

Schedule of Responses – Appendix H.1

Waste Management 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	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			/	Consultation responses from statutory and other consultees sought clearer statements of intent on waste management, including a formal waste management strategy and plan, together with appropriate recognition in the Sustainability Statement, Habitats Regulation Assessment and Environmental Statement. Specific issues included the need to ensure waste movements impacting the Strategic Roads Network are included in the transport assessment, the potential need for a proportion of dredged material to be disposed to landfill, and the potential unsuitability of Cannington Quarry for landfill because of geological and archaeological sensitivities. Potential beneficial uses were also identified in flood risk management and noise / light screening of villages close to the main construction site.
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	/			Since carrying out the formal consultation exercise, a Waste Management Implementation Strategy (WMIS) document has been discussed with the Environment Agency and Somerset County Council, finalised and submitted with this application for development consent. This comprehensive strategy covers the site preparation, construction, operation and removal/reinstatement phases of the project including the associated developments. The level of detail and explanation included in this strategy responds to each of the conventional waste management issues raised.
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	/			The EDF Energy Group aims to achieve zero waste to landfill by 2020 across its businesses. In the HPC project, EDF Energy will apply the waste hierarchy to construction, demolition and engineering related waste, aiming to re-use, recycle or recover as much as is practicable. This would include a target of re-using all excavated clean soils within the development. The practical steps to achieve this are set out in the WMIS and include: using two way trips, and sea-borne modes in preference to road movements; re-using materials on the associated developments during restoration; sustainably using the existing waste management infrastructure; and encouraging re-use of materials.
Marine and Fisheries Agency	Statutory Consultee	Stage 1	It would be the results from this analysis which would determine whether or not material would be suitable for sea disposal. In general, contaminant levels in dredged material below Action Level 1 are of no concern and are unlikely to influence the licensing decision. However, dredged material with contaminant levels above Action Level 2 is generally considered unsuitable for sea disposal. The latter situation most often applies only to a part of a proposed dredging area and, if viable, that area can be defined as excluded from disposal at sea and disposed of by other routes e.g. landfill. Dredged material with contaminant levels between Action Levels 1 and 2 requires further consideration and testing before a decision can be made.	8691-143-4429	/			The key principle is the management of waste in order of the waste hierarchy, i.e. prevention, preparing for re-use, recycling, other recovery and disposal, complemented by adherence to the proximity principle, whereby waste would be managed close to the point of origin.
Marine and Fisheries Agency	Statutory Consultee	Stage 1	We will expect you to investigate the use of the material within small scale beneficial (alternative) use schemes through CEDA and the investigation of other available disposal options rather than at sea. Should the applicant wish to dispose of material to sea, the nearest offshore disposal ground is Cardiff Grounds (LU 110) which is in Welsh waters.	8691-143-5174	/			
Highways Agency	Statutory Consultee	Stage 1	The Agency acknowledges that the form of the spoil is not yet known and as a consequence, EDF is considering several options for its disposal. As one of these is 'off-site via road to other designated waste management facilities in the south-west', the Agency will require further information to highlight if this will result in an impact on the SRN.	88860-143-19069	/			

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Somerset County Council	Dual - Local Authority, Statutory Consultee and Consultee with an Interest in Land	Stage 1	g) During the construction phase of the development there will clearly be a significant amount of construction waste that arises. The Stage 1 consultation report makes no reference to how this waste will be managed and notably there is no recognition of the value of, and the requirement for a Site Waste Management Plan. In order to fully assess the impact of the development it is essential that full consideration is given to the management of the wastes that are generated and need to be transported, stored and disposed of during the construction phase.	87920-143-628	/			In accord with this, waste will be segregated and stored on each site pending final sentencing. The majority of sites are designed to achieve a neutral cut / fill soil balance. Where possible, surplus soils would be stored as noise/flood attenuation bunds throughout the operational phase, particularly to shield the villages to the south of the main construction site. This material would then be re-used during site restoration. Other material which cannot be re-used would be sent to a Materials Recycling Facility (MRF).
Kilve Parish Council	Statutory Consultee	Stage 1	Spoil disposal/landscape integration; It is not acceptable for spoil from the site to be transported from the "Jetty" to off shore dumping sites. This would be considered as being NIMBY in the extreme. Any major amounts of suitable spoil should be utilised by building up a screen between Shurton, and the construction site, ideally established early on in the construction phase, and left as a natural habitat. Again (3.3.13) The creation of a substantial landscape buffer, this should be considered for permanent use. Immediate screening/planting would ensure that a semi natural buffer was created, and well established by the end of the construction period. Consideration should also be given to the land to the north of Shurton, between the hamlet and the power station, and its use after construction. Woodland planting to mitigate the loss of several areas of woodland as a result of the main building project.	88930-143-2702	/			In accord with the proximity principle, suitable licensed waste facilities located closest to the point of waste production will generally be preferred over those located further away. To minimise the risk of over-burdening these, the WMIS demonstrates that the nearby facilities have the capacity to process the waste arisings. There is no intention for waste (other than dredged material) to be disposed of at sea, at Cannington Quarry, or on any other land surrounding the HPC development site. Any waste to be disposed of, will be sent to a licensed site. The WMIS includes predicted waste volumes for the site preparation, construction, operational and removal/reinstatement phases at the HPC Development Site and the off-site associated development sites. The volumes for HPC were derived taking account of experience at the Flamanville 3 nuclear power station in France. Those for the off-site associated development and on-site accommodation campus were estimated from the material volumes expected to be required for construction. All waste volumes have been taken into account within the Freight Management Strategy included in the application for Development Consent.
Kilve Parish Council	Statutory Consultee	Stage 1	Spoil disposal sites; much of the spoil was to have been used to create a barrier/screen between Shurton and the site. This would reduce light/noise pollution; some was to have been used to fill in the dis used quarry at cannington. At no time during discussions with MALG has there been mention of the spoil being "exported" from the temporary jetty, as mentioned now in 4.14.2, Table 4.4, and 4.14.2.	88930-143-5497	/			
Kilve Parish Council	Statutory Consultee	Stage 1	Is it permissible to export spoil taken from a vertical shaft, and horizontal tunnel, and "dump it at sea"? The spoil from the tunnelling project will presumably be different composition than that taken from the on-site foundations. What will this "spoil" consist of, how will it be graded, and having been graded, what areas are being considered for its disposal or re-use?	88930-143-20029	/			
Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	- Cannington Quarry is a designated County Geological Site and a site where significant archaeological remains have been recovered in the past. For these reasons the proposals for the quarry are not supported and EDF Energy are urged to consider and present further options for spoil disposal. The use of spoil in flood risk management works is a beneficial reuse option that should be investigated.	88370-143-4077	/			

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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	As a designated County Geological Site the use of Cannington Quarry as a spoil tip would not be permitted unless a full assessment of alternatives is presented along with a plan to provide compensation for the loss of the quarry site.	88380-143-1483	/			
Tractivity 62455	Public	Stage 2	(personal details removed) also asked what would happen to the excavated material particularly from the deep cutting.	10079-143-2537	/			
Countryside Council for Wales	Statutory Consultee	Stage 2	d) Waste Arisings 7.9.12 We note that it is difficult to provide accurate estimates of quantities of waste produced during the construction phase at this time, but recommend that this information is provided in the HR report and ES, especially with respect to waste generated from construction of inlet and outlet structures and associated connections. This will be needed to inform the competent authorities HRAs. If material is to be disposed of to sea there may be in-combination issues that need to be considered.	89129-143-2278			/	
Highways Agency	Statutory Consultee	Stage 2	- It is not clear whether all the waste remains on site during the construction phase. The Agency requires EDFE to provide details of waste to be moved off site	89169-143-1502	/			
Tractivity 63240	Consultee with an Interest in Land	Stage 2	13.20.5 What is meant by the term "clean" (7.9.15) and how it will be determined?	89444-143-14236			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The discussion is limited through the lack of estimates over waste quantities that may be produced and also through the absence of a draft waste management strategy. The effect of this that the significance of the waste management challenge and the ability for local facilities to accommodate this cannot be assessed.	89423-143-14095	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	3. The County Council recognises the progress which has been made on a number of key issues and matters raised within the Council's response to the second stage of consultation. However, there are still a number of outstanding issues which require urgent attention and there is a lack of information included within the consultation document. As a result, it is difficult to provide detailed comments or any commentary on specific proposals.	89843-143-2300	/			

