Draft Accommodation Strategy

February 2011

This is a **draft document** which EDF Energy will continue to develop during the preparation of its application for development consent to the Infrastructure Planning Commission later this year. The contents of this document are likely to change prior to final submission of the application. The consultation document entitled 'Hinkley Point C: Update on and Proposed Changes to the Preferred Proposals' details the material changes to the proposals since Stage 2 consultation, and in the event of any inconsistency between this draft document and the consultation document, it is the consultation document that takes precedence.

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EDF ENERGY

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1. INTRODUCTION

1.1.1 NNB Generation Company Limited (company number 06937084), part of EDF Energy, is the company that will ultimately make the Development Consent Order application. For the purpose of this document, NNB Generation Company Limited is referred to as EDF Energy.

1.1.2 EDF Energy is planning to build a new nuclear power station at Hinkley Point near Bridgwater, Somerset, comprising two UK EPR reactor units. The expected output is approximately 1,630MW per unit.

1.1.3 The new site, Hinkley Point C (HPC) is to the west of the existing Hinkley Point Power Station Complex. The new power station is based on replicating as much as possible the design for the Flamanville 3 unit in Normandy, France, currently under construction.

1.1.4 This Accommodation Strategy is provided as a supporting document to EDF Energy's "Update on and Proposed Changes to Preferred Proposals" consultation. The strategy addresses EDF Energy's approach to the anticipated accommodation demand that will be generated by the Hinkley Point C project.

1.1.5 The strategy begins with some context on the anticipated scale of accommodation demand which will be generated by the Hinkley Point C Project, and describes the objectives EDF Energy has set for its accommodation proposals. The paper then moves on to explain the reasons why EDF Energy is proposing a balanced strategy for meeting the accommodation requirements of the project, one which includes both significant use of existing spare accommodation capacity in the local area and a substantial provision of additional purpose-built campus accommodation. It discusses EDF Energy's proposals for avoiding any negative impacts on local private rented and tourist accommodation arising from the Hinkley Point C construction workforce.

1.1.6 The strategy also explains why EDF Energy is proposing to provide additional accommodation for the construction workforce in the form of temporary campuses and the key benefits which are considered to arise from a campus based approach. The key benefits which arise from having some campus accommodation located very close to the HPC Development Site in an on-site campus are set out and the paper also explains EDF Energy's proposals for accommodation campuses in Bridgwater. The strategy explains that EDF Energy is exploring the scope to work with developers and the local authorities to facilitate housing development and the refurbishment of properties in the local area.

1.1.7 The final sections of the strategy describe how it is envisaged that the accommodation demand generated by the project will be managed in practice; both during the early years of the project and once EDF Energy's accommodation campuses are operational. The paper also sets out EDF Energy's proposals for a Housing Fund which could be used, for example, to renovate vacant or substandard properties or provide loans to enable local people to get on the housing ladder.

1.1.8 Overall the strategy aims to demonstrate that EDF Energy's proposals represent a balanced and optimum solution for meeting the temporary increase in local accommodation demand which the Hinkley Point C project will generate – offering operational efficiency for EDF Energy through the construction programme, economic benefits to the local area and mitigation of impacts during the construction period.

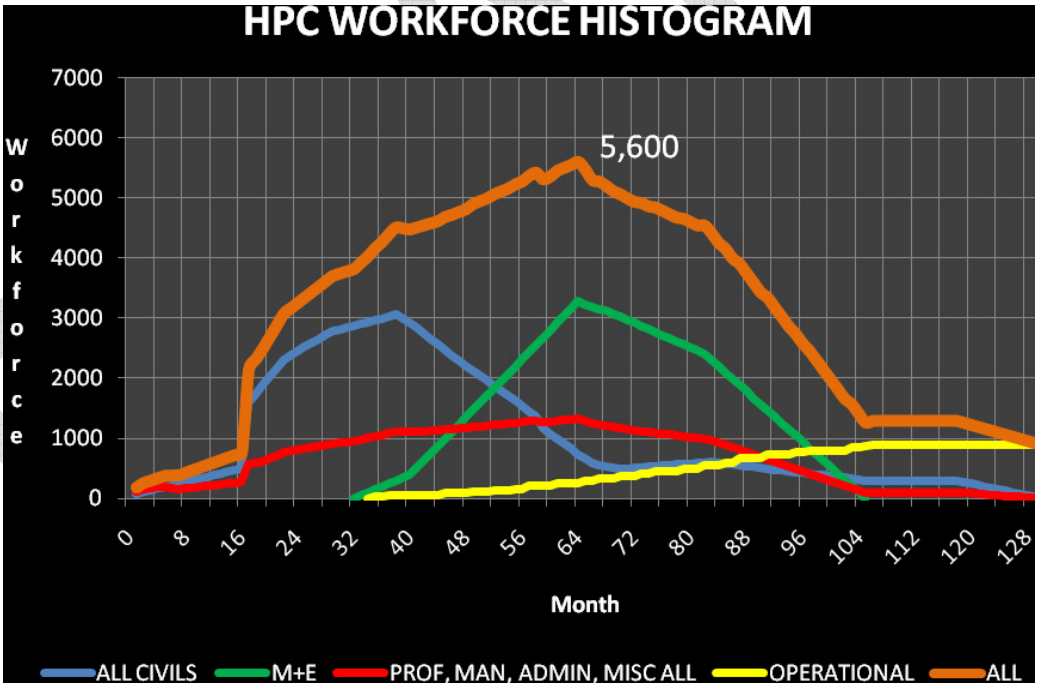
2. CONTEXT FOR ACCOMMODATION STRATEGY

2.1.1 EDF Energy has recently undertaken a detailed review of the construction workforce profile for the Hinkley Point C Project. This review has considered the latest information from the Flamanville 3 project in Normandy, France, where a European Pressurised Reactor (EPR) of the same design as that proposed for HPC is under construction. EDF Energy has also taken account of early information from the companies bidding to supply construction services for the Hinkley Point C Project, as well as experience from other nuclear power station projects around the world.

