

From: [REDACTED]
To: [West Burton C](#)
Cc: Robert.Vickers@environment-agency.gov.uk
Subject: RE: EN010088 West Burton C Power Station
Date: 18 November 2019 12:58:29
Attachments: [Peter Coomber. EA to send.pdf](#)

Following receipt of your email on the 6th November, I have now also received a copy of the application as promised.

I have also received the information I requested from Bassetlaw Council under the Freedom of Information Act.

I also requested the same from the applicant- EDF; and to date I have not received this- despite two requests and the initial timeframe for their compliance being past. Having chased them, they have indicated that they will provide the information requested by the 22nd November 2019.

I was also promised a letter from EDF- which was supposed to be received by myself by the 8th November- relating to aspects of correspondence (which have been unspecified by themselves)- which has also not been received by myself.

I also sent a letter to the Environmental Agency on the 10th October and I have not received any reply to this letter either (attached for reference).

The consequence of these points is that I am unable to make a full representation by the deadline of the 20th November- due to the outstanding data I have requested.

I will make every attempt to make my representation once I have received the information that is relevant to the situation. However, this will be a large amount of information that I am due to receive and I will need to review it, gather my thoughts and respond.

I will make every attempt to respond by the 6th December 2019.

I also request to attend the next 'open floor' examination, and the site visit that is being arranged.

I will keep you informed of any further developments.

Regards

Peter Coomber





10th October 2019

FAO: Robert Vickers (Environment Agency Representative)

Reference: EN010088

Application by EDF Energy (Thermal Generation) Limited for an Order Granting Development Consent for the West Burton C power station

I am writing following my telephone conversation with yourself, please find below the representations I would like to make regarding the above planning application.

In summary:

Following my complaints about noise/extra low frequency pollution/ electromagnetic interference; within my property (address above), Bassetlaw District Council and/or Spectrum Acoustic (acting for EDF Energy) have carried out monitoring at my address,

For the purposes of this letter I shall refer to the list of complaints/issues experienced as 'noise'.

From this monitoring I expected a meaningful appraisal on the impact of the 'noise' on my wellbeing; which has been impacted for a long period of time (my GP has written to Public Health England in respect of this: refer to page 158 of the bundle supplied by Bassetlaw District Council following my Freedom Of Information request).

However, following four testing periods, Bassetlaw District Council and/or Spectrum Acoustic concluded that there were not sufficient grounds for a nuisance to be considered.

I oppose the findings of this testing and/or the reports, and as a result any planning application should not be approved until this matter has been fully and properly assessed by agencies who have no conflict of interest with EDF Energy, and, the relevant agencies have had the opportunity to fully investigate and carry out correct testing for the issues I have raised (and I believe others have raised too)

Conflict of Interest, inadequate testing and improper notification of complaint to relevant authorities:

Prior to completing the testing at my property Spectrum Acoustic had been employed by EDF Energy to carry out noise monitoring at Coal Station A and B. Therefore, it is my understanding that Spectrum Acoustic should not have been involved in the monitoring arising from a complaint at my address, due to a conflict of interest.

Also, at the time of monitoring the levels of noise being produced by the ancillary equipment being used lower than the previous levels experienced (that generated my complaint); as the monitoring was carried whilst 3 of the generators at Power Station A were broken down. In addition, there was also a period of benign weather in May 2018; which meant the gas turbines were being run at a very low level.

All this means is that it wasn't possible to produce a meaningful reading as the plant was running at below typical levels.

Environment Agency criteria requires a full inspection of all equipment, in full operational mode, following any complaints made. It was also a requirement of EDF Energy to notify yourself of any such complaint. You are aware that this did not take place.

Background context:

Following my initial complaint of 'noise' interference in my property Bassetlaw District Council completed monitoring with Spectrum Acoustic. After testing I requested a copy of the report and was made aware that the data had been lost by Bassetlaw Council; albeit Spectrum Acoustic still had their copies of the data (that have never been released).

Bassetlaw District Council then carried out four lots of further monitoring; one of which was to replace lost data from the initial monitoring that was completed with Spectrum Acoustic(as above).

However, it has since become apparent that during all testing Bassetlaw District Council used the wrong equipment for the purposes of recording the noise frequencies being experienced - as they were just monitoring within infrasound (pure noise) using NR45 criterion curve**** rather than monitoring within the lower band (NR30) - that the 'noise' was being produced at. In summary, the testing should have been C weighted rather than A weighted*

In addition, there were other issues with the accuracy and efficacy of testing:

- For the monitoring that was completed outside the property (by Spectrum Acoustic), the calibration of the equipment was at the wrong level to accurately assess the 'noise'.
- For the Internal monitoring (also completed by Spectrum Acoustic) there were calibration issues as the equipment was not synchronised.
- The wrong microphones were being used- they should have used magnetic down to 1Hz and didn't.
- Also they should have recorded for infrasound and low frequencies. To date it not clear which they type of 'noise' testing they completed

Crucially, at no point did EDF disclose that Coal Station A was not being monitored for the vast majority of the testing period (as it was under repair). I only became aware of this when I recently received the Spectrum report which I received as part of the Freedom Of Information request.

