

Schedule of Responses – Appendix H.1

Environmental Mitigation 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)
Devon County Council	Local Authority	Stage 1	i) [Section 3] The document needs to recognise the importance of submitting a Construction Environment Management Plan as part of the planning application	8713-147-420			/	Environmental management and monitoring plans (EMMPs) have been prepared and comprise Annexe 3 (for the Hinkley Point Development Site) and Annexe 4 (for the off-site Associated Development) of the Environmental Statement (ES) .
Environment Agency	Dual - Statutory Consultee and Consultee with an Interest in Land	Stage 1	5.General comments on pollution prevention We require that the risks of pollution are reduced in all aspects of development this includes construction as well as the operation phase.	88820-147-3748			/	The EMMPs comprise subject-specific management plans designed to achieve focused management and control of an activity, such as construction, where the project may have a particularly significant impact on the environment. The plans set out legal, regulatory and project requirements and management guidance within their focus area. Subjects covered are: <ul style="list-style-type: none"> Air quality – this would focus especially on mitigation of dust generation, and would include proposals for dust control, monitoring, and corrective actions in response to complaints. Land contamination – this would focus on identification of contaminated vs. uncontaminated soils and of those suitable for re-use. Water quality – this would focus on drainage, covering control of discharge rates, use of sustainable drainage systems (SuDS), and prevention of soil erosion and sediment runoff. Noise and vibration – this would identify (i) those activities which are likely to generate noise and vibration; (ii) the permitted levels of noise and vibration emissions; (iii) sensitive receptors close enough to the work/activity to be impacted by noise and/or vibration; and (iv) potential mitigation measures to be adopted. Soil – this would focus on the suitability of soils for re-use in the landscape restoration, and would cover soil stripping, handling, transport, storage and reinstatement or re-use, including guidance on sustainable use. Materials – this would focus on reuse of site-derived materials so as to ensure that (i) the materials are suitable for their intended use; (ii) there is certainty as to the requirement for that use; (iii) the quantity of material required is reliably defined; and (iv) any potential risks to human health and the environment from the
Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	Environmental Management The inclusion of a commitment to produce an Environmental Management and Monitoring Plan (EMMP) is welcome. The inclusion of a reference to CIRIA Environmental Good Practice on Site and Environment Agency Pollution Prevention Guidelines (PPG1, 5, 6, 7, 13, 18 and 21) is also welcome.	88560-147-2751	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	- Environmental Monitoring and Management Strategy: We expect a comprehensive strategy to be provided that details measures to be implemented during construction in order to reduce the impact from sediment and silt entering the water environment. At this stage this information has not been provided. - Construction Environmental Management Plan: This should detail pollution prevention measures put in place to avoid adverse impact on the environment during construction. It should also include an incident plan. We ask that this plan to be provided to us as proposals are finalised.	89069-147-10055	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	Issues: Lack of clarity on the relationships between strategies Comment: It is not clear how all the various management strategies and plans (including for example, the CEMP, EEMP, Waste Management Strategy) which are proposed for the Construction Period are interlinked, or when and by whom they will be produced. Action: All relevant Strategies and Plans need to be identified, clear defined and scope agreed upon. It also needs to be clear when and by whom they will be produced and how they are all related.	89088-147-402	/			