2.1.2 Following these detailed studies it is now anticipated that the construction workforce for Hinkley Point C will rise gradually to reach an anticipated peak of 5,600 workers in 2016. Workforce numbers will then fall gradually over time until the end of construction in around 2019/20. This compares to a peak workforce estimated at Stage 2 consultation of 5,000.

2.1.3 The overall estimated profile for the HPC construction workforce – along with profiles for the main breakdown of worker categories – is shown in the graph below.

Figure 2.1: HPC Workforce Histogram



2.1.4 EDF Energy's socio-economic consultants have examined the breakdown of the construction workforce and the capacity of the local labour market to meet the workforce requirements of the project. This will vary by construction worker category and the analysis takes account of information on local labour skills and supply, the degree of specialism required, evidence from previous nuclear construction projects and EDF Energy's vision, which is shared with the local authorities, to maximise the opportunities for local employment generated by the project.

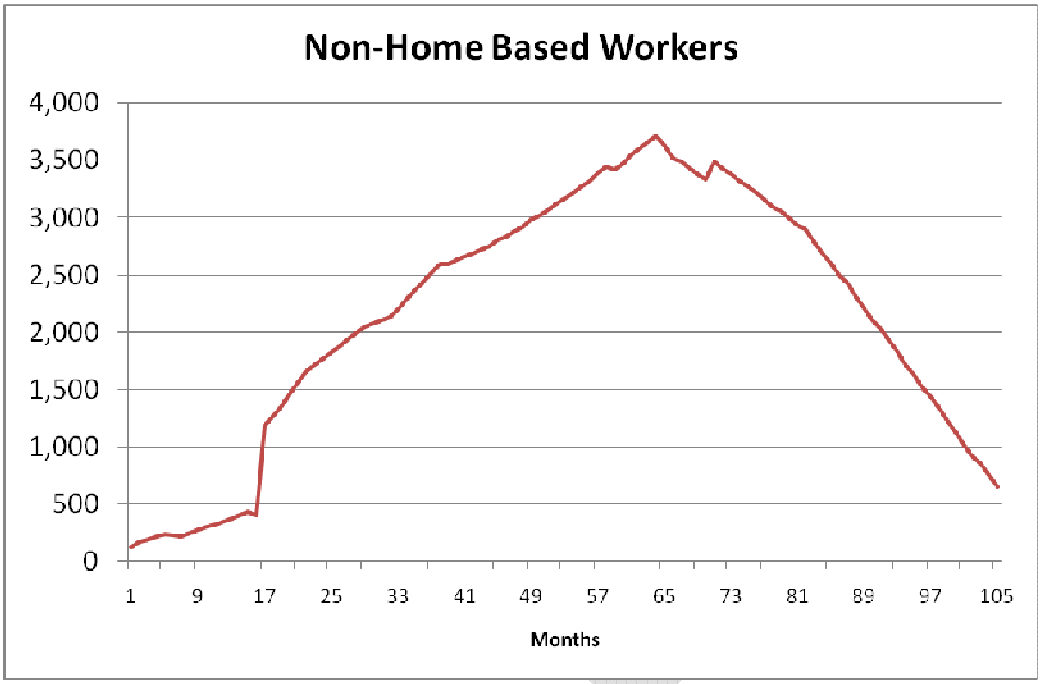
2.1.5 On this basis the following estimates of the proportion of the workforce which will be home based (i.e. already living locally) and non-home based (i.e. those moving into the local area for the purpose of working on the project) at peak construction has been derived.

Table 2.1: Breakdown of the Hinkley Point C Peak Construction Workforce

	Total	Home Based		Non Home Based	
		%	Number	%	Number
Civil Operatives	740	50%	370	50%	370
M + E Operatives	3,290	30%	990	70%	2,300
Operational Staff	250	50%	130	50%	130
Staff and Management	1,030	15%	150	85%	880
Site Services, Security & Clerical	300	90%	270	10%	30
All (including AD & Prelims)	**5,600**	**34%**	**1,900**	**66%**	**3,700**

2.1.6 It can be seen that at peak construction it is now estimated that 34% of the 5,600 construction workforce would be home based but that 66% of the workforce - approximately 3,700 workers – will require accommodation in the local area. This represents the maximum level of accommodation demand that the project is expected to generate. It should be noted that, for several years either side of peak construction, accommodation demand generated by the project is expected to be less than this, but still substantial. The estimate of the number of non-home based workers who will require accommodation in the local area over the life of the project is shown in **Figure 2.2**

Figure 2.2: Estimated Profile of the Non-home based Workforce over the Construction Period



2.1.7 This sustained and significant level of demand for accommodation represents the context for EDF Energy's Accommodation Strategy and proposals. Moreover, it should be noted that these are "snapshot in time" figures: many employees will stay for only a limited period such that the total number of individuals who will be employed at some point during the construction period will be substantially higher and is estimated at between 20,000 and 25,000 people.

