Dear Mr White,

The Hinkley Point C (Nuclear Generating Station) Order 2013 – S.I. 2013 No. 648 Non-Material Amendment in relation to the Hinkley Point C Development Site

Thank you for consulting us on 28th September 2017.

We have considered the proposals and can advise that the majority of matters have no direct bearing or impact on Sedgemoor District.

In coming to this conclusion we have considered our development plan (the Core Strategy) and the relevant major infrastructure policies, the Planning Performance Agreement agreed with EDF Energy and local authority partners, as well as the Local Impact Report.

We note the changes, and specifically the additional scale of the Interim Spent Fuel Store. The impact on the immediate locality and coast path and the impact on long distance views in the context of the length of time the building may be in existence, is an important matter which does need specific and separate consideration by the Secretary of State (SoS).

We request that in considering the decision, the Secretary of State provides the strongest assurance to the local communities, that from a regulatory perspective, the selection of dry storage is consistent with the regulatory aims of the Office for Nuclear Regulation, to ensure the delivery of a safe and secure location for interim storage of spent fuel.

We will be seeking confirmation from EDF Energy that the changes to the jetty construction, specifically, the addition of pipework along the underside of the structure to discharge pumped groundwater arising from dewatering activities, will not result in further delays to the jetty completion and commissioning. Any delay is unlikely to be acceptable due to the ongoing impact and disruption of HGV movements associated with aggregate movement by road.

The Secretary of State will I am sure wish to be satisfied that the proposed works will not result in delays to the essential infrastructure and may wish to seek an update of the Implementation Plan, to confirm the programme.
In relation to environmental matters, and specifically water quality and discharges, our colleagues in the Environment Agency and the Marine Management Organisation and Natural England, are better placed to advise.

We further note concerns expressed by West Somerset Council in relation to the lack of information available and the justification for the proposal to the host authority and we will be keen to understand PINS’ response to their concerns. Please provide Sedgemoor with a copy of the response so that we are able to further advise our members and communities on the process which is to be followed.

We also appreciate the concerns raised by West Somerset Council in relation to the number of changes being proposed as part of the previous and current non material change applications and ensuring that these are properly assessed cumulatively.

Sedgemoor District seeks confirmation and assurance that the spent fuel store will not be used for imported waste from other sites as this will have an impact on Sedgemoor District and will create additional movements on the highway network as well as community safety concerns. Whilst not explicit within either the DCO Application or this application for a Non-Material Change, the Council wishes to reiterate the position regarding the policy objection in place relating to the importation of waste or spent fuel from other nuclear installations set out in the Hinkley Point C Joint Supplementary Planning Document which was adopted by West Somerset Council and Sedgemoor District Council in September 2011.

Box 20

**Approach to Nuclear Waste Storage**

The HPC project promoter should consider and evaluate all potential effects of the radioactive waste aspects of the HPC project and review the mitigation proposals and compensation that would be necessary to mitigate impacts on local communities. The HPC project promoter should seek to align strategies for the management of radioactive waste with any local guidance set out in the forthcoming Somerset Waste Core Strategy and ensure that:

- All practical measures are taken to minimise any adverse effects of the interim nuclear waste proposals in line with and appropriate mitigation measures are identified.
- That mitigation and compensation are agreed with the authorities that will address and mitigate against any perceived and actual detrimental effects of radioactive waste storage proposals.
- Appropriate measures are set out for the long term decommissioning and site restoration proposals for any interim waste storage facility and these are set out clearly in a DCO application.
- That all necessary steps are taken to ensure that absolutely no waste from other nuclear establishments is stored on site at Hinkley Point C.

While we recognise that **community benefit** is not a matter for PINS and the Secretary of State in relation to this NMA, for your information and awareness the Authorities will be seeking further comfort from the Government on the mechanisms and next steps to realise community benefit, to reflect the location and duration of the spent fuel store in the locality, alongside additional waste facilities at Hinkley A. It is vital that a coordinated approach is considered and
an implementation plan agreed to ensure community benefits are secured in the locality in a timely way to reinvest in wider economic development priorities.

Yours sincerely

Claire Pearce
Group Manager, Strategy and Development
Bsc, Msc, MRTP, MIED, Dip PA