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Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>Issue: At this time there is no plans which manage the risk posed by construction phase on the environment. A construction environmental management plan is required</p> <p>Comment: A development site of this nature should have a Construction Environmental Management Plan (CEMP). The construction environmental management plan should include the specific measures that will taken to control and manage the environmental risks posed by the development during construction (includes schemes for the prevention of pollution, surface water sediment management). This plan should also include a detailed risk assessment and an incident management plan for the construction phase to show how potential emergency situations will (or could) be mitigated to prevent significant impact on controlled waters.</p>	89088-147-7927	/			<p>material have been properly assessed.</p> <ul style="list-style-type: none"> Ecology – this would identify (i) sensitive ecological “receptors”, i.e. the terrestrial and marine species, habitats and designated sites (including those considered under the Habitats Regulations Assessment) that may be impacted by the works; (ii) the activities likely to impact on those receptors; and (iii) potential mitigation and control measures Pollution, incident, control – this would identify (i) sensitive environmental “receptors”, such as controlled water courses/bodies, soils, ecologies and people, that may be impacted by an abnormal event or emergency during the proposed works; (ii) the risks to those receptors posed by the work; and (iii) potential mitigation and control measures.
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	<p>The following missing data has been identified in the Stage 2 documentation:</p> <ul style="list-style-type: none"> - Freight Management Plan - Waste Management Plan - Operational Management Plans - Landscape planting details 	89200-147-3650	/			<p>To deliver effective control of environmental impacts throughout the project, EDF Energy define the necessary roles and responsibilities for staff and contractors within the EMMPs.</p> <p>Competencies in environmental management would be managed via the recruitment and sub-contracting processes. Staff responsible for the delivery of environmental management would be assessed to ensure that they possess the necessary skills and experience to fulfil their role. In turn, contractors would be responsible for identifying the training needs of their personnel and sub-contractors to ensure that all whose work may cause an impact on the environment receive appropriate environmental training.</p>
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	<p>- It is stated in various sections of Chapter 19 that implementation of a site Environmental Management Plan (eMp) and/or an Environmental Management and Monitoring Plan (EMMP) will ensure many of the necessary mitigation measures will be carried out. It is the case that some issues for inclusion in the EMMP are listed in 19.9.7 and 19.9.8, however, without an outline of the complete set of issues to be addressed in such a document or documents it is not possible to assess whether the EMP and/or EMMP will be effective in dealing with mitigation issues.</p>	89253-147-4517	/			<p>The EMMPs and supporting management plans are structured to comply with environmental management standard ISO14001, though formal accreditation of management standards may be sought at a later stage. The EMMPs reference relevant external standards including the Environment Agency’s Pollution Prevention Guidelines and the Construction Industry Research and Information Association’s (CIRIA) Environmental Good Practice guides. The EMMPs also embody the sustainability objectives of the HPC project.</p>
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	<p>An Environmental Management and Monitoring Plan (EMMP) is submitted as Appendix 1.1.1 to Chapter 1 of Volume 3 of the Environmental Appraisal. This is a very generic document and it contains no specific proposals for monitoring the impact on terrestrial ecology of the development (with mitigation measures in place).</p>	89259-147-18507	/			

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Stogursey Parish Council	Statutory Consultee	Stage 2	[16.1, 17.1-7, 19.1, 22.1, 24.1] Environmental, Integrated Land, Surface Water, Soil and Waste Management Plans. None of these have been provided, so it is not possible at this stage to comment on their suitability and effectiveness. Will EDF provide these before the DCO application to allow time for consultation on them, in accordance with their SOCC?	89294-147-4982	/			
Hallam Land Managmnt	Consultee with an Interest in Land	Stage 2	<p>Development Impacts</p> <p>The general lack of consideration given to the impact of the EDF proposals on the North East Bridgwater development leads to the omission of assurances regarding the direct impacts of the development on this critically important development.</p> <p>It is encouraging that an Environmental Mitigation and Monitoring Plan is envisaged to mitigate construction impacts on e/isting communities. This must include proposed communities such as that North East Bridgwater. It will not be acceptable even for short term construction impacts to have a negative impact on the remainder of the North East Bridgwater development at a time when the residential and employment opportunities that it offers are being marketed. The proposals should e/plicitly set out a commitment not to avoid negative physical impacts on the North East Bridgwater development during construction, occupation and demolition of the accommodation campus. The planning obligation should ensure that there are measures in place to match such a commitment.</p> <p>The social and community safety impacts of the Bridgwater-A and Bridgwater-C campuses also need further consideration to ensure that there are no negative social or community impacts on the North East Bridgwater development and its attractiveness to potential or future residents. Any adverse impacts in terms of the delivery of North East Bridgwater or indeed impacts on the property market must be considered and addressed in the planning obligation. In this regards, HLM notes the proposals made by the Councils response in relation to a comprehensive consideration of the issue and the requirement for proposals for compensation in relation to negative impacts e/perienced in the property market.</p> <p>Assurances also need to be given as to how the campus development integrates with other aspects of the North East Bridgwater development and master plan such as in relation to drainage.</p> <p>Hallam Land Management will wish to engage in discussions with the Councils and EDF on these issues.</p> <p>Other Issues</p> <p>It is not clear why the EDF proposals do not make firm commitments to:</p> <ul style="list-style-type: none"> - contribute to the strategic flood defence solution in Bridgwater - undertake improvements in the Bristol Road Corridor at Bridgwater 	89456-147-0		/		