2.1.8 Equally, the scale of the Hinkley Point C construction workforce, and the number of non-home based workers who will seek accommodation in the local area, needs to be seen in the context of wider local demographics. The workforce will be a relatively small number when seen in the context of the existing population of Somerset (523,000) and of the nearest districts of West Somerset and Sedgemoor (just under 150,000).

2.1.9 This population is relatively dynamic and mobile. Two of the key sectors in the Somerset economy are agriculture and tourism, both of which rely extensively on a seasonal and migratory workforce which moves in and out of the area. Every year just under 7% of households move either within, to or from the area.

2.1.10 Moreover Somerset has a substantial tourism accommodation industry, where each year some 2.4m visitors spend almost 10m nights. Relative to that, demand for accommodation from the Hinkley Point C workforce will be relatively small.

2.1.11 The kinds of accommodation sought by the construction workforce for Hinkley Point C will depend on the nature of their role on the Project and the length of time for which they are employed. This will vary considerably. Some, mainly professional and project management staff, will move to the area for a significant length of time (many years or for the duration of construction) and in the case of future operational staff on a potentially permanent basis. These individuals are more likely to seek permanent housing in the local area and to bring their families with them. However this element will form a relatively small proportion (just under 10%) of the peak workforce. The majority of those employed will be civil, mechanical and electrical operatives who are typically more likely to work on the Project for periods of months or low (1-2) numbers of years. These workers are likely to move to the local area without their partners/families and will (typically) seek more temporary forms of accommodation in the local area.

2.1.12 Further detail on the construction workforce profile and the basis for these estimates is contained in a separate supporting document which is also being published alongside the "Update on and Proposed Changes to Preferred Proposals" consultation.

3. OBJECTIVES OF ACCOMMODATION STRATEGY

3.1.1 In developing the accommodation strategy, EDF Energy's overall vision for the project, along with the objectives drawn from the local authorities' planning, economic and community strategy objectives have been considered. As a result the following overarching objectives have been developed:

- To develop a balanced strategy, making use of existing accommodation in the local area and supporting local businesses and accommodation providers whilst seeking to avoid displacement of local people or the local tourist industry.
- To meet the operational needs of the Hinkley Point C Project by providing a range and choice of good quality accommodation of a type which will be attractive to workers and to the requirements of principal contractors.
- To adopt a strategic approach to the location of any purpose built accommodation campuses, focussing on locations with good accessibility to public transport and sustainably located in relation to either the Hinkley site or to local services.
- To ensure that all purpose built accommodation is of a high standard, with high quality facilities and amenities (e.g. bars, sports facilities, laundries), and is appropriately priced.
- Where possible or appropriate, to ensure that purpose built accommodation and associated facilities (e.g. recreational facilities) are developed on a sustainable basis, with legacy opportunities considered.
- To reduce adverse impacts on local communities and to ensure that workers, in all forms of accommodation are well supported and maintain high standards of conduct, especially in their interaction with the local community.
- To ensure the impacts of the development on local communities are mitigated, managed and assessed and that appropriate mitigation measures are put in place.

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4. USE OF EXISTING ACCOMMODATION IN THE LOCAL AREA

4.1.1 One of the key questions in establishing an optimum accommodation strategy for the HPC workforce is the extent to which there is local accommodation available to meet likely demand and to what extent use of this kind of accommodation will deliver positive impacts for the local area.

4.1.2 EDF Energy's socio-economic consultants have examined in detail the scope for existing accommodation in Somerset to meet the additional demand created by the project. This has involved careful consideration of the potential scale of accommodation available in the tourist sector (Bed & Breakfast, guest houses and caravan parks) as well as in the local private rented market. The following main data sources have been used for this analysis:

- For tourist accommodation – South West Tourist Boards' Accommodation Database and a survey undertaken by Arup on behalf of the local authorities.
- For private rented accommodation – Census (for ward level data), estate agents, and local authority data including the Strategic Housing Market Assessment and Housing Strategy Statistical Appendix (HSSA) returns.

4.1.3 In addition, two newspaper surveys were conducted to establish the level of additional accommodation supply potentially available in the local area but which is not currently offered to the market or captured by existing data sets – we describe this as the latent accommodation supply and it might typically involve home owners letting out spare bedrooms or second homes.

4.1.4 The analysis has covered the geographic area represented by a sixty minute travel zone to the Hinkley Point C Development Site, with a particular focus on Somerset and the three immediate districts of West Somerset, Sedgemoor and Taunton Deane. The sixty minute zone represents the zone within which construction workers moving into the local area to work on the Project would be expected to seek accommodation.

4.1.5 There is a range of good reasons for using existing accommodation sources to meet a significant proportion of the demand created by the HPC Project:

- There is clear potential to deliver both direct economic benefits to local accommodation providers and indirect (spin-off) benefits for other businesses in the local area.
- There is evidence from the responses to EDF Energy's consultations and accommodation surveys of a high level of interest from local providers to offer accommodation to the construction workforce.
- There is clear evidence that some local accommodation sources have significant spare capacity at certain times of the year (notably tourist accommodation during off-peak periods).

- The location and kinds of accommodation sought by the construction workforce will vary depending upon a range of factors, most notably the length of stay, salary, role and family circumstances of the individuals concerned and whether or not they plan to move to the local area on a permanent basis. As a result dedicated campus or other forms of EDF Energy-provided accommodation will not be suitable or attractive options for all workers, with a number preferring to find local accommodation through other routes.
- Use of existing accommodation sources will be required prior to the completion of any purpose built campus accommodation provided by EDF Energy.
- The demand created by the Project should help to stimulate improvements in the existing housing and tourist stock, thus generating legacy benefits.
- Using existing accommodation that is not fully occupied as part of the Accommodation Strategy is responsible, cost efficient and sustainable.

