

**From:** [Tessa Bond](#)  
**To:** [HPCNuclear](#)  
**Cc:** [Andy Coupe](#)  
**Subject:** Hinkley Point C Non-Material Amendment No.4 - Response from Somerset County Council  
**Date:** 04 September 2020 15:53:30  
**Attachments:** [Somerset County Council response to Hinkley Point C Non-Material Amendment 4.pdf](#)

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Dear Sir/Madam

**Hinkley Point C (Nuclear Generation Station) Order 2013, made 18th March 2013:**

**Application for a Non-Material Change in relation to the Hinkley Point C Permanent Development Site  
Consultation under Regulation 7 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011**

Somerset County Council was consulted by EDF Energy on the above proposed Non-Material Amendment application on 29<sup>th</sup> July 2020.

Please find our comments attached which we hope you find useful in the determination of the application.

Kind regards,

Tess Bond

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Somerset County Council  
01823 357147

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**Date:** 4<sup>th</sup> September 2020

**Your Ref:** HPC Non-Material Change 4

Dear Sir/Madam,

**Hinkley Point C (Nuclear Generation Station) Order 2013, made 18th March 2013:**

**Application for a Non-Material Change in relation to the Hinkley Point C Permanent Development Site.**

**Consultation under Regulation 7 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011**

Somerset County Council has been consulted by EDF Energy on the submission of a Non-Material Amendment (NMA) application to the Planning Inspectorate.

The NMA application includes the following proposed changes: -

1. Amendments to the description of the authorised development within the Development Consent Order (DCO) and amendments to the approved plans, for the purposes of changing the siting, layout and design of buildings and structures within the Site;
2. Amendments to the DCO schedule of Requirements for the purposes of removing references to the permanent helipad which is no longer proposed; and,
3. An amendment to the DCO for the purpose of amending the procedure for the discharge of requirements, in relation to fees.

Having reviewed the submitted material we would like to take the opportunity to offer the following observations to assist the Secretary of State in the determination of the application; each matter is detailed in the same order as the above summary of changes.

## **1. Amendments to the description of the authorised development within the DCO and amendments to the approved plans, for the purposes of changing the siting, layout and design of buildings and structures within the Site**

The County Council has reviewed the proposed main site changes in accordance with its responsibilities and interests as the County Planning Authority and Local Highway Authority; therefore, our comments relate to any impacts that may arise which relate to Waste, Minerals, and impacts on Local Highways. The County Council defers to Somerset West and Taunton Council to provide comments in accordance with their role as the Local Planning Authority.

In respect of local highway impacts, it is understood that the proposed changes would not lead to an increase in HGV movements during the construction phase. The applicant sets out at paragraph 3.1.4 of the Application Statement that "*With regards to traffic levels, the quantities of materials and duration of movements are unlikely to materially alter as a result of the proposed changes*", we agree with the applicant and also take into account that HGV movements are controlled and capped by virtue of the approved Construction Traffic Management Plan (CTMP), which is secured as part of the August 2012 Section 106 Agreement between EDF Energy and the relevant Local Authorities, including Somerset County Council. It is acknowledged that no change has been requested to the CTMP as a result of this NMA application.

It is noted that changes are proposed for several transport related buildings, namely the following: -

- Entry Relay Building
- Off-Site Delivery Checkpoint
- Off-Site Vehicle Search Area

We understand that the applicant is proposing the removal the Entry Relay Building from the Site Layout Plan and transfer the functions (which related to the receipt of small packages or deliveries for the Operational Service Centre) to the newly proposed Off-Site Delivery Checkpoint.

In respect of the Off-Site Vehicle Search Area, the applicant is proposing to remove the Off-Site Vehicle Search Area from the Site Layout Plan. The footprint of this building would be left vacant by the removal of this building and would not be occupied by a replacement structure. The building's functions would be replaced within the proposed Off-Site Delivery Checkpoint.

In reviewing the submitted plans, it appears that the proposed turning head, located south of the newly proposed Off-Site Delivery checkpoint building, would remain. However, it is currently unclear whether this also applies to the previously approved lay-by configuration. Confirmation from the applicant is advised.

It's noted that under Schedule 1 Part 3 (Approved Plans) of the currently approved DCO, there is included Highway Plan Ref. HPC-GEN124-R1-RFC-DRW-000046 Rev 01. This plan still includes details of the Off-Site Vehicle Search Area; and it is therefore suggested that this plan is updated as part of this application process to be consistent with the applicant's proposals. In addition, sight of this updated plan would add clarity to the proposed changes in this area.

The operational transport impacts of the proposal were assessed as part of the 2012 HPC DCO Examination, with 2021 being the year assessed in the Transport Assessment as the power station being operational (albeit with construction works still likely to be required in relation to the main site Interim Spent Fuel Store). The proposed changes do not create a new use or function to the site, but relocates and consolidates existing facilities, therefore we do not consider that the proposed changes would create additional highway impacts to that which have already been assessed.

In respect of Public Rights of Way (PRoW); PRoW that were within the HPC site boundary were stopped up early in the process due to security, health and safety. To ensure connectivity and minimise disruption, diversions and network enhancements have been agreed and installed. It is noted that no changes are proposed in relation to the current diversion, and in any event Article 14(3) of the current DCO secures the installation and maintenance of the main site diversionary route for the duration of the construction period. It is also appreciated that the proposed changes have no impact and requires no change to the commitment to re-opening the coastal path as secured by DCO Requirement MS31.

We do not consider that the proposed changes create any new mineral related impacts, given that the site was assessed as a whole as part of the original DCO Examination in 2012, and there were no outstanding mineral matters at that time.

In light of waste matters, it is appreciated that no change is proposed to DCO Requirements PW11 (Waste Management Implementation Strategy); PW14 (Code of Construction Practice); PW19 (No Burning of Materials); PW20 (Unidentified Contamination); P13 (Geology and Contaminated Land); P14 (Storage of Oils, Fuels, Concrete and Chemicals); P15 & P16 (Geology and Contaminated Land), and therefore it is appreciated that these safeguards and control mechanisms would remain in place to ensure minimal impacts linked to waste arisings.

**2. Amendments to the DCO schedule of Requirements for the purposes of removing references to the permanent helipad which is no longer proposed**

The County Council has no comments to make in respect of this proposed change.

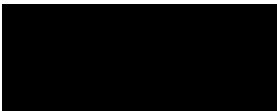
**3. An amendment to the DCO for the purpose of amending the procedure for the discharge of requirements, in relation to fees**

It is understood that the applicant wishes to amend Schedule 14 Paragraph 5 – Procedure for Discharge of Requirements of the current DCO, to re-categorise DCO Requirement PW3 “Buildings and Structures” as a minor requirement, as opposed to a major requirement. It is noted that whilst this Requirement is classified as a “Project Wide” Requirement denoted by the “PW” reference, it does in fact only relate to buildings and structures comprising Work No. 1A(d) to (k) and (o), which is located on the HPC main site.

Somerset West and Taunton Council would be the Local Planning Authority responsible for determining any PW3 application, and therefore we defer to their comments. We would however like to raise that from our understanding PW3 was originally classified as a “major” requirement due to the potential complex issues that may require specialist technical support, given the sensitive location of the site and proximity to nearby local communities affected by the project such as Shurton and Burton.

We hope that the above observations are helpful in the determination of the Non-Material Amendment application. Somerset County Council looks forward to participating in any future processes as may be deemed necessary by the Secretary of State.

Yours sincerely



Tess Bond  
Senior Planning Officer  
Somerset County Council