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	While it is noted that no equivalent plan is presented for construction at HPC, this document states 'the EMMP is an evolving document which will address, in chronological sequence: the construction including site preparation phase and the operation phase of Hinkley Point C development'. As such, there remains some lack of clarity as to the coverage of this document. Proposals for environmental management of the Hinkley Point C site do not refer to an EMMP. We particularly note the ambiguity with regards to the mechanism for ensuring appropriate environmental management of the preliminary works at the site, which are not addressed by the overall submission.	89332-147-3196	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The layout of the document is confusing. The project and site description is in the middle of the report in section 2, although this is also given as being presented in appendi/ A (which would be more appropriate); and 'Reporting' is in section 1.5 and then again in section 3 covering much similar material but in a different format and in a unnecessary level of detail for a framework document. The reference to 'Special Waste' Consignment notes in Table 2 is five years out of date. Furthermore the document does not appear to have possibly been subject to the appropriate internal review processes before release.	89332-147-3865			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	This document is presented as a 'Framework', which is appropriate at this stage. However, this document lacks one of the key elements of a framework document, which is to set out what the future parts of the environmental management system will be and how they will fit together. In particular, there is no mention of an Environmental Management System, no mention of Design Environmental Management, and no e/planation of how Construction Environmental Management Plans will be developed or used. Also, there is no mention of Site Waste Management Plans (a legal requirement), or of Materials Management Plans, Soil Management Plans, Sustainability Plans and other typical components of construction environmental management. The authorities are concerned that the Framework document fails to adequately present the proposed environmental management structure of the project.	89332-147-4486	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	There are various references to the evolving nature of the EMMP. While it is acknowledged that the overall environmental management will evolve as the project proceeds, this would more typically be by development of the environmental management system, its plans and sub-plans, while the framework document might be e/pected to stand as a valid overarching document. In addition, there are a number of elements such as the records of baseline data, the register of environmental commitments and recording of monitoring data described here that would not typically be within the framework document, but rather would fit into the overall system in a manner defined by the framework. There appears to be some confusion as to the role of the EMMP Framework document.	89332-147-5366	/			

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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	A framework needs to demonstrate clearly how the project will ensure that the necessary controls will be in place at the appropriate time. This document does not do this adequately as there is insufficient detail on, for example, who will review and approve the future elements of the EMMP, what hold points there will be, when the further elements will be produced, and what mechanisms there will be to address failure to comply. Some of the proposals are presented as 'examples' e.g. Tables 1 and 2. In places, the wording is somewhat weak, for example the executive summary states 'The purpose of an EMMP is to monitor and confirm that the effects or changes from construction and operation of the proposed development do not exceed the stipulated environmental quality standards and objectives for each project' (author's italics). The document does not demonstrate an appropriate strength of framework for this stage of the project.	89332-147-6132	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Expectations of appropriate statements in this document to demonstrate a strong framework for future development of the environmental management include the following examples: 'The purpose of an EMMP is to ensure that the commitments of the Environmental Statement are delivered.' The document should list the stakeholders who will be involved in the developing EMMP, and define their role in review/approval. The document should define the hold points in relation to the project for approval of each stage of the developing environmental management systems, e.g. an approved site-specific construction environmental management plan will be in place at least one month before the start of any works on the site. The document should state that a valid environmental plan must include named individuals for the various roles, to ensure that there is clarity of responsibilities	89332-147-7073	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The document focuses much on monitoring and reporting, and describes failure as 'exceedances'. These are important elements of environmental management but they are only part of the process. There are many important management controls which precede monitoring and reporting, and many types of failure other than exceedances. It is surprising that this document make no reference, either directly or by implication in its coverage, of BS EN ISO 14001, the international standard for environmental management. There are a number of important elements of environmental management such as competence, documents, internal audit, management review and emergency preparation that the standard addresses that are not covered in this framework document. There is a lack of understanding of the full extent and scope of environmental management in general.	89332-147-7965	/			