4.1.6 Equally in delivering the Accommodation Strategy, EDF Energy does not wish to use existing accommodation sources beyond their capacity or in ways which deliver detrimental impacts for the local tourism sector or local communities. The provision of substantial campus accommodation will act as a buffer against the risk of adverse impacts from too much pressure on existing accommodation resources, as well as providing significant operational benefits for EDF Energy and its contractors - these benefits are discussed further in **Section 5**.

4.2 Tourism Accommodation

4.2.1 There is a substantial local supply of tourist accommodation in the Somerset area. **Table 4.1** provides information on supply in the three immediate districts:

Table 4.1: Tourism Accommodation in Sedgemoor, Taunton Deane and West Somerset.

	Sedgemoor	Taunton Deane	West Somerset	Total
Serviced	1,753	2,198	1,860	5,811
Self-Catering	517	536	1,406	2,459
Holiday Village	4,776		7,256	12,032
Caravan/Camping	4,946-5,620	251-309	1,478-1,603	6,675-7,532
Campus/hostel	249		282	531
Total	**12,241-12,915**	**2,985-3,043**	**12,282-12,407**	**27,508-28,365**

4.2.2 It can be seen that there are approximately 28,000 tourism bed spaces within the three districts. Average occupancy levels for this accommodation outside of peak holiday periods typically ranges from around 20-50% - meaning a large pool of tourist accommodation could potentially be utilised by the construction workforce in off-peak periods. Use of some of this accommodation during off-peak periods would clearly offer economic benefits to tourist accommodation providers and other related local businesses.

4.2.3 However it is also recognised that occupancy of tourist accommodation during the holiday season is much higher and that it would be detrimental to the local economy if, during peak periods, a significant proportion of the construction workforce was using accommodation that would normally be occupied by tourists. In the analysis of spare capacity in the tourist accommodation sector a very conservative estimate has been made: initially considering only a proportion of that capacity which is estimated to be spare during the peak (August) period for tourism. Any use of holiday villages or caravan/camping parks has been excluded entirely from this calculation. On this basis a much more conservative assessment of approximately 430 bed spaces would be available at peak periods for use by the construction workforce without any risk of displacing tourists.

4.2.4 In practice, the risk of adverse effects on the tourism sector will also be further reduced by the seasonal pricing operating within tourism markets. This is likely to act to significantly reduce the take up by the HPC construction workforce of tourist accommodation during peak periods – for example the average price of a hotel or bed & breakfast accommodation in Somerset in August is substantially above the normal union-agreed accommodation allowance for the majority of the construction workforce. Therefore, the normal operation of market mechanisms would be likely to encourage the use of tourist accommodation mainly during the cheaper non-peak periods when there is significant spare capacity and when the tourism industry stands to benefit from the additional demand generated by the construction workforce.

4.3 Private Rented Accommodation

4.3.1 There is also a substantial private rented sector within West Somerset, Sedgemoor and Taunton Deane. The following table shows the number of private rental sector (PRS) units at the time of the 2001 Census and at the time of the 2008 update included in the Housing Needs Survey (HNS) that was undertaken as part of the local authorities' Strategic Housing Market Assessment.

Table 4.2: Private Rented Accommodation

District	2001 Census PRS %	PRS Units (2001)	2008 Update from HNS	PRS Units (2008)	Bedspaces
Sedgemoor	7.2%	3,199	9.7%	4,689	9,847
Taunton Deane	8.2%	3,598	11.1%	5,522	11,596
West Somerset	9.9%	1,547	13.1%	2,148	4,511
3-District Area	8.0%	8,344	10.8%	12,359	25,954
Other in 60 minutes	7.1%	4,528	9.9%*	15,738	33,050

*Figures from 2006 HNS, cited in WoE SHMA

4.3.2 In total it can be seen that there are over 12,000 units in the three Districts closest to the Hinkley Point C Development Site and a further 15,700 in the remainder of the 60 minutes travel zone. It should be noted that these are private rented sector units rather than bed spaces. The vast majority of units have more than one bedspace, and an average of 2.1 bed spaces per unit has been assumed (based on typical unit sizes), producing a total of 59,000 bedspaces across the 60 minute travel zone.

4.3.3 However, it is likely that the majority of workers will want to take accommodation within the three immediate Districts. As such, the focus of the assessment has been on those areas, using current vacancy rates (which are less than 5%, and compare to annual turnover in the sector of around 20%). This provides a figure of over 400 units (equating to more than 900 bedspaces) and, for the reasons set out above, also represents a conservative assessment of the private rented accommodation capacity that might be used by the construction workforce without incurring negative impacts on the sector.

4.4 Latent Accommodation

4.4.1 EDF Energy placed newspaper adverts on two separate occasions inviting potential landlords to register their property if they wished to offer accommodation to the HPC construction workforce. In total these adverts produced responses for over 750 rooms, of which over 450 were genuinely "additional" when compared against existing data. It is likely that the amount of latent accommodation of this kind will increase over time as the construction phase starts and more people respond to the commercial opportunities which arise from it.