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Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	4. Despite the Council working closely with EDF, it is apparent that key documents have still not been provided and there is a lack of depth, justification and evidence to support both the substantive proposals and the changes identified in the consultation. This has limited our ability to provide guidance and constructive feedback to this consultation. This, in turn, gives rise to a concern that the community have also not been able to engage effectively on issues relating to the impacts of the proposals and how these should be addressed.	89843-143-2745	/			

Respondent Reference	Respondent Type	Consultation Stage	Comment	Comment ID	Change	No Change	Noted	EDF Energy Response (Begins at first page of Topic)
Tractivity 60822	Public	Stage 1	Ecosystem economics suggests that scale of use of resources and management of waste should be considered at an early stage in design, not treated as a secondary issue in a strategic environmental analysis.	9402-180-1245	/			<p>Responses from statutory and other consultees sought formal plans for site waste management, construction environment management and soil management, with clear linkage to the CL:AIRE protocol, as a coherent framework for management of the main and associated development sites. Reassurance was sought that waste management had been considered from the design stage, that the strategy had been designed to minimise waste and maximise recycling, applying the proximity principle, and that full account had been taken of the actual availability of existing waste management and materials recycling facilities and the impact on transport (with preference for sea-borne mode). The Environment Agency identified the need for permits for prolonged soil storage and disposal. Particular note was made of bentonite-contaminated tunnelling spoil and asbestos-contaminated material on the part of the site closest to HPA.</p> <p>As already described, a Waste Management Implementation Strategy (WMIS) document has been developed since Stage 2 consultation and submitted with this application for development consent. This covers all stages of the preparation, construction, operation and removal/reinstatement phases of the Hinkley Point C (HPC) development sites, including the off-site associated development. It constitutes a key topic-specific element supporting the overall Environmental Monitoring and Management Plans for the project, and it addresses the issues raised in the consultation responses summarised above.</p> <p>The key principle within the WMIS is the management of waste in the order of the waste hierarchy, i.e. prevention, preparing for re-use, recycling, other recovery and disposal, complemented by adherence to the proximity principle, whereby waste would be managed close to the point of origin. The transport impacts of the WMIS are taken into account within the Freight Management Strategy, also included with this application. The WMIS itself identifies the potential benefits of barge transport and the limited potential of the railway infrastructure surrounding Hinkley Point.</p> <p>The WMIS also identifies the need to apply for an environmental permit to store materials on site for prolonged periods, and to surrender this before re-use with a justification that it is not, or has ceased to be, a</p>
Devon County Council	Local Authority	Stage 1	ii) [Section 3] Further emphasis should be given to minimising waste generated on site and maximising recycling initiatives	8713-144-580	/			
Environment Agency	Dual - Statutory Consultee and Consultee with an Interest in Land	Stage 1	Spoil Disposal Site: Any spoil taken off site for disposal will need an appropriate permit in place before any disposal can take place. If the quarry is going to be used as a site for disposal an application for an appropriate permit (Exemption or Environmental permit) must be made to the Environment Agency for consideration.	88830-144-8797	/			
Environment Agency	Dual - Statutory Consultee and Consultee with an Interest in Land	Stage 1	13.Section 4.14 Spoil disposal sites There should be a presumption against any spoil disposal in the floodplain of any watercourse where it would result in a net loss of floodplain storage volume, thus increasing local flood risks. Spoil should be placed in a manner that does not create increased surface water flood risk to adjoining property, either by re-directing overland flows and/or impeding local ditches, land drains, etc.	88830-144-25658			/	
Countryside Council for Wales	Statutory Consultee	Stage 1	The findings of this AoS in respect of waste should be considered cumulatively with waste issues arising from other National Policy Statements (including Hazardous Waste) and other relevant plans, programmes and strategies throughout the UK.	87860-144-3262			/	
Countryside Council for Wales	Statutory Consultee	Stage 1	Soils, geology and land use 4.49: We welcome the additional information included in the AoS on the nature of the landfill sites associated with the existing facility and accept that further assessment will take place as part of the more detailed site based EIA.	87880-144-2089			/	
Highways Agency	Statutory Consultee	Stage 1	The Agency acknowledges that the form of the spoil is not yet known and as a consequence, EDF is considering several options for its disposal. As one of these is 'off-site via road to other designated waste management facilities in the south-west', the Agency will require further information to highlight if this will result in an impact on the SRN.	88860-144-19069	/			

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Somerset County Council	Dual - Local Authority, Statutory Consultee and Consultee with an Interest in Land	Stage 1	g) During the construction phase of the development there will clearly be a significant amount of construction waste that arises. The Stage 1 consultation report makes no reference to how this waste will be managed and notably there is no recognition of the value of, and the requirement for a Site Waste Management Plan. In order to fully assess the impact of the development it is essential that full consideration is given to the management of the wastes that are generated and need to be transported, stored and disposed of during the construction phase.	87920-144-628	/			waste. This statement will be based on a Materials Management Plan and Verification Report demonstrating that the material is not a waste and is suitable for its intended purpose, without causing harm to human health or the environment. In terms of practical implementation, the WMIS considers waste prevention or reduction at the design stage, for example through the intent to achieve a neutral mass balance of cut and fill and to use prefabricated modular accommodation units. Where waste is produced the intent is that it would be managed by a waste contractor, in accord with the waste hierarchy.
Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	Furthermore, there is limited information on the mechanism for managing excavated material other than a reference to stockpiling. No information is provided on the site control to ensure effects associated with air quality and noise are managed, nor the potential requirement for removal of material from site (and associated traffic issues) where this is not of suitable quality for use as engineering fill.	88580-144-3278	/			For the main site, waste could potentially be managed by a single contractor, who would seek opportunities where possible to re-use or recycle materials. Where this could not be achieved, material would be sent off site to a Materials Recycling Facility or sold, possibly through a broker, with disposal to landfill only as a last resort. For the HPC on-site accommodation campus and other off-site associated developments, the same principles would be applied.
Tractivity 770	Public	Stage 2	13. Please let us have your overall views on our proposals and any other general comments in the box below We are concerned about disposal of low level waste. Currently access to the rail head is along Rosebery Avenue (a narrow road, which has no restrictions on parking, so wide loads are at times, impossible to access the rail head). Can anything be done to alleviate this problem.	9528-144-6653			/	The principal point of waste production will be the removal/reinstatement of the majority of the associated developments. These have an operational life span of the same order as the HPC construction and commissioning period. At the point of removal/reinstatement, a review of the waste management options will be undertaken, recognising that the nature of materials that can be reused or recycled, as well as available facilities, is likely to change over the next decade.
Tractivity 569	Public	Stage 1	Old quarry seems to have hit a spring line (cut into the water table). If this used for spoil where is the water going to and how will it be detained?	9238-144-4539		/		
Tractivity 589	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? The land to the North of Shurton should not be used as a dumping ground for spoil.	9255-144-4800		/		
Tractivity 26164	Public	Stage 1	He has heard that we will be depositing soil between the pylons and the sea at Stolford (East). His colleague around the area of Stockland Farm advised that this is the case and he has been in talks with Stockland drainage board.	9381-144-0			/	
Tractivity 62237	Dual - Consultee with an Interest in Land and Public	Stage 1	There are a few detailed comments which may be of assistance: i) [Section 3] The document needs to recognise the importance of submitting a Construction Environment Management Plan as part of the planning application	9437-144-390	/			

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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	9437-144-610	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	- Waste Management Strategy: We expect the strategy to cover the main site and associated developments. Proposals will need to be supported by an appropriate strategy on waste that adopts the Contaminated Land : Application in Real Environment (CL:AIRE) code of practice. This approach addresses the protocols around managing waste and sets out good practice which can be applied to material excavated in development projects.	89069-144-9625	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>Waste Management Strategy</p> <p>Issue: The Waste Strategy provided does not have enough scope and detail. There is limited information associated with the strategy to judge if it adequately covers the waste management of Hinkley C and its associated developments from construction through to operation through to decommissioning.</p> <p>Comment: (7.8.14)The re- use of materials at any other site than from where it is produced will need to be carried out under the CL:AIRE Code Of Practice in accordance with a Materials Management Plan (MMP). If the CL:AIRE Code of Practice and MMP is not in place at the time the material is to be used, then the Environmental Permitting Regulations 2010 will cover any storage/treatment/disposal or reuse of waste. These permits will take a period of approximately 4 months to obtain.</p> <p>Top soil and soil in general can be considered a waste under certain circumstances. On some of the associated developments sites, there is still a chance that the topsoil and soil will be contaminated. This should be included in the total waste arising, otherwise the figures may be misleading. In particular Bridgwater C is the site of an historic landfill site. This will need to be investigated before construction takes place.</p> <p>The storage of top/subsoil at associated development sites and at the main Hinkley Point C site will need to be clearly identified under the CL:AIRE CoP. The content/origin of the deposits should be clearly recorded and future intentions for the material described. These storage areas should be clearly located in the planning stages.</p> <p>If these storage areas are not described and clearly located under the CL:AIRE CoP and MMP, then these storage areas will be permittable and an Environmental Permit will need to be obtained to cover the storage/disposal of this waste.</p> <p>A key part of the waste strategy is to articulate how judgments are made. This will link with the Objectives, polices and targets used with lifecycle analysis.</p> <p>We would expect this Waste Management Strategy to:</p> <p>1) Have a clear period of operation: For example for the construction phase of the project e.g. 2010-2018</p>	89088-144-930	/			

