of additional sustainability opportunities for the project including the opportunity to include rainwater harvesting. This is now included on the Simulator Training Centre (STC) at the Main Site. Further information is provided within Chapter 7 of the Hinkley Point C Development Site Design and Access Statement (DAS) . It should be noted that rainwater harvesting has not been included on more buildings due to the stringent technical requirements of the nuclear buildings or because of the conflict with
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To avoid increased flood risk (including coastal flood risk) and seek to reduce risks where possible We understand that the level of the HPC platform will be increased and coastal protection from erosion will be provided to ensure resilience of the main site during operation and decommissioning.	89413-142-8918			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- That the project is undertaken to the highest standards of safety, reliability and sustainability.	89418-142-8368			/	EDF Energy's aspiration to include green roofs. Similarly, at Stage 2, EDF Energy did not publish the number of buildings with green roofs. A commitment has now been made to allocate 14,696 m ² of green roofs as part of the masterplan. A statement has been produced which details how and where such features have been provided, together with an explanation of the approach and types of roof proposed. The Green Roof Feasibility Study can be found appended to the Hinkley Point C Development Site DAS .
Tractivity 189	Public	Stage 1	12. Do you have any other comments about EDF Energy's initial proposals for the development of a new nuclear power station at Hinkley Point? With rising sea levels it could be underwater in a few years. Nuclear power is the wrong way to go. There is an estuary and several rivers with high tidal ranges that could be used to generate electricity cleanly and without dangerous waste. Also it is windy out in the Bristol Channel.	8905-137-4637			/	It was suggested that with rising sea levels from climate change, the development could be underwater in a few years. This is not the case. The Government's Nuclear National Policy Statement, EN-6, sets out specific requirements for flood risk mitigation for new nuclear facilities, which requires that facilities are designed to address issues of flood risk, taking account of future risk scenarios posed by climate change, as well as other factors, such as tsunami and storm surge. EDF Energy has responded to this by developing a land platform for the nuclear island which is fixed at 14m Above Ordnance Datum. This takes account of flood risk projections from the UK Climate Impacts Programme (UKCP09). Further, the sea wall, proposed to protect the cliffs from coastal erosion has been designed to be adaptable to future sea level rise. More broadly, flood risk has been key to the planning and design of other associated development sites, and in all cases the sites put forward by EDF Energy meet with the sequential test, where this is required to be demonstrated. This is further detailed in the Overarching Flood Risk Assessment Report .
WSC & SDC Joint Response	Dual - local authority and consultee with an interest in land (Sedgemoor only)	Stage 2 Update	The principal topics and themes for the measures/initiative/projects are set out within section 10 of the Councils' HPC Project SPD. Additional areas to those set out within EDFE's Stage 2 document, that will need to be incorporated within obligations and requirements for a Development Consent Order, include: - Measures for carbon emission minimisation and to enable local climate change adaptation.	89890-137-12573	/			Comments were also received that objected to nuclear power as a low carbon technology, supporting the development of other renewable energy forms such as hydro-generation. EDF Energy acknowledges the importance of a range of energy technologies to meet with climate change targets and secure energy supplies. The UK Low Carbon Transition Plan identifies the role that nuclear power will have for decarbonising the power sector, alongside greater utilisation of renewable energy and application of Carbon Capture and Storage (CCS). The carbon intensity of nuclear power is recognised to be very low, calculated for HPC as 4.8 gCO ₂ eq/kWh, and having the advantage over other forms of renewable energy in its ability to provide a steady, resilient power source. HPC will therefore provide low carbon energy. Further information is available from the Sustainability Statement .

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Tractivity 62577	Dual - Consultee with an Interest in Land and Public	Stage 2	- Where in all the company's claims to be 'low-carbon' are the figures to show the traffic generated by the service personnel for the hostels and the recreational use of vehicles by the hostel inhabitants?	10128-134-4809	/			<p>Consultation responses regarding renewable and low carbon energy relate to two main areas: conservation of energy and calculation of the carbon footprint of the project. EDF Energy's responses to these comments are detailed in this section. More broadly, a number of consultation responses were provided in relation to the principle of nuclear power over other forms of energy generation. The application of strategic wind farm projects and the use of tidal power on the Severn Estuary were identified. EDF Energy's response to these more general points is not addressed within this section. However a broad response is available Topic Issues Beyond the Scope of the Consultation – Nuclear Energy and Principle of Development – Conditional Support and Opposition for Nuclear Development.</p> <p>Conservation of energy</p> <p>Energy conservation is an important aspect of EDF Energy's corporate sustainability ambitions. As such, a number of measures have been incorporated into the design of Hinkley Point C (HPC) and associated development to ensure that energy efficiency is maximised. At the main site, this is demonstrated in the Hinkley Point C Development Site Design and Access Statement through establishing a land platform which is resilient to flood risk, but which is optimised to ensure that energy associated with pumping cooling water is minimised. Energy efficiency will also be facilitated through a private wire⁽¹⁾ electrical connection from HPC, which once operational, will supply all buildings on site with electrical power. HPC will have no gas supply, and therefore 100% of the sites power supply will come from this low carbon power source. Because power will be drawn through this connection, this reduces transmission losses associated with the National Grid connection. Specific design proposals have also been considered at the building level to reduce energy consumption and to conform, where appropriate with Part L of the Building Regulations.</p> <p>Energy conservation has also been considered for the associated development. This is achieved through passive design measures and efficiency measures that reduce energy demand as well as the application of renewable energy technologies. Further information can be found within the Energy Statement for Associated Development.</p> <p>EDF Energy has ensured that, as a minimum, relevant development associated with the project will achieve</p>
Tractivity 1037	Public	Stage 2	13. Please let us have your overall views on our proposals and any other general comments in the box below I am not opposed to nuclear power and construction of Hinkley c but I consider EDF are making too many demands in the Dunball/Puriton/J23 area..	9795-137-8300			/	
Tractivity 228	Public	Stage 1	10. Do you have any comments on our proposals in relation to training and business opportunities? we would hope that your Contractors will employ local tradesman wherever possible and have great regard for keeping the carbon footprint to a minimum.	9338-137-6520			/	
Tractivity 62442	Public	Stage 2	9. Regarding Hinkley Point C, you claim that you will utilise the electricity generated from the plant "making the operation low carbon". However, given that there are 50 substantial buildings being constructed on the HPC site together with various pits and ponds, predominantly made of concrete, can you please advise what carbon emissions will be produced in the actual building of the power station? A calculation has, presumably been done, given the government's commitment to cutting carbon emissions? How does this compare to the use of the electricity you will generate?	10070-137-9149	/			
Tractivity 62469	Public	Stage 2	2.1.5 of your Sustainability Evaluation claims: 'As the most affordable low carbon option available, nuclear power has a major role to play in the UK's future energy mix'. This claim must be substantiated as two government departments' own figures contradict it - Cabinet Office Energy Review page 197, DTI Options for a Low Carbon Future, Occasional Paper No 1, page 19.	89472-137-7168			/	
WSC & SDC Joint Response	Dual - local authority and consultee with an interest in land (Sedgemoor only)	Stage 2 Update	- Provision of low carbon solutions for local households including energy efficiency advice, insulation solutions and low carbon energy installations to off-set the carbon footprint of the temporary developments;	89888-142-2716		/		
Stop Hinkley	Non-Statutory Consultee	Stage 2	3. Nuclear as a low carbon fuel EdF repeatedly claims, for example in its Sustainability Evaluation para 8.3.1, that "nuclear power is a low carbon technology, with operating CO2 emissions comparable to wind energy". This is a meaningless comparison.	89447-135-5692			/	