4.5 Summary of Accommodation Capacity

4.5.1 Based on the above analysis it is estimated that, during the peak tourist period, and looking across all sources of accommodation, there is aggregate spare capacity of in excess of 2,200 bed spaces which HPC construction workers would be able to use without creating any risk of significant disruption to accommodation markets. This figure breaks down between the main sources of accommodation as follows:

Table 4.3: Summary of Spare Accommodation Capacity Analysis

Accommodation Type	Estimated Local Spare Capacity	Comments
Owner Occupied	450 +	Will be driven by the number of workers that wish to relocate for the long-term. EDF Energy's estimate is that the additional demand for owner occupied properties will be negligible compared to the existing large owner occupied market.
Private Rented Sector	925 +	Based on current vacancy rates in the narrower three district area of West Somerset, Sedgemoor and Taunton Deane. Assumes an average of 2.1 construction workers per private rented property.
Tourist (ie B&Bs/hotels/ guesthouses)	435 +	Very conservative estimate based on availability at peak August period. Much more is available during the remainder of the year. Includes mainly B&B serviced accommodation but excludes caravans and holiday parks.
Latent (ie accommodation not currently offered to the market)	450 +	Based on survey data. Likely to be an under-estimate of total which will come forward.
Total	**2,260 +**	

4.5.2 As a result of this analysis, EDF Energy has concluded that it is reasonable to assume that at least 2,200 bed spaces will be available locally to support the accommodation of the HPC construction workforce without displacing local people or tourists. Use of local accommodation up to this level will offer net positive benefits to the local area and economy, with a low risk of any material negative impacts. For the reasons set out above this is a very conservative estimate and there is potential to use much more tourist accommodation, in particular outside of the peak holiday periods.

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5. A CAMPUS BASED ACCOMMODATION STRATEGY

5.1.1 While taking account of the good case for using existing accommodation sources, EDF Energy considers that there is a clear requirement to provide additional accommodation to support the HPC construction workforce. This will not only mitigate against the risks of negative local impacts, e.g. during peak periods of demand, but will also deliver significant operational benefits for EDF Energy in terms of delivery of the construction programme and management of the workforce.

5.1.2 EDF Energy believes that the best approach to providing additional accommodation for workers during the construction of Hinkley Point C is through the provision of dedicated accommodation campuses. The preference for a campus based approach is based on a range of operational and practical considerations, drawn from experience on other projects. In particular it is considered that campuses:

- Provide the best means of managing large numbers of workers to ensure high standards of behaviour. Accommodation campuses will contain a mix of supervisors and workers, with security personnel always on hand to deal with any issues that might arise, for example in relation to noise or unauthorised visitors. This will help to contain any potential impacts within the accommodation campuses, reducing the risk of disruption for the local community.
- Can be purpose-built to meet the needs of construction workers – e.g. with on-site catering, laundries, bars and sports facilities. This will ensure that the needs of workers are met and will provide a range of readily available amenities during their leisure time;
- Will enable EDF Energy to run shuttle bus services to the site, thereby reducing additional traffic on the local road network. It is acknowledged that transport impacts of the Hinkley Point C Project are a local concern and the transport management benefits of campus accommodation are significant.
- Will provide a convenient and attractive accommodation option for workers, which will be important in attracting and retaining a high-performing workforce. Many workers will be coming to the area only for short periods. Some will be returning home at weekends – and some may need short-term accommodation while they make longer term arrangements. The accommodation campuses provide ideal flexibility for workers and certainty for contractors to respond to these varying needs.

5.1.3 The accommodation campuses will provide attractive, good standard facilities. Every room will have its own TV and en-suite bathroom. The two largest campuses (Bridgwater A and the on-site campus) will have communcalcatering and laundry facilities, bars, on-site security, and leisure facilities including sports pitches that will also be available for use by local people.

5.1.4 The accommodation campuses, for which consent will be sought as part of the development consent for the Hinkley Point C Project, will provide EDF Energy with a clear and certain means of accommodating a significant proportion of the construction workforce moving into the area. Such certainty is important not only in attracting and accommodating the workforce required for the Project but also to ensure, as discussed above, that the accommodation demand generated by the Project will not generate adverse effects on the availability of tourist or private rental accommodation. This certainty is important to EDF Energy, to contractors and should be of comfort to those concerned about the impact of the inflow of workers to the area.

5.2 Experience from Sizewell B

5.2.1 The accommodation campus proposals take account of the fact that a similar style of campus accommodation was used during the construction of Sizewell B – the most recent nuclear power station built in the UK. The campus was widely regarded as a success, in particular by local people who found that it generated minimal disturbance and provided an effective means of managing the workforce. The campus also proved very popular with construction workers, with a waiting list throughout the development period. The campus philosophy used at Sizewell and the lessons learned will be factored into the successful running of the Hinkley Point C accommodation campuses.

5.3 Support for Local Housing

5.3.1 Some responses to EDF Energy's Stage 2 consultation suggested that either permanent housing should be provided instead of campuses, or that the accommodation campuses should be built in such a way as to allow for subsequent conversion into housing once the construction phase of the Project was complete.

5.3.2 The accommodation campuses themselves are not suitable for conversion into housing due to their high density, with around 35 workers living in individual rooms in each accommodation block and shared amenities provided in separate blocks. This is the most efficient way of accommodating a large number of workers but it is not appropriate for family-style housing or the requirements and lifestyle of permanent residents in the local area. However a campus-style approach can lend itself to adaptation for student accommodation and this is why EDF Energy has brought forward proposals for legacy use by Bridgwater College of the accommodation campus at Bridgwater C (see **Section 6** for further details).

