

Application No:	HPC Supplemental s106, March 2022
Parish	Stogursey
Application Type	Supplemental s106 Agreement
Case Officer:	John Burton
Grid Ref	Easting: 320538 Northing: 145965
Applicant	NNB Generation Company (HPC) Ltd., Hinkley Point C, Stogursey.
Proposal	Supplemental Agreement to the s106 Agreement of 30 th August 2012 in relation to the Development Consent Order for the Hinkley Point C (Nuclear Generating Station), in order to secure appropriate and responsible enhancements to the package of mitigation measures secured under the original Agreement. These measures are considered appropriate in the context of the likely increase in the peak number of workers involved in the construction of the Power Station above the 5,600 peak that was assumed for the purposes of the assessments in the application for the Development Consent Order.
Location	Hinkley Point C New Nuclear Build, Hinkley Point Road, Stogursey, Bridgwater, TA5 1UF

1. Recommendation

- 1.1 There are four recommendations to Members, each of which will assist Officers to 'plan, monitor and manage' the proposed uplift in workforce numbers required by the HPC project. It is recommended that each one is approved.
- (1) To authorise the Programme Manager (Regeneration) and the Strategic Lead (National Infrastructure Projects) to provide reasonable representations on behalf of Somerset West and Taunton Council to the Hinkley Point C Transport Review Group, Socio-Economic Advisory Group, and Emergency Services and Local Authorities Group (Hinkley Community Safety Management Group), to enable variations and agree addendums as appropriate to the following Hinkley Point C Management Plans as a result of the increase in workforce envisaged, subject to the additional measures and obligations as set out at Appendix A of this report
- Construction Workforce Travel Plan
 - Accommodation Management Strategy
 - Community Safety Management Plan
 - Workforce Development Strategy

- (2) To authorise that Somerset West and Taunton Council enters into a Supplemental Deed of Development Consent Obligations pursuant to S106 Town and Country Planning Act 1990 to secure financial contributions and obligations to deal with the effects of the increase in the Hinkley Point C workforce, as set out at Appendix A of this report;
- (3) To delegate authority to the Assistant Director (Strategic Place and Planning) to agree the terms of the Supplemental Deed referred to in (2) above;
- (4) To delegate authority to the Programme Manager (Regeneration) to commission delivery of all the financial contributions payable to Somerset West and Taunton Council within the Supplemental Deed to be agreed under (2) and (3) above, after consultation with the relevant Portfolio Holders.

2. Executive Summary of key reasons for recommendation

- 2.1 EDF Energy wants the Councils affected by the construction of the new nuclear build to consider entering into a Supplemental Deed to the s106 Agreement of 30th August 2012 in relation to the Development Consent Order for the Hinkley Point C (Nuclear Generating Station), in order to secure appropriate and responsible enhancements to the package of mitigation measures secured under that Agreement. These measures are considered appropriate in the context of the likely increase in the peak number of workers involved in the construction of the Project above the 5,600 peak that was assumed for the purposes of the assessments in the application for the Development Consent Order. This report deals with the effects of this increase.
- 2.2 Joint legal advice has been sought on these proposals, the conclusions of which are confirmed in Section 11 below. This confirms the appropriate form of decision making, in particular that it is neither necessary nor appropriate for any amendment to be made to the DCO as a result of the increase in the peak construction workforce.
- 2.3 It is the view of SWT Officers (and shared by the Joint Council's Officer group) that a combination of amendments to the Hinkley Point C Management Plans and Strategies, the use of financial contingencies secured by the DCO s106 Agreement using the existing approval mechanisms under that agreement and further obligations to be secured under a Supplemental Deed, which are additional to the package of mitigation measures secured under the original DCO s106 Agreement (as set out in Appendix A), are -
 - necessary to make the increase in the workforce acceptable in planning terms;

- directly related to the increase in the workforce and revised project timeline;
 - are fair and reasonably related in scale and kind to the likely effects of the increase in the workforce; and
 - Are accordingly in the public interest.
- 2.4 The precise effects of the workforce uplift are, however, not possible to predict. Therefore, it is important that a 'plan, monitor, manage, approach' is taken. This will be achieved through the regular consideration of a broader range of information and metrics at the groups set up under the DCO s106 Agreement and to be secured via changes to the Management Plans and Strategies. It should be noted that contingency funds remain available in the existing DCO s106 Agreement should unexpected impacts arise, and it may be necessary to seek new obligations or mitigation to cover new impacts, should they arise. These would be considered on a case-by-case basis through change processes relevant to the scale of the impact.

3. Other options considered

- 3.1 It is not an option for the Joint Councils to require the submission of an application for a change to the DCO, given that the clear legal advice received is that it is neither necessary nor appropriate for any amendment to be made to the DCO as a result of the increase in the peak construction workforce.
- 3.2 An option would be for the Joint Councils to refuse to consider the Proposed Measures, but this would mean that the Management Plans/Strategies would not be updated to reflect the current position of the project, and it would result in a lost opportunity to secure additional funding to deal with the effects of the forecasted peak workforce, which is already above the numbers originally assumed in the DCO.
- 3.3 A further option could be to seek to continue negotiations to enhance further the proposed measures, but the view of SWT Officers (shared by the Joint Councils group) is that the Proposed Measures offered by EDF Energy are fair and reasonably related in scale and kind to the likely effects of the increase in the workforce. It is not considered that any further discussions would be likely to result in an improvement to the package of measures already negotiated. Further negotiations are not considered to be necessary.

4. Background to the proposal.

- 4.1 The conclusions of an internal review of the Hinkley Point C (HPC) project by EDF Energy in 2019, revealed that, in order to maintain safety and quality standards and to maintain the project programme timelines, the number of

workers would need to be increased above the number originally assessed in the original DCO Application. At the time that the Hinkley Point C (Nuclear Generating Station) Order 2013 (DCO) was granted by the Secretary of State, the number of workers likely to be employed on site was estimated to peak at around 5,600 at any one time. That estimate was reflected in the assessment of likely significant environmental effects in the Environmental Statement prepared in support of the application, and in the report of the Examining Authority who examined the application and recommended to the Secretary of State that the DCO should be granted. It is now anticipated that at the peak of construction (expected to be early 2023), around 8,600 workers will be required.

- 4.2 Initial negotiations were held in 2020 with officers from the Joint Councils affected by the project (Somerset County Council, Sedgemoor District Council, Somerset West and Taunton Council and North Somerset Council). This included discussions on the basis for considering the potential impacts of the increased workforce and legal advice on processes. As a result, EDF Energy has provided assessments of the impacts, reviewing the effect of the proposed workforce increase on the conclusions drawn in the DCO Environmental Statement. These are referred to as the Topic Papers.
- 4.3 Since discussions commenced, the impact of the Covid-19 pandemic has needed to be considered and at the present time, the programme for HPC has been extended by 6 months, with Reactor No. 1 now due to be operational by June 2026.
- 4.4 In October 2020, the Joint Councils and EDF agreed the principle of entering into a Planning Performance Agreement (PPA) to establish the basis on which discussions would take place and the basis upon which funds could be made available to the Joint Councils to seek both technical and legal advice on the potential impacts from the workforce uplift. A PPA was entered into on 29th January 2021.
- 4.5 In January 2021, a special combined meeting of the HPC Community Forum, the Main Site Forum and the Transport Forum was held, in order to explain the proposal and the processes involved to interested parties. In February 2021 EDF Energy launched a virtual exhibition seeking input from the local community and interested stakeholders. Two drop-in sessions took place during February 2021 and meetings took place with local Town Councils and Parish Councils in February and March (2021).
- 4.6 In October 2021, the Joint Councils issued EDF with their written response to the Topic Papers and following further negotiations, another special meeting of the three HPC Fora was held to update interested parties on progress and process. In January 2022, officers of the Joint Councils sent further comments on the Topic Papers and agreed draft Heads of Terms for a supplemental Section 106 agreement.