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			<p>2) Be reviewable: The Strategy will need to be reviewable at regular intervals. A system needs to be in place to ensure the document is reviewed.</p> <p>3) Use the Best Available Information. There are no background documents or any associated documents that detail the data behind the strategy. There should be information on the waste arising, composition, potential waste facilities etc..</p> <p>4) Use clear targets. The strategy should also be clear on how it will achieve those targets. These should be linked to the policies and objectives of the company and the project. For example: An objective may be to reduce the amount of material sent to landfill. A target may be to be recycle 100% of the aggregate used on site and so on.</p> <p>5) Allow for growth and contraction. The document should allow for different scenarios. It should be flexible to allow for different types and changing compositions of waste.</p> <p>6) Demonstrate what facilities are to be used.</p> <p>7) Consider potential health impacts.</p> <p>8) Use a Life Cycle Analysis using programmes such as Waste & Resource Assessment Tool for the Environment (WRATE) to analyse the sustainability of the options.</p> <p>9) Provide evidence that a range of options have been considered.</p> <p>The waste strategy should not just focus on the waste arising from the construction and demolition phase, but also the operational phases of Hinkley C and its associated developments. This would include municipal waste and commercial waste produced.</p> <p>Action: An overarching waste management strategy is required which incorporates the associated developments and main site. Waste issues. This document should provide details on the types and quantities of waste.</p>					
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>Site Waste Management Plan</p> <p>Issue : There is no indication as to how the resources will be managed and waste controlled during all stages of the construction project. It is a legal requirement to provide a Site Waste Management Plan for projects over £300,000. This is set out in The Site Waste Management Plan Regulations 2008.</p> <p>Comment: A Site Waste Management Plan will be needed for each of the projects. These documents should link to the overarching Waste management strategies. The Site Waste Management Plans should describe how resources will be managed and waste controlled at all stages during the construction projects. The Site Waste Management Plans will also help demonstrate how Duty of Care is being followed.</p> <p>Action: A Site Waste Management Plan is required for development proposals. This must be available on the relevant sites at all times. Ideally a copy would be provided to the local authorities and the Environment Agency to demonstrate that they have been completed before construction and/or demolition work begins.</p>	89088-144-8731	/			

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Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	We have not yet been provided with information on your environmental protection strategies related to site preparation and construction activities. In the absence of these documents we are unable to establish your ability to comply with our legislation. Our hope is that that such an important national development would follow, and provide fresh examples of, best practice. Our regulatory officers are well placed to provide appropriate levels of advice and guidance to you in these areas in order to protect the Somerset environment.	89097-144-4751	/			
Highways Agency	Statutory Consultee	Stage 2	- It is not clear whether all the waste remains on site during the construction phase. The Agency requires EDFE to provide details of waste to be moved off site, the type of waste and average pay load per vehicle that will be used to transport it. The Agency assumes that empty waste vehicles will arrive on site to be filled and seeks clarification on this point.	89169-144-1502	/			
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	1.16. Waste management detail: Site Waste Management Plans are proposed for both the main site and for the off-site associated development sites and it is proposed that these are to be annexed to the Development Consent Order (DCO) application. This information is, however, required prior to the DCO application in order to properly assess the impact of the development and to understand how wastes generated will be transported, stored and disposed of during the construction phase.	89196-144-8885	/			
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	- Waste management continues to be an area where there is limited information, particularly relating to transport implications. It is noted that the Waste Management Plan is to be produced after the Stage 2 consultation, which is disappointing as the County Council would welcome sight of the plan during Stage 2 in order to help formulate any submission to the IPC.	89199-144-4599		/		
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	The following missing data has been identified in the Stage 2 documentation: - Freight Management Plan - Waste Management Plan	89200-144-3652	/			

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Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	A Freight Management Strategy (FMS) and a Waste Management Strategy (WMS) is required, in order to mitigate and manage the impact of freight and waste traffic respectively.	89220-144-6904	/			
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	Freight and Waste Management Strategies are required;	89234-144-76	/			

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Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	<p>Further information relating to information used to derive the stated quantities of materials required for HPC and also evidence to support the vehicle payloads assumptions and the calculation of peak hour freight movements is required;</p> <p>5. The potential impact of the proposed consolidation centre needs to be calculated and understood;</p> <p>6. HGV parking levels at the logistics facilities require further assessment and explanation;</p> <p>7. Freight movements associated with operational phase need to be considered;</p> <p>8. Freight trip distribution and subsequently routing needs to be given careful consideration taking into account the Somerset freight route hierarchy and sensitivity testing carried out to test the resilience of the network.</p> <p>3.182 It is expected that the Waste Management Strategy (WMS) and Freight Management Strategy (FMS) would build on the information provided in the Transport Appraisal. The FMS should provide information including, but not limited to:</p> <ol style="list-style-type: none"> 1. Details of the number and frequency of construction vehicle movements across all modes and all development sites; 2. Construction operation hours; 3. Construction delivery hours; 4. Construction vehicles routes to and from each development site with distance details; 5. HGV parking details; 6. Car parking for contractors; 7. Specific measures to be adopted to mitigate construction impacts (including infrastructure improvements if appropriate); 8. A detailed traffic management plan to control traffic during the construction phases; 9. A contingency plan for abnormal loads should it not be possible to transport them all by sea as currently proposed, including vehicle type/size, routings, timings and liaison with the County Council; and 10. A Delivery Management System, in order to instruct in-bound vehicles to the appropriate logistic facility and to subsequently managing the timing of trips on the network and provide clear routing information. This should be a responsive system which can be flexible depending on the current operation of the highway network and be able to deal with unexpected events, such as road accidents. 	89234-144-363	/			
Tractivity 63240	Consultee with an Interest in Land	Stage 2	<p>13.20.2 What assurances will be provided that the ACM contaminants, found in the BDAE area, will be completely removed and not find their way into re-used</p>	89444-144-13211	/			

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Tractivity 63240	Consultee with an Interest in Land	Stage 2	13.20.6 The Estate believes that the view being taken by EDF where they expect waste contractors to invest in additional facilities (7.9.22), is a risk to the operator, to the local community and Somerset. The Estate seeks clarification as to how EDF will work with contractors and local stakeholders to ensure that the appropriate facilities and infrastructure are developed both for the development and the sustainable needs of the communities both presently and in the future. The Estate believes that without robust management and communication between the stakeholders, a potentially beneficial legacy for the County could become an ill-judged unsustainable aspect left to future generations.	89444-144-14321			/	
Tractivity 63240	Consultee with an Interest in Land	Stage 2	<p>In addition to the above, a selection of key points relating to the Principal Contractor (PC) and the Waste Broker (WB) has been drawn out from section 7.9.11 for comment. Hence, EDF are asked to clarify why there appears to be no verification or validation of the Principal Contractor (PC) and/or Waste Broker (WB) roles in waste management activities, when it is noted that:</p> <p>13.22 The PC will have a process to allow contracts to be placed and that the work is to be legally compliant. Section 7.9.11 refers.</p> <p>13.23 The PC or WB is to provide estimates of wastes produced which will be used to set KPIs. Sections 7.9.13 and 7.9.26 refer.</p> <p>13.24 The PC or WB is to provide facilities and management for the wastes and to decide upon the correct method of treatment and/or disposal. Section 7.9.14 refers.</p> <p>13.25 The PC or WB will be responsible for ensuring contractor compliance and discharging producer responsibilities. Section 7.9.16 refers.</p> <p>13.26 Performance against KPIs will be monitored by the PC or Waste Broker. Section 7.9.27 refers.</p> <p>13.27 Regular audits will be undertaken by the PC or waste broker to ensure contractor compliance and adherence to legal requirements, best practice and guidance. Section 7.9.30 refers.</p> <p>13.28 To the Estate there appears to be a possible conflict of interest with the PC having to complete the various phases of the work demanded by EDF and the need to maintain a balance with the various demands for environmental protection.</p>	89444-144-15028			/	
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: Need to demonstrate that servicing and refuse collection will be feasible.</p> <p>Update September 2010: The management of specific waste streams during construction and operation is set out in the non-radioactive waste management chapter of the EA. Full details of how servicing and collection will be managed have not yet been set out however it is recognised that there will be constraints. The authorities are keen that this issue to investigated further as a priority.</p>	89327-144-4341	/			

