

West Burton C (Gas Fired Generating Station)

The West Burton C (Generating Station) Order

Land to the north of the West Burton B Power Station,
Nottinghamshire

Applicant's Comments on Relevant Representations

Examination Deadline 1



Applicant: EDF Energy (Thermal Generation) Limited
Date: 20 November 2019

GLOSSARY OF ABBREVIATIONS AND DEFINITIONS

ABBREVIATION	DESCRIPTION
AIL	Abnormal Indivisible Load - a load that cannot, without undue expense or risk of damage, be divided into two or more loads for the purpose of being carried on a road.
Applicant	EDF Energy (Thermal Energy) Limited (the Applicant).
BAT	Best Available Techniques – available techniques which are the best for preventing or minimising emissions and impacts on the environment. BAT is required for operations involving the installation of a facility that carries out industrial processes.
BDC	Bassetlaw District Council – the local planning authority with jurisdiction over the area within which the West Burton Power Station site and Proposed Development Site (the Site) are situated.
BPEO	Best Practicable Environmental Option
BPM	Best Practicable Means – actions undertaken and mitigation measures implemented to ensure that noise levels are minimised to be as low as practicable.
BS	British Standard – business standards based upon the principles of standardisation recognised inter alia in European Policy.
CCGT	Combined Cycle Gas Turbine – a CCGT is a combustion plant where a gas turbine is used to generate electricity and the waste heat from the flue-gas of the gas turbine is converted to useful energy in a heat recovery steam generator (HRSG), where it is used to generate steam. The steam then expands in a steam turbine to produce additional electricity.
CCR	Carbon Capture Ready – a power station is Carbon Capture Ready where it has been demonstrated that: sufficient space is available on or near the site to accommodate carbon capture equipment in the future; retrofitting carbon capture technology is technically feasible; that a suitable area of deep geological storage exists for the storage of captured CO ₂ ; transporting CO ₂ to the storage location is technically feasible and carbon capture and storage is likely to be economically feasible.
CCS	Carbon Capture and Storage - a technology that enables carbon dioxide, that would otherwise be released to the atmosphere, to be captured and permanently stored. Once carbon dioxide has been captured, it is then compressed and transported, before being permanently stored in deep geological formations, such as depleted oil and gas fields and saline aquifers.
CCS	The Considerate Constructors Scheme – a non-profit making, independent organisation founded in 1997 by the construction industry to improve its image.

CD&E	Construction, Demolition and Excavation Waste
CEMP	Construction Environmental Management Plan – a plan to outline how a construction project will avoid, minimise or mitigate effects on the environment and surrounding area.
COSHH	Control of Substances Hazardous to Health – a United Kingdom Statutory Instrument stating general requirements on employers to protect employees and other persons from the hazards of substances used at work by risk assessment.
CIRIA	Construction Industry Research and Information Association – a member-based research and information organisation dedicated to improvement in all aspects of the construction industry.
CTMP	Construction Traffic Management Plan - a plan outlining measures to organise and control vehicular movement on a construction site so that vehicles and pedestrians using site routes can move around safely.
CWTP	Construction Workers Travel Plan – a plan managing and promoting how construction workers travel to a particular area or organisation. It aims at promoting greener, cleaner travel choices and reducing reliance on the private car.
DCO	A Development Consent Order made by the relevant Secretary of State pursuant to The Planning Act 2008 to authorise a Nationally Significant Infrastructure Project. A DCO can incorporate or remove the need for a range of consents which would otherwise be required for a development.
DCLG	Department of Communities and Local Government – the UK department for communities and local government in England (now the Ministry for Housing, Communities and Local Government).
DEFRA	Department for Environment, Food and Rural Affairs.
EA	Environment Agency – a non-departmental public body sponsored by the United Kingdom government's Department for Environment, Food and Rural Affairs (DEFRA), with responsibilities relating to the protection and enhancement of the environment in England.
EIA	Environmental Impact Assessment – a term used for the assessment of environmental consequences (positive or negative) of a plan, policy, program or project prior to the decision to move forward with the proposed action.
ELV	Emission Limit Values – emission limit values based on the Best Available Techniques.
ES	Environmental Statement – a report in which the process and results of an Environment Impact Assessment are documented.
FBA	Furnace Bottom Ash – the “coarse” ash fraction produced by coal-fired power stations when pulverised fuel is burned at high