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			<p>Any scientific analysis of carbon emissions must take into account the lifecycle operations of a particular power generation technology, including the mining and production of its fuel and the emissions involved in the construction and eventual decommissioning of its plant. For nuclear power this would include, for example, the mining of uranium, its preparation and enrichment, the concrete and steel involved in building the power station, the decommissioning process and the long term management of radioactive waste.</p> <p>An assessment of 103 lifecycle studies of the nuclear fuel cycle by (personal details removed) from the National University of Singapore (1) has shown that, even when only the most methodologically rigorous of these studies were selected, the average lifecycle emissions from nuclear plants amounted to 66 grams CO₂equivalent/kWh of electricity generation. Although this is less than the estimate of 112-166g CO₂e/kWh reported by (personal details removed) (2), it is more than ten times the nuclear industry's estimates, and far worse in terms of carbon emissions than all the renewable alternatives, including solar PV.</p>					<p>the national timetable for carbon reduction, consistent with the Building Regulations. Various consultation responses have been received which identify the need to go beyond these standards. An assessment of energy and carbon emissions has been undertaken for the associated development, to ensure that these buildings are designed to meet with the prevailing policy for carbon reduction, as put forward within the Draft Sedgemoor District Council Core Strategy. The Energy Statement for Associated Development sets out how this is achieved. Achieving higher standards, beyond policy and regulation is considered to be uneconomic.</p> <p>In addition, EDF Energy has placed requirements on its contractors to ensure that energy demand is minimised during construction. Their obligations to set targets, monitor and report on emissions are detailed in the Sustainability Statement. More broadly, opportunities to minimise emissions by using local tradesman was identified at consultation. EDF Energy has undertaken significant activities to promote the use of local labour during construction, which will have a benefit for minimising emissions from activities such as personal travel.</p> <p>Carbon footprint</p> <p>EDF Energy's approach also provides a significant focus on keeping the carbon footprint during construction to a minimum, as well as an incentive to employ low carbon technologies becoming available where these are practicable.</p> <p>Various responses related to the location of associated development, particularly temporary worker accommodation in relation to the HPC development site and the associated carbon footprint. EDF Energy's accommodation strategy attempts to minimise travel to work distances, which in turn limits the projects carbon footprint. The proposals to locate development in Bridgwater strike a balance between the need to minimise impacts from transporting construction workers to the site, with socio-economic considerations.</p> <p>Consultation responses questioned whether the overall carbon intensity of the electricity generated by the development would be low if calculated on a comprehensive lifecycle basis. This would include construction, fuel from mining to disposal, decommissioning and waste management as well as</p>

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								<p>operation.</p> <p>In response, EDF Energy has undertaken an assessment of carbon emissions over the whole lifecycle of HPC, including construction (and also decommissioning and waste management and disposal) as well as operation, apportioning this total over its lifetime electricity generated. On this basis, emissions relating to the construction of HPC are minimal in themselves, and far less than would have been produced by the prevailing mix of electricity supplied to the National Grid in the absence of HPC. This assessment is being set out in an Environmental Product Declaration (EPD) for the project, which is a reference to the Sustainability Statement.</p> <p>Furthermore, the UK Low Carbon Transition Plan identifies the role that nuclear power will have for decarbonising the power sector, alongside greater utilisation of renewable energy and application of Carbon Capture and Storage (CCS). The carbon intensity of nuclear power is recognised to be very low, calculated for HPC as 4.8 gCO₂eq/kWh, and having the advantage over other forms of renewable energy in its ability to provide a steady, resilient power source contributing to national and regional security of supply.</p> <hr/> <p>Notes: 1. A private wire arrangement is where any electricity generated on or in the vicinity of the site is fed directly to the building being assessed, by dedicated power supplies (BRE (2010) BREEAM Retail 2008: issue 4.0 pg104)</p>

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Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	- BRI-A - Development at North East Bridgwater is to provide an exemplar of sustainable development providing opportunities for people to live, work, learn and enjoy their leisure time.	88420-141-3525			/	<p>Consultees commented that further work should be done to enhance the energy efficiency of local homes and businesses. EDF invests in the local communities of Sedgemoor through the Community Energy Saving Programme (CESP), which invests in households that have the most need for energy efficiency and helps them to tackle fuel poverty.</p> <p>EDF Energy has worked with the Local Authorities to develop an approach to procurement and employment and skills, which supports the development of a low carbon cluster in Somerset. The investment in training facilities and activities designed to support the supply chain will contribute to the diversification of the local economy towards higher level jobs with a focus on low carbon technologies.</p>
Tractivity 403	Public	Stage 1	<p>2. Any other ideas or comments?</p> <p>While creation of wildlife sites combined with woodland is important, sustainable agriculture must be a top priority to feed the growing population which in turn is to benefit from the power produced at Hinkley C.</p>	9086-141-638			/	<p>The development of specific proposals regarding 'hard to reach' groups are detailed in the Employment Outreach section of the Construction Workforce Development Strategy document, included in the Economic Strategy. The Employment Outreach proposals have been developed in close discussion with the Local Authorities and the document details interventions designed to reach specific areas of the community. There are also specific Section 106 commitments relating to Employment Outreach.</p>
Tractivity 60822	Public	Stage 1	Associated off-site developments. These should be consistent with the existing local area development frameworks and sustainable communities strategies of Somerset County Council, West Somerset and Sedgemoor District Councils given that during construction and decommissioning there will be significant implications for their communities.	9402-141-2241			/	<p>The Construction Workforce Development Strategy also contains a section on apprenticeships and the detailed interventions that EDF Energy is implementing over the course of the construction of HPC and into the operational phase. It is also noted that local employer engagement is detailed in the Project Supply Chain Engagement Strategy, also included in the Economic Strategy section.</p>
Tractivity 60822	Public	Stage 1	The mix of solutions for accommodating workers seems sensible and should be driven by the local sustainable community strategies, without exception, and should be required to use sustainable building designs including thermally efficient structures, renewable energy supply, rain water storage and efficient waste management	9402-141-3511			/	<p>EDF Energy has been working closely with West Somerset Community College (WSCC) since committing, at Stage 2, to invest in a training provider in the West Somerset District. EDF Energy is providing assistance to WSCC to achieve the alignment of the college's vocational offer, through the construction of a new mechanical and electrical</p>
Tractivity 62237	Dual - Consultee with an Interest in Land and Public	Stage 1	vii) [Question 9] The community benefits package could usefully include awareness raising about low carbon/renewable energy and links to skills development/apprenticeship programmes in the local area	9437-141-1777	/			<p>EDF Energy has been working closely with West Somerset Community College (WSCC) since committing, at Stage 2, to invest in a training provider in the West Somerset District. EDF Energy is providing assistance to WSCC to achieve the alignment of the college's vocational offer, through the construction of a new mechanical and electrical</p>