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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>Section 7 of Volume 2 to the EnvApp describes how conventional waste is likely to be generated, through construction, commissioning and operation of the proposed development; and that waste generation associated with ancillary buildings and on-site and off-site developments will also be considered.</p> <p>The discussion of local waste infrastructure is also limited. Section 7.9 (Paragraph 7.9.22 acknowledges that waste management infrastructure within Somerset is limited, although identifies out of County facilities. Consideration is not afforded to identifying the locations and capacity of waste management facilities, either with regards to the preferred options of materials recycling facilities and waste to energy plants, or with regards to landfill capacity.</p>	89336-144-525	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Given the potential effect on local facilities, acknowledged in Paragraph 7.9.22 which anticipates that to service the project, waste management contractors will need to invest in creation of additional waste management infrastructure in Somerset, it may be necessary to identify compensation measures from EDF Energy, if the Council are likely to incur costs for providing new, expanded waste facilities. At this stage, the availability of sites and the implications of disposing waste at new waste management facilities have not been examined in significant detail.</p>	89336-144-3139		/		

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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>Section 7.9 describes arrangements for Construction Waste Management, which, in line with regulatory requirements, will be managed via a Site Waste Management Plan. EDF Energy have stated they are committed to managing and minimising waste and intend to implement integrated waste management principles and detailed site waste management planning, and appropriate operating procedures and instructions throughout the supply chain.</p> <p>The Site Waste Management Plan (SWMP) is a regulatory obligation on large construction sites such as those associated with this scheme. It will outline how construction waste will be managed to minimise its impact, and will describe procedural tools for estimating waste arisings and making decisions on waste treatment and disposal. Paragraph 7.9.4 describes how “the SWMP will refer to, and has been written in conjunction with, other documents” These include the following:</p> <ul style="list-style-type: none"> • Materials Management Plan; • Contaminated Land and Groundwater Strategy; and, • Integrated Waste Strategy - which states how waste will be managed during construction, operation, decommissioning and site restoration. <p>We note that neither the waste management plans, nor any of the three contributory documents, were available within the Stage 2 consultation material. Further discussion presented in Section 7.9 provides a discussion relating to various aspects of the Site Waste Management Plan. The current discussion is generally presented in a summary form, addressing primary aspects of the SWMP, including the responsibility of the Principle Contractor to minimise waste arisings through design and procurement.</p> <p>Given that details with regards to the materials management plan, contaminated land and groundwater strategy and the integrated waste strategy are not available at this time we are unable to provide comment on the content of the plan, or on the likely effectiveness with which it may alleviate stress on local and regional waste management facilities, or prevent generation of indirect environmental impacts at this time.</p> <p>The authorities are therefore concerned that the Stage 2 consultation materials in relation to conventional waste are inadequate and consider that this should be rectified prior to EDF submitting an application for a development consent order for HPC.</p>	89336-144-3730	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>A primary area of uncertainty within the chapter relates to the availability and capacity of waste management facilities in the area. Section 7.9.19 describes that, in line with the waste hierarchy, construction will be managed where reasonably practicable by on site segregation, off-site segregation at a Materials Recycling Facility (MRF), and through potential energy recovery from waste at a waste to energy plant. While it would appear reasonable to assume that sufficient land is available on-site for on-site segregation, the discussion of local waste infrastructure describes “limited waste management infrastructure within Somerset” (Para 7.9.22), with insufficient capacity of MRF in Taunton and possible further MRFs in Bristol and Exeter, although capacities of these are not assessed. While waste to energy plants are proposed for construction in the Avonmouth area of Bristol, it is unclear whether these are indeed consented.</p>	89336-144-6844	/			

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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 discussion also raises questions over the capacity of local infrastructure to accommodate levels of waste likely to be generated and suggests that the further infrastructure demanded will be delivered by local market forces. The availability of local infrastructure needs further consideration.	89423-144-14416	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2 Update	Any storage of excess spoil for more than a year will need to be agreed with the Environment Agency and with the Local Planning Authority (a permit may also be required). We would expect details of soil management to be within the soil management plans.	89711-144-2282	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2 Update	Please be aware that the material/waste created as part of the demolition of the barns on the main site may not fit into the CL:AIRE Developer Industry Code of Practice being used on the rest of the project. Therefore a Waste Exemption may need to be applied for under the Environmental Permitting Regulations 2010. Further discussions are required within this area.	89711-144-3719			/	
Countryside Council for Wales	statutory consultee	Stage 2 Update	Section 6.4.8- we welcome the proposed disposal of dredge material at Cardiff Grounds as the preferred option as it retains the sediment in the estuary system.	89836-144-2323	/			
Highways Agency	statutory consultee	Stage 2 Update	2.9 A large number of questions are raised in relation to the Draft Freight Management Strategy and the Construction Waste Management Strategy. The Agency is concerned that there are a significant number of assumptions made for which no evidence has been provided.	89837-144-6352	/			
Highways Agency	statutory consultee	Stage 2 Update	3.75 Paragraph 1.1.9 states that a more detailed analysis of the different waste types, quantities and disposal routes will accompany the application for development consent. Therefore at this stage the CPWMS appears to act more as a framework document with greater detail to be added later in the process.	89841-144-4444			/	
Highways Agency	statutory consultee	Stage 2 Update	3.76 Paragraph 4.1.4 appears to discuss materials that cannot be re-used when the section is titled Reuse. This should be clarified.	89841-144-4789	/			

Respondent Reference	Respondent Type	Consultation Stage	Comment	Comment ID	Change	No Change	Noted	EDF Energy Response (Begins at first page of Topic)
Highways Agency	statutory consultee	Stage 2 Update	3.77 The use of a barge to transport construction waste by water is commended and it is believed that this approach should be imposed as a condition on the designated contractor. If this is not deemed achievable, justification will need to be clearly demonstrated. Further details on this proposal are requested.	89841-144-4925	/			
Highways Agency	statutory consultee	Stage 2 Update	3.78 The scope of the option appraisal for the use of the local waste facilities should be agreed with the Agency prior to being carried out. The results from the appraisal process will need to be discussed and a preferred solution agreed with the both County Council and the Agency in due course.	89841-144-5241			/	
Highways Agency	statutory consultee	Stage 2 Update	3.79 Details of the total number and daily profile of waste vehicle trips is needed to form part of the Construction Phase Waste Management Plan (CPWMP). The proposal to consider utilising vehicles making deliveries for taking waste away is welcomed and should be included in EDF Energy's DMS. However, this proposal will need to be developed out further to understand its feasibility and associated implications.	89841-144-5563	/			
Highways Agency	statutory consultee	Stage 2 Update	3.81 There is a lack of information relating to how the CPWMP will be monitored and reported. The final targets for the CPWMP need to be agreed adhering to SMART principles (Specific, Measurable, Achievable, Realistic, Timed). Penalties/safeguards for not meeting targets also need to be agreed in due course. An action plan defining the measures, objectives with clear roles and responsibilities and timescales should be produced. It is also recommended that the CPWMP be incorporated as part of the wider suggested FMS steering group with the relevant representatives from the Agency. The steering group should meet on a regular basis with clear reporting on the progress and implementation of CPWMP over the life of the construction period.	89841-144-6195	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	34. Notwithstanding the above, we feel that the supporting strategy documents do not contain the level of detail that we would expect at this late stage of the application process. They cover only a broad outline of the proposals and data and do not, therefore, provide sufficient detail to enable the Council to comment in full. For example, we note that the Construction Waste Management Strategy appears to act as a framework document with more detailed analysis of the different waste types, quantities and disposal routes to be provided at a later stage in line with the application for development consent.	89844-144-15540	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.44 The intention to transport construction waste by water is commended and it is believed that this approach should be enshrined as a DCO requirement or obligation and imposed as a condition on the designated contractor. If this is not deemed feasible it will need to be clearly demonstrated why this is not practicable. Further details on this proposal are requested.	89846-144-3561	/			