5. Environmental Impact Assessment

- 5.1 This proposal does not require the formal submission of a planning application because there are no changes to the approved development being proposed. EDF Energy will still be implementing the same development granted consent in April 2013. Neither does the current proposal involve any changes to the approved DCO that would warrant either a Material or Non-Material change to the DCO. The change now sought is for an increase in the workforce numbers to help the project proceed more quickly and more safely. SWT Officers are happy that this will not give rise to any new or materially different environmental effects from those considered and assessed in the original Environmental Statement (ES). So, for all of these reasons, a new Environmental Impact Assessment is not required.

6. Habitats Regulations Assessment

- 6.1 This was obviously considered as part of the original Environmental Statement and the changes now sought do not impact on that, as explained above. The site is outside of the catchment area for the Somerset Levels and Mors Ramsar site, but, in any event, the Council is not being asked to approve a plan or project in this instance. The DCO will remain unchanged. Therefore, a new Habitats Regulation Assessment is not required.

7. Consultation and Representations

- 7.1 Officers at Somerset County Council, Sedgemoor District Council, Somerset West and Taunton Council and North Somerset Council (the Joint Councils) have been working actively and collaboratively with EDF Energy in analysing the potential implications of a forecasted increase in the peak workforce. Liaison has also been undertaken with the Clinical Commissioning Group, Avon and Somerset Constabulary and the Devon and Somerset Fire and Rescue Service.
- 7.2 As the proposed increase in the peak workforce does not constitute a material or non-material change to the DCO, nor does it require the formal submission of any other form of planning application, a formal consultation exercise is not legally required. Despite this, EDF Energy has voluntarily conducted an engagement and information sharing exercise with the local communities surrounding Hinkley Point C, to help support the necessary decision making processes. EDF Energy has supplied an engagement report to the Joint Councils as part of the material submitted for consideration, which aims to ensure full transparency of the future plans, provide reassurance on the scale of change across key topic areas and to collect and feedback areas of heightened community concern. The

engagement plan was based around a multi-channel approach that consisted of

- Special joint meetings of the Hinkley Point C Fora (Community, Main Site and Transport);
- Public drop-in sessions (delivered virtually due to Coronavirus restrictions), designed to provide clarity on the proposals whilst also answering questions and receiving feedback;
- New webpages explaining the proposals, accessible via the front-page of the Hinkley Point C website;
- A virtual exhibition that provided an overview of the proposals whilst also giving a means by which individuals could provide direct feedback;
- Direct communication with individuals and groups via e-mail distribution lists. This was further widened through collaboration with Somerset County Council to engage with hard to reach groups;
- Information provided via regular project Monthly Updates;
- Social media engagement via the Hinkley Point C Twitter feed;
- Proactive briefing and engagement of local and regional media outlets (TV/Radio/Newspaper) to increase wider visibility of the proposals;
- Use of Parish News to drive visibility of the proposals and the means by which individuals could source additional information and feedback routes; and
- Meetings with Parish and Town Councils to engage directly with community representatives in local areas which may be affected by the proposed increase in workers.

7.3 In addition to the above, the Joint Councils have held briefing sessions open to all members of each of the affected Council, and regularly updated the Somerset Nuclear Energy Group (SNEG) – the membership of which includes key Cabinet/Executive Members from each of the Joint Councils. In the case of Somerset West and Taunton Council, the Councillors involved are Cllrs. Benet Allen (who acts as Chair of the Somerset Nuclear Energy Group) and Marcus Kravis (who is the Portfolio Holder for Asset Management and Economic Development).

8 Relevant planning policies and guidance

- 8.1 The Planning Act 2008, amongst other provisions, establishes requirements about the authorisation of projects for the development of nationally significant infrastructure.
- 8.2 The site lies in the former West Somerset area, for which the Development Plan comprises the Adopted West Somerset Local Plan to 2032, Somerset Mineral Local Plan (2015), and Somerset Waste Core Strategy (2013).
- 8.3 Both the Taunton Deane Core Strategy and the West Somerset Local Plan to 2032 are currently being reviewed and the Council undertook public consultation in January 2020 on the Council's issues and options report. Since then the Government has announced proposals for local government reorganisation in Somerset and Regulations are currently going through Parliament for a new unitary authority in Somerset to be created from 1 April 2023. The work undertaken towards a new local plan will feed into the requirement to produce a Local Plan covering the whole of the new authority area.
- 8.4 Other relevant local policy documents include –
- Somerset West and Taunton Council's Climate Positive Planning, and
 - The Interim Guidance Statement on Planning for the Climate Emergency (February 2021)
- 8.5 Members will also need to have regard to the National Planning Policy Framework. That said, the proposal before the Committee does not seek any amendment to the DCO or other planning permissions

9. Material Planning Considerations and issues

- 9.1 Following the completion of the common raft concrete pour on Unit 1 of the HPC Project (known as J - Zero) an internal project review by EDF Energy commenced. EDF Energy has explained in a series of Topic Papers the following issues. An Executive Summary produced by EDF Energy is attached at Appendix B.
- That a range of factors were considered including the underlying commitments to industry leading safety and the highest quality standards, as well as maintaining the committed programme to deliver Unit 1 in 2025 (now mid 2026 due to the Covid 19 pandemic) and Unit 2 around 12 months after Unit 1;
 - The review examined the desire to maximise the opportunities to capture and implement learnings from Unit 1 when undertaking the

same activities on Unit 2. In addition, following the appointment of the Mechanical Engineering and Heating (MEH) Alliance, much more detail about that programme was available to feed into the review. Finally, the review was able to take into account over 4 years of on-site operational practice since the agreement with the Government was finalised and construction activity began in 2016;

- The conclusions of the review revealed that in order to maintain safety and quality standards and to maintain the programme, the number of workers at the peak of construction will need to be increased above the number that was originally assessed within the Development Consent Order (DCO) application. The review highlighted that there would need to be a greater overlap between the MEH and Civils phases of the project and that the number of support and professional / management roles based at the HPC site would be significantly above the number anticipated in the DCO application;
- The full implications of the ongoing Coronavirus pandemic are still to be considered and that the review in the latter part of 2019 was conducted and concluded before the pandemic began. That said, the programme for HPC has been extended by 6 months, with Unit 1 now due to be operational by June 2026, which is dependent on Coronavirus restrictions not continuing to constrain activity;
- Following an initial high level discussion in early 2020, work to analyse the potential implications from the increased workforce has been undertaken by EDF Energy in conjunction with the relevant stakeholders and in particular the relevant local authorities;
- The conclusion of these discussions resulted in EDF Energy proposing to provide voluntary assessments of the impacts to review the effect of the proposed workforce uplift on the conclusions drawn in the DCO Environmental Statement. These assessments (referred to as Topic Papers) have enabled EDF Energy and the Joint Councils to consider in relation to the DCO s106 Agreement and the relevant strategies and plans there under whether in each case:
 1. no change would be required;
 2. changes might be appropriate that could be made under the processes set out within the DCO s106 Agreement itself; or
 3. Changes might be appropriate which cannot be approved under the DCO s106 Agreement itself and therefore would require a modification to the DCO s106 Agreement through a Supplemental Deed.