5.3.3 EDF Energy is exploring options to work with developers and the local authorities to facilitate housing development and property refurbishment and in particular whether this could kick-start developments that were previously granted planning permission but have not yet been fully developed. This would not remove the need for campus accommodation but could usefully meet the needs of some of the workforce, e.g. for workers who bring their families to the area, and would provide a legacy of some housing in the local area. Any housing proposals would require consent from the local planning authorities and would not form part of EDF Energy's application for development consent for the Hinkley Point C project.

6. EDF ENERGY'S ACCOMMODATION CAMPUS PROPOSALS

In this section further information is provided on EDF Energy's specific accommodation campus proposals.

6.1 Sizing of Accommodation Campus Provision

6.1.1 The size of the accommodation campuses have been based on a range of considerations, including:

- operational requirements and the benefits of providing substantial campus accommodation;
- the scale of the anticipated peak workforce and the estimated proportion of local recruitment at peak construction;
- the estimated level of spare accommodation capacity in the local area; and
- concerns expressed at Stage 2 consultation by some stakeholders about the scale of campus accommodation in their locality.

6.1.2 Overall, and noting that a degree of uncertainty is inherent in estimating the accommodation demand that will be generated by the project, it has been concluded that a total campus provision of around 1,500 spaces strikes the right balance between these various considerations.

6.1.3 In reaching this figure, EDF Energy has been mindful of the desirability of providing confidence that there will not be any negative impacts on local accommodation markets even at the point of peak construction. The indicative calculation in **Table 6.1** has been considered:

Table 6.1: Accommodation Analysis at Peak Construction

Peak workforce	5,600
Local recruitment at peak	34%
Workforce requiring accommodation at peak	3,700
Spare accommodation capacity locally	Approx 2,200
Additional accommodation to be provided by EDF Energy at peak	Approx 1,500

6.1.4 Construction of the accommodation campuses will commence once development consent for the Hinkley Point C Project has been granted and they will be occupied from 2013 onwards. They will remain operational throughout the construction period and will cease to operate once the construction phase has been completed, anticipated in around 2020. For much of the construction period it is estimated that the campuses will provide accommodation for around 50% or more of the non-home based workers who will move into the area – and at peak construction they will provide accommodation for around 40% of the non-local workforce. As such the accommodation campuses will meet a significant proportion of the accommodation

demand generated by the Project and will provide a significant buffer against any potential risks of unsustainable usage of existing local accommodation capacity.

6.1.5 It is proposed that 1,510 campus bed spaces are provided at three sites as follows:

- On-site campus: 510 spaces;
- Bridgwater A campus: 850 spaces;
- Bridgwater C campus: 150 spaces.

6.1.6 The rationale for the proposals for each site is discussed in the following sections.

6.2 On-site Campus

6.2.1 EDF Energy is proposing a 510-bed on-site accommodation campus, to be located on land already owned by EDF Energy and adjacent to the HPC Development Site.

6.2.2 In addition to the general benefits of campus accommodation set out above, there are a number of specific benefits that arise uniquely from a campus located on, or very close to, the HPC Development Site. These benefits are as follows:

- Workers can either walk directly to site or take a very short bus journey within the site compound. This will materially reduce the trips of workers through Cannington and other local villages on the local road network.
- Having personnel close to site will ensure a rapid and effective response to any on-site issues or incidents.
- By minimising travel times between the campus and the site, the on-site campus will help to increase the productivity and efficiency of the workforce through minimising the effective length of their working day.
- An on-site accommodation campus will be particularly beneficial for those working night shifts or irregular unsocial hours, including some supervisory and maintenance staff.

6.2.3 These considerations are supported by EDF Energy's recent engagement with bidders for the civil engineering contracts for Hinkley Point C. The feedback from these major construction companies is that a well appointed on-site accommodation campus will be popular with construction workers through reasons of convenience and reduced travel time and will facilitate the efficiency of the construction programme for the reasons outlined above. This was also reflected in the experience at Sizewell B.

6.2.4 In this context it should also be noted that the principle of an on-site accommodation campus at the Hinkley Point C site was considered as part of the permission granted in 1990 for a single Pressurised Water Reactor (PWR) on land within the proposed Hinkley Point C site. The proposal was for a 400-bed campus with the capability to be extended up to 700. The Inquiry Inspector, Michael Barnes QC, weighed the advantages, including the reduction in traffic on the local roads and operational benefits, against possible social impacts including concerns about disturbance from local villages and recommended that on balance accommodation should be provided on-site.

6.3 Size of the On-site Accommodation Campus

6.3.1 EDF Energy proposed a 700-bed on-site campus in its Stage 2 consultation. Given the considerations set out above, from an operational perspective there would be advantages in having an even bigger campus on-site. However having taken account of local concerns raised during the consultation about the scale of the proposed development in relation to local communities and following wider assessment of local accommodation capacity, EDF Energy is now proposing to reduce the campus size to 510 spaces.

6.3.2 While it is recognised that there are those who would like to see an even smaller on-site accommodation campus, it is considered that any further reduction in the size of the on-site campus would materially reduce the operational efficiency of construction. It would also increase the transport impacts on the local road network. Furthermore it would be increasingly difficult to justify the economic provision of good quality on-site facilities and supporting amenities for construction workers.

6.3.3 It is therefore considered that an on-site accommodation campus of this scale represents a reasonable balance between the requirements of the Project and local considerations, and that this view is supported by the outcome of the 1989 HPC inquiry.

6.3.4 The on-site accommodation campus has been designed to include a good level of facilities to meet the anticipated demand of workers. This includes sports pitches (which will also be available for use by local communities), meeting areas, restaurant and bar facilities and IT facilities. Providing a good set of amenities on-site will result in workers having less need to leave the site and will therefore reduce traffic impacts and help to ensure employee well-being and good behaviour.