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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	There is no reference to Quality Management Systems, which can form a powerful framework for helping to deliver environmental commitments through general good management of the works, and with which an EMS can usefully be aligned. Similarly, the concept of 'non-conformity' rather than 'e/ceedance' gives a wider view and better management of environmental failures. There is a lack of understanding of the link between environmental and quality management systems.	89332-147-8816	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	For environmental management of the Associated Development sites it would be appropriate to commit to operating an environmental system which is fully compliant with 14001. For the Main Site, with a construction period of over seven years, it would be reasonable to commit to having an accredited 14001 system in place within say the first year of operation. There is a lack of commitment to demonstrating best practice environmental management through working to standards.	89332-147-9285	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The document covers construction in its scope but barely references the design phase. Design is an important stage in ensuring that environmental considerations and commitments are fully incorporated into the works. Environmental management in the design stage should cover both the design of environmental mitigation works and also ensure that the environmental requirements are fully incorporated into the main engineering works. Design environmental management is a different operation from construction environmental management, and needs a specific design-phase environmental management plan. ISO 14001 offers a suitable framework for this. There is a lack of understanding of the need for environmental management of the design phase.	89332-147-9763			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	There is no mention of sustainability in the document. Sustainability is an important consideration in the design phase, and hence should be included in the design-phase environmental management plan. Even in the construction there are sustainability issues that can effectively be addressed, such as energy efficiency of temporary accommodation, and hence sustainability should be integral to the environmental management system. Sustainability has not been addressed.	89332-147-10507			/	

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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	Roles and responsibilities have been addressed in a generic way which is reasonable for a framework document. However, there is no statement of requirements for the key role of Environmental Officer. It would be appropriate to state here that this person should be e.g. a Chartered Environmentalist with at least 10 years e/perience on major projects. Competence requirements of the key environmental role have not been addressed.	89332-147-10980	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Training is mentioned to some e/tent, but without reference to Training Needs Analysis to ensure that the right training is delivered to the right people, including subcontractors. General competence and training requirements need to be strengthened.	89332-147-11414			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Subcontractors are mentioned to some e/tent, but their importance in delivery of the commitments in not emphasised. Environmental controls are rapidly attenuated down the subcontract chain, and processes need to be in place to address this. Monitoring of compliance is proposed, but this needs to be backed with a clear system of control, correction and penalties as appropriate. The role of Procurement in setting up appropriate contractual mechanisms (in addition to 'including required good practice guidance') should be stated. Subcontractor controls need to be strengthened.	89332-147-11668			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	Overall the authorities are concerned that the framework EMMP fails to provide confidence that environmental management procedures to be adopted during construction would include appropriate systematic adoption of working measures and systems to ensure the avoidance and timely correction of potential construction environmental impacts. It does not align with or reference the international standard for environmental management (ISO 14001), and does not define or commit to adequate levels of control in developing the further stages of the project environmental management.	89332-147-12251	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	While a draft EMMP framework is provided in support of Volume 3 of the EnvApp, this apparently relates to Associated Development and its relevance to the Main Site is ambiguous. Both the EMMP and the SWMP have the potential to significantly affect the e/ecution of the project and the overall environmental performance of construction activities and omission of details of these documents is considered a general omission of the Stage 2 consultation material.	89350-147-1395	/			

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	The assessment states that all identified impacts are below the threshold whereby mitigation beyond standard good practice to be implemented through an Environmental Management and Monitoring Plan (EMMP) is required. This is a valid assessment based on the information presented although there are concerns with the level of detail concerning the baseline information gathered.	89425-147-6099			/	
Countryside Council for Wales	statutory consultee	Stage 2 Update	- Environmental Management and Monitoring Plan (EMMP)- we welcome the provision of the EMMP. This is a key mechanism to avoid adverse impacts on the European sites and should be taken into account when you are carrying out your HRA. However, our comments above on the need to identify which conditions are required to avoid impacts to features of European Sites are also relevant here. To address the HRA issues Appendix C of the EMMP would have to be expanded to highlight specific reference to any HRA requirements.	89835-147-6009	/			
Countryside Council for Wales	statutory consultee	Stage 2 Update	Appendix 26- Environmental Management and Monitoring Plan (EMMP) - we welcome the provision of the EMMP. However, our comments above on the HRA and the need to identify which conditions are required to avoid impacts to features of European Sites are also relevant here. We strongly recommend that Appendix C of the EMMP is expanded to highlight specific reference to any HRA requirements.	89836-147-8077	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>CONDITION If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local</p> <p>Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.</p> <p>REASON For protection of the water environment.</p>	89090-613-1889	/			