- EDF Energy and the Joint Councils agreed, following a review of the DCO Application, that the 6 topic areas which needed to be considered were as follows:
 1. Accommodation;
 2. Transport;
 3. Workforce Development;
 4. Community Safety;
 5. Health; and
 6. Environment

- It was subsequently established that a review of the spatial distribution of the workforce was also required, as this would ultimately influence the potential impacts on the housing market and the transport strategy. Relevant factors, including the location of the existing workforce, the type of accommodation the workforce is staying in, the availability of accommodation and the likely make up of the workforce, including any workforce families have been considered;

9.2 The Joint Councils have responded to the Topic Papers and the Spatial Distribution note, with all papers being amended following further discussion. A link to the final versions of the Topic Papers can be found at paragraph 9.9 below. Whilst the Joint Councils have worked with EDF Energy on the Topic Papers, they are EDF Energy's documents. The Joint Councils agree with the majority of the conclusions drawn, but this is not the case in all areas. This is unsurprising given the complexity of the task and the uncertainty that exists in predicting the future. Both parties, however, recognise the need to work collectively together to resolve issues and develop solutions that will mitigate any anticipated impacts, particularly in a timely manner before the peak workforce is achieved in late 2022 / early 2023. A summary of the key points within the Topic Papers is set out below.

9.3 Accommodation

9.3.1 The following assumptions underpin EDF Energy's assessment of impacts on accommodation as set out in their Topic Paper:

- The peak workforce is taken as a 3-month rolling average (8,210 workers) as this is considered to reflect the peak demand on the Private Rented Sector (PRS).
- The new central case is that 38% of workers at peak construction will be home-based and 62% non-home-based.
- The residual number of non-home-based workers requiring private accommodation at peak construction is estimated to

be 3,175 which is 925 more than the estimated peak assessed within the DCO.

9.3.2 EDF Energy recognise that there are significant issues regarding both the affordability and availability of housing in the local area and in the rest of the UK, and that unmitigated, the impacts at the of peak construction could exacerbate these issues beyond that assessed in the DCO Accommodation Strategy.

9.3.3 On this basis, EDF Energy has proposed two new 'Strategic Interventions' to provide additional accommodation for up to 950 HPC workers. They propose:

- to increase the capacity of both the existing Campuses by providing an additional bed into each of the ground floor rooms in each accommodation block. This would create an additional 480 bed spaces (160 at Hinkley Campus and 320 at Sedgemoor Campus); and
- subject to planning permission being applied for and gained, significant investment in three caravan sites (Quantock Lakes and Mill Farm in Sedgemoor, and Moorhouse Farm in Somerset West & Taunton) which are currently being used by HPC workers. This would create at least 360 new caravan pitches and accommodate an estimated 470 HPC workers.

9.3.4 With these strategic interventions in place, EDF Energy estimate that the residual number of non-home-based workers looking for private accommodation will be around 2,700, which is roughly 450 more than was assessed at the DCO.

9.3.5 EDF Energy also predict what type of private accommodation the residual non-home-based workers will live in:

- 890 – PRS (+140 from DCO)
- 890 – Latent (+490 from DCO)
- 680 – Tourist accommodation (+80 from DCO)
- 260 – Owner Occupied (-240 from DCO)

9.3.6 The future distribution of workers has been modelled by EDF Energy based on observed data taken from workforce surveys, coupled with predictions regarding the preferences of the workers who would make up the peak non-home-based workforce. It should be noted that SWT Officers (and the Joint Councils officer group) believe there to be uncertainty over the predictions and therefore the choices made by workers will be monitored. If and where necessary, steps can be put in place to ensure accommodation impacts do not cause

serious disruption to the housing market or adversely affect vulnerable residents. Additional monitoring measures are proposed to be secured through amendments to the Accommodation Management Strategy and will include close monitoring of the implementation and use of the proposed strategic interventions.

9.3.7 This Topic Paper recognises that the underlying challenges within the local housing market are a cause for concern, both in the rural villages closest to the HPC site and in Bridgwater, where there are concentrations of workers. It also recognises that there are lead-in times associated with delivering additional bedspaces. To ensure that any potential negative impacts on the housing market are addressed, EDF Energy are proposing to make advanced payments from the Housing Contingency Fund (DCO s106 agreement):

- £195,000 to Sedgemoor District Council for Hinkley Housing Initiatives focussed in Bridgwater as well as £410,000 towards delivering affordable housing at Cricketers Farm in Nether Stowey.
- £390,000 to Somerset West & Taunton for Hinkley Housing Initiatives focussed in the Hinkley Point Cluster and Taunton.

9.3.8 In addition to the proposed mitigation and enhancement for addressing potential housing market impacts, EDF Energy propose to make up to £300,000 available from the existing Transport Contingency (under the original DCO s106 Agreement) for local communities to develop and deliver localised car parking solutions to address the unanticipated impacts on parking availability from non-home-based workers occupying a significant number of properties in rural villages. Whilst workers are (for the most part) parking legitimately, they tend to have more cars than a single household would have, and parking issues can create community tension. The mechanics of this are currently under discussion, but the intention is that EDF Energy would administer the process.

9.3.9 The package of mitigation and strategic interventions proposed by EDF Energy in relation to accommodation, should be welcomed. Subject to the proposed interventions being delivered on time and being managed by EDF Energy to ensure they are occupied by HPC workers in the numbers proposed, it is not anticipated that workforce uplift would give rise to any materially new or different relevant effects on accommodation. Consideration is currently being given to the method for securing the timely delivery of these mitigation measure and strategic interventions (currently proposed by EDF Energy to be identified in the addendum to the Accommodation Management Strategy).

9.4 Transport

9.4.1 The following measures are proposed to be taken by EDF Energy to avoid significant impacts on the transport network and prevent any materially new or different environmental effects arising compared to those identified in the original Environmental Statement:

- Amendments to the time of travel of workers, based on changed shift patterns and corresponding times of travel to work to encourage travel outside of main peak periods.
- Amendments to the mode split of worker travel, with a reassessment having taken place in light of the new spatial distribution assumptions. This includes an amendment to the transport allocation policy to provide for walking distances in Bridgwater in excess of 800m to reduce the number of workers allocated a Park and Ride permit because they still live within a reasonable walking distance of a direct bus.
- Use of existing Park and Rides, which may include seeking permission from the Transport Review Group to increase the use of the J23 Park and Ride from 920 to 1,300 spaces subject to further modelling of the Dunball Roundabout.
- Retention of Park and Ride facilities at Quantock Lakes and a new facility established at J25, plus additional parking will be provided at the Sedgemoor Campus and overflow from Hinkley Campus will go to J23.
- Update to the HPC Bus Strategy that includes the reintroduction of Direct Buses and retaining Walk and Ride services from Bridgwater, Taunton, Weston-Super-Mare and Burnham-on-Sea, and incorporating a new funded HPC Car Share Scheme.

9.4.2 The existing DCO s106 Agreement currently includes a mechanism under which contingency payments can be made, if impacts arise as a result of the methods set out within the Construction Workforce Travel Plan not being effective.

9.4.3 The transport measures proposed by EDF Energy represent a reasonable approach. However, the Joint Councils will need to ensure adherence to the assumptions which underpin the spreadsheet model through the allocation to transport policy. A broadened range of monitoring data will be agreed that will be presented regularly to the Transport Review Group (TRG) to this effect. EDF Energy has confirmed that it remains extremely confident that the HGV limits within the Construction Traffic

Management Plan will not need to be extended. The challenges associated with long term forecasting are noted and EDF Energy has undertaken to refine and share the HGV forecasts periodically with the Transport Review Group.

9.5 Workforce Development

9.5.1 A revised Workforce Development Topic Paper was issued by EDF in February 2022. Despite it illustrating strengthened commitments to existing successful measures, SWT Officers (and the Joint Councils officer's group) believe there are additional opportunities to expand and diversify activity in particular to:

- Deal with business impacts – particularly if this becomes disproportionate either by geography or sector;
- Provide outreach support to individuals – including supporting hard to reach groups get back to work;
- Maximise the benefit of the Hinkley Supply Chain;
- Re-broker individuals to local employers once peak is over and the project requires less workers; and
- Ensure a positive impact for local employment and skills is delivered and embedded in appropriate strategies and bids.