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West Somerset Community College	Non-Statutory Consultee	Stage 2	<p>As the largest education and training provider in West Somerset the College has a particular interest in the EDF/Hinkley C workforce development strategy. The EDF "Pathway to Employment" must respond to the needs of hard to reach groups and promote local employer engagement. Not only must this strategy ensure the availability of an appropriately skilled workforce for the duration of the construction period and beyond, but every element of the strategy and of related contracts must be designed to secure a sustainable legacy for the region through training provision that delivers:</p> <ul style="list-style-type: none"> - Transferable skills for young people - Increased aspirations and knowledge of progression routes and employment opportunities - Enhanced employability and life chances 	10265-141-1470	/			<p>workshop and updating of other existing facilities. The project will also see WSCC aligning its provision with the requirements of the wider construction industry in West Somerset. As such, the offer that the college will provide will be demand-led. The project is based upon a robust business case that has been produced in partnership with the college. Similar demand-led skills interventions are being undertaken in Sedgemoor with Bridgwater College. These interventions are also detailed within the Construction Workforce Development Strategy.</p> <p>A Worker Code of Conduct has been produced to outline the expectations of EDF Energy in terms of worker behaviour. All workers will be required to adhere to the requirements of this document. Workers will also be vetted and subjected to a rigorous induction process, and Community Liaison Officers will monitor and enforce the requirements of the Code of Conduct. Section 106 commitments include requirements to invest in leisure provision that will provide benefits to the community.</p>
South West Regional Development Agency	Statutory Consultee	Stage 2	The South West RDA welcomes EDF's commitment to controlling the procurement strategy and contracts awarded, including the ability to influence the sustainable and local supply of material, goods and services.	89056-141-7137			/	
West Somerset Council	Local Authority	Stage 2	<p>Low Carbon Economy</p> <p>To develop Somerset as a centre of excellence for a low carbon economy, with a strong business and educational reputation for low carbon and environmental technologies.</p>	89184-141-2181			/	
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	12. There is reference to existing EDF corporate initiatives concerning energy efficiency for homes and businesses. However, we would like to see more proposed to enhance this offer for communities hosting this development, such as helping to address local fuel poverty issues and the use of waste heat from the power station.	89189-141-10274			/	

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Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	We are concerned that the proposed designs do not support the principle of sustainable communities and are likely to result in unnecessary short car trips.	89191-141-3037	/			
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	EDF should give stronger emphasis to more sustainable transport options, such as local bus services, rail, long-distance coaches, walking and cycling.	89196-141-5378			/	
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	There is some reference to existing EDF Corporate initiatives concerning energy efficiency for homes and businesses, but this offer could be enhanced.	89196-141-6436			/	
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	9. The proposed Legacy Plans for the accommodation and park & ride/freight sites should set out, prior to the DCO submission, how they will provide long term economic/tourism mitigation, compensation and legacy for Somerset communities through entrepreneurial approaches, such as joint ventures, and contribute to the low carbon Unique Selling Proposition of Somerset.	89211-141-4136	/			

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Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	11. EDF should relocate elements of their corporate organisation to Somerset such as training/induction and R&D so that a long term "nuclear commissioning base" is established in Somerset, as a key part of the low carbon business cluster, which could provide expertise for new nuclear build in the UK and internationally.	89211-141-4738			/	
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	7) Demonstrate EDF's role in developing the capacity of local third sector providers to deliver targeted and sustainable pre-employment interventions and coordinating such local activity to tackle worklessness.	89213-141-1213	/			
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	9) Ensure that the proposed Pathway to Employment includes and clearly explains how individuals will be engaged and assessed prior to entering 'the Pathway'. Investment at these stages, and the development of additional outreach activities, will ensure take-up of the "Pathway" and increase the chances of sustainable employment for individuals.	89213-141-1638	/			
Tractivity 63240	Consultee with an Interest in Land	Stage 2	Bridgwater is a sizeable town and has the capacity to assimilate, without difficulty, the numbers of workforce proposed to be accommodated on site. The town offers a number of opportunities for the redevelopment of unused or underused previously developed sites. It would benefit from the additional expenditure brought to the town by this element of the additional workforce and the money to be spent on providing leisure and recreation facilities at Hinkley Point would be better applied towards improving such facilities in Bridgwater which can then be accessed by that town's population rather than being reserved for the exclusive use of EDF's workforce. This is a considerably more sustainable approach to providing accommodation than first providing and then removing accommodation and other facilities adjacent to the construction site at Hinkley Point.	89441-141-1760			/	

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	It is essential therefore that proposals for associated development in Sedgemoor respond to the opportunities identified by the Council and its communities and where possible, provide investment that supports longer term sustainable place-shaping and development.	89307-141-2832			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability objectives include 'development of sustainable communities' and is noted to achieve this by providing 700 bed spaces at Hinkley, providing high standard accommodation for workers; establishing a code of conduct for employees; designing residential accommodation addressing principles of safety and security; avoiding noise and lighting disturbance and establish community liaison facilities to ensure that complaints and community concerns are addressed rapidly. The authorities do not agree that these measures equate to the 'development of sustainable communities.'	89325-141-5496			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Contributions to be made via the Section 106 mechanism would be limited. The Stage 2 Consultation document on "Proposed Planning Requirements and Obligations", proposes currently limited levels of compensation and community benefits, which does not appear to be commensurate with the harm of the project on local communities.	89412-141-4919			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	In addition we would expect a scheme to compensate for the loss of value of property and for residents that have difficulty in selling their property due to the project. Without this evidence and compensation scheme we consider that the evidence does not exist against which to attempt to score performance of this objective.	89412-141-6158	/			

Respondent Reference	Respondent Type	Consultation Stage	Comment	Comment ID	Change	No Change	Noted	EDF Energy Response (Begins at first page of Topic)
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	12. There is reference to existing EDF corporate initiatives concerning energy efficiency for homes and businesses. However, we would like to see more proposed to enhance this offer for communities hosting this development, such as helping to address local fuel poverty issues and the use of waste heat from the power station.	89189-137-10274			/	