6.4 Location of the On-site Accommodation Campus

6.4.1 EDF Energy is aware of the concerns from local residents about the position, scale and visual impact of the accommodation campus development from neighbouring villages and has worked hard to address these concerns.

6.4.2 Having explored alternative options, it is considered that the proposed location of the on-site campus, in the south-east area of the Hinkley Point C Development Site, represents the best solution available. Alternative locations that have been explored include:

- land to the north of Green Lane, adjacent to the existing Hinkley Point A site.
- land to the south of the existing Hinkley Point A and B stations.

6.4.3 Land north of Green Lane, adjacent to the existing Hinkley Point A site, is to be used for the nuclear installation itself. Land south of the existing Hinkley Point A and B stations contains a Scheduled Monument, Pixies Mound, and is designated as part of the Severn Estuary Special Protection Area (SPA), as a Ramsar Site and as part of the Bridgwater Bay Site of Special Scientific Interest (SSSI). Therefore, this area has a high ecological and heritage value and is unsuitable for development.

6.4.4 As a result, the most suitable location for an on-site accommodation campus is within the area proposed, south of Green Lane. Within this area, the campus has been located as far north as possible, away from Shurton and in close proximity to the highway for efficient use of construction land. Land directly north of the chosen site forms part of an area allocated as common land and is not in the ownership or control of EDF Energy. The location also takes into account potential construction noise and is therefore located at the perimeter of the site to reduce disturbance to campus residents and is also sited to reduce light, noise and general amenity issues.

6.4.5 EDF Energy recognises the concerns of some in the local community regarding an on-site campus and has proposed a number of mitigation methods to address them. A planted landscape bund (area of raised ground) is proposed to screen the on-site accommodation campus at the time of construction, providing visual mitigation and some noise attenuation both for Doggetts and for the residents of Shurton. The lighting design, together with the landscaping strategy, has been designed to minimise light spill to the residential properties to the south.

6.4.6 The accommodation campus layout has been designed to reduce potential noise, light and visual impacts on the local community. The quieter, residential buildings have been positioned along the southern boundary of the site and the recreational facilities have been positioned to the north of the campus development, at the furthest point from Shurton village. There is no direct pedestrian access or road to the village of Shurton and access will only be obtained from Wick Moor Drove: the main access point. This will ensure that the development includes effective measures that prevent unofficial shortcuts from the site to Shurton and Stogursey.

6.4.7 Since Stage 2 consultation, a number of further modifications have been made to the campus design which will further reduce the level of visual impact and disturbance of the accommodation campus to the neighbouring village of Shurton. These include:

- A more compact arrangement of accommodation and amenity buildings – arising from the reduction in size of the on-site campus and consolidation of facilities.
- The ground level of the campus will be lowered, to a maximum of 20m and the embankment to the south will be constructed to reach 26m. This arrangement will therefore reduce the visibility of the accommodation blocks as viewed from the south.
- The car park will be repositioned to the north-west of the site to reduce visual impacts to those living close to the site.
- The playing fields will be repositioned to the north east of the site to facilitate public use of the sports pitches.

6.4.8 EDF Energy will continue to work closely with the local community throughout the construction period to address concerns arising from the operation of the on-site accommodation campus wherever possible.

6.5 Bridgwater Accommodation Campus Proposals

6.5.1 In addition to the on-site campus, EDF Energy is proposing two accommodation campuses in Bridgwater. Bridgwater is considered a suitable location for campus accommodation as it is the principal urban area closest to Hinkley Point and therefore within proximity of a range of local services and with good transport links.

6.5.2 A number of concerns were raised at Stage 2 consultation around the additional traffic impacts of sizeable accommodation campus being located in Bridgwater. As noted above, dedicated bus services will be used to transport workers housed in campuses to and from the construction site, thereby minimising the additional journeys generated by the campuses. More generally it is recognised that the scale of the Hinkley Point C Project as a whole will give rise to additional traffic in the Bridgwater area and as a result we are proposing to bring forward a number of road improvements – details of which are contained in the main consultation document "Update on and Proposed Changes to Preferred Proposals".

6.6 Bridgwater A Campus

6.6.1 The Bridgwater A accommodation campus site incorporates a previously developed site, known as the former "Innovia" site, and is located to the north east of Bridgwater Town Centre. An 850-bed campus is proposed for this location (which may rise to 1,000 spaces in the event that the Bridgwater C site is not developed – see **Section 6.7**).

6.6.2 This site is considered suitable for an accommodation campus development as it is located on brownfield land, is close to the centre of Bridgwater, is of sufficient size to allow for a significant development and previous planning decisions have supported the principle of development of this land. Much of the site in question is subject to ground contamination and will require remediation. Whilst the site benefits from planning permission for residential development, it forms part of the much larger north east Bridgwater development which is planned to be developed over a number of years.

6.6.3 Benefits from EDF Energy's development of the Bridgwater A site for campus accommodation will therefore include land remediation, the potential to create serviced parcels of land and the facilitation of future development of the site for residential use in line with the Bridgwater Vision. EDF Energy will also develop new external sports facilities on the site which will be made available for the use of local residents as well as campus workers residing at the accommodation campus during its operation.

6.6.4 As with the on-site accommodation campus, the Bridgwater A campus will be developed with good quality supporting amenities and facilities for the use of construction workers. In addition to the accommodation units, the development will include an amenity building, comprising communal canteen dining facilities, a lounge and bars. A clubhouse with changing facilities and showers and external recreational facilities including a single large sports pitch and two 5-a-side pitches will also be provided. There will be bus terminus to facilitate transfers to the Hinkley Point C Development Site.