9.5.2 EDF's approach is set out within its Workforce Development Strategy, which is updated on an annual basis and upon which the Joint Councils will have the opportunity to make reasonable representations. The Strategy and the role of the Joint Councils in delivering a coordinated approach will therefore continue to evolve over the lifetime of the project. Active discussions are also underway about the activities that need to be undertaken across a range of partners, including EDF, to maximise the positive legacy from the project, not least from a 'people' perspective that will be framed within future iterations of the Workforce Development Strategy. In the meanwhile, the Joint Councils will continue with their economic development related activities currently funded through the DCO s106 Agreement, diversify this economic development activity using the additional monies to be provided by EDF in the Supplemental Deed, and seek to lever in additional funding opportunities as projects and activities are identified.

9.6 Community Safety

9.6.1 Hinkley Community Safety Group has identified a series of potential impacts based on experience of the project to date and taking into account the risks that were originally identified in the DCO Environmental Assessment. For example, in relation to Anti-Social Behaviour, Crime and Disorder and nighttime economy. EDF has recognised that impacts could arise, and to that end wish to take a precautionary approach. The following enhancements to existing measures have been proposed which are considered by SWT Officers (and the Joint Councils officer group) to be reasonable:

- Extension to the funded Community Safety Officer role to 2025
- Funding for Community Safety Grants
- Funding for activities carried out by the Community Safety Officer
- Funding for Devon and Somerset Fire and Rescue Service
- Continued funding of the dedicated fly-parking team
- Funding for the Avon and Somerset Police Community Safety Beat Team in accordance with the terms of the current DCO s106 Agreement

9.6.2 A revision to the Community Safety Management Plan will also be made upon which the Emergency Services and Local Authorities Group (Hinkley Community Safety Group) will be consulted.

9.7 Health

9.7.1 The health Topic Paper explores the following issues and considers whether workforce uplift results in any changes to the conclusions drawn in the original Health Impact Assessment.

- Change in local population structure;
- Potential change in communicable disease from incoming temporary workforce;
- Potential change in social structure and interactions within the existing community influencing local community resources and services; and
- A potential impact on community well-being.

- 9.7.2 The Topic Paper concentrates on socio-economic health related effects only. Air quality, noise and transport related health issues have been scoped out and are considered in the Environment, Workforce Development and Transport topic papers. It concludes that the likely residual impacts on health in general are negligible given the suite of existing mitigation in place.
- 9.7.3 EDF Energy propose that the existing mitigations provided for through the DCO s106 Agreement (financial contributions to Clinical Commissioning Group (CCG) and provision of preventative health measures) and the on-site medical centre (Hinkley Health), in addition to initiatives funded through the HPC Community Fund have sufficient capacity to service the healthcare needs of the additional workforce.
- 9.7.4 EDF Energy will commit in the Supplemental Deed, to ensuring that any additional demand stemming from workforce uplift, will be met by a matched uplift in provision and it will ensure that Hinkley Health continues to match its resource to demand.
- 9.7.5 The CCG were consulted on the topic paper by EDF Energy and have raised no issues.
- 9.7.6 EDF Energy conclude that there is no change from the DCO assessment that the project will have a negligible impact on health. The Joint Councils agree with this conclusion, subject to using a 'plan, monitor and manage' approach, so that if the situation changes, for example more workforce families come to the area, this can be assessed, and measures put in place where required.

9.8 Environment

- 9.8.1 The following environmental topic areas were assessed: air quality, light pollution, sustainability, waste, noise and vibration, ecology.
- 9.8.2 The physical form of the development at HPC is not being altered either in terms of the permanent development or the construction site. The proposed change relates purely to an increase in the number of workers working at the same time to complete the power station. The vast majority of these workers will be located in the northern part of the site between Green Lane and the Bristol Channel, far from neighbouring properties.
- 9.8.3 In addition, the activities which were going to cause the most significant environmental effects and effects on receptors, will have been completed by the peak period for construction. This includes the main earthworks, the works to the southern landscape area, the

construction of the emergency access road and the intake/outfall tunnelling under the Bristol Channel. The suite of environmental management plans originally approved were principally designed to address impacts during these activities. On this basis it is not currently considered that there will be any new or materially different effects that arise.

9.8.4 By using a 'plan, monitor and manage' approach the Joint Councils can continually assess issues in case unforeseen circumstances are identified at a later stage.

9.8.5 There are two areas EDF Energy has agreed to in order to mitigate potential environmental issues

1. The introduction of an 'Environment Group' to monitor environmental key performance indicators and ensure that impacts are reported, addressed and reduced as far as possible. This group is up and running and composed of representatives from each of the effected Councils. It reports to the Socio-Economic Advisory Group.
2. Funding for the continued use, monitoring and maintenance of the existing air quality monitors on the primary transport routes between Bridgwater and the HPC site. The funding originally agreed had expired, but this new money will now allow viable use of the monitors up to and just beyond the peak of construction period.

9.9 Background papers

9.9.1 All of the Topic Papers (Accommodation, Transport, Workforce Development, Community Safety, Health, and Environment), the Spatial Distribution Note, and the Workforce Uplift Engagement Report, can all be found at the following link -

<https://www.sedgemoor.gov.uk/article/5469/Hinkley-Point-C-Final-Topic-Papers>

10 Key risks

10.1 A key risk to the Council is a legal challenge by third parties to the process used to deal with the effects of the increase in peak workforce. This risk has been assessed through legal advice – see section 11 below.

10.2 A key project risk relates to a failure by EDF Energy to deliver the extra bed spaces envisaged through the proposed strategic accommodation interventions, especially as the delivery of half the bedspaces will be subject to further planning permissions. The risk will be addressed in part through the application of a 'plan/monitor/manage' approach and use of contingency

payments. The crucial concern is to ensure that any impacts at the workforce peak do not exacerbate issues associated with the affordability and availability of housing in the local area beyond that assessed in the DCO Accommodation Strategy. To ensure this, the agreement of positive early actions would need to be developed.

- 10.3 A further project risk relates to the spatial distribution of workers being significantly different to that assumed, leading to impacts across the topic areas and impacts that have not been already planned for and managed under proposed existing and new mitigation. The likelihood is moderated by the fact that the spatial distribution is based on project experience and knowledge. However, this could be impacted by a combination of accommodation availability and whether the core assumption that Mechanical Engineering and Heating workers will seek similar types of accommodation (including locations and prices) to Civils workers remains valid. Again, the risk will be addressed through the application of a 'plan/monitor/manage' approach and use of contingency payments as necessary.
- 10.4 There is also a risk that greater than expected numbers of workers could come from outside of the County, moving to the area with their families, which would place pressure on early years and school places in areas that are already under pressure. The spatial distribution model confirms that historic and predicted worker choices on accommodation location overlays with those areas where school places are already a challenge, including secondary schools. Although the immediate pressures on early years and primary places were addressed through the construction of Northgate Primary School in Bridgwater (which included a contribution from the existing DCO s106 Agreement funds), accurate information remains challenging about the number and location of workforce children in the area. Discussions continue with EDF Energy about the way information is gathered to enable a 'plan, monitor, manage' approach to allow appropriate decisions to be taken.

11 Legal and HR considerations

- 11.1 It is considered by both EDF Energy and the Joint Council's Officer Group that the predicted increase in peak workforce numbers does not require any amendment to the DCO and considers that the Proposed Measures can be secured using existing mechanisms under the DCO s106 Agreement and a Supplemental Deed thereto.
- 11.2 The Joint Councils have sought legal advice from their appointed advisers and this confirms as follows:
- It is not necessary or appropriate for any amendment to be made to the DCO as a result of the predicted increase in the peak HPC

construction workforce. The DCO contains no restriction on peak workforce numbers and there is no basis for implying such a restriction into the DCO.