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Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.45 The scope of the option appraisal for the use of the local waste facilities should be agreed with the County Council prior to being carried out. The results from the appraisal process will need to be discussed and a preferred solution agreed with the County Council in due course.	89846-144-3935	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.152 Para 1.1.9 states that a more detailed analysis of the different waste types, quantities and disposal routes will accompany the application for development consent. Therefore at this stage the CWMS appears to act more as a framework document with greater detail to be added later in the process.	89849-144-2375	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.153 4.1.4 Appears to discuss materials that cannot be re-used when the section is titled Reuse. This should be clarified.	89849-144-2713	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.154 4.1.6 The use of a barge to transport construction waste by water is commended and it is believed that this approach should be imposed as a condition on the designated contractor. If this is not deemed achievable, justification will need to be clearly demonstrated. Further details on this proposal are requested.	89849-144-2840	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.155 4.1.9 The scope of the option appraisal for the use of the local waste facilities should be agreed with the County Council and the HA prior to being carried out. The results from the appraisal process will need to be discussed and a preferred solution agreed with the County Council and the HA in due course.	89849-144-3163	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.156 Details of the total number and a daily profile of waste vehicle trips is needed to form part of the CWMP. The proposal to consider utilising vehicles making deliveries for taking waste away is welcomed. However, this proposal will need to be developed out further to understand its feasibility and associated implications. This should be included within EDF's DMS.	89849-144-3502	/			

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Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.157 It is considered appropriate to include waste vehicle trips in the DMS proposed in the FMS to ensure all vehicle trips associated with HPC are accounted for and managed. There is a lack of information relating to how the CWMP will be monitored and reported. The final targets for the CWMP need to be agreed adhering to SMART principles (Specific, Measurable, Achievable, Realistic, Timed). Penalties/safeguards for not meeting targets also need to be agreed in due course. An action plan defining the measures, objectives with clear roles and responsibilities and timescales should be produced. It is also recommended that the CWMP be incorporated as part of the wider suggested FMS steering group with the relevant representatives from the County Council and the HA. The steering group should meet on a regular basis with clear reporting on the progress and implementation of CWMP over the life of the construction period.	89849-144-3900			/	
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.1. Para 1.1.4 states that the Construction Phase Waste Management Strategy serves as a "strategy and practical plan for the management of waste during the construction phases of the Hinkley Point C Project, including its associated developments". As a general comment, for the document to be truly practical, it will require more detail / specifics on what will happen to the waste generated from the construction of HPC and associated developments.	89866-144-1031	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.2. Para 1.1.5 states that the overall objective is to "achieve a level of waste management and performance that is better than current practice". However, the document does not state what current practice is. Para 2.1.1 refers to point 1.1.12, which presumably would summarise current practice and provide a benchmark - but the document does not currently contain para 1.1.12.	89866-144-1486	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.3. Para 1.1.5 states that the study will include consultation with Somerset County Council as Waste Planning Authority. It would be helpful to know if the future consultation with Somerset County Council will be a formal review of a revised document or ongoing consultation. In this context, the waste policy team welcomes ongoing consultation with EDF, but has a preference to a formal review of any final waste strategy document at the end of any such consultation period.	89866-144-1868			/	
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.4. EDF should further clarify what is meant by objective number 3 in para 1.1.6 ("increase re-use and recycling outside of the Hinkley C Project"). Somerset County Council would welcome a broader goal, which could lead to a stronger collaboration with the local community.	89866-144-2347	/			

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Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.5. It is not clear if objective 4 ("reduce volumes of waste sent to landfill (<10%") focuses on construction waste or all wastes. Para 4.1.16 suggest this might refer to C&D waste. If so, this should be made clear and a separate target / approach be considered for general wastes.	89867-144-0	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	1.6. Para 1.1.9: it is recommended that EDF consider application of the proximity principle as a fundamental building block of this strategy. Application of the proximity principle is an important element of Somerset's adopted Local Waste Plan and will be continued forward in the emerging Waste Core Strategy.	89867-144-287	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	2.1. Para 2.1.1 refers to point 1.1.12, which presumably would summarise current practice and provide a benchmark. But the document does not currently contain para 1.1.12.	89867-144-635			/	
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	3.1. The strategic plan refers several times to plans for excavated materials being stored on site for use during reinstatement of land several years later. The County Council looks forward to reviewing more information - via Materials Management Plans and Verification Plans - on how much excavated material is forecast to be generated at each site to be stored for several years and how and where such storage will be arranged e.g. for Hinkley C accommodation campus; the laydown area for Comwich Wharf; the Cannington Park and Ride facility; and the park and ride planned for Junctions 23 and 24.	89867-144-1248	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	3.3. Further explanation is required on Para 3.1.10. What does it mean that engineering waste would be "retained once Hinkley Point C is complete"?	89867-144-2312	/			
Somerset County Council	Dual - local authority, statutory and consultee with an interest in land	Stage 2 Update	4.1. As a general comment within the strategy, more detailed coverage is needed on clear proposals about which waste disposal sites EDF hope to use. 4.2 Para 4.1.1 refers to the reliance on surrounding waste infrastructure as a sustainable approach. The application of the proximity principle is welcome; however, this approach is only sustainable if the surrounding facilities have the capacity to process the waste arisings. This has yet to be demonstrated.	89867-144-2499	/			

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			<p>4.3. Para. 4.1.4 proposes that excavated soils which cannot be reused on site will be transported to a Materials Recycling Facility (MRF). This requires some clarification given the status of the three MRFs in Somerset.</p> <p>Evidence gathered to support the emerging Waste Core Strategy suggests that there are currently three operational, licensed MRFs in Somerset. One MRF is located next to the Priorswood Household Waste Recycling Centre, operated by Viridor Waste Management. An extension to this facility was permitted in March 2011 (subject to conditions) to allow for additional uptake of commercial waste. It should be noted that the facility remains relatively small in scale and is not equipped to process large volumes of "dirty" waste. Further dialogue with the Somerset Waste Partnership (SWP) and Viridor would be needed to establish the suitability of Priorswood facilities to accept any excavated materials.</p> <p>Two MRFs operated by Perry's Recycling in Huntworth, Bridgwater, and Marston Magna, near Yeovil process mainly dry recyclables such as paper, card and glass and so they are unlikely to be a suitable destination for excavated materials.</p> <p>There are a number of waste transfer stations in Somerset which are not licensed as MRFs but process general wastes and also construction and demolition waste. Some of these facilities are situated close to licensed non-hazardous and inert landfill sites, or sites operating under exemptions granted by the Environment Agency, where inert material is used for landfill or land recovery. A report on Waste Management Need to 2028 recently produced by the waste policy team provides a list of operational waste management sites, including transfer stations. The report will shortly be available for downloading on the County Council's website: www.somerset.gov.uk/mineralsandwaste.</p> <p>4.4. Para 4.1.4 refers only in brief to re-use of excavated soils. EDF should consider the scope for re-use of other materials. For instance, materials may be recovered and re-used from the refurbishment activity of Comwich Wharf.</p> <p>4.5. Para. 4.1.5 asserts that the Waste Local Plan states that 685,000 tonnes of waste will be accepted by Material Recycling Facilities (MRFs) in Somerset in 2011. The value of this figure is questionable in this context. It is suggested that this no longer forms a useful figure to quote when planning for the coming years. (The source of the figure is also unclear. EDF need to provide further details, for example on which page in the Waste Local Plan this capacity is stated).</p> <p>4.6. More detail is needed on which facilities will be approached and/or used for recycling construction waste in Somerset. More detail is required on the "practical plan" associated with construction waste recycling. In the first instance, it is recommended that EDF speak with Viridor - the disposal partner of the Somerset Waste Partnership - regarding construction waste recycling capacity at Walpole.</p> <p>4.7. It is incorrect to say there are three MRFs in Somerset (Chard, Highbridge and Williton). There are no MRFs in these three towns. All three towns have a Household Waste Recycling Centre that accepts trade waste primarily to support SMEs (small to medium-sized enterprises). There is a clean MRF in Taunton, as mentioned above, but this is not a large facility and does not have equipment to process "dirty" input material.</p> <p>4.8. Reference to options appraisal is welcome in para 4.1.9. Relevant</p>					