6.6.5 A further advantage of this site is its immediate proximity to the other proposed campus at Bridgwater College (see below). This proximity enhances the ability to provide efficient bus services and to provide facilities which serve both sites.

6.7 Bridgwater C Accommodation Campus

6.7.1 The proposals for the Bridgwater C accommodation campus remain unchanged from the Stage 2 consultation at 150 bed spaces. The Bridgwater C campus is proposed to be located immediately across the road from the Bridgwater A site (on the rugby training pitch next to Bridgwater College). The amenity and recreational facilities have been omitted since Stage 2 consultation and workers will now share the facilities at Bridgwater A. The two accommodation campuses will therefore operate in some respects as one campus for the duration of the construction period.

6.7.2 Once the campus is no longer needed for the HPC workers, it could be made available for student accommodation or other facilities in connection with Bridgwater College, subject to planning permission being granted for that use by the local planning authority. In the event that planning permission was not granted, the buildings would be removed.

6.7.3 It should be noted however that since the Stage 2 consultation further ground survey work has been carried out on the site (which is a former landfill site) and this has raised issues of concern in respect of load-bearing capacity and therefore viability of the site for development. Further studies will be conducted and in the event that the site is considered unviable for development, it is proposed to move the 150 places onto the nearby Bridgwater A site, bringing the total number of bed spaces on that site to 1,000.

7. ACCOMMODATION MANAGEMENT

EDF Energy recognises that there are understandable concerns about the impacts of a large number of construction workers moving into the local area within a relatively short period of time. In addition to the proposals set out above, EDF Energy is committed to managing and monitoring the accommodation impacts of the construction workforce on an ongoing basis.

A key part of the approach to this is the establishment of an accommodation management office.

7.1 Accommodation Management Office

7.1.1 A small dedicated accommodation management office will be set up which will:

- provide a service to local people and businesses who wish to offer accommodation to Hinkley Point C workers
- provide a signposting service for construction workers providing them with details of accommodation available in the local area
- ensure that EDF Energy's accommodation campuses, once operational, achieve high occupancy levels at all times.
- monitor the up-take of accommodation within the local area by the construction workforce and – in consultation with relevant local stakeholders – adjust the activities of the office if necessary.

7.1.2 The accommodation management office will enable local people and businesses to advertise their accommodation and will maintain an up-to-date database of local accommodation sources. It will be up to accommodation providers to take bookings and enter into contractual arrangements with workers.

7.1.3 This will provide information to allow workers to make informed choices in relation to the suitability of accommodation for their requirements. The information provided to companies and workers via this database will be particularly valuable in the early construction phase while EDF Energy's accommodation campuses are still under development. Workers will also be provided with information about public services, schools and transport to help inform their accommodation choices, as well as information about local leisure and attractions to help promote the area to the workforce.

7.2 Monitoring of Accommodation Patterns

7.2.1 The accommodation management office will work with local communities to ensure that any issues or problems are identified and addressed at an early stage.

7.2.2 This will be achieved through:

- Working closely with all the main HPC contractors to ensure an adequate and regularly up-dated picture of accommodation usage by the construction workforce is maintained. The results of this monitoring will be made available to all the relevant authorities on a regular basis.
- Regular dialogue with key local stakeholders in the business, tourism and private rented sectors, as well as local authorities, to ensure that any emerging issues or problem areas are identified at an early stage.
- Developing or promoting, where appropriate, actions to address potential emerging issues. These might, for instance, include the development of block booking arrangements with providers or encouraging workers to consider particular accommodation options.

7.3 Housing Fund

7.3.1 EDF Energy is confident that the proposals for accommodation campuses and accommodation management will ensure that the influx of construction workers into the local area is managed efficiently and effectively.

7.3.2 However it is recognised that there is a possibility of some residual local accommodation impacts from the workforce and therefore, as an additional protection against the potential for any adverse effects, it is proposed to establish a £5m housing fund. This fund has the potential to bring real and lasting benefits to the local housing stock and to local people trying to access the housing market. For example, it could help to refurbish vacant or substandard properties, or provide loans to help local people get onto the housing ladder. EDF Energy will work closely with the local authorities on the design of the fund to ensure that it can be targeted where it is most needed.

7.4 Worker Code of Conduct

7.4.1 EDF Energy also recognises that there is widespread concern about the potential behaviour of some construction workers outside working hours. EDF Energy will require the highest standards of behaviour from workers on the Hinkley Point C project. Those standards will apply to the behaviour of workers in the local community as well as within accommodation campuses and on site. EDF Energy will work with its contractors to ensure that prompt and effective action is taken to address any cases of unacceptable behaviour by workers in the community.

7.4.2 All construction workers will be subject to a Code of Conduct, encouraging respect for the community and setting ground rules for behaviour. The Code will set out the standards expected of the workforce in their use of accommodation and the way they interact with the local community. Similar Codes of Conduct were implemented at Sizewell B and at West Burton and proved to be highly effective.

7.4.3 The Code of Conduct will be imposed through all the main contracts let by EDF Energy relating to the construction of Hinkley Point C and will be vigorously enforced.

7.4.4 The communications team in Bridgwater will engage with the local community throughout the Project, and will be available for the community to contact should they have any questions or concerns. Additionally, and in direct response to comments received from the public, a 24-hour dedicated helpline has been established to allow the local community to contact EDF Energy at all times.

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