- The conclusion that it is not necessary for an amendment to be made to the DCO as a result of the estimated peak construction workforce, is not affected by the fact that at the time the application was examined and determined, the peak workforce was predicted to be 5,600 and not 8,600.
- The predicted increase in the peak HPC construction workforce will not give rise to any breach of the original DCO s106 Agreement, or of any of the relevant strategies which are required to be implemented under that agreement.
- The proposed addendum to the Construction Workforce Travel Plan (CWTP) is capable of being approved by the Transport Review Group (TRG) under the existing approval mechanisms contained in the DCO s106 agreement. The Socio-Economic Advisory Group (SEAG) may also consider amendments to the Accommodation Management Strategy.
- Existing mechanisms under the original DCO s106 agreement may be used to:
 - request a Housing Fund Contingency Payment to mitigate any impacts of the predicted increase in the peak HPC construction workforce on the private-rented housing sector;
 - provide increased contributions to the Avon and Somerset Constabulary, which apply where the number of HPC construction workers increases above a certain level.
- A supplemental s106 agreement (the Supplemental Deed) is an appropriate mechanism to secure the following additional measures:
 - financial contributions towards the costs of funding certain staff posts at the Councils;
 - a financial contribution towards air quality monitoring in Bridgwater; and
 - increasing the capacity of Hinkley Health in line with the number of workers on site.

11.3 In addition to the above measures, the detail of the mechanisms for the following are currently being finalised:

- the payment of £1m (index linked) from the HPC Community Fund towards urban regeneration projects in Bridgwater Town Centre, in recognition of the role the town plays in absorbing the impacts of a significant percentage of non-home-based workers;
- funding for local communities to develop and deliver localised car parking solutions to address the unanticipated impacts on parking availability from non-home-based workers occupying a significant number of properties in rural villages.

11.4 The Proposed Measures include additional funding in some key areas to enable continuity of officer input across the Joint Councils for the remainder of the construction period. There are therefore no specific Human Resources implications.

11.5 The Council has a discretion as to whether to enter into the proposed Supplemental Deed, which must be exercised reasonably, in the 'Wednesbury' sense. That exercise of discretion must not be influenced by irrelevant considerations and must take account of any obligatory material considerations. In this case it is SWT Officer's opinion that it is appropriate and necessary to enter into such an agreement, because it is the only way of mitigating what could otherwise be a significant burden on local communities and a drain on the Council's own resources. That is a material consideration. By entering into the Supplemental Deed, the Council would be reasonably and sensibly mitigating and lessening the identified 'burdens' and 'costs' of the workforce increase, which have no other way of being addressed.

11.6 The legal advice provided to the Councils is that in circumstances where a developer volunteers to enter into a s106 Agreement independently of development-control decision making, as is the case here, the normal policy tests on seeking obligations and taking them into account are not directly engaged (and are therefore not obligatory material considerations). Those policy tests are set out in Regulation 122(2) of the CIL Regulations 2010 (see below). However, that does not mean that those tests are legally irrelevant considerations. When negotiating the terms of any s106 Agreement and in judging whether it would be appropriate in the public interest to enter into such an agreement independently of a development control decision, it would be both prudent and reasonable for the Council to consider whether the proposed obligations were:

- a. necessary to make the proposal acceptable in planning terms;
- b. directly related to the development; and
- c. fairly and reasonably related in scale and kind to the development.

The following paragraphs assess each of these three tests in respect of the proposed Supplemental Deed.

- 11.7 In (a) above, the proposals are direct mitigation for the potential impact that a significant uplift in the peak workforce would be likely to bring. This is particularly the case with
- worker accommodation, hence the need for advanced payments from the Housing Contingency Fund;
 - the extra work for the Council in processing all aspects of permissions, monitoring and potential enforcement that will be required as a result of faster working and a faster build, hence the need for extra funding for appropriate officer posts;
 - the need to ensure that HPC's own health facilities are expanded to prevent un-paid for drains on the existing public health provisions in the community;
 - The need to extend the operating lifespan (through additional funding) for the Air Quality Monitors on the principal route to the site from Bridgwater.

So, the proposals provide direct mitigation for anticipated impacts.

- 11.8 In (b) above, the obligations proposed in the Supplemental Deed are considered to be directly related to the workforce uplift issue, because it is clear that the effects anticipated would not arise if the workforce numbers were to remain at the levels envisaged in the 2012 enquiry process. EDF Energy and officers from all of the affected Councils, have jointly worked together to identify direct consequences that are likely to arise from the proposed workforce uplift and the proposed obligations have been devised to directly target these consequences.
- 11.9 As required by (c) above, the obligations now being sought have been negotiated and agreed by both parties and are considered to be fairly and reasonably related in scale and kind to the development. Mitigation was accepted as being required in the original DCO s106 Agreement in order to counteract the envisaged effects of a workforce of 5,600 at peak. It is therefore reasonable to seek to re-negotiate the mitigation required given that the workforce numbers are now being estimated to become up to 65% higher than originally envisaged. The measures in the proposed Supplemental Deed are considered to be appropriate and responsible enhancements to the existing package of mitigation measures in the context of the likely increase in the peak number of workers.
- 11.10 For the above reasons, SWT Officers consider that it is in the public interest to enter into the Supplemental Deed

- 11.11 A resolution by the Committee to authorise the Council entering into the Supplemental Deed would be liable to challenge by means of Judicial Review, if there is a legal flaw in the decision. This can take the form of procedural irregularity, the taking into account of irrelevant considerations, failing to take account of relevant considerations, or irrationality. Officers consider that the detailed case report and subsequent Committee debate and resolution in a public meeting, will mitigate this risk.
- 11.12 EDF Energy and the other Joint Councils have agreed to enter into the Supplemental Deed on a voluntary basis, in order to secure appropriate and responsible enhancements to the package of mitigation measures secured under the original DCO s106 Agreement. These voluntary measures are considered appropriate and in the public interest in the context of the likely increase in the peak number of workers involved in the construction of the Project above the 5,600 peak that was assumed for the purposes of the assessments in the application for the Development Consent Order itself. On the basis that the conclusions expressed in the Topic Papers are agreed by both parties, Officers consider that this is an entirely reasonable and hence legal, conclusion for the Council to reach.

12 Local Finance Considerations

- 12.1 The Proposed Measures (as set out in Appendix A) include a number of financial measures to be made using the mechanisms under the existing DCO s106 Agreement, or to be secured under the proposed Supplemental Deed . Securing these monies will ensure that financial impacts do not fall to either the District Council, or the new Unitary Council following vesting day on 1 April 2023.
- 12.2 In parallel with consideration of the effects of an increase in the workforce, the Joint Councils have also discussed with EDF Energy the effect of the changes in the construction timetable. The DCO s106 agreement provides for financial contributions towards the costs of the engagement of a variety of officers in the HPC project, but the overall quantum of funding and profile no longer aligns with the construction programme. EDF Energy has allowed the Joint Councils some flexibility in the way that the contributions contained in the original s106 Agreement can be used and has offered to provide additional funding in some key areas to enable continuity of officer input across the Joint Councils throughout the remainder of the construction period. This has been future proofed against the needs of the new Council. The schedule of new funding contributions is shown in Appendix A.

13 Conclusions

- 13.1 The proposal is for the Local Planning Authority to accept a package of additional measures and processes that mitigate what could otherwise be adverse impacts. It makes sense therefore for these measures to be approved.

13.2 As set out in section 11 above, the additional measures are considered to be

- necessary to make the proposal acceptable in planning terms;
- directly related to the development; fairly and reasonably related in scale and kind to the development, and,
- Are accordingly in the public interest.