	temperatures and pressures.
FGD	Flue Gas Desulphurisation – a set of technologies used to remove sulphur dioxide from exhaust flue gases of fossil-fuel power plants.
HEMP	Handover Environmental Management Plan
HGV	Heavy Goods Vehicle – vehicles with a gross weight in excess of 3.5 tonnes.
HRSG	Heat Recovery Steam Generator – an energy recovery heat exchanger that recovers heat from a hot gas stream. It produces steam that can be used in a process (cogeneration) or used to drive a steam turbine (combined cycle).
IDB	Internal Drainage Boards – a type of operating authority with permissive powers to undertake work to secure clean water drainage and water level management within drainage districts.
ISMP	Invasive Species Management Plan
LCC	Lincolnshire County Council – the county council that has jurisdiction over land to the west of the River Trent.
LWS	Local Wildlife Site
MMP	Materials Management Plan
NCC	Nottinghamshire County Council – the county council with jurisdiction over the area within which the West Burton Power Station site and Proposed Development Site (the Site) are situated.
NPPF	The National Planning Policy Framework was published on 24 July 2018 and replaced the previous NPPF published on 27 March 2012. The NPPF sets out the Government's planning policies for England and how these should be applied in both plan-making and decision-taking. It does not contain any specific policies on Nationally Significant Infrastructure Projects but its policies may be taken into account in decisions on DCOs if the Secretary of State considers them to be relevant.
NPPW	National Planning Policy For Waste
OCGT	Open Cycle Gas Turbine – a combustion turbine plant fired by gas or liquid fuel to turn a generator rotor that produces electricity.
PFA	Pulverised Fuel Ash – a by-product of pulverised fuel fired power stations.
PPE	Personal Protective Equipment
PWMS	Precautionary Working Method Statement
PPG	Pollution Prevention Guidelines – a series of documents developed by the Environment Agency for England and Wales, the Northern Ireland Environment Agency (NIEA) for Northern

	Ireland, and the Scottish Environment Protection Agency (SEPA) for Scotland. Each PPG is targeted at a particular type of business or activity and covers environmental good practice to minimise pollution.
SEA/SA	Strategic Environmental Assessment/Sustainability Appraisal - SA is designed to ensure compliance with SEA and as such includes for requirements on environmental decision making such as an opportunity for the public to express their opinion on draft plans (community involvement), take into account significant environmental effects including those on human health, material assets and climatic factors and a full assessment of alternative options and reasons why alternatives have been assessed and why others have not.
SWMP	Site Waste Management Plan - a SWMP sets out how resources will be managed and waste controlled at all stages during a construction project.
WBA	West Burton A - the existing coal fired power station within the West Burton Power Station Site, owned and operated by EDF Energy (Thermal Generation) Limited.
WBB	West Burton B - the existing gas-fired power station, using Combined Cycle Gas Turbine (CCGT) technology, owned and operated by EDF Energy (Thermal Generation) Limited.
WLDC	West Lindsey District Council – The adjoining local planning authority to where the West Burton Power Station site and Proposed Development site (the Site) are situated.