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Tractivity 62213	Public	Stage 1	I also object strongly to the proposals of the 900 car park and ride and consolidation facility at either site. The noise and light pollution from 24 hours a day activities, would make life impossible for local residents, and the squandering of yet more good agricultural land, in open countryside, must surely contravene Government Regulations. While it is accepted that we must have provision for light and heat, there is also a requirement for sustainable agriculture to feed the ever increasing population. Brown Field sites can be identified in the northern area of Bridgwater, which in turn, would link up with the new route from the A38. North of Bndgwater. While the loss of some agricultural land for the creation of a new road infrastructure is regrettable, it would serve it's purpose for the next 100 years and beyond. The creation of unnecessary permanent brown field sites, with only a five year projected use, is totally unacceptable, and must be opposed at all levels.	9431-141-1153		/		<p>During all stages of consultation, EDF Energy's approach to the delivery of sustainability for the Hinkley Point C Project (HPC Project) has been a twin-track process, incorporating the company's own corporate ambitions for sustainability as well as project specific issues. This approach ensures that the most relevant opportunities are taken during the project's design, construction and operation to address principles of sustainability. The process is described further in the project Sustainability Statement.</p> <p>EDF Energy published its Sustainability Evaluation at Stage 2, which set out at a high level, how sustainable design and construction for the project might be achieved. A review of the consultation responses identified the following main issues:</p> <ul style="list-style-type: none"> • use of greenfield land; • the application of green roofs; • the use of materials; and • proposals for sustainable construction. <p>More broadly, a number of comments were provided in relation to the location and sustainable legacy use of associated development, in particular the worker accommodation and infrastructure. These comments, whilst linked to sustainable design and construction, are addressed in the site specific consultation comments.</p> <p>Use of Greenfield land</p> <p>Concerns were raised during Stage 1 and 2 consultations that, in accordance with national sustainability policy, and recognising the importance of food production, use of greenfield farmland – especially Best and Most Valuable Land – should be minimised. These comments went on to identify that as a responsible organisation, EDF Energy should prioritise the use of brownfield sites. Where use of greenfield land is inevitable, land should be restored after temporary use and its 'green' attributes should be maximised, including wooded areas valued for timber as well as landscape benefits.</p>
Junction 24 Action Group	Non-Statutory Consultee	Stage 1	First, these sites constitute land which will be required to feed future generations as populations grow and resources become increasingly scarce. Only last week, the Government introduced a new UK food strategy which raised the spectre of future food shortages - and the need now to consolidate and invest in food production that is locally sourced. It is our firm conviction that vital farmland must be preserved.	9370-141-1307			/	
Tractivity 476	Public	Stage 1	2. Any other ideas or comments? It may prove to be an opportunity to rebalance the region especially for sustainabl aspects such as increasing areas of woodland both for permanent scenic reasons and to provide a continuing source of timber supply in the future. Wildlife habitats both past and future, are crucial to the future of Somerset so this should be high on the list of priorities. Bear in mind the future of the tourist industry and farming issues affected by any nuclear waste.	9152-137-1101			/	
Tractivity 600	Public	Stage 1	2. Any other ideas or comments? As green as possible to counteract all the concrete	9266-137-717			/	
Tractivity 403	Public	Stage 1	2. Any other ideas or comments? While creation of wildlife sites combined with woodland is important, sustainable agriculture must be a top priority to feed the growing population which in turn is to benefit from the power produced at Hinkley C.	9086-141-638			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	While the SE accepts that the use of Greenfield land would see the scheme fail to satisfy this sustainability objective, it may be argued that the quantity of Greenfield and best and most valuable land is a significant failure with regards to the sustainability objective. In the absence of any specific criterion against which to qualify this however, we would simply highlight the uncertainty associated with the current assessment. While in the medium-term we generally agree with the assessment, the long-term proposals are generally undefined and assessment in this regard may be considered unjustified.	89413-134-2292			/	<p>EDF Energy has always attempted to minimise the use of greenfield sites. Since Stage 2 consultation, EDF Energy has changed the proposed location of the Williton park and ride facility from the greenfield site at Mamsey Lane to the existing Smithyard Terminal (known as the Lorry Park) on the B3190. Whilst the original site had the advantage of convenience for workers based in Williton, bus services from the lorry park site will pick up workers based in Williton en route. A similar approach has been taken at Junction</p>

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Given the fundamental conflict between the scheme and the sustainability objective, we consider scoring underplays the extent to which greenfield and agricultural land will be utilised by permanent and temporary elements of the scheme. In terms of long-term performance, while the statement is made (Part 2, Section 13) that "much of the development site may be returned to greenfield land, as will a number of off-site associated developments located on greenfield land", while there is not transparent commitment to restoration, it is likely to be more appropriate to score this sustainability objective according to a more precautionary approach and recognising the inherent uncertainty reflecting site reinstatement.	89413-134-1568			/	24, where the site has now moved to an existing brownfield site, whereby buildings and infrastructure will be re-used. The use of brownfield sites to facilitate the project as a whole has not been possible however. A reason for this is set out within the Alternative Site Assessment , which is appended to the Planning Statement . This provides justification for the use of greenfield sites or sites which have present amenity value. For example, the proposed use of the practice rugby pitch for the Bridgwater C site is justified by its legacy contribution to the Bridgwater Vision for new and enhanced educational facilities at the adjoining Bridgwater College.
South West Regional Development Agency	Statutory Consultee	Stage 1	In addition, the Agency will be keen to understand further the measures to be put in place to ensure the sustainable construction and operation of the facility.	8731-138-1263	/			EDF Energy recognises the importance of the natural landscape and as a result, has endeavoured to mitigate potential impacts wherever possible; accordingly, the use of greenfield land has often been avoided. This is not possible for the HPC development site however. Here, the requirement set out in the Government's Nuclear National Policy Statement to locate nuclear development away from urban centres and near existing sites inevitably requires the use of greenfield land. On the main site EDF Energy has addressed these concerns as far as possible through an iterative masterplanning process which has reduced the size of the development and hence the area of land required. This is supported with a landscape strategy and landscape restoration plan which is designed to integrate the HPC development into the wider landscape setting.
Environment Agency	Dual - Statutory Consultee and Consultee with an Interest in Land	Stage 1	7.Sustainable Construction In previous EDF documents it was noted that the companies mission statement is one of sustainable solutions. We are please to note the companies values highlighted, included respect for the environment and excellent performance. We look forward to receiving further information on the design of the associated infrastructure which demonstrates this. Suggestions include incorporating a high code for sustainable homes targets which will embody EDFs values.	88820-138-6595			/	
Tractivity 1011	Public	Stage 2	10. Any other ideas or comments? It is not enough to say that you will leave a park & ride as a ?legacy? of your development. If a park and ride is going to be feasible and environmentally, socially and financially sustainable, then it?s design and provision needs to be far broader than just being designed for one development project, the necessary feasibility studies would take time, something you?re alleging not to have enough of! It seems that you wish to rush everything through without the proper research, design and public scrutiny necessary to ensure that any development project is environmentally, socially and financially sustainable for businesses and communities of both Somerset and more widely the communities and taxpayers and voters of the whole of the UK.	9769-138-11079			/	Green Roofs Responding to the scale of roof area in the proposed development, a number of consultation responses expressed the desire for green roofs and rainwater recycling as a demonstration of environmental sustainability. At Stage 2 consultation, EDF Energy did not publish the number of buildings with green roofs. Further analysis has since been undertaken and subsequently the design incorporates green roofs on various ancillary buildings at the main site. A feasibility study has been produced which details how and where such features would be provided, together with an explanation of the approach and types of roof proposed. This can be found appended to the Hinkley Point C Development Site Design and Access Statement .
Tractivity 1117	Public	Stage 2	9b. Any other ideas or comments? Please note previous comment about Bar facilities. The construction of the units on this site should use state of the Art sustainable eco technology. As this could be use to demonstrate EDF Energy commitment to energy saving -	9875-138-4547			/	
Tractivity 391	Public	Stage 1	To help with planned expansion of the local communities and accomodation built should be to a high standard that can be remodlled for onward use and construction should be to standards above the current building regs to achieve the lowest carbon footprint possible.	9076-138-3482			/	Similarly, EDF Energy has explored opportunities for rainwater recycling. This will be used on the Simulator