- Coal Station A not being operational meant that regardless of the weighting issues and calibration issues, overall, inaccurate readings were achieved by Bassetlaw District Council and Spectrum Acoustic.

Some of the analysis of the 2nd, 3rd, 4th, 5th monitoring by Bassetlaw District Council has been assessed by INVC (their external advisors); which showed various spikes in 'noise' within my property, which INVC (and therefore Bassetlaw District Council) attributed to noise being generated by electric equipment within the property; using Spectrum Acoustics only available graph**- which was produced from outside monitoring overlaid with the inside spike data.

They also took the data from the 1st June 2018 at 03:00- which coincided with the time that one of the turbines at the power station would not be working.

However, the data that informed this opinion was inaccurate for the reasons described above.

- The reports that have been disclosed under the Freedom Of Information request show that this conclusion was, and remains inaccurate as it doesn't stand the test of rigour***

Subsequently, Bassetlaw District Council have concluded that the noises I continue to experience within my house are being generated from within my house. I refute these findings due to the inadequate testing that I have detailed above.

Impact on my, and public health, due to 'noise' from West Burton Power Station

According to the Environment Agency licencing, all vibration and noise (and other criteria relating to the operation of West Burton Power Station) should be contained within the boundary of the site, and not egress into the wider community. Whilst the inadequate testing and monitoring has not established that the noise being experienced within my property is coming from West Burton Power Station I am in no doubt that the issues I am experiencing are generated by the West Burton Power Station and this remains an impact on my health and wellbeing.

In addition, I have submitted a Freedom Of Information and Data Subject Access Request to EDF Energy on two occasions (Initial letter on the 28th July 2019 and 'chase' letter on the 26th September 2019) and to date I have received no acknowledgement or information (from my request). My next step will be to inform the Information Commission Officer if I have not received a response by the Freedom Of Information and Data Subject Access Request deadline.

However, until I receive this information I am unable to further detail my representation to the upcoming inspectorate examination. On my initial request to make representation (online submission), I was restricted to 500 words, I am aware that there follows an opportunity to make a more detailed representation; which I will complete when I have the available information from EDF Energy and yourself.

I also have many concerns on other matters such as the impact of additional transport etc if the planning permission were to be granted.

I also plan to explore Public Health England's response to the scoping, and will include this in my further representation.

Since EDF Energy put in the planning application (c2017) it has been extremely difficult, and still is, even at this late stage, to establish exactly what the application is for (as there are at least 3 options outlined in the planning application); so I don't fully know what I am objecting to.

The scoping criteria has changed a considerable number of times throughout this period. Therefore, once the inspectorate has set the agenda I hope to be in a clearer position as to how to respond.

Furthermore, EDF Energy have not released the consultation papers, and I draw your attention to pages 30-37 of the bundle (public meeting in Bole, Autumn 2017, where Mr Hugh Burton District Councillor attended) where my views on the development have previously been documented, and forwarded to EDF, to go into their consultation papers.

In conclusion:

It has taken me significant time to get this matter to be investigated, and I am concerned that it is only through my persistence and detailed reading on the subject that I am able to make the representations I am making. It should not be necessary for a lay-person to need to complete this level of research and investigation, to be able to have an issue fully and completely investigated; so that my health and wellbeing issues caused by this noise can be addressed.

Information has not been fully disclosed throughout the investigations.

For example; the documentation received I from Bassetlaw District Council following my Freedom Of Information and Data Subject Access Request I have found a large amount of previously undisclosed correspondence (emails and reports). For example; I had not been made aware by Bassetlaw District Council that there was a second Spectrum Acoustic report.

Throughout this period, I have kept a daily diary on the noise being experienced and how it has affected me and my health and wellbeing. It is now broadly accepted* that this 'noise pollution/ low frequency impact' is a recognised phenomenon. With the increasing move towards gas turbines, I expect that there will be a wider effect on more people within the community and there needs to be an approach that deals with these issues to protect the public from the issues I have experienced.

As you are aware, I am currently trying to sell my property and these ongoing issues may impact my ability to do so.

I am hopeful that now the Environment Agency are involved in this situation, that EDF Energy can be held accountable and the truth of the impact of the noise pollution be brought to light.

I have looked in detail at the inspectorate website, and in particular your comments.

Despite the inspectorate accepting the application, there are a large number of unresolved methodology reports to be prepared by various parties; some of which you have outlined in your previous response. I have taken on board that all the points you have indicated cannot be dealt with at this time and I await your response.

Yours,

Peter Coomber

*Source: University of Salford- Procedure for the assessment of low frequency noise disturbance report 2005 and 2011 (revised version)

**Source: Spectrum Acoustics Report Page 5- Figure 4: FFT of Spectrum audio samples recorded inside and outside the property at Rose Lea on 1st June 2018. Showing low frequency results between 0 and 500 Hz.

*** Source: Spectrum Acoustics Report Page 11- Sections 6 Conclusions

**** Source: Email dated 23rd May 2019 from Peter Wilson at INVC to David Watts