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Environment Agency	Dual - Statutory Consultee and Consultee with an Interest in Land	Stage 1	5.General comments on pollution prevention We require that the risks of pollution are reduced in all aspects of development this includes construction as well as the operation phase.	88820-148-3748			/	Environmental management and monitoring plans (EMMPs) will be important to ensure satisfactory management and control during the development of the Hinkley Point C project. They have been developed through the various stages of the consultation process and comprise Annexe 3 of the Environmental Statement (ES) . The EMMPs set out the management and monitoring measures to be adopted throughout the HPC project life-cycle, starting with design through to construction. For temporary developments they also cover operation and post-operation. For permanent developments, including the HPC Main Site, however, the management of environmental impacts in the operation and post-operation phases would be managed in accordance with EDF Energy's Environmental Management Systems (EMS), which would be developed at an appropriate stage of the project's life-cycle. The EMMPs are structured in accordance with the environmental management standard ISO14001 and hence include specific elements on roles and responsibilities, operational control and audit/corrective actions etc. Formal accreditation of management standards may be sought at a later stage.
Sedgemoor District Council & West Somerset Council Joint Council Response	Dual - Local Authority and Consultee with an Interest in Land (Sedgemoor only)	Stage 1	Environmental Management The inclusion of a commitment to produce an Environmental Management and Monitoring Plan (EMMP) is welcome. The inclusion of a reference to CIRIA Environmental Good Practice on Site and Environment Agency Pollution Prevention Guidelines (PPG1, 5, 6, 7, 13, 18 and 21) is also welcome.	88560-148-2751	/			
Somerset Wildlife Trust	Non-Statutory Consultee	Stage 1	Insufficient data is available to determine what level of impact could occur to the Severn Estuary SPA, SAC and Ramsar site, and this would be our principal concern at this stage. The possible terrestrial ecological impacts need to be elucidated also, along with effective mitigation proposals.	8769-148-12557	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	Issue: We cannot comment on the Environmental Management and Monitoring Plan as insufficient detail has been provided at this stage. We support the action proposed to address risk perception management. Action: Provide a more detailed Environmental Management and Monitoring Plan	89078-148-10131	/			Each EMMP identifies and documents the environmental management requirements that apply to a specific package of work on the HPC project. The suite of EMMPs and supporting management plans will ensure continuity in environmental management and control across the HPC project, and provide the framework within which contractors would develop their own management arrangements and controls as appropriate for their specific package of work.
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	- All outstanding information/data/evidence needs to be provided as soon as possible to enable proper analysis prior to submission of the DCO application. For e/ample, the Environmental Management and Monitoring Plan (EMMP) may include detail for measures to limit the potential impacts of the proposals and to ensure quality monitoring. It would be welcome to have sight of this plan prior to submission to the Infrastructure Planning Commission (IPC).	89199-148-1610			/	To give assurance of environmental compliance, it is intended that an audit, inspection, monitoring, and reporting programme would be applied to each element of the project. Monitoring and reporting requirements contained in the EMMPs would be included in this programme, and environmental audits against the EMMP requirements would be carried out as part of EDF Energy's oversight of the project. A non-statutory consultee at Stage 1 sought further information on the impacts of the European

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Hallam Land Managmnt	Consultee with an Interest in Land	Stage 2	<p>The general lack of consideration given to the impact of the EDF proposals on the North East Bridgwater development leads to the omission of assurances regarding the direct impacts of the development on this critically important development.</p> <p>It is encouraging that an Environmental Mitigation and Monitoring Plan is envisaged to mitigate construction impacts on e/isting communities. This must include proposed communities such as that North East Bridgwater. It will not be acceptable even for short term construction impacts to have a negative impact on the remainder of the North East Bridgwater development at a time when the residential and employment opportunities that it offers are being marketed. The proposals should e/plicitly set out a commitment not to avoid negative physical impacts on the North East Bridgwater development during construction, occupation and demolition of the accommodation campus. The planning obligation should ensure that there are measures in place to match such a commitment.</p>	89456-148-23			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	While a draft EMMP framework is provided in support of Volume 3 of the EnvApp, this apparently relates to Associated Development and its relevance to the Main Site is ambiguous. Both the EMMP and the SWMP have the potential to significantly affect the e/ecution of the project and the overall environmental performance of construction activities and omission of details of these documents is considered a general omission of the Stage 2 consultation material.	89350-148-1395	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2 Update	<p>Protection of the Watercourses</p> <p>All efforts should be made to protect the watercourses from pollution. We look forward to receiving an Environmental Management Plan for each development proposal detailing how pollution risks will be managed in all stages of development.</p>	89711-146-4089			/	

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Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2	<p>Any facilities, above ground, for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipe work should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge into the bund.</p> <p>REASON: To prevent pollution of the water environment</p>	89090-610-4532				