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1. Introduction

- 1.1 This document (**Document 8.2**) has been prepared on behalf of EDF Energy (Thermal Generation) Limited (the 'Applicant') in respect of its application (the Application) for a Development Consent Order ('DCO') for the West Burton C (WBC) Project (the 'Proposed Development'). The Application was submitted to the Secretary of State for Business, Energy and Industrial Strategy on 30 April 2019 and accepted for examination on 23 May 2019.
- 1.2 The Application seeks a DCO to construct, operate (including maintenance) and decommission a gas-fired electricity generating station with a gross output capacity of up to 299 megawatts (MW), together with associated buildings, structures and plant. The Proposed Development is proposed on land within the boundary of the existing West Burton Power Station site, in Nottinghamshire.
- 1.3 A DCO is required for the Proposed Development as it falls within the definition and thresholds for a 'Nationally Significant Infrastructure Project' (a 'NSIP') under Section 14 and 15(2) of the Planning Act 2008 (the '2008 Act'). The DCO, if made by the Secretary of State, would be known as the West Burton C (Generating Station) Order (the 'Order').
- 1.4 This document sets out the Applicant's comments on the Relevant Representations that were submitted by the Interested Parties to the Secretary of State by the relevant deadline date of 30 August 2019, together with the Applicant's comments on the Additional Submissions accepted at the discretion of the Examining Authority (ExA).
- 1.5 This document has been submitted for Deadline 1 of the Examination.

2. Applicant's Comments on Relevant Representations

- 2.1 The Applicant's comments on the Relevant Representations submitted by Interested Parties are set out in Table 2.1 on the following pages of this document.
- 2.2 Table 2.1 includes the reference number for each Relevant Representation, the name of the Interested Party that submitted the Relevant Representation, the full text of the Relevant Representation and the Applicant's comments on each Relevant Representation.