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Junction 24 Action Group	Non-Statutory Consultee	Stage 1	Thirdly, as a matter of principle, we believe that EDF - as a responsible organisation - should deliver on its own claims to be 'passionate about sustainability' and to recognise 'environmental and social concerns are as important as financial ones'. This should mean prioritising 'brownfield' sites for the types of developments you are proposing.	9370-138-1965	/			Training Centre. Further information about the rationale for applying rainwater harvesting is available within the Sustainability Statement . Materials Consultation responses noted the need to understand the scope to use Pulverised Fuel Ash (PFA) and other reused materials in place of primary aggregates, and more broadly to commit to use BRE Green Code materials where practicable.
Tractivity 62508	Public	Stage 2	The campuses themselves are not sustainable. The proposal is to build modular accommodation with all relevant services, which will be removed following completion of the construction project. This will involve using a great deal of energy, and increase the local carbon footprint considerably.	10098-138-8712		/		Bearing in mind the specific requirements of the concrete employed for safety-related purposes at HPC, EDF Energy will use PFA as a secondary aggregate in concrete production. The exact quantity of PFA was not published at Stage 2 consultation; however this detail has been provided at Development Consent Order. For the overall contribution of reused materials within the project, please refer to the Construction Method Statement , which is appended to the Environmental Statement .
CABE	Statutory Consultee	Stage 2	There is much more opportunity to design the auxiliary buildings to minimise energy use in passive ways. For example, the operational service centre will require comfort cooling. The design could however be developed to minimise energy use by using a shallower plan to maximise the use of natural light and incorporating shading measures in the treatment of the facades.	10185-138-6785			/	Although no firm commitments were made for reuse of the steel used in constructing HPC, the opportunity to recycle steel at final decommissioning has been highlighted and is being considered at this stage to inform development and approval of the Funded Decommissioning Programme. The practical opportunities to recycle steel within the recycling market as it will exist beyond 2080 will need to be explored closer to the time, when these options can be realistically assessed.
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	- Sustainability Rating: We commend NNB GenCo on having a number of higher level objectives on sustainability. We feel that these objectives need to be reflected in the development proposals. High environmental standards for development are expected in water use, resource efficiency and construction.	89069-138-12245			/	The BRE Green Guide to material specification has been identified as a means to ensure the sustainability of materials is promoted, however this can only be applied where such flexibility exists. A firm commitment to the application of the Green Guide was not made during Stage 2 consultation, due to the level of detail available and various uncertainties about the types of construction proposed. The application of the Green Guide is further explained within the Sustainability Statement .
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	- Associated development, particularly accommodation provision built on sustainable principles, acting as a show case for sustainable construction, including use of low carbon energy sources. Link to sustainable construction knowledge and expertise at Somerset College to stimulate knowledge transfer and best practice. Provides a show piece for image of the county and of EDF as a business	89215-138-3134			/	Sustainable Construction EDF Energy's Sustainability ambitions have been integrated into the design process and will be enforced during construction through the requirement to meet sustainable construction standards such as BRE Environmental Assessment Method (BREEAM) and CEEQUAL, and in implementing EDF Energy's other sustainability opportunities.
Stogursey Parish Council	Statutory Consultee	Stage 2	[6.4.4] 'For safety reasons it is EDF's policy not to harvest and recycle rainwater.'? There will be a massive area of roofing for rainwater collection which could supply a large amount of the non-potable water requirements on site. Will EDF explain what can possibly be unsafe about collecting and re-using rainwater, and will they reconsider this green initiative?	89289-138-9542			/	It is a requirement on contractors to sign up to the Considerate Constructors Scheme (CCS). This
Stogursey Parish Council	Statutory Consultee	Stage 2	[7.10.5] 'The roof of the office block will be aluminium.' This roof could and should be a green roof. This will help with controlling rainwater run off and improve insulation. It will also assist in achieving BREEAM 'Excellent'. Will EDF reconsider this design parameter?	89289-138-10088			/	

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Stogursey Parish Council	Statutory Consultee	Stage 2	[4.4.74 and Figure 27]. Is EDF really proposing to use corrugated iron, galvanised steel or cheap timber board as the external cladding of these buildings? This gives the lie to the good words, and makes it clear that the camp will be constructed as cheaply as possible with no thought given to its surroundings or sustainability.	89290-138-7157			/	commits contractors to being monitored against a Code of Considerate Practice which is designed to encourage best practice beyond statutory requirements. In addition, EDF Energy has produced additional, project specific requirements for Tier 1 suppliers and contractors to ensure sustainable construction is delivered at HPC. All Tier 1 suppliers must set out a strategy for how emissions will be limited from the delivery of goods and services. All Tier 1 contractors must monitor their emissions and set progressive targets for reduction, which will be reported back to EDF Energy.
Stogursey Parish Council	Statutory Consultee	Stage 2	[4.4.77] States 'Construction sites are synonymous with the use of cheap, modular cabins that provide little quality or comfort. The challenge is to provide comfortable, efficient and sustainable buildings delivered with imagination to avoid repeating stereotypical notions of campus developments.' There is little evidence in this document about how this is to be achieved, as many of the key design issues have not be tackled, and the paragraph above shows how low EDF are setting the bar. When will EDF come forward with proposals that meet this aspiration?	89290-138-7489	/			Furthermore, concerns were raised in consultation on the adequacy of the water supply to the construction site and on the impacts of dewatering on groundwater flows and the potential for increased discharges to surface water. All contractors will monitor water consumption and targets will be set in accordance with the Department of Trade and Industry (now the Department for Business, Innovation and Skills) key performance indicators available from the Centre of Construction Innovation.
Stogursey Parish Council	Statutory Consultee	Stage 2	[4.7.16] Rainwater recycling. This should be more than an aspiration; it should be an absolute requirement. EDF are always promoting their green credentials, so will they commit to including this as a design requirement?	89290-138-8055			/	All contractors will also receive training on sustainability aspects of construction. A commitment has been made by EDF Energy to ensure 100% of site workers on the main site will receive this training as part of the site induction, before starting work on the site.
Stogursey Parish Council	Statutory Consultee	Stage 2	'Where feasible green roofs will be employed on certain non-nuclear buildings.' Scrutiny of the Masterplan for the main site does not reveal any buildings with green roofs. Will EDF commit to installing green roofs on all of these buildings, to improve bio-diversity and reduce visual impact?	89293-138-5387	/			During consultation, the use of modular construction was criticised. However, contractors will be required to take all opportunities to explore the use of standardised, prefabricated and modular buildings and construction elements where appropriate. Rather than increasing energy demands and the local carbon footprint, the sustainability benefits of modular construction are widely acknowledged and accepted.
Sedgemoor District Council and West Somerset Council Joint Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Overall, we consider that there is a case to argue that during construction, the sustainability objective may not be met insofar as adverse impacts on air quality, albeit not demonstrated to exceed air quality objectives, would be expected. Adverse effects, albeit to a lesser degree, may also be experienced during operation due to decommissioning activities associated with elements of Associated Development, and also the long-term traffic increase to be expected as a result of routine operation and peak demand during outages. In the long-term, considering decommissioning and beyond, we consider that in absence of proposals for this, affording any score is currently unjustifiable.	89411-138-11621	/			With modular construction, the buildings are manufactured under controlled conditions off-site. As a consequence, there is a reduction of waste both at the factory and site location, as well as reduced noise and pollution on site during the construction period. It should also be noted that the reuse framework will be implemented to seek the most sustainable possible reuse of temporary buildings.
Sedgemoor District Council and West Somerset Council Joint Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Construction and decommissioning methods would be required to be controlled through adherence to an EMMP to ensure the avoidance of accidental impacts.	89413-138-6189	/			