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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	<p>Environmental Management</p> <p>The inclusion of a commitment to produce an Environmental Management and Monitoring Plan (EMMP) is welcome. The inclusion of a reference to CIRIA Environmental Good Practice on Site and Environment Agency Pollution Prevention Guidelines (PPG1, 5, 6, 7, 13, 18 and 21) is also welcome.</p> <p>The EMMP should provide a mechanism to record commitments / agreements carried through from the Environmental Statement produced for all aspects of the development and including all aspects of consultation (particularly that related to environmental control).</p>	88560-146-2751	/			<p>EDF Energy's strategy to mitigate the potential environmental impacts during the construction and operation of Hinkley Point C (HPC) and its Off-Site Associated Developments is based on the production of a series of environmental management and monitoring plans (EMMPs)</p> <p>The EMMPs comprise subject-specific management plans designed to achieve focused management and control of an activity, such as construction, where the project may have a particularly significant impact on the environment. The plans set out legal, regulatory and project requirements and management guidance within their focus area. Subjects covered are:</p>
The Bristol Port Company	Statutory Consultee	Stage 2	<p>There are clearly opportunities for TBPC, EDF and the Agency to share data collected during the Environmental Impact Assessment process so far to the mutual benefit of all. There will be a requirement on all developers to devise long-term monitoring programmes to verify the predictions of the environmental assessments, to observe any environmental changes as a result of the developments, and to monitor the effectiveness of mitigation and compensation measures. Given the close proximity of our respective developments and potential for cumulative impacts, there will be benefits in cooperating in the development and implementation of our monitoring strategies.</p>	10204-146-7149	/			<ul style="list-style-type: none"> Air quality – this would focus especially on mitigation of dust generation, and would include proposals for dust control, monitoring, and corrective actions in response to complaints. Land contamination – this would focus on identification of contaminated vs. uncontaminated soils and of those suitable for re-use. Water quality – this would focus on drainage, covering control of discharge rates, use of sustainable drainage systems (SuDS), and prevention of soil erosion and sediment runoff.
Countryside Council for Wales	Statutory Consultee	Stage 2	<p>Appendix/ 1.1.1</p> <p>We note and welcome the preparation of an Environmental Management and Monitoring Plan. The implementation of an appropriately worded EMMP provides a potential mechanism to avoid adverse impacts on the European sites. With the provisos below we support the approach taken.</p> <p>Our comments on the EMMP for the associated developments also apply to the EMMP for the main works</p>	89136-146-1579	/			<ul style="list-style-type: none"> Noise and vibration – this would identify (i) those activities which are likely to generate noise and vibration; (ii) the permitted levels of noise and vibration emissions; (iii) sensitive receptors close enough to the work/activity to be impacted by noise and/or vibration; and (iv) potential mitigation measures to be adopted.
Somerset County Council	Dual - local authority, statutory consultee and consultee with an interest in land	Stage 2	<p>The following missing data has been identified in the Stage 2 documentation:</p> <ul style="list-style-type: none"> - Freight Management Plan - Waste Management Plan - Operational Management Plans - Landscape planting details 	89200-146-3650			/	<ul style="list-style-type: none"> Soil – this would focus on the suitability of soils for re-use in the landscape restoration, and would cover soil stripping, handling, transport, storage and reinstatement or re-use, including guidance on sustainable use. Materials – this would focus on reuse of site-derived materials so as to ensure that (i) the materials are suitable for their intended use; (ii) there is certainty as to the requirement for that use; (iii) the quantity of material required is reliably defined; and (iv) any potential risks to