Table 2.1 – Applicant's Comments on Relevant Representations

Ref.	Interested Party	Relevant Representation	Applicant's Comments
RR-001	Anglian Water Services Ltd	<p>Thank for you the opportunity to comment on the West Burton C Power project. Anglian Water is considered to be a statutory consultee for nationally significant infrastructure projects as identified in the Planning Act 2008 and associated regulations. The following representations are submitted on behalf of Anglian Water as water undertaker for the above site: Anglian Water is in principle supportive of the above project. Impact on existing assets: There is no existing water infrastructure in Anglian Water's ownership within the boundary of the above project as shown on our asset plans. We are not aware of a need for any requirement for diversion(s) or mitigation to protect existing infrastructure to enable the proposed development. Groundwater sources: As noted in the submitted Environmental Statement (document APP-041) there is an existing borehole known as Humble Carr which is used by Anglian Water to supply potable (clean) water located 2km to the north east of the proposed site. There is 220m of mudstone overlying the aquifer. As such we don't have any concerns relating to implication of the above site for this groundwater source. Protective provisions: Anglian Water normally requests protective provisions specifically for its benefit where existing infrastructure is located within the redline boundary of DCO applications. As set above there is no water infrastructure within the site boundary. Therefore in this instance we are not seeking protective provisions specifically for Anglian Water. Connections to water supply network: Anglian Water is not aware of any requirements made upon them for a connection(s) to the</p>	<p>The Applicant acknowledges the response from Anglian Water Services and notes that no further dialogue is deemed necessary and no protective provisions are required in the draft DCO.</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>water supply network for the above project. Should you have any queries relating to this response please let me know.</p>	
RR-002	Canal & River Trust	<p>The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. The Trust is a prescribed consultee and we have already provided a response at the pre-application stage. However we take this opportunity to state the Trust's position at this stage. The River Trent runs to the east of the West Burton Power Station. The Trust does not own the river but is Navigation Authority and therefore concerned with ensuring that there are no adverse impacts on navigation or navigational safety arising from the proposed development. The River Trent is defined as a freight waterway by the Trust and we are therefore also keen to promote the use of the waterway for the sustainable transportation of freight. Protective Provisions The development boundary extends up close to the River Trent. The Trust has responsibilities to maintain Navigation upon the river as part of our role as Navigation Authority, and we advise that any works on site should seek to avoid damage to the river structure to a degree that could impede navigation. Given the proximity of works to the River Trent, we request that a future Development Consent Order (DCO) should include provisions for the protection of the Trust in our role as Navigation Authority. We note that the draft DCO includes protective provisions within schedule 4 for the protection of electricity and water undertakers. We request that protective provisions in relation to the Trust are included. The Trust has standard provisions which have been included in a number of DCOs which have recently been</p>	<p>The Applicant acknowledges the response from the Canal and River Trust (the Trust).</p> <p>The River Trent falls outside of the Order Limits (APP-022, Document 3.5) and there are no works proposed to the river. Therefore, there will be no obstruction or impediment to the navigation of the watercourse. Chapter 12: Flood Risk, Hydrology and Water Resources of ES Volume I (APP-041, Document 5.2) has been prepared on this basis. Notwithstanding, the Applicant is in dialogue with the Trust and an update will be provided in Deadline 2.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>confirmed.</p> <p>Water Abstraction/Discharge The Trust has previously commented on the potential for any alterations to the existing abstraction and discharge rates of water from the River Trent to impact upon navigation. We note that the submitted information states that no alterations to the discharge to the River Trent, nor any alterations to any existing water abstraction from the Trent, are sought. In the event that any alteration to these arrangements is required, the Trust would wish to be consulted further to ensure that the impact to navigational safety can be fully assessed.</p> <p>Freight The use of the waterway for the transportation of waterborne freight, especially bulk materials and abnormal loads is a form of sustainable transport which can help in reducing greenhouse gas emissions and reduce congestion on the local highway network. Efforts to mitigate against the adverse impacts of traffic are promoted by paragraph 102 of the National Planning Policy Framework and in, in the case of larger loads, in the governments water preferred policy for the movement of abnormal loads. Correspondence from the Department for Transport to PINS highlights the policy position for the movement of abnormal indivisible loads by water, and the advisory role of Highways England. https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2018/02/wpp_letter.pdf We note that the submitted 'Framework Construction Traffic Management</p>	<p>The Proposed Development does not include any new outfalls and the proposed abstraction and drainage systems would connect into the existing West Burton A and West Burton B system. As confirmed in Chapter 12: Flood Risk, Hydrology and Water Resources of ES Volume I (APP-041, Document 5.2), any alteration to the current abstraction volume would be 'minor' and carried out within the existing licence capacity. There would be no new abstraction or drainage connections to the river which could affect navigation.</p> <p>Paragraph 1.8.1 of the Framework Construction Transport Management Plan (CTMP) (APP-140, Document 7.6) clarifies that the appointed contractor will review options for the use of rail and water when sourcing construction materials. This is not limited to Abnormal Indivisible Loads. Paragraph 3.1.7 of the CTMP relates to consultation on traffic routing for Abnormal Indivisible Loads using the road network. Given the focus and content of the CTMP (the movement of transport by road), the Applicant does not consider it appropriate to consult the Trust in that context. If it is considered, in consultation with Highways England and the highways authority, that waterbourne freight should be utilised, the Trust would be consulted at that time to ensure the necessary consents are in place to use the watercourse for transportation. This will be made clear in an update to the CTMP.</p>