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	With regards to the discussion provided in Section 17, we note the limitations and conflicts with the ability to deliver high standard sustainable design and construction together with safety critical infrastructure and have the following comments on the initiatives illustrated within Section 17.3:	89413-138-11558			/	Comments were also received in relation to sustainable construction and air quality. Whilst it is recognised that there will inevitably be air quality impacts during the construction of HPC and associated development, EDF Energy has endeavoured to reduce this impact with strict requirements on contractors such as those mentioned above. However, the generation of dust will occur from various activities throughout construction. Numerous controls will be put in place to avoid significant nuisance or other adverse impacts. All sustainable construction requirements will be detailed in the Environmental Management and Monitoring Plans . Beyond construction standards, air quality impacts will also be mitigated by reducing individual car journeys by construction workers. Travel by bus will be a condition of employment for contractors during the construction phase. Encouraging travel to the park and ride sites by cycle or car share will support this. Further information on air quality can be found in Chapter 1, of Volumes 2 - 11 of the Environmental Statement .
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- We note the intention to utilise PFA as a secondary aggregate. In support of this aspiration, it would be useful to understand the availability of material, together with expected contribution to the scheme of re-used materials together with primary aggregates.	89413-138-11861	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Noting requirement for 19,000 tonnes of structural steelwork, and that steelwork can be re-used at the end of life, we consider that there is no firm proposals or commitment to reuse on decommissioning of the station.	89413-138-12128	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- While we support the aspiration to select building elements against the BRE Green Guide to Materials, we would be keen to see this reflected in terms of a commitment.	89413-138-13116			/	
Tractivity 62998	Public	Stage 2 Update	No mention of environmental efficiency or carbon reduction in proposed new build housing facilities.	89692-138-1395	/			
WSC & SDC Joint Response	Dual - local authority and consultee with an interest in land (Sedgemoor only)	Stage 2 Update	Large temporary accommodation campuses are considered to be detrimental in terms of place making and regeneration objectives in the short and medium term, providing a poor quality built environment. They also represent an unsustainable approach for the long term as temporary units will need to be removed and the land redeveloped.	89876-138-6757			/	

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WSC & SDC Joint Response	Dual - local authority and consultee with an interest in land (Sedgemoor only)	Stage 2 Update	- EDFE should include contract clauses related to the minimisation of food miles and sourcing sustainably produced inputs that should provide a competitive advantage to local enterprises. EDFE should also introduce audit systems to prove compliance.	89883-142-3711			/	
South West Regional Development Agency	Statutory Consultee	Stage 1	The South West RDA understands the process for examining options for the location of future nuclear power stations. The Agency will be interested in the contributions that will be made to ensure that a sustainable energy supply is provided that helps to maintain security of energy supplies at a regional level (in accordance with the RES and the Regional Sustainable Energy Strategy).	8731-137-879	/			
Kilve Parish Council	Statutory Consultee	Stage 1	An assurance from EdF that all projects supported by them, or provided by them, will take into account where practical and possible, low carbon technologies that are currently available, or that become available during the construction phase. Although the production of electricity from nuclear sources is low carbon, the construction of the power station is not. The construction of the installation itself, new roads, temporary accommodation, temporary jetty, Sea defence wall, park and ride, lorry movements, etc will have an enormous carbon footprint. It is hoped that every possible effort will be made to reduce carbon emissions during and after construction. It is also hoped that EdF will fully engage with the Parish Council during all phases of the construction period.	88930-137-30673	/			

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Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	Associated Development proposals would therefore be expected to meet the most stringent energy efficiency and environmental standards, which should be tested through externally certified assessment methods such as CEEQUAL, BREEAM and the Code for Sustainable Homes.	88480-136-1270			/	Throughout the development of the sustainability strategy, EDF Energy has always intended to draw as far as possible on third party verified sustainability standards. These provide a basis for assurance that environmental and resource efficiency and carbon reduction, rather than cost alone, have properly been taken into account in the design of the project.
Tractivity 1220	Public	Stage 2	a. Any other ideas or comments? Why only to BREEM satisfactory levels? Need to be 'excellent' standard. 9b. Bridgwater and Albion Rugby Football Club site, College Way (site BRI-C) for up to 150 places? Box ticked: Unsatisfactory 9b. Any other ideas or comments? Destruction of the last green patch 'between Sydenham and town centre. Shameful. Why these built to BREEM 'excellent' standard.	9978-136-5837	/			Various consultation responses received related to how such standards were to be applied to the project; in general asking for greater assurances that such standards would be achieved as part of a firm commitment as opposed to an aspiration. At Stage 2 consultation, EDF Energy aspired to achieve these design standards because of the level of detail available on the buildings design. Since this time, and in tandem with additional design development, EDF Energy has developed a strategy as to how such standards can be applied to the project. This takes account of various constraints, for example that certain elements of the project, particularly the Hinkley Point C development site (HPC development site) works, have very specific and over-riding design and construction requirements, based on their significance for nuclear safety and security, which do not always lend themselves to recognised standards.
Stogursey Parish Council	Statutory Consultee	Stage 2	[6.4.2] For occupied non-industrial buildings, EDF aspires to achieve a BREEAM (This acronym is not defined) 'Excellent' rating. This must be an absolute requirement. Will EDF guarantee that these buildings will be constructed to 'Excellent' standard? There is no reason why the occupied industrial buildings should also not be specified to 'Excellent'.	89289-136-9185			/	With regard to associated development, certain consultation responses advocated employment of the Code for Sustainable Homes for the project. This is a relevant sustainability standard for application to new homes; however in practice, EDF Energy is not directly providing any development that would qualify for the Code for Sustainable Homes. Instead, accommodation campuses are being taken forward under the BREEAM (BRE Environmental Assessment Method) multi-residential criteria, which is an appropriate standard to apply to this type of development. This has been agreed via a scoping exercise with the BRE. For the other buildings, over 1000 m ² , EDF Energy is applying BREEAM Other Buildings, and has engaged with the BRE since Stage 2 consultation to develop a set of applicable assessment criteria.
Stogursey Parish Council	Statutory Consultee	Stage 2	[7.11.10] 'EDF aspires to BREEAM 'Excellent' for the PIC'. This building, of all buildings as the public face of the company, should be 'Excellent'. Will EDF commit to this, rather than simply aspiring to it?	89289-136-10364			/	The choice to adopt BREEAM as a building sustainability standard was taken early in the design process and was consulted upon at Stage 2 consultation. The BREEAM level which it is intended
Stogursey Parish Council	Statutory Consultee	Stage 2	[3.2.9] Energy efficiency. Where is the detail as to the specifications for the buildings to ensure they are energy efficient? Elsewhere BREEAM 'Good' is specified which is not sufficiently challenging.	89289-136-13119	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	For instance, the stated objective of achieving BREEAM Good ratings for new buildings associated with the project is unambitious, considering EDF Energy's core business and the low carbon rationale for new nuclear power generation capacity.	89302-136-5486	/			

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Authorities position May 2010: Information about how 10% energy standards and or Code for Sustainable Homes and BREEAM standards will be achieved</p> <p>Update August 2010: Site orientation has been considered but no specific information has been provided on how the Code for Sustainable Homes and BREEAM standards will be achieved.</p>	89328-136-9678	/			<p>to achieve depends on the legacy use, if any, of the development. EDF Energy will target a higher BREEAM level for buildings that are permanent and required to support the operation of HPC, or for ongoing use by another party, than it will for temporary buildings. This priority is considered to be in accord with sustainability principles.</p> <p>At Stage 2 consultation, EDF Energy published its intention to achieve BREEAM 'Good' for the temporary accommodation buildings, since additional investment to achieve higher levels of sustainable design and construction against BREEAM was considered uneconomic and potentially unsustainable. However BREEAM 'Good' was identified during consultation as un-ambitious. EDF Energy has responded positively to these concerns. The initial targets were based on early assessment work which has since been developed. EDF Energy now intends to achieve BREEAM 'Very Good' for the temporary sites, which include buildings at the Bridgwater A site and the HPC accommodation campus and associated amenity buildings. This target will also be applied to the temporary induction centre at Junction 23. The legacy accommodation at the Bridgwater C site will achieve BREEAM Excellent. This higher target reflects the permanent nature of the Bridgwater C site accommodation campus, making it more appropriate than the Bridgwater A site as an exemplar of sustainability.</p>
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Authorities position May 2010 Information about how 10% energy standards and or Code for Sustainable Homes and BREEAM standards will be achieved</p> <p>Update August 2010 No information provided.</p>	89329-136-1674	/			<p>In addition, EDF Energy has continued to explore opportunities for achieving BREEAM 'Excellent' for applicable buildings on the HPC development site. The ability to achieve BREEAM is restricted by EDF Energy's need to address the specific regulatory requirements arising from the Nuclear Installations Act 1965 and the Nuclear Industries Security Regulations 2003. However, BREEAM will be applied to three major HPC development site buildings: the Public Information Centre (PIC), Operational Service Centre (OSC) and Simulator Training Centre (STC). BREEAM is not proposed for other industrial type buildings on the site. These are typically specialist buildings, have infrequent occupation, do not lend themselves to specific design measures required by BREEAM and are typically excluded from Part L of the Building Regulations: Conservation of Fuel and Power (2010).</p>
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>While we also note the opportunities considered for off-site associated development, discussion remains aspirational and lacks general commitment to performance criteria. While discussion is afforded to recognised sustainable design and construction standards, this appears not to be a firm commitment, with the Environmental Appraisal suggesting construction of BRI-A to BREEAM "good" standards, which would appear contrary to sustainable design standards.</p>	89412-136-514	/			<p>Details relating to the BREEAM strategies for these buildings and the associated development can be found appended to the Design and Access Statements. Further details regarding the approach taken towards BREEAM are provided within the Sustainability Statement for the project. However</p>