The measures in the proposed Supplemental Deed are considered to be appropriate and responsible enhancements to the existing package of mitigation measures in the context of the likely increase in the peak number of workers.

13.3 Legal advice concludes that –

- There is no provision in the DCO that explicitly or implicitly sets a limit on the number of construction workers that may be employed at any one time in order to implement the development that it authorises.
- An increase in the number of construction workers employed on site does not constitute 'development' as defined in Section 32(1) of the Planning Act 2008 and Section 55 of the TCPA 1990.
- Accordingly, the increase in the number of construction workers beyond what was predicted at the time the DCO was examined and made, does not involve either a breach of the terms of the DCO or a breach of Development Control. In these circumstances there is nothing in the DCO that needs to be removed or altered, or anything further that needs to be added.
- Neither is there any need to vary any of the obligations in the original DCO s106 Agreement, as none will be breached, nor any need to amend any of the associated strategies in order to avoid a breach.

13.5 Despite this though, EDF Energy is nevertheless proposing:

- to prepare addenda to the Accommodation Strategy and the Construction Workforce Travel Plan;
- to work with the Joint Councils to develop a revised Community Safety Management Plan and a revised Construction Workforce Development Strategy for 2021-2024; and

- to provide a supplemental s.106 agreement to provide for financial contributions towards the costs of funding certain staff posts at the Councils, a financial contribution towards air quality monitoring in Bridgwater, and to increase the capacity of Hinkley Health in line with the number of workers on site.
- 13.6 Subject to securing specified appropriate mitigation measures, there is not expected to be any materially new or different environmental effects compared to those identified in the ES.
- 13.7 For the reasons set out in this report, having regard to all the matters raised, it is therefore recommended that the Planning Committee should consider these proposals in a positive light and authorise the completion of a supplemental Deed of Development Consent Obligations, delegating authority to SWT Officers to negotiate further on the details required to meet the Heads of Terms identified and discussed in this report.
- 13.8 The Committee is also requested to authorise SWT Officers to provide reasonable representations to the relevant Groups to enable variations and agree addendums to the specified Hinkley Point C Management Plans as a result of the increase in workforce envisaged and as set out in this report.

In preparing this report the planning officer has considered fully the implications and requirements of the Human Rights Act 1998 and the Equality Act 2010.

Proposed Measures

Summary of Obligations to be Secured through Supplemental S106 Agreement

- £200,000 - Joint Community Safety Project Officer
- £12,000 – Community Safety Grants
- £5,000 - Community Safety Activities
- £210,000 – Economic Development Officers
- £170,000 – Project Managers
- £120,000 – Planning Officers
- £40,000 – Finance Officers
- £25,600 - Planning Enforcement Officer
- £25,500 - Air Quality Monitoring
- Hinkley Health to be increased in line with the number of workers on the HPC Development Site

Separate to the supplemental S106, advanced payments will also be made from the Housing Contingency Fund (DCO s106 agreement):

- £195,000 to Sedgemoor District Council for Hinkley Housing Initiatives focussed in Bridgwater as well as £410,000 towards delivering affordable housing at Cricketers Farm in Nether Stowey.
- £390,000 to Somerset West & Taunton for Hinkley Housing Initiatives focussed in the Hinkley Point Cluster and Taunton.

Furthermore, EDF Energy will make an early payment of £1m (index linked) from the HPC Community Fund towards urban regeneration projects in Bridgwater Town Centre, which is in recognition of the role the town plays in absorbing the impacts of a significant percentage of non-home-based workers. The principle of this is agreed, and the detail of the mechanism is currently being finalised.

EDF Energy also propose to make up to £300,000 available from the existing Transport Contingency (under the DCO s106 agreement) for local communities to develop and deliver localised car parking solutions to address the unanticipated impacts on parking availability from non-home-based workers occupying a significant number of properties in rural villages. The mechanics of this are currently under discussion, but the intention is that EDF Energy would administer the process.

EDF Energy also proposes to prepare:

- an addendum to the Construction Workforce Travel Plan (CWTP), updated Bus Strategy and a Car Share Strategy for approval by the TRG;

- an addendum to the Accommodation Strategy and an amendment to the Accommodation Management Strategy for approval by the SEAG. Consideration is currently being given the method for securing the delivery of mitigation measures associated with the increased campus capacity and other project accommodation (currently proposed to be identified in the amendment to the Accommodation Management Strategy);
- an update to the Community Safety Management Plan for consideration by the Emergency Services and Local Authorities Group (Hinkley Community Safety Group);
- an update to the Construction Workforce Development Strategy upon which the Joint Councils will make their Reasonable Representations.

Topic Papers.

Executive Summary of Workforce Uplift Topic Papers, produced by EDF Energy and agreed with the Joint Councils.

Executive Summary of Workforce Uplift Topic Papers

January 2022

Appendix B

Executive Summary of Workforce Uplift Topic Papers

January 2022

Background / Timeline

1. In the autumn of 2019, the Hinkley Point C project team reviewed its position in relation to the likely number of workers required at the peak of construction. The conclusions of the review revealed that in order to maintain safety and quality standards and to maintain the project programme the number of workers at the peak of construction would need to increase above the number originally assessed in the DCO Application.
2. Initial negotiations with the Joint Councils began in January 2020 and over the first 6 months of 2020, the basis for considering the potential impacts of the increased workforce was discussed and legal advice considered. The conclusion of these discussions resulted in EDF proposing to provide voluntary assessments of the impacts to review of the effect of the proposed workforce increase on the conclusions drawn in the DCO Environmental Statement. Those assessments would enable EDF and the Joint Councils to consider in relation to the section 106 agreement and the relevant strategies and plans under the section 106 agreement whether in each case:
 - a. No change would be required; or
 - b. Changes may be appropriate that could be made to strategies under the processes set out within the DCO s106 agreement itself; or
 - c. Changes may be appropriate which that cannot be approved under the DCO s106 agreement itself and therefore would require a modification to the DCO s106 agreement.

3. The 6 areas which were to be the subject of assessment and discussion were agreed as:
 - i. Accommodation
 - ii. Transport
 - iii. Workforce Development
 - iv. Community Safety
 - v. Health; and
 - vi. Environment
4. Since discussions commenced the impacts of the Covid-19 pandemic have needed to be considered and at the present time the programme for HPC has been extended by 6 months, with Unit 1 due to be operational by June 2026.
5. In the summer/autumn of 2020, EDF and the Joint Councils held a series of workshops over the scope of the 6 subject areas. In addition to the 6 subject areas, it was established that a review of the spatial distribution of the workforce was also required in order to establish the basis on which the assessments could take place, an initial draft of a spatial distribution note was shared in September 2020.
6. In October 2020, the Joint Councils and EDF established the principle of entering into a Planning Performance Agreement (PPA) to establish the basis on which discussions would take place and a basis on which funds could be made available to the Joint Councils to seek both technical and legal advice on the potential impacts from the workforce uplift. A PPA was entered into on 29th January 2021.
7. In January 2021, a special meeting of the 3 HPC forums (Community, Main Site and Transport) was called and in early February a virtual exhibition was launched seeking input from the local community and interested stakeholders. Two drop-in sessions took place during February and meetings took place with local Town Councils and Parish Councils in February and March. A consultation report summarising the feedback received was compiled and sent to the Councils in April.