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		<p>Plan' (FCTMP) dated April 2019 identifies measures to manage HGV traffic associated with the construction of the proposal. However, it does not identify whether the River Trent can be used to transport general materials to and from the site. We respectfully request that appropriate consideration is given as to whether waterbourne freight can be utilised as a viable option to provide deliveries to and from site (not just limited to the transport of abnormal loads) in order to limit the HGV movements necessary. We welcome the recognition in section 3 of the FCTMP that the River Trent could be utilised for the transport of abnormal loads to and from site. As Harbour and Navigation authority for the River Trent, the Trust would be able and willing to work with the applicant and advise how abnormal loads could be transported by river to site. We do note that paragraph 3.1.7 does not identify that the Trust would be consulted upon the plan for delivery of Abnormal Indivisible Loads. We respectfully request that the Trust is included in the Management Plan to ensure that the potential for transport by river is fully assessed and taken into account.</p>	<p>It is not possible to commit to the use of rail or water-borne transport at this time, because it is not certain where materials required for the construction of the Proposed Development would be sourced from. It is likely that this would not be known with certainty until after a DCO is secured and a contractor is appointed. However, the Applicant is committed to reviewing the viability of transporting materials by sustainable modes of transport during the construction of the Proposed Development. This is proposed to be secured through Requirement 17: Construction Traffic and Routing Management Plan of the draft Development Consent Order (APP-004, Document 2.1). The Applicant wrote to the Trust on 1 October 2019 in response to the Trust's Relevant Representation. That correspondence confirmed that the Applicant had considered the Trust's request that their 'standard' protective provisions be included in an updated draft Development Consent Order. The Applicant explained in its response that, due to the very limited effect that the Proposed Development would have on the River Trent and the much more limited effect it would have on the waterway when compared with other schemes where the Trust's protective provisions had been used, there is no basis upon which the standard protective provisions would be considered necessary. The Applicant offered to include the Trust as a consultee under the surface and foul water drainage scheme secured by Requirement 9: Surface and foul water drainage of the draft Development Consent Order.</p> <p>The Trust has since responded with a suggested set of</p>

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			<p>protective provisions which are more limited in scope. Notwithstanding the more limited scope, the Applicant maintains its position that protective provisions for the Trust are not appropriate in the context of the Proposed Development. The Applicant is meeting with the Trust on 22 November 2019 and an update will be provided to the ExA via Deadline 2.</p>
RR-003	Environment Agency	<p>Please find below our relevant representation for the West Burton C (Gas Fired Generating Station). The Role of the Environment Agency The Environment Agency has a responsibility for protecting and improving the environment, as well as contributing to sustainable development. We have three main roles: We are an environmental regulator – we take a risk-based approach and target our effort to maintain and improve environmental standards and to minimise unnecessary burdens on business. We issue a range of permits and consents. We are an environmental operator – we are a national organisation that operates locally. We work with people and communities across England to protect and improve the environment in an integrated way. We provide a vital incident response capability. We are an environmental advisor – we compile and assess the best available evidence and use this to report on the state of the environment. We use our own monitoring information and that of others to inform this activity. We provide technical information and advice to national and local governments to support their roles in policy and decision-making. One of our specific functions is as a Flood Risk Management Authority. We have a general supervisory duty relating to specific flood risk management matters in respect of flood risk arising from Main Rivers or</p>	<p>The Environment Agency provided an updated response dated 18th September 2019 to reflect the latest information and which the Examining Authority accepted as an Additional Submission.</p> <p>The Applicant's response to the Environment Agency is provided against its Additional Submission in Table 3.1 of this document.</p>

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		<p>the sea. Outstanding information and issues of concern Our relevant representation outlines where further work, clarification or mitigation is required to ensure that the proposal has no detrimental impact on the environment. For the Inspectors information, we have been provided with a draft Statement of Common Ground from the applicant. Please do not hesitate to contact me if you require any further information. We look forward to continuing to work with the applicant to resolve the outstanding issues provided in our Relevant Representation and to ensure the best environmental outcome for this project.</p>	
RR-004	Historic England (HBMCE)	<p>We are a Statutory Consultee and have been engaged in pre application discussions with the applicant and their agents and we previously advised the Planning Inspectorate with regard to the scope of EIA.</p> <p>This is a large new structure but when set against the existing West Burton A and B Stations it represents a limited additional presence in the landscape. There is as acknowledged in the ES some additional impact upon the landscape setting of designated heritage assets at Bole (GII Listed Manor House and GII Listed Church of St Martin) and the Scheduled West Burton Deserted Medieval Village but the additional presence provided by West Burton C is limited.</p> <p>We believe direct archaeological impacts have been sufficiently covered in the Environmental Statement.</p> <p>Overall the proposed development will add to the landscape impact of power generation on the three</p>	<p>The Applicant acknowledges the response from Historic England. No further dialogue is deemed necessary.</p> <p>Reference should be made to the agreed Statement of Common Ground (Document 8.7), also submitted at Deadline 1. The SoCG acknowledges that the Applicant is committed to fostering and maintaining a close working relationship with the local community and will consider opportunity to widen the current community engagement programme to include heritage assets. However, this would sit outside the DCO process as it is not considered necessary to make the Proposed Development acceptable in planning terms.</p>