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								<p>the BREEAM methodology can only be applied to non-domestic buildings. Thus many elements of the development proposed by EDF Energy as part of the HPC Project are not suitable for such an assessment.</p> <p>EDF Energy has therefore also been exploring opportunities to apply CEEQUAL (the Civil Engineering Environmental Quality Assessment and Award Scheme) to civil engineering elements of the associated developments. Sedgemoor District Council has also published its desire to see that civil engineering elements of the scheme are taken forward under this assessment method in the Draft Hinkley Point Supplementary Planning Document (2011), and this was also reflected in consultation responses. The option to apply CEEQUAL has been evaluated through a series of sustainability workshops and feasibility studies and EDF Energy published its intention to achieve CEEQUAL at Stage 2 consultation. EDF Energy intends that Cannington Bypass will achieve CEEQUAL 'Excellent' and Cannington park and ride, Junction 23 and Junction 24 park and ride, Williton park and ride and Comwich freight logistics/storage facility will achieve CEEQUAL 'Very Good'.</p>

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Highways Agency	Statutory Consultee	Stage 1	The Agency welcomes the inclusion within the Statement of Sustainability to a coherent transport strategy.	88860-140-19467			/	Consultation responses highlighted the need for sustainable transport links between the Hinkley Point C development site (HPC development site), associated development park and ride sites, and nearby town centres, so as to avoid short car trips and encourage use of bus, rail, cycle and walking modes.
Sedgemoor District Council & West Somerset Council Joint Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	- West Somerset Council is firmly of the view that any development taking place in Williton has a long term, sustainable (i.e. carbon neutral) legacy and is placed in a location that will allow suitable separation between existing development whilst allowing successful long term integration with the town. Development needs to be located where it can deliver long term benefits to the town whilst being positioned to minimise the traffic implications in the immediate vicinity of the site and on the local traffic network. With this in mind the suitability of search area WIL-B with its access onto the A358 is questioned given the majority of the traffic (both from a residential campus and from workers living further from the site from Williton); is expected to use the A39 to travel to and from Hinkley Point.	88470-140-0			/	EDF Energy has taken into account the potential adverse impacts of the development on air quality, noise and congestion if transport is not appropriately controlled, and some responses welcomed work towards a coherent transport strategy, including its implementation of park and ride facilities at motorway junctions. However, EDF Energy was also criticised for not demonstrating how sustainable forms of transport would be encouraged, and it was suggested that a 'green' or 'sustainable' transport strategy should be considered.
Tractivity 62508	Public	Stage 2	No attempt has been made to encourage sustainable forms of travel, either on or off site. The assumption has been made that workers will use their own vehicles to access the accommodation campuses.	10098-140-6489		/		At Stage 2 consultation, EDF Energy had been in the course of undertaking a comprehensive Transport Assessment , appended to the Environmental Statement , that had not yet been completed.
Tractivity 62508	Public	Stage 2	Despite EdFs promoting green forms of transport [1.4.1] "Sustainable forms of transport will be encouraged". There is little evidence of this.	10098-140-10565		/		Subsequent to the Stage 2 consultation, the walking and cycling strategy has been progressed and EDF Energy has submitted the Transport Assessment which explores the contribution of other transport modes. A travel plan has also been submitted with the Development Consent Order (DCO) application which includes the promotion and encouragement of use of sustainable transport modes, with mode shift targets.
Tractivity 62573	Dual - Consultee with an Interest in Land and Public	Stage 2	You should investigate using electric powered vehicles to transport workers - you have the power! Less pollution and less noise.	10124-140-4473			/	EDF Energy is encouraging workers to use sustainable modes of transport by including within its proposals park and ride sites with shuttle buses to transfer workers to and from the site. A majority of workers will be required to use these facilities. Car sharing will also be promoted.
Tractivity 62573	Dual - Consultee with an Interest in Land and Public	Stage 2	10. Comment 1. Use electric powered buses.	10124-140-6769	/			The walking and cycling strategy includes several improvements in Bridgwater to link the accommodation campuses with the town centre and other cycle/walking routes.
Tractivity 62582	Public	Stage 2	EDF are supposedly a green' company yet no provision has been made for improving the C182 and no cycle lane planned, so even if people wanted to go to the site on a bicycle it would be too dangerous to do so.	10133-140-5189	/			In terms of provisions for cycling, a range of cycle infrastructure improvements are proposed. A cycleway is provided along the full length of Cannington Bypass; this has been added in response to Stage 2 consultation feedback. Improvements to the cycle route between Cannington and Hinkley Point are also being considered, as well as reducing the speed limit on the C182 to 50mph to make the route safer for cyclists. There are a number of proposed cycle path improvements, and bike pools will be put in place at accommodation campuses to encourage workers to cycle. However the suggestions made at Stage 2 consultation, to use electric bikes and to
Homes and Communities Agency	Statutory Consultee	Stage 2	Stage 2 indicates that the commercial development of electric vehicles will be monitored and that an electric park and ride bus could be used, "if viable". Although this is new technology, a number of electric buses are being successfully used in locations around the country, such as Oxford and Newcastle. I am sure that local partners would welcome a firm commitment by EDF to employ green technology including the use of electric buses.	10191-140-3316	/			