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Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>EDF Energy’s mitigation strategy appears to be set out in their Environmental Appraisal in a series of disparate entries, which are commented on below. EDF Energy introduce their approach to Mitigation Strategies in their Planning Strategy Overview under section 3.5 of the Preferred Proposals: E/planation & Assessment document(7), however this mainly refers to the Stage 2 document ‘Proposed Planning Requirements & Obligations which sets out a range of proposed mitigation measures under a number of heading. Further in Volume 1 of the EnvApp EDF Energy in their EIA Methodology (Chapter 5) under section 5.5 discuss at a very high-level their approach to ‘mitigation measures and strategy’ and the preferred hierarchy of mitigation. The EDF Energy ‘strategy’ behind this ‘range of proposed mitigation measures’ which is e/pressed as Planning Requirements and Obligations appears to be encompassed by the following limited statements:</p> <p>‘.... Stage 2 document ‘Proposed Planning Requirements and Obligations’ sets out a range of proposed mitigation measures under a number of headings. These are generally characterised by being mitigation proposals that arise from the assessments set out in the Environmental Appraisal and they seek to mitigate the anticipated likely significant adverse impacts of the development.’ Section 3.5 Stage 2: E/planation & Assessment document;</p> <p>Stage 2: Environmental Appraisal: Volume 1 Chapter 5 Section 5.5:Mitigation Measures and Strategy:</p> <p>‘5.5.1: The rating of the impact significance may provide a strong indication as to whether mitigation may be required and also determines whether, following the use of mitigation measures, identified impacts may be avoided, reduced or offset such that environmentally acceptable levels prevail.’</p> <p>‘5.5.2 For the purposes of this appraisal, and in accordance with the EC directives and the EIA Regulations, only those impacts which have been assessed as being of potentially greater than minor adverse significance have been initially considered as requiring mitigation. The purpose in these cases is to reduce predicted impacts to acceptable levels (e.g.). Consequently, individual impacts rated as negligible or minor adverse have not been automatically considered as requiring mitigation. However, where appropriate, and taking into account views and comments received through consultation to date, consideration has been given to the implementation of mitigation measures to reduce potential impacts to a negligible or neutral status.’</p> <p>‘5.5.3 The preferred hierarchy of mitigation is prevention first, then minimisation and only as a last resort, compensation or remediation...’</p> <p>In the Planning Requirements & Obligations document EDF Energy set out their early proposals for all the planning requirements and development consent obligations. Within this document they refer to being guided by their vision for the Project and a series of high- level objectives, elements which are of relevance in relation to guiding the environmental elements of their proposed package of planning requirements and obligations are:</p> <p>‘EDF Energy will ensure that any significant adverse effects of the</p>	89316-146-3507			/	<p>human health and the environment from the material have been properly assessed.</p> <ul style="list-style-type: none"> Ecology – this would identify (i) sensitive ecological “receptors”, i.e. the terrestrial and marine species, habitats and designated sites (including those considered under the Habitats Regulations Assessment) that may be impacted by the works; (ii) the activities likely to impact on those receptors; and (iii) potential mitigation and control measures Pollution, incident, control – this would identify (i) sensitive environmental “receptors”, such as controlled water courses/bodies, soils, ecologies and people, that may be impacted by an abnormal event or emergency during the proposed works; (ii) the risks to those receptors posed by the work; and (iii) potential mitigation and control measures. <p>To deliver effective control of environmental impacts throughout the project, EDF Energy define the necessary roles and responsibilities for staff and contractors within the EMMPs.</p> <p>EDF Energy’s contractors would be required to prepare Contractors Environmental Management Plans (CEMPs) in compliance with the EMMP framework. These would need to be submitted to EDF Energy for review and approval before work can commence. The CEMP would provide specific details of the practical day-to-day working controls to be implemented by the contractor, including those applied down the sub-contractor chain.</p> <p>The EMMP and supporting management plans would be periodically reviewed and revised as necessary to reflect changing circumstances, for example to reflect new legislation. Contractors would be required to report their environmental and sustainability performance.</p>

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			<p>construction, operation or decommissioning of the power station are appropriately mitigated in a way which is environmentally responsible and sensitive both to the needs of the community and to the strategies of the relevant authorities.'</p> <p>'To minimise any negative environmental impacts and seek opportunities for environmental enhancement.'</p> <p>Further under section 1.6 of this document EDF Energy outline that the proposed package of planning requirements and development consent obligations are intended to ensure:</p> <p>'that any significant adverse effects from each stage of the Project will be avoided and mitigated, where appropriate, and that the selection and implementation of the mitigation strategies will take account of local circumstances, the views e/pressed by stakeholders as well as the pla</p>					
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Mitigation and compensation measures should address the impacts and residual effects identified in the EIA process and should be ultimately reported within the Environmental Statement. Planning requirements and obligations should be in response to the DCO documentation submitted (i.e. including the Environmental Statement which should contain the details of the mitigation measures). The use of the Planning Requirements and Obligations by the EDF Energy as the basis to their mitigation strategy and to describe the mitigation measures is the authorities suggest potentially not compliant with the requirements of the EIA Regulations nor follows good practice for EIA namely:</p> <p>Schedule 4 of the EIA Regulations(8) requires an Environmental Statement (ES) to include:</p> <p>'A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment'</p>	89317-146-127	/			