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		<p>designated heritage assets discussed above and as such we would urge the applicants to seek opportunities whereby they can financially support the local community in the physical conservation of heritage assets and the reinforcement of historic landscape character in the immediate area.</p> <p>We do not be oppose the grant of a DCO on this project and would be happy to look at a closely focused SoCG (and difference) in due course if that would be of assistance to the Examining Authority.</p>	
RR-005	Natural England	<p>Natural England's main points with regard to this application relate to the potential impact on the ecology of the site and in particular the assessment and mitigation of impacts on European protected species. Natural England acknowledges that since the submission of our response (16/10/2019) to the Preliminary Environmental Information Report (PEIR) the concerns that we raised have been addressed in the submitted documents. The Ecology report (Chapter 9) identifies key biodiversity enhancement proposals and further detail is given in the Landscaping and Biodiversity Management and Enhancement Plan. In particular these documents provide details on the restoration and enhancement of habitat for great crested newts. We also note that additional protected species surveys have been submitted.</p> <p>Natural England has indicated that a Statement of Common Ground would be an appropriate method to set out the matters that can be agreed between the applicant and ourselves and this is currently being prepared.</p>	<p>The Applicant acknowledges the response from Natural England.</p> <p>Reference should be made to the agreed Statement of Common Ground (Document 8.6), also submitted at Deadline 1. The agreed SoCG sets out matters agreed between the Parties.</p>

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		<p>The applicants have also indicated that they will approach Natural England with the draft European Protected Species Mitigation licence application for great crested newt for their protection during construction which we will review during the DCO examination period and if appropriate provide a letter of no impediment (LONI).</p>	<p>The draft European Protected Species Mitigation licence application was submitted to Natural England via the Pre-submission Screening Service on 9 September 2019. This has been accepted by Natural England and is currently progressing through the Natural England review process.</p>
RR-006	Public Health England	<p>Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals at this stage of the project and can confirm that: With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us at the scoping stage on 22nd May 2017 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. We are satisfied with the methodology used to undertake the environmental assessment. We have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion. Please do not hesitate to contact us if you have any questions or concerns.</p>	<p>The Applicant notes that earlier comments from Public Health England have been addressed and that the Environmental Statement has not identified any issues which could significantly affect public health. The Applicant notes that no further dialogue is deemed necessary.</p>
RR-007	Bawtry Town Council	<p>Bawtry Town Council would like to comment and reiterate the concerns of the DMBC conservation officer i.e. whether any additional noise and traffic generated by the development would have an incremental adverse impact on the historic character of the Bawtry conservation area given the A631 from Gainsborough joins the Great North Road in the town. We would raise issue with any potential increase in traffic traffic during the construction phase. This is</p>	<p>The Applicant notes the concerns of Bawtry Town Council.</p> <p>The Applicant undertook consultation with Doncaster Council (i.e. the host authority of Bawtry Town Council) to agree the scope of the Transport Assessment, including the assessment required for the A631 Bawtry Road/A638 junction. This was based upon worst-case assumptions, including a peak of construction lasting up to 3 months (over</p>