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			consultation (including discussions with Somerset Coun					
Stogursey Parish Council	statutory consultee	Stage 2 Update	2.1.8 [4.1.19] Where will the spoil excavated from the 8.6km of water intake and outfall tunnels be stored? What is the volume of this material and how will it be used subsequently?	89872-144-3845				
Stogursey Parish Council	statutory consultee	Stage 2 Update	2.3.11 [Table 6.1] This shows that all 220,000 tonnes of waste will be removed from site by road - some 30,000 vehicle movements. Vessels delivering bulk materials other than aggregates and cement have the capacity to take waste away as they will have general cargo holds which will be empty. As EDF plan to have a single waste contractor, they could load all waste into containers for removal by sea in these empty vessels, thereby reducing costs and road vehicle movements.	89872-144-13329			/	
Stogursey Parish Council	statutory consultee	Stage 2 Update	2.6.1. [1.1.10] This and other paragraphs assume that the waste will be removed from the main site by road to the nearest suitable waste handling facilities. A greener option, which will reduce road movements, would be for the waste to be containerised and removed from site by sea via the jetty in the empty holds of general cargo vessels that have delivered material to site. The waste would then be processed at facilities near the home dock. This option is briefly mentioned at [4.1.6/7], but should be given more prominence. [Table 5.1] states that a total of over 291,000 tonnes of construction waste will be generated on-site, representing perhaps 20,000 HGV journeys. Sending this by sea would have a substantially beneficial impact on road traffic volumes.	89872-144-18524			/	
Stogursey Parish Council	statutory consultee	Stage 2 Update	2.6.2 [6.2] Employing a single waste management contractor may simplify EDF's duty of care achievement, but it will not in itself drive reduction in waste. Indeed the waste contractor will not wish to see waste minimised as the more waste there is, the greater their profits. What is EDF planning to do to incentivise all contractors on site to minimise waste?	89872-144-19390			/	
Stogursey Parish Council	statutory consultee	Stage 2 Update	2.6.3 [6.3.2] It is not clear why the high standards required by the nuclear industry in itself produces more waste. If materials are correctly specified and delivered to the specification, then waste volumes should be no greater.	89872-144-19754		/		
WSC & SDC Joint Response	Dual - local authority and consultee with an interest in land (Sedgemoor only)	Stage 2 Update	- Identification of appropriate means for reducing, reusing, recycling or disposing of waste materials, including transportation of waste arising from construction activity where required.	89890-144-13096	/			
Stogursey Parish Council	Statutory Consultee	Stage 2	[3.6.2] Due to the size of the tunnels, the potential volume of Bentonite contaminated waste is substantial. Will EDF say what the volume is, and how this will be dealt with? Will this require additional vehicle movements over and above those already stated?	89291-256-8218	/			

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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 local availability of waste management sites is not characterised and that the nature and quantities of materials for management remains largely unspecified, the assessment of the significance of the need to manage such quantities of waste materials remains unaddressed. Volumes of materials would, however, be expected to be significant and comprise of large quantities of bulk materials such as concrete, aggregates etc.	89336-365-2698	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Paragraph 7.9.3 identifies how, in the short-term, until suitable waste-to-energy plants are developed, it will be necessary to take material to a suitable landfill site, or to the nearest commercial waste-to-energy plant in Colnbrook near Heathrow. Residual indirect impacts, associated with traffic, noise, airborne emissions, health, and other indirect effects of management of waste are not addressed.	89336-365-7815	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>The significance of various different waste management procedures is not directly addressed. The emphasis of the discussion is on providing a narrative overview of strategic aspirations for waste management procedures and control. Broad estimates of volumes of waste are indicated in Section 7.8 as described below:</p> <ul style="list-style-type: none"> • Unquantified volumes of waste materials from enabling works including stone, spoil, wood and asbestos containing materials; • Unquantified volumes of waste from preliminary works, although it is estimated (Paragraph 7.8.11) that 2.1 million cubic metres of material will be generated by required earthworks and excavation; • HPC Main civil works, for which it is assumed 5% of construction materials would end up as waste; • Estimated 45,000 of potential wastes from construction of Associated Developments; • Unquantified volumes of contaminated soils from the Bridgwater A and other sites; • Operational waste from use of associated development sites; and, • Estimated 250,000 tonnes of waste from demolition and removal of associated development sites. 	89336-365-1600	/			

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Environment Agency	Dual - statutory consultee and consultee with an interest in land	M5 J24 and Bridgwater Highway Improvements	<p>Waste</p> <p>It is expected that the approach to waste for this site will follow the overarching waste management strategy which is being prepared for all the sites. If any construction work takes place then a site waste management plan will be required. In England, it is a legal requirement to have a site waste management plan (SWMP) for all new construction projects worth more than £300,000. The level of detail that your SWMP should contain depends on the estimated build cost, excluding VAT. You must still comply with the duty of care for waste. Because you will need to record all waste movements in one document, having a SWMP will help you to ensure you comply with the duty of care.</p> <p>Further information can be found at http://www.netregs-swmp.co.uk</p> <p>Any waste arising from this development must be managed in line with the waste hierarchy.</p>	89917-144-3112	/			

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	- It is noted that waste (non-radioactive) would be treated on site. As there is going to be a significant amount arising, clarification if the Decommissioning Waste Processing Facility will do all treatment would be welcomed. - More detail on the conventional waste building proposed would be welcomed, along with whether this constitutes storage only or if there is some form of processing involved.	89201-219-4094			/	Statutory and public consultee responses highlighted the need for a Site Waste Management Plan and for this to accord with Waste and Resources Action Plan (WRAP) guidance, and sought clarification of practical details on storage of wastes, especially hazardous wastes, and on how municipal wastes would be dealt with (including appropriate risk assessment). One consultee expressed a preference for retaining wastes on site rather than disposing of them to the Cannington Quarry.
OFWAT	Statutory Consultee	Stage 1	We have not found in your document references to arrangements for water supply (of drinking water standard) and sewage disposal.	8703-145-686	/			In addition, a number of responses addressed issues concerning operation of HPC as a power station, as well as the construction issues summarised here. These included the arrangements for storing and treating radioactive and non-radioactive wastes, their impacts and the role of off-site facilities including supercompactors, incineration and the proposed Geological Disposal Facility. These issues are covered in Volume 2, Chapters 7 and 8 respectively of the Environmental Statement and in the associated consultation responses. In particular, arrangements for radioactive wastes will be in accord with the conditions of the Nuclear Site Licence and Radioactive Substances Regulation environmental permit for which EDF Energy has applied.
Tractivity 60822	Public	Stage 1	Ecosystem economics suggests that scale of use of resources and management of waste should be considered at an early stage in design, not treated as a secondary issue in a strategic environmental analysis.	9402-180-1245	/			As already described, a Waste Management Implementation Strategy (WMIS) document has been developed since Stage 2 consultation and submitted with this application for development consent. This constitutes a key topic-specific element supporting the overall Environmental Monitoring and Management Plans (EMMPs) for the project, and it addresses the issues raised in the consultation responses summarised above relating to operation of the construction sites.
OFWAT	Statutory Consultee	Stage 1	Whilst reference is made to it under 'Waste management strategy' (Section 3.4 operational considerations) the document does not explain how EDF is proposing to dispose of domestic sewage from the site. There are also a number of off-site locations for associated development, and we would expect that EDF will be in communication with Wessex Water on water supply and sewage disposal. Note that construction of additional works by Wessex Water to service the developments are also subject to due process of planning legislation and should be factored into programming.	8703-145-1219	/			Contractors will be required to produce Site Waste Management Plans as part of the EMMP framework. To this end EDF Energy has produced a template in accordance with the WRAP Protocol, which it will require its contractors to maintain.
Devon County Council	Local Authority	Stage 1	ii) [Section 3] Further emphasis should be given to minimising waste generated on site and maximising recycling initiatives	8713-145-580	/			Waste produced during the operational phases of the associated developments will be collected by a private waste contractor employed by EDF Energy. Recycling facilities will be provided to encourage the separation and segregation of waste. These will be sent to an appropriate facility for treatment or disposal.
Environment Agency	Dual - Statutory Consultee and Consultee with an Interest in Land	Stage 1	An overarching strategic sustainable approach to waste management should be adopted, incorporating all the developments within the Nuclear New Build Process. The individual site waste management plans (SWMP) should link to this strategy. In England, it is a legal requirement to have a SWMP for all new construction projects worth more than £300,000. The level of detail that the SWMP should contain depends on the estimated build cost, excluding VAT. It must still comply with the duty of care for waste. A record of all waste movements is required in one document, having a SWMP will assist with compliance with the duty of care. Further information can be found at http://www.netregs-swmp.co.uk	88820-145-5895	/			
Countryside Council for Wales	Statutory Consultee	Stage 1	The findings of this AoS in respect of waste should be considered cumulatively with waste issues arising from other National Policy Statements (including Hazardous Waste) and other relevant plans, programmes and strategies throughout the UK.	87860-145-3262			/	