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Cyclists Touring Club	Non-statutory Consultee	Stage 2	a) Workers and construction staff should be encouraged to cycle to and fro;	10246-140-712			/	provide cycles at the HPC development site, will not be pursued – the latter reflecting, amongst other factors, the range of potential hazards inherent in a major construction site. Full detail on the measures to encourage bicycle use is contained with the Travel Plan submitted as part of the DCO application.
South West Regional Development Agency	Statutory Consultee	Stage 2	We welcome provision for park & ride facilities at the motorway junctions. A potential further option could be to extend the facility at J25/A358 to secure even greater carbon savings. We see this as an effective strategy and would question the carbon savings resulting from the proposed temporary P&R site at Cannington.	89056-140-10618		/		Bus services are also being enhanced and additional services provided. Bus services will be available from the rail station in Bridgwater. Some consultation comments advocated use of electric vehicles for local transport of workers or goods. Recognising this, but taking into account the constraints of duty and distance relevant to the development, EDF Energy would trial hybrid buses during the first year of construction.
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	6. Evidence that the Contribution of Other Transport Modes have been sufficiently explored; including enhancement of local bus services, coach, cycling and walking;	89221-140-2352	/			A full traffic Impact analysis has been carried out over the various stages of the HPC development. The impacts of the development at different stages of the scheme on the Strategic Road Network has been included within the Transport Assessment . The full traffic impact analysis is also contained within the Transport Assessment .
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	Whilst 'pool bikes' are proposed for the campuses, we would consider that these may also be of value on the HPC construction site to facilitate short cycle journeys around the site.	89233-140-6337		/		Consultation responses also related to the transport of materials to the site. The transport strategy has also been informed by the need to transport significant materials to the construction site in a sustainable way. A practical way to achieve this, whilst minimising impacts on the road network is to make use of sea transportation as far as possible. This has informed the need for a jetty and upgrades to the existing Combwhich Wharf and the construction of a freight consolidation/laydown facility.
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	For the campuses, consideration should be made to workers using cycles for leisure purposes, and the proposed cycle pool is a positive enabler of casual cycle use for workers who have not brought a cycle with them.	89233-140-6528		/		
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	The secure parking (HPC and campus sites) should be covered and the document should define the nature and quantity of this parking, which need to be agreed in line with the target mode share. The specific details of provision, quantity and location will certainly need to be provided in the site specific plans.	89233-140-6752		/		

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Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	The potential to incorporate electric vehicles for use at the consolidation centre should also be considered to improve the environmental and air quality credentials of the scheme. Improvements in payload and vehicle range can make using electric freight vehicles a viable option especially when they are able to run back and forth from a depot location over relatively short distances.	89234-140-7610			/	
Stogursey Parish Council	Statutory Consultee	Stage 2	[5.4.4] There is provision for cycle parking, but no work to be done to encourage cycling. Will EDF be providing showers and lockers for cyclists, and will they be improving access to the site by creating cycle paths etc.?	89289-140-8959	/			
Stop Hinkley	Non-Statutory Consultee	Stage 2	More broadly, although the developers should be encouraged to seriously consider all options for minimising road transport movements, there is no avoiding the fact that the construction of Hinkley C will involve a major increase in vehicle journeys, and their associated air pollution and increased greenhouse gas emissions.	89451-140-1931			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- During operation and decommissioning, the effects on transport, capacity and congestion remain uncertain. We note that EDF Energy have discussed measures to encourage adoption of sustainable transport, although at the moment, it fails to provide the confidence that these will be effective in avoiding impacts on the function and efficiency of strategic transport infrastructure.	89412-140-8245		/		
17	Comments received under the EIR from the IPC	Stage 2	<p>4. We intend to maximize the use of local workers to build the power stations but we expect between 3,000 and 3,500 workers at peak to require short-term accommodation because they currently do not live locally. These workers will be accommodated in a mixture of rented and owner-occupied accommodation, bed and breakfast and caravan parks. We are also proposing purpose built accommodation campuses; two in Bridgwater and on the Hinkley Point C site. What are your views on our overall accommodation strategy?</p> <p>Satisfactory Unsatisfactory No Opinion Don't know</p> <p>- Where are the figures to show exactly what proportion of the work-force will be local and how it will be recruited?</p> <p>- Where is the admission that the terms 'peak' and 'short-term' represent several years?</p> <p>- Where in all the company's claims to be 'low-carbon' are the figures to show the traffic generated by the service personnel for the hostels and the recreational use of vehicles by the hostel inhabitants?</p>	89806-140-4474	/			

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Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.170 The accommodation strategy mentions parking provision at campuses, but does not give any quantification or justification for parking levels, and does not mention provision of any sustainable transport linkages associates with the campuses. Further information is requested.	89849-140-14878	/			
Sedgemoor and West Somerset District Council's	Dual - Local authority and consultee with an interest in land (Sedgemoor)	M5 J24 and Bridgwater Highway Improvements	- There remains a lack of proposals for sustainable transport schemes identified in the Somerset Future Transport Plan, Bridgwater Vision and Draft HPC SPD, such as bus priority, electric buses and electric vehicle charging points, enhancement of rail facilities, walking and cycling and related public realm investment. EDFE should demonstrate how non-car modes of transport are promoted, particularly for short trips around Bridgwater, such as when construction workers are travelling to Park & Ride sites. Use of the rail network should be promoted for travel to and from Bridgwater.	89959-140-15400	/			

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Tractivity 62237	Dual - Consultee with an Interest in Land and Public	Stage 1	ii) [Section 3] Further emphasis should be given to minimising waste generated on site and maximising recycling initiatives	9437-139-610			/	This section provides a brief overview of the waste related comments from consultees that may also result in sustainability issues. For a comprehensive response to waste issues please refer to Topic Waste Management Strategy . Consultation responses welcomed the consideration of the principles of sustainable waste management and the inclusion of waste as a distinct sustainability theme additional to the set used in the Government's Appraisal of Sustainability for the Nuclear National Policy Statement. The responses also identified the need to address waste in accordance with a waste hierarchy, which should be applied to both conventional and radioactive waste.
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	There are also no proposals for dealing with the additional municipal waste generated by the workforce with possible solutions such as anaerobic digestion and enhanced recycling facilities.	89196-139-9370			/	A few responses were received which related to the need to minimise waste and maximise recycling. EDF Energy has ensured that this is achieved through the implementation of the Waste Management Implementation Strategy , appended to the Environmental Statement . For more information please refer to this document. EDF Energy has also been working with Sedgemoor District Council and Somerset Waste Partnership with regards to municipal waste. The Waste Management Implementation Strategy attempts to limit impacts from waste and address principles of sustainability in accordance with the waste hierarchy by applying principles such as the proximity principle, and making use of Best Available Technology (BAT). Responses were received at Stage 2 consultation relating to the lack of information in relation to the way in which municipal waste will be handled. Since this time, additional work has been undertaken. It is anticipated that commercial waste will be collected by a commercial waste contractor. EDF Energy is also responding to consultation feedback by exploring opportunities to make use of anaerobic digestion.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Sustainability Objective: To minimise waste and apply principles of the Waste Hierarchy We welcome consideration of principles if sustainable waste management, during site preparation, construction and operation.	89413-139-14514			/	It was also highlighted that decommissioning of the main site is likely to result in significant quantities of waste. The opportunities here to maximise recycling and reuse non-active waste, while taking account of the overriding need to deal safely and appropriately with radioactive waste in accord with national policy, are already considered as part of the Funded Decommissioning Programme. This will be informed by the further experience in nuclear decommissioning that will have been gained by the time this is required.
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	- Decommissioning of the site would be expected to result in significant quantities of waste. Accepting that it is feasible that these quantities, albeit large, could be managed according to the waste hierarchy, the suitability of recycling and re-use, together with the long-term implications of radioactive waste management, should also be reflected.	89413-139-15955			/	Meanwhile, EDF Energy is exploring opportunities to limit waste impacts during the decommissioning of associated development sites, including ways of working to the waste hierarchy as far as practicable. For more information please refer to the Waste Implementation Management Strategy .
Stogursey Parish Council	statutory consultee	Stage 2 Update	2.6.4 [4.1.8&15] Any recycling material sent to the Williton MRF or the Cannington anaerobic digester must be routed via the C182, Cannington Bypass and A39. Local lanes, which are the shorter route, are entirely unsuitable.	89872-139-19988			/	