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		<p>expected to peak at 350 two-way movements per day during months 25-27, 112 of these being HGVs during months 18-30. There is no vehicle routing information - the application states that no further quantitative traffic impact analysis is required "as the figures are below the screening thresholds indicated in published guidance". This could however cause problems in Bawtry, depending upon where this significant amount of HGVs go.</p>	<p>the anticipated 3 year construction period) and assignment of up to 26 and 34 construction worker vehicles over the AM and PM peak periods respectively, with up to 4 HGVs inbound/outbound in any one hour forecast. Doncaster Council agreed in July 2017 that no further assessment or modelling of the A631/A638 junction in Bawtry was required within the Transport Assessment (TA) presented as Appendix 6A of Volume II of the Environmental Statement (ES) (APP-051, Document 5.2). Based on the TA, additional traffic generated by construction of the Proposed Development would not be likely to have a significant traffic and transport related effect on the Bawtry Conservation Area.</p> <p>Potential effects of noise and vibration are considered in Chapter 8: Noise and Vibration of Volume I of the ES (APP-037, Document 5.2). This includes an assessment of construction traffic related noise and vibration (paragraphs 8.6.11 – 8.6.16) which uses traffic data from the Appendix 7A: Transport Assessment and calculates the basic noise level (BNL) at 10m from the roadside at relevant roads. The assessment compares the change with and without the Proposed Development, including other committed developments, and predicts a maximum change in BNL of +0.7 dBA (refer to Table 8-29 of Chapter 8: Noise and Vibration) as a result of construction traffic associated with the Proposed Development. This BNL change is classified as a 'very low' magnitude impact (refer to Table 8-10 of Chapter 8: Noise and Vibration) and results in a negligible (not significant) effect on the affected roads (a Significant Observed Adverse Effect Level (SOAEL) is set at a +3 dB and the Lowest Observable Adverse Effect Level (LOAEL) is</p>

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		<p>In the absence of a traffic routing analysis, we would have concerns with an approval of this development.</p>	<p>set at +1 dB). Given that traffic flows associated with the Proposed Development at the A631/A638 Bawtry Junction would be lower than those flows at the affected roads within the scope of the TA, it follows that the BNL change at the A631/A638 Bawtry Junction and within the wider Bawtry Conservation Area would also be classified as not significant. An incremental adverse impact on the historic character of the Bawtry Conservation Area as a consequence of the Proposed Development would therefore not be considered likely.</p> <p>A traffic routing analysis and junction capacity assessments for the junctions, agreed to be within the scope of the assessment, are provided within Section 5 and Section 9 respectively of Appendix 7A: Transport Assessment (APP-052, Document 5.2). Construction worker routing is illustrated in Appendix E of Appendix 7A: Transport Assessment (APP-052, Document 5.2). An HGV routing plan is provided as Figure 2 of the Framework Construction Transport Management Plan (CTMP) (APP-140, Document 7.6).</p>
RR-008	Doncaster Council	<p>Thank you for notifying Doncaster Council of the application for Development Consent for the West Burton C Power Station. In order to make the following comments, consultation has taken place with colleagues in Air Quality, Contaminated Land, Ecology, Environmental Health, Highways and Transportation and Conservation. Ward Members and the Town Council for Bawtry have also been consulted, although no comments have been received directly.</p>	<p>The Applicant acknowledges the response from Doncaster Council.</p> <p>As explained under the Applicant's response to Bawtry Town Council (RR-007) in this table, Doncaster Council agreed in July 2017 that no further assessment or modelling of the A631/A638 Bawtry Junction in Bawtry was required within the Transport Assessment (TA) presented as Appendix 6A of Volume II of the Environmental Statement (ES) (APP-051, Document 5.2).</p>