Respondent Reference	Respondent Type	Consultation Stage	Comment	Comment ID	Change	No Change	Noted	EDF Energy Response (Begins at first page of Topic)
Highways Agency	Statutory Consultee	Stage 1	The Agency acknowledges that the form of the spoil is not yet known and as a consequence, EDF is considering several options for its disposal. As one of these is 'off-site via road to other designated waste management facilities in the south-west', the Agency will require further information to highlight if this will result in an impact on the SRN.	88860-145-19069	/			
Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	Consideration of non-radioactive and radioactive waste needs to be addressed and the long term impact on human health and the environment as a result of such proposals. The future studies setting out this evaluation should be included within this section. Long term impacts of waste and waste transfers have not been identified and the cumulative contamination and waste issues have not been identified.	88130-145-704			/	
Tractivity 770	Public	Stage 2	13. Please let us have your overall views on our proposals and any other general comments in the box below We are concerned about disposal of low level waste. Currently access to the rail head is along Rosebery Avenue (a narrow road, which has no restrictions on parking, so wide loads are at times, impossible to access the rail head). Can anything be done to alleviate this problem.	9528-145-6653/S12a			/	
Tractivity 249	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? What about the storage of waste? You have not mentioned this. It should be stored on site, not at Cannington Quarry. How many extra lorries would this mean? I accept that if we want power then we need to develop power stations and the Hinkley site, if suitable is as good as any.	8942-145-4814	/			
Tractivity 547	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? Concerns about health risks. Risk of leaks, accidents and terrorism. What happens to nuclear was	9216-145-4731/S12a			/	

Respondent Reference	Respondent Type	Consultation Stage	Comment	Comment ID	Change	No Change	Noted	EDF Energy Response (Begins at first page of Topic)
Tractivity 62121	Public	Stage 1	<p>I live 75 miles north of Hinkley Point, yet I am a local. In early May 1986 I used a scintillation counter to measure radiation in my vegetable garden that was up to 20 times normal background radiation. That radiation was from Chernobyl, 1,600 miles away which released about 2,000 TBq of radioactive material. Naturally I feel concern about the prospect of you accumulating up to 32,000 TBq of high burnup spent fuel at Hinkley Point.</p> <p>You say in your consultation document that: "The spent fuel removed during refuelling will be stored underwater in a fuel pond, which will provide cooling and radioactive shielding. The radioactive waste will be treated and packaged in a waste building serving both UK EPR units. The spent fuel and higher level radioactive waste will be kept on-site, in stores capable of lasting for at least 100 years, pending despatch to a national geological disposal facility. I note that your colleagues in AREVA believe that: "Leaving the spent fuel onsite for extended periods of time was never intended and is not responsible. ISFSIs can safely operate past 100 years by implementing an ageing management program...(but) More responsible options exist, recycling and final disposal need to be pushed forward" [Research and Data Needs for Very Long-Term Dry Storage - AREVA Perspective (personal details removed) Inc. June 11, 2009] If you don't want to be irresponsible, don't create waste that cannot be disposed of unless it has been cooled for 100 years. The long term storage of high burnup spent fuel is expected to result in greater fuel cladding failure, with consequent higher risk of radiation exposure for the generation attempting to retrieve and condition the failed fuel elements.</p>	9412-145-44/S12a			/	
Tractivity 62237	Dual - Consultee with an Interest in Land and Public	Stage 1	<p>ii) [Section 3] Further emphasis should be given to minimising waste generated on site and maximising recycling initiatives</p>	9437-145-610	/			
Tractivity 62442	Public	Stage 2	<p>12. Also in your Masterplan "Small quantities of non-radioactive wastes would be produced. Some of this will be classified as hazardous waste and require special storage and treatment arrangements. This will include batteries, solvents, paint residues and decontamination products". Where is this waste to be stored and again, where is your risk assessment for the storage of such materials?</p>	10070-145-10580			/	
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>- Waste Management Strategy: We expect the strategy to cover the main site and associated developments. Proposals will need to be supported by an appropriate strategy on waste that adopts the Contaminated Land : Application in Real Environment (CL:AIRE) code of practice. This approach addresses the protocols around managing waste and sets out good practice which can be applied to material excavated in development projects.</p>	89069-145-9625	/			

Respondent Reference	Respondent Type	Consultation Stage	Comment	Comment ID	Change	No Change	Noted	EDF Energy Response (Begins at first page of Topic)
Highways Agency	Statutory Consultee	Stage 2	<p>3.64 The WMP should provide detailed information on how construction waste will be minimised and handled. It is recommended that guidance be taken from the Waste and Resources Action Programme (WRAP) www.wrap.org.uk. As guidance, the document should include, but not be limited to the following:</p> <ul style="list-style-type: none"> - Waste prevention actions; - Forecasts of waste amounts; - Waste reduction actions; - Specify waste carriers; - Plan waste destinations; - A waste management recording framework; and - Key Performance Indicators and reporting functions. 	89172-145-1507	/			
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	this may result in additional burden on the affected Local Authorities as a result of additional demand upon key services, such as housing, waste management	89195-145-4442			/	
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.	89196-145-9370	/			
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	- Reference is made to supercompaction of waste prior to transporting. Clarification on the location of this work would be welcomed.	89201-145-5170/S12a			/	

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	<p>Authorities position May 2010: Need to demonstrate that servicing and refuse collection will be feasible.</p> <p>Update September 2010: The management of specific waste streams during construction and operation is set out in the non-radioactive waste management chapter of the EA. Full details of how servicing and collection will be managed have not yet been set out however it is recognised that there will be constraints. The authorities are keen that this issue to investigated further as a priority.</p>	89327-145-4341			/	
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 this, the high level strategy for HPC waste management (Section 6.12 of the EnvApp) identifies the preference for recycling of materials where possible, and this is also a particular consideration with regards to contaminated metals. The authorities note the potential for recycling discussed in the EnvApp, although observe that this would be dependent on establishment of a supply chain to provide such services. Discussion is also afforded to incineration of combustible wastes as an option (para 6.12.2, bullet 2) (subject to Conditions for Acceptance); however we are similarly aware of a shortage of incinerator capacity in the vicinity of the HPC site. The authorities therefore request further details of the feasibility of these options to provide confidence in the achievability of the high level strategy discussed in Section 6.12.</p>	89335-145-4045	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>The authorities' general observation is that at face value, estimated amounts of waste in the proposals seem reasonable, the conditioning processes appear fit for purpose, and provided that Letters of Compliance are obtained there is nothing in the ILW strategy of arisings which is outside anticipated UK capability. EDF Energy does mention the possibility that new UK LLW disposal facilities might also be used for short-lived ILW. This might be a sensible change, but would need to be progressed in UK policy, and is a potential improvement rather than a necessary step.</p>	89335-145-8449			/	

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	<p>Virtually all the radioactivity produced in PWRs is contained within the fuel which, under current UK Government policy, will become a waste when it is discharged from the reactors. All PWRs use very similar fuel, though through optimisation of designs and material over the last 50 years the amount of power produced per tonne of fuel has risen markedly and will be in the 50-65GWd/teU (20) range for new build reactors.</p> <p>Section 6.38 of the EnvApp describes the composition of fuel within reactors, with 241 element assemblies in each reactor, with 527.5 kg of uranium in each spent fuel assembly. Given that 90 elements would be removed every 18 months of activity a total of 3,400 fuel assemblies would be expected for each of the two reactors over 60 years, with 1,800 teU of fuel charged per reactor. Hinkley Point C will therefore be required to store some 3,600 teHM (21) of spent fuel, comprising approximately 3,600 tonnes.</p> <p>PWR fuel is clad in zirconium alloy which is very resistant to corrosion in water and to oxidation in air at low temperatures. When the fuel is discharged it is still generating significant amounts of heat and requires effective cooling and therefore discharged fuel would be stored, under water in ponds, until heat generation has reduced enough to consider dry storage of the elements. EDF Energy state that the radioactivity in the fuel reduces by a factor of 100 in a year, and by 1000 within 40 years. Experience in storage of PWR fuel extends for over 50 years in many countries with no reported problems.</p>	89335-145-10321			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Section 6.42 of the EnvApp describes that EDF Energy's proposals for the interim storage facility (ISF) have adopted a two-stage process to interim storage of spent fuel. For an initial period of up to ten years, spent fuel would be stored in a reactor pond for cooling and following this initial period, spent fuel would be stored in an ISF until a GDF were to be available. Section 6.43 of the EnvApp documents the key operational and safety features associated with the HPC spent fuel ISF and lists the characteristics of and reasons for choosing wet storage.</p>	89335-145-11875			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>As stated in Section 6.47 of the EnvApp, the NDA, who are charged with project managing the GDF, envisage that a period of 100 years may be required for interim storage of spent fuel before it could be disposed of to GDF. Given an operational period of 60 years, spent fuel may be required to be stored at the ISF up to 2177 (and 2180 for the second reactor). Once the GDF is available to take spent fuel, EDF Energy has assumed that the fuel will be transported to a central facility for encapsulation prior to disposal. Paragraph 6.49.6 highlights the possibility that a national or regional encapsulation facility may not become available by that time, and a new facility may be required at Hinkley Point for encapsulation prior to disposal to the GDF.</p>	89335-145-12441			/	

