

## **LATE SCOPING CONSULTATION RESPONSES**

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Secretary of State's scoping opinion.

**From:** [richard.bull@environment-agency.gov.uk](mailto:richard.bull@environment-agency.gov.uk)  
**To:** [Alan Ridley](#);  
**Subject:** Environment Agency Response to: 130213\_EN010058\_1654674  
**Date:** 27 March 2013 16:44:13  
**Attachments:** [PlanningProposal.rtf](#)

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The proposal has been reviewed and I enclose the Environment Agency's comments on:

Seabank Power Station, Severnside, Bristol

LPA ref: 130213\_EN010058\_1654674

Mr A Ridley  
The Planning Inspectorate  
National Infrastructure Directorate  
Temple Quay House  
(2 The Square) Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** WX/2013/123155/01-L01  
**Your ref:** 130213\_EN010058\_1654674  
**Date:** 27 March 2013

Dear Mr Ridley

**EIA SCOPING REPORT 12 FEB '13 - PROPOSED COMBINED CYCLE GAS  
TURBINE POWER STATION AT SEABANK POWER STATION, SEVERNSIDE,  
BRISTOL**

Thank you for referring the above proposal, which was received on 14 February 2013, and I apologise for the delay in responding.

I can now make the following comments relating to the EIA Scoping Report:

**FLOODRISK**

We note the proposal to divert the existing Red Rhine and acknowledge that the Lower Severn Internal Drainage Board is the appropriate body to agree the design and decide whether the proposals are satisfactory.

However, we are concerned that the flood risk section does not state that tidal flooding will be investigated further. In the first instance the Avonmouth/Sevenside Strategic Flood Risk Assessment Level 2 Report should be referred to in order to understand the risk of tidal flooding over the lifetime of the power station. It may be appropriate to carry out further detailed site specific tidal modelling (breach and overtopping) to ensure the power station is protected. Please consult with us to agree the criteria of the modelling.

It is important to establish who will be responsible for funding and provision of improved tidal defences over the development site.

Please note that the Flood Defence Officer for this area is Colin Taylor and his telephone contact number is 01278 484610.

**INTREGRATED POLLUTION CONTROL**

We request a full Best Available Techniques (BAT) assessment for the cooling options

Environment Agency  
Rivers House, East Quay, Bridgwater, Somerset, TA6 4YS.  
Customer services line: 03708 506 506  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

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outlined, the scope of the assessment should include the benefits to be gained in retrofitting the direct cooling option to the existing plant as well as the proposed new plant.

## GROUNDWATER PROTECTION/CONTAMINATED LAND

In addition to land contamination aspects we anticipate that the EIA will need to consider the construction phase and post construction phase risks to controlled waters. These risks may include dewatering and or the construction of deep excavations.

The effect of the development on any private water supplies in the area must be considered.

We also advise that any controlled water risk assessments completed within the EIA process should be based on Environmental Quality Standards (EQS) appropriate for the site context - i.e. adjacent to the Severn Estuary Special Protection Area (SPA). Rhines and ditches in proximity to the development site will eventually discharge into this receptor and thus EQS for the rhines should be the same as those for the SPA.

## BIODIVERSITY

The aspect of the proposal we would have most concerns about is the diversion of the Red Rhine. As stated, the rhine acts as a corridor for migrating eels and as such full consideration should be given to the Eels Regulations (2009) to ensure safe passage when proposing mitigation measures. Although this responsibility will fall to the Lower Severn Internal Drainage Board, it is worth reiterating.

The Red Rhine and associated ditches may also support water voles and act as corridors for otter. Proposed survey work in the spring should highlight any potential impacts on these species. A Mitigation Strategy for water voles, should they be present, should be discussed with the Environment Agency before being submitted as part of any planning application.

If you wish to discuss any of the above I can be contacted on 01278 484625.

Please quote the Agency's reference on any future correspondence regarding this matter.

Yours sincerely

**Richard Bull**  
**Sustainable Places - Planning Advisor**

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