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8. In April, EDF submitted 6 Topic Papers, a draft Heads of Terms for a supplemental Section 106 agreement alongside the consultation report and a copy of the latest spatial distribution note. [HPC Workforce Uplift - Topic Papers \(sedgemoor.gov.uk\)](https://www.sedgemoor.gov.uk)
9. In June and July, the Joint Councils and EDF held further discussions on the content of the Topic Papers and provisionally agreed on a series of 'high-level solutions' which the parties agreed would help, subject to further assessment, address the concerns of the Joint Councils.
10. In October, the Joint Councils issued EDF with their written response to the Topic Papers which reflected the issues discussed in June and July.
11. In November, the Joint Councils and EDF met with and presented the contents of the Councils written responses, the nature of the proposed 'high-level solutions' and set out the

'state of play' to another special 3 HPC forums meeting. The presentation included details of the Joint Councils proposed decision making process.

12. In December, EDF submitted updated versions of 5 of the 6 Topic Papers, a revised draft Heads of Terms for a supplemental Section 106 agreement alongside a copy of the latest spatial distribution note which had been revised to take account of the emerging proposed solutions and the results of the workforce survey's which had been undertaken in late 2020 and during 2021.
13. The 6th Topic Paper – workforce development – was the subject of a workshop in November and a revised draft is being prepared and will be sent to the Joint Councils in January 2022.
14. In late December, the Joint Councils sent further comments on the updated Topic Papers
15. In January 2022, a further revision to the updated Topic Papers, a revised draft Heads of Terms for a supplemental Section 106 agreement alongside an updated spatial distribution note were sent to the Joint Councils.

Summary of the Spatial Distribution Note

16. The spatial distribution note sets out the potential Home Based (HB)/Non-Home Based (NHB) split, accommodation choices and subsequent estimated spatial distribution of the Hinkley Point C (HPC) construction workforce, based on a revised workforce peak.
17. The spatial distribution note is based on the revised workforce profile which is attached at Appendix A of this summary document.
18. The spatial distribution note sets out the basis for calculating the following:
 - a. The split of home-based and non-home-based workers which in part is influenced by the measures described in the Workforce Development topic paper. The split set out in the note is expected to be 38:62 homebased:non-home-based workers and a more conservative split of 34:66 home-based:non-home-based workers is also assessed
 - b. The expected distribution of workers by accommodation type; and
 - c. The expected spatial distribution of workers split by accommodation type

Summary of the Topic Papers (Updated v2, January 2022)

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Accommodation

19. The accommodation topic paper sets out an assessment of the potential impact on the local housing market that is likely to arise as a result of accommodating the non-home-based workforce at the peak of construction.

20. The DCO Application and the approved Accommodation Strategy focussed on 5 key sectors which would accommodate the non-home-based workforce at the peak of construction which were: the purpose built campus accommodation, the private rented sector, tourist accommodation, owner occupied and latent accommodation.
21. The April topic paper set out an assessment of the likely take up and distribution across the 5 key sectors based on the content of the spatial distribution note. In each of these sectors the topic paper refers to the assessment carried out in support of the original DCO application and analyses the potential impacts associated with the workforce uplift, assesses the adequacy of existing mitigation and sets out if additional mitigation is required as a result of any identified residual impacts.
22. During June/July the Councils raised concerns with the likely impact on the private rented sector noting the significant pressure which was being applied within the housing market more generally and concerns that the most vulnerable within the housing market could be adversely affected from an increase in the number of non-home-based workers as a result of the workforce uplift.
23. In seeking to address these concerns EDF presented a series of strategic interventions namely, an increase in the number of beds which would be available at the campus accommodation and investment in existing local caravan parks which are already hosting HPC workers. These proposed interventions were well received when discussed at the November 3 HPC forum meeting and at a Joint Member briefing.
24. The January 2022 topic paper sets out a revised assessment of the likely impacts within the 5 key sectors taking account of the proposed strategic interventions, based on the updated spatial distribution note. The topic paper also proposes an early payment from the housing contingency fund for the Joint Councils to continue to deliver a range of housing initiatives to ensure that the most vulnerable households in the housing market continue to be supported.
25. EDF will work with three existing caravan parks to make planning applications to accommodate additional workers and will make an application to extend the car park at the Sedgemoor Campus to accommodate additional vehicles for the additional workers staying at the campus.
26. In order to mitigate against the impact of non-home-based workers staying in the private rented sector and in latent accommodation in rural villages, the topic paper also sets out proposals to establish a rural car parking fund to allow Parish Councils to draw down from an existing transport contingency fund to create additional parking areas in affected villages.
27. The content of the updated topic paper and the mitigation set out within will inform the content of an accommodation strategy addendum which will be presented to the Socio-Economic Advisory Group for approval.
28. The conclusions of the updated topic paper set out that there would be no new or materially different effects on the local housing market arising as a result of the proposed workforce uplift.

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29. The transport topic paper sets out an assessment of the potential impacts of additional vehicle movements as a result of the increased number of workers, noting that additional materials and HGV deliveries will not be needed and noting that the additional home-based and additional non-home-based workers are considered as all require transport to the HPC site.
30. The topic paper was drafted based on an approach (the Transport Scope and Methodology) which was shared and agreed with the Joint Councils and sought to:
 - a. Understand and quantify the number of bus movements (direct and Park and Ride) expected to be generated by an increased workforce travelling to and from the HPC site (and accompanying parking capacity at Park and Rides);
 - b. Calculate predicted movements based on assumptions for future scenarios;
 - c. Consider if existing Park and Rides will continue to operate within the parameters assessed in the Environmental Statement and Transport Assessment and their existing permissions;
 - d. Consider if existing Park and Rides will require additional parking capacity or bus services; and
 - e. If it is found that additional capacity is required above that which can be provided at the existing Park and Rides, mitigation will then be considered. This could include the provision of new Park and Rides along with changes to bus services with routes, frequencies or capacities
31. The April topic paper set out an assessment of the likely effects based on an assessment of the relevant factors set out in the original DCO application and analyses the potential impacts associated with the workforce uplift, assesses the adequacy of existing mitigation and sets out if additional mitigation is required as a result of any identified residual impacts.
32. In June Somerset West and Taunton Council granted permission for up to 400 HPC workers to park at Junction 25 Park and Ride site.
33. In June/July the Joint Councils raised concerns regarding the split of workers expected to travel by Direct Bus and those who would travel to Park and Ride Sites before boarding a bus. An update to the HPC Bus Strategy was requested alongside an update to the Car Sharing Strategy.
34. In seeking to address the concerns of the Joint Councils amendments to bus routes and the Bus Strategy were proposed in an attempt to ensure that as many HPC workers were using Direct Bus services, particularly in Bridgwater.
35. In November Sedgemoor District Council granted permission for the continued use of Quantock Lakes Park and Ride site.
36. In January, a final version of the transport topic paper was submitted. Alongside the topic paper and the associated spreadsheet model, an updated Bus Strategy, Car Sharing Strategy

and addendum to the Construction Workforce Travel Plan will be presented to the Transport Review Group for approval.

37. The conclusions of the updated topic paper set out that there would be no new or materially different effects on the local transport network arising as a result of the proposed workforce uplift.