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	<p>Existing UK Magnox reactors have graphite moderated cores leading to very large volumes of ILW and LLW which require disposal and the absence of an ILW disposal route is one key reason for the lack of progress in decommissioning these reactors. Though several other treatment and disposal methods are at the research stage, the GDF availability to take ILW graphite effectively sets the current timescale for these reactors, which include Hinkley Point A and B.</p> <p>By contrast, PWRs, such as the UK EPR, use water moderation and are much more compact, leading to smaller volumes of decommissioning waste. Several PWRs have been completely decommissioned, notably in the USA, though it must be emphasised that the availability of low-cost near-surface disposal of ILW makes decommissioning much easier.</p> <p>EDF Energy's decommissioning strategy for HPC, as outlined in Section 5.5 of Volume 2 of the EnvApp, is for early site clearance with delicensing. Meeting the Regulators' 'No Danger' standard for delicensing would essentially remove usage restrictions, but the EDF Energy assumption is landscaping and reversion to grassland. The process would start with defueling soon after the final reactor shutdown, and EDF Energy envisage the process to be substantially complete, with the reactor removed, approximately 20 years after the end of generation. An exception to this will be the storage facilities for spent fuel and ILW, whose lifetimes will be determined by the specification and availability of a UK GDF. In the case of ILW, all decommissioning ILW would be assumed to be available for disposal by around 2090, potentially giving a long period where the site is delicensed apart from spent fuel and ILW storage facilities.</p> <p>As discussed above, with regards to ILW and spent fuel disposal, the achievement of prompt decommissioning would depend on both the GDF being available and on a 'place in the queue' being designated for HPC ILW. We note, however, that dates associated with availability of GDF for disposal are not yet firm commitments and that there a number of factors which may affect the overall programme for decommissioning. In addition, further uncertainty is also associated with disposal of LLW at LLW repository and VLLW at licensed facility as discussed above. As such we consider that further information should be provided with regards to contingencies in the event of unavailability of GDF, and particularly with regards to the effects that this would have on the overall decommissioning programme.</p>	89335-145-15504			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Section 7 of Volume 2 to the EnvApp describes how conventional waste is likely to be generated, through construction, commissioning and operation of the proposed development; and that waste generation associated with ancillary buildings and on-site and off-site developments will also be considered.</p> <p>The discussion of local waste infrastructure is also limited. Section 7.9 (Paragraph 7.9.22 acknowledges that waste management infrastructure within Somerset is limited, although identifies out of County facilities. Consideration is not afforded to identifying the locations and capacity of waste management facilities, either with regards to the preferred options of materials recycling facilities and waste to energy plants, or with regards to landfill capacity.</p>	89336-145-525	/			

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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 potential effect on local facilities, acknowledged in Paragraph 7.9.22 which anticipates that to service the project, waste management contractors will need to invest in creation of additional waste management infrastructure in Somerset, it may be necessary to identify compensation measures from EDF Energy, if the Council are likely to incur costs for providing new, expanded waste facilities. At this stage, the availability of sites and the implications of disposing waste at new waste management facilities have not been examined in significant detail.	89336-145-3139	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	A primary area of uncertainty within the chapter relates to the availability and capacity of waste management facilities in the area. Section 7.9.19 describes that, in line with the waste hierarchy, construction will be managed where reasonably practicable by on site segregation, off-site segregation at a Materials Recycling Facility (MRF), and through potential energy recovery from waste at a waste to energy plant. While it would appear reasonable to assume that sufficient land is available on-site for on-site segregation, the discussion of local waste infrastructure describes "limited waste management infrastructure within Somerset" (Para 7.9.22), with insufficient capacity of MRF in Taunton and possible further MRFs in Bristol and Exeter, although capacities of these are not assessed. While waste to energy plants are proposed for construction in the Avonmouth area of Bristol, it is unclear whether these are indeed consented.	89336-145-6844	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Section 7.9 describes how Site Waste Management will establish Key Performance Indicators and define how performance will be monitored. The principal Contractor or appointed waste broker is expected to provide and record estimates of waste produced during the construction phase. While it is described that these will inform the need for further actions to improve performance, the effectiveness of monitoring would depend on the target levels adopted and the potential capability of the construction to affect production of waste. It may also be useful for targets to also relate to the capacity of available local infrastructure to accommodate waste.	89336-145-8244			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Waste Management - ensuring the necessary plans and initiatives are in place to manage waste during the construction and operational stages in a safe and sustainable way (including the recycling of waste and the use of waste heat).	89418-145-14083			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Paragraphs 24.1 and 24.2 refers to a Site and Off-Site Associated Development Waste Management Plans for the construction of the project to be annexed to the DCO. The authorities agree that Site Waste Management Plans will be required and are disappointed that drafts of these Plans did not form part of the Stage 2 Consultation material. The authorities are also concerned that no requirements or obligations are presented with respect to waste management matters for the plant when operational.	89421-145-13057			/	

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Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2 Update	Any storage of excess spoil for more than a year will need to be agreed with the Environment Agency and with the Local Planning Authority (a permit may also be required). We would expect details of soil management to be within the soil management plans.	89711-145-2282			/	
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2 Update	It is suggested that there are MRFs (Material Recycling Facilities) at Chard, Highbridge and Williton. This is incorrect as there are no MRFs in these locations. We assume that this section is referring to Household Waste Recycling facilities. Please be aware that these are not for commercial use.	89711-145-2539	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2 Update	We would like to remind EDF that any waste storage compounds proposed for any of their construction sites should abide by any relevant Exemption or Permit (if required). The most relevant exemption would appear to be Non Waste Framework Exemption 2 "Storage at site of production". This has clear requirements which are available to read on our external website http://www.environment-agency.gov.uk/business/topics/permitting/117006.aspx	89711-145-2841			/	
Selworthy & Minehead Without Parish Council	statutory consultee	Stage 2 Update	The Parish Council understand that waste will be stored on site. Is this true?	89753-145-1580	/			
26	Comments received under the EIR from the IPC	Stage 2	12. Also in your Masterplan "Small quantities of non-radioactive wastes would be produced. Some of this will be classified as hazardous waste and require special storage and treatment arrangements. This will include batteries, solvents, paint residues and decontamination products". Where is this waste is to be stored and again, where is your risk assessment for the storage of such materials?	89815-145-10443			/	

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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>The quantities of waste generated are indicative; particularly during operation of the development. While outline indications regarding the quantities of waste that may be produced are provided, the sources and nature of these is not yet available.</p> <p>It also remains unclear as to the approach that the scheme will adopt in terms of materials balance, cut-and-fill and reuse of excavated material, both from the site and from construction of cooling water tunnels. While significant quantities will be generated, the capacity of the site to accommodate these, either owing to the proposed final ground levels proposed, or owing to the nature, character and reusability (i.e. geotechnical properties/ contamination) of materials for on-site fill, remains unknown.</p>	89336-365-6077	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>The significance of various different waste management procedures is not directly addressed. The emphasis of the discussion is on providing a narrative overview of strategic aspirations for waste management procedures and control. Broad estimates of volumes of waste are indicated in Section 7.8 as described below:</p> <ul style="list-style-type: none"> • Unquantified volumes of waste materials from enabling works including stone, spoil, wood and asbestos containing materials; • Unquantified volumes of waste from preliminary works, although it is estimated (Paragraph 7.8.11) that 2.1 million cubic metres of material will be generated by required earthworks and excavation; • HPC Main civil works, for which it is assumed 5% of construction materials would end up as waste; • Estimated 45,000 of potential wastes from construction of Associated Developments; • Unquantified volumes of contaminated soils from the Bridgwater A and other sites; • Operational waste from use of associated development sites; and, • Estimated 250,000 tonnes of waste from demolition and removal of associated development sites. 	89336-365-1600			/	