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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>Stage 2 EnvApp Presentation of Mitigation Strategy</p> <p>Whilst the authorities accept that the EnvApp is not the ES it is being used as a tool of consultation. In the overall suite of documents it is very difficult to identify the mitigation strategy, and of that material which is described as offering mitigation there are a series of high-level statements with very limited description or details regarding implementation. There is also at this stage still a lack of commitment to undertaking mitigation measures. The following commitments do not appear to be discharged by EDF Energy's approach at Stage 2:</p> <p>'which is environmentally responsible and sensitive both to the needs of the community and to the strategies of the relevant authorities'; EDF's vision for the project;</p> <p>'that the selection and implementation of the mitigation strategies will take account of local circumstances, the views e/pressed by stakeholders as well as the planning and community strategies of the local authorities of the affected areas.'; Section 1.6 Stage 2 Planning Requirements & Obligations.</p>	89317-146-3635			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>EDF Energy's 'Mitigation Strategy' appears to be a series of high level statements which:</p> <p>are insufficient given the scale and proposed timeframe for the project;</p> <p>lack clear focus in what it seeks to achieve;</p> <p>lack real commitments to measures;</p> <p>lack detail regarding mitigation measures and their implementation;</p> <p>do not put forward a clear consistent mitigation strategy across the project (i.e. both the Hinkley Point C Main Site and the Associated Developments) for e/ample the use of trial trenching at the Cannington bypass site as a first stage of mitigation is not acceptable or realistic in order to minimise/avoid effects on potential buried archaeological remains but further is inconsistent with the approach taken on other elements of the project.</p>	89317-146-4793	/			
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	<p>Currently the EnvApp is someway short of identifying mitigation measures to enable conclusions to be drawn on the residual effects of the project and lacks generally a clear level of commitment to and mechanism for the implementation of measures. Therefore the conclusions of the current assessment of the likely effectiveness of these measures may not be fully supported.</p>	89317-146-5569	/			

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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>Given this is a nationally significant infrastructure project we believe a clear mitigation strategy is required which sets out a series of commitments to mitigation measures. A comprehensive framework of measures is required to ensure community well-being and environmental protection through mitigation, and also compensation for any residual impacts, including non conventional ones which are perceived or intangible. Where mitigation measures cannot prevent or reduced the residual effect compensation measures should be used. Also given EDF's vision, referenced benefits, and approach described in Section 1 of the Planning Requirements and Obligations document we urge them to consider enhancement measures where possible and to seek benefits for the environment and local community with their mitigation strategy.</p> <p>The mitigation measures must be put forward as part of the EIA process and ultimately the ES and not wrapped up in the responsive 'Planning Requirements & Obligations' process. We urge EDF to review this matter to ensure compliance with both the EIA Regulations, enable clarity on commitments to mitigation measures and alignment with good EIA practice (38). The measures need to be e/pressed in a transparent clear way which clearly links to and provides for each impact (and cumulative impact) identified in the EnvApp.</p>	89417-146-11302			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The local authorities require EDF to commit to a series of measures. We are very concerned regarding the lack of commitments to measures in the EnvApp documents given the timescales which are being indicated by EDF in their consultation documentation regarding enabling works and preliminary works.	89417-146-12651			/	
Sedgemoor District Council and West Somerset Council Joint Council Response	Dual - local authority and consultee with an interest in land (Sedgemoor)	Stage 2	The residual effects of the scheme can only be determined based on a set of clear mitigation commitments supported by detailed implementation plans. We urge EDF to prepare a detailed mitigation strategy with clear mitigation commitments.	89417-146-13760	/			

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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	EDF also need to include uncertainty testing of their assessment assumptions and mitigation strategy to test the consequence of not achieving certain measures. For e/ample, the consequential effects of not achieving 40% local labour share during construction - a relatively minor difference of say 5% in the labour share could lead to a significant difference in the predicted housing, transport, air quality, socio-economic and other impacts. Given the uncertainties over whether the 40% local labour share will be achieved (particularly given the authorities' concerns over EDF Energy's proposals), sensitivity testing is required to make EDF Energy's prediction of effects more robust.	89417-146-14271	/			
Environment Agency	Dual - statutory consultee and consultee with an interest in land	Stage 2 Update	<p>Protection of the Watercourses</p> <p>All efforts should be made to protect the watercourses from pollution. We look forward to receiving an Environmental Management Plan for each development proposal detailing how pollution risks will be managed in all stages of development.</p>	89711-146-4089			/	