Workforce Development

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38. The workforce development topic paper sets out the basis for the measures which the HPC project will put into place to assist local residents to access roles during the various phases of the construction, commissioning and eventually operational phases of the project. The topic paper refers to the assessment carried out in support of the original DCO application and analyses the potential impacts associated with the workforce uplift, assesses the adequacy of existing mitigation and sets out if additional mitigation is required as a result of any identified residual impacts.
39. The topic paper focusses on what measures will be put into place in an attempt to meet the target of achieving 38% of the workforce at the peak of construction being home-based. The key measures are:
 - a. The 3 new centres of excellence (welding, mechanical and electrical)
 - b. The Jobs Service linking people to roles
 - c. The Skills pipeline and specifically the role of the Hinkley Support Operative role
 - d. Apprentices and Young People
 - i. Education programmes
 - ii. Use of the Apprenticeship levy
 - iii. T-levels and traineeships
40. The topic paper explains the role of the Workforce Development Strategy (WDS) and key focusses and objectives within each of the key areas
41. The April topic paper set out the position on all of the above issues and noted the WDS which was to be published covering the academic period from 2021-2024 which was to be published in the Summer
42. In June/July the Joint Councils highlighted concerns about the link between the topic paper, the WDS for 2021-24 and the Annual Implementation Plan. Greater clarity was requested to understand the step change needed to achieve 38% home-based workers along with the associated impact of hosting non-home-based worker families on support services.
43. In September the WDS for 2021-24 was published

44. In October the Joint Councils provided comments on the topic paper and the WDS for 2021-24
45. In November a workshop was held to discuss the concerns and it was agreed that an updated topic paper would be prepared reflecting on the comments from the Joint Councils
46. In January 2022 an updated topic paper was sent to the Joint Councils
47. Updates to the WDS for 2021-24 will be prepared as a result of the updated topic paper
48. The topic paper concludes that the Workforce Uplift is not anticipated to give rise to any materially new or different relevant workforce development-related effects compared to conclusions of the relevant assessment in the original Environmental Statement

Environment

49. The environment topic paper sets out the potential additional and altered environmental impacts which might arise from the additional workforce at the peak of construction.
50. The topic paper also addresses a historic issue in that limited information regarding adherence to environmental compliance was made available to the Joint Councils and the community
51. The following areas are assessed within the topic paper:
 - a. Noise and vibration;
 - b. Light pollution;

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- c. Air quality;
 - d. Conventional waste;
 - e. Waste water;
 - f. Sustainability; and
 - g. Ecology
52. In each of these areas the topic paper refers to the assessment carried out in support of the original DCO application and analyses the potential impacts associated with the workforce uplift, assesses the adequacy of existing mitigation and sets out if additional mitigation is required as a result of any identified residual impacts.
53. The April topic paper set out initial conclusions on each of the topic area and proposed a set of Key Performance Indicators (KPIs) which could be used to monitor the effectiveness of existing mitigation measures in the key areas of noise, air quality, lighting, ecology, sustainability, environmental reporting and the number and nature of community complaints relating to environmental matters. The KPIs will be reported to a newly formed Environmental Monitoring Group which would meet on a quarterly basis and issues arising would be reported to the Socio-Economic Advisory Group.
54. In June/July during wider discussions the Joint Councils indicated that there were no significant concerns with the content of the environment topic paper.

55. In October the Joint Councils did highlight some areas which required further clarification.
56. A revised topic paper was prepared to take account of the issues which the Joint Councils raised and to address issues which had been raised in other topic areas, most notably in the transport topic paper.
57. The conclusion of the assessment set out in the topic paper is that the Workforce Uplift is not anticipated to give rise to any materially new or different relevant environment-related effects compared to conclusions of the relevant assessments in the original Environmental Statement

Health

58. The health topic paper sets out the potential additional and altered health related impacts which might arise from the additional workforce at the peak of construction.
59. The following areas are considered in detail within the topic paper:
 - a. Change in local population structure, with potential implications for amenities and healthcare facilities;
 - b. A potential change in communicable disease from the incoming temporary workforce;
 - c. A potential change in social structure and interactions within the existing community, influencing local community resources and services (including education, healthcare and policing); and
 - d. A potential impact on community well-being
60. In each of these areas the topic paper refers to the assessment carried out in support of the original DCO application and analyses the potential impacts associated with the workforce uplift, assesses the adequacy of existing mitigation and sets out if additional mitigation is required as a result of any identified residual impacts.
61. The topic paper sets out that the primary mitigations continue to be:
 - a. That occupational and general health would be largely addressed through the proposed on-site EDF Energy medical centre (Hinkley Health);

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- b. The provision of preventative health measures including health promotions and the provision of sports infrastructure (both directly at the campus accommodation and indirectly through s106 agreement payments); and
 - c. Financial contributions (under the DCO s106 agreement) to Somerset PCT (now known as the Somerset Clinical Commissioning Group) to aid delivery of local health care provision
62. The April topic paper considered the relevant issues and communicated that the key mitigation measure in relation to potential health impacts is the on-site medical facility,

known as Hinkley Health and the topic paper committed to growing the capacity and services offered by Hinkley Health to meet the anticipated demands from the additional workers who would be present at the peak of construction.

63. In October, the Joint Councils confirmed that they had no concerns in relation the assessment and conclusion set out in the topic paper.
64. In December the topic paper was updated to take account of developments in other areas but the basis of the assessment did not change
65. The conclusion of the assessment set out in the topic paper is that the workforce uplift is not anticipated to give rise to any materially new or different relevant health related effects compared to conclusions of the relevant assessments in the original Health Impact Assessment and Environmental Statement

Community Safety

66. The community safety topic paper sets out the potential additional and altered community safety related impacts which might arise from the additional workforce at the peak of construction.
67. The following areas are considered in detail within the topic paper:
 - a. The influx of non-home-based workers and their families;
 - b. Crime and disorder
 - i. The role of Avon and Somerset Police
 - ii. The role of Devon and Somerset Fire and Rescue Service
 - c. Night-time economy
 - d. Accommodation
 - e. Equality within the community
 - f. Social Service
 - g. Fire
68. In each of these areas the topic paper refers to the assessment carried out in support of the original DCO application and analyses the potential impacts associated with the workforce uplift, assesses the adequacy of existing mitigation and sets out if additional mitigation is required as a result of any identified residual impacts.
69. The April topic paper acknowledges the issues which have arisen as a result of the project and acknowledges the collective and collaborative approach that continues to be required to minimise the impact of community safety related and crime related incidents which involve HPC workers
70. The topic paper sets out that financial contributions relating to Avon and Somerset Constabulary are the subject of a calculation set out in the existing DCO s106 agreement which will be adjusted to take account of the increased workforce at the peak of construction and the extended construction timetable when compared to the original DCO agreement.

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71. In June/July the Joint Councils highlighted concerns regarding the way in which adherence to the projects code of conduct was being enforced and who was involved in that process, that the instances of crime and disorder were distorted as a result of the Covid-19 pandemic and that potential impacts were being underplayed as a result and that additional resources were required to enable the funded community safety officer role at the Councils to carry out their role to maximum effect.
72. In October the Joint Councils set out their concerns in writing and in December an updated topic paper was issued seeking to address the concerns of the Joint Councils and the Police. A more through explanation of the way in which the code of conduct is enforced was set out along with updated statistical information and an agreement to make additional resources available for the community safety officer.
73. The topic paper commits to update the Community Safety Management Plan which EDF will undertake in conjunction with the members of the Hinkley Community Safety Group.
74. The conclusion of the assessment set out in the topic paper is that the workforce uplift is not anticipated to give rise to any materially new or different relevant community safety related effects compared to conclusions of the relevant assessments in the original Environmental Statement.

Summary of Mitigation Proposed

75. Use of the Housing Contingency Fund towards additional measures and schemes £995,000
 76. Use of the Transport Contingency Fund towards the provision of rural car parking measures £300,000
 77. An early annual payment of the EDF Energy Community Fund in 2022 towards urban regeneration projects in Bridgwater
 78. Additional payments towards the following Council Officer posts:
 - a. Joint Community Safety Officer*
 - b. 2x Economic Development Officers*
 - c. 2x Project Managers
 - d. Housing Officer*
 - e. 2x Finance Officers*
 - f. 2x Planning Officers*
 - g. Joint Planning Enforcement Officer
- *these posts are proposed to be extended in accordance with the Review process set out in the DCO s106 agreement
79. Additional payments towards Community Safety Grants £12,000 and Community Safety Activities £5,000 80.
 80. An increase in the capacity of Hinkley Health

81. Additional payment towards the cost of maintaining air quality monitoring equipment in Bridgwater £25,500