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		<p>Air Quality It is highly unlikely that the operation will have any adverse effect upon the air quality of Doncaster; thus there are no objections on the grounds of air quality.</p> <p>Highways and Transportation There are no objections from a Highways Development Control perspective and the impact of this development on Doncaster's network will not be severe.</p> <p>Ecology It is not envisaged that this proposal would have any impacts on ecological receptors in Doncaster.</p> <p>Conservation The proposal is supported by an EIA which considers visual impact and the impact on heritage assets although the study area is confined to a 5km radius. The nearest heritage assets in Doncaster are 16km to the north west. There is no impact on these from the existing West Burton B buildings on the site and it is not considered there will be any visual or physical impacts from this additional development. Another consideration is whether any additional noise and traffic generated by the development would have an incremental adverse impact on the historic character of the Bawtry conservation area given the A631 from Gainsborough joins the Great North Road in the town.</p> <p>Environmental Health The distance to the closest Doncaster Borough residents is such that noise and vibration would not be an issue. The</p>	<p>Potential effects of noise and vibration are considered in Chapter 8: Noise and Vibration of Volume I of the ES (APP-037, Document 5.2). This includes an assessment of construction traffic related noise and vibration (paragraphs 8.6.11 – 8.6.16) which uses traffic data from the Appendix 7A: Transport Assessment and calculates the basic noise level (BNL) at 10m from the roadside at relevant roads. Given that traffic flows associated with the Proposed Development at the A631/A638 Bawtry Junction would be lower than those flows at the affected roads within the scope of the TA, it follows that the BNL change at the A631/A638 Bawtry Junction and within the wider Bawtry Conservation Area would also be classified as not significant.</p> <p>An incremental adverse impact on the historic character of the Bawtry Conservation Area as a consequence of the Proposed Development would, therefore, not be considered likely.</p> <p>On the remaining points raised by Doncaster Council, no further dialogue is deemed necessary by the Applicant.</p>

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		<p>comments in my correspondence dated 26th April 2019 and 14th May 2019 also remain relevant and I should be grateful if this could be taken into consideration.</p>	
RR-009	Newark and Sherwood District Council	<p>Dear Sir/Madam Town and Country Planning Act 1990 – Planning Consultation Proposed Works: Application for development consent order to construct, operate and decommission an open cycle gas-fired electricity generating power station Site Address: West Burton C Power Station, Sturton Road, Retford. Applicant: EDF Energy Application Reference: 19/01219/NPA</p> <p>I refer to the above consultation received by this Authority on 1st July 2019 in relation to the above application. The site is located approximately 13km metres to the north of the boundary with Newark & Sherwood District Council and as such it is considered unlikely that the proposal would result in any direct impact on the settlements or landscape within the District.</p> <p>Following consultation with colleagues in Environmental Health, I can advise you that Newark & Sherwood District Council wish to make the following comments; In relation to air quality the applicant has modelled the proposed effects both during construction and operational phases and in both cases the impact on air quality is describes as not significant. Environmental Health do not have the software or expertise to verify the model outputs, however the site will operate under an Environment Agency permit to control emissions and as such will have to use best available techniques. As such I have no adverse comments to make in relation to air quality.</p>	<p>The Applicant acknowledges the response from Newark and Sherwood District Council and notes that no further dialogue is deemed necessary.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>Other than highlighting the comments above, I have no other observations to make in relation to the proposed application for development consent order to construct, operate and decommission an open cycle gas-fired electricity generating power station.</p> <p>Please note that this matter has not been formally reported to the District Council's Planning Committee. In these circumstances the comments are those of an Officer of the Council under delegated power arrangements.</p> <p>Yours faithfully, pp. Matt Lamb Business Manager for Growth and Regeneration Development Business Unit.</p>	
RR-010	North and South Wheatley Parish Council	<p>North and South Wheatley PC on behalf of its residents have concerns regarding the following:</p> <p>[1] Contractor traffic using the village lanes as rat runs to get to the Power Station during the construction phase [3] Increase in HGV traffic through the village</p>	<p>The Applicant acknowledges the response from North and South Wheatley Parish Council. A response to each item is provided below.</p> <p><u>Applicant's Response to Items 1 and 3</u> Construction worker routing is illustrated in Appendix E of Appendix 7A: Transport Assessment (APP-052, Document 5.2). An HGV routing plan is provided as Figure 2 of the CTMP (APP-140, Document 7.6).</p> <p>Appendix 7A: Transport Assessment (APP-052, Document 5.2) assumes that a percentage of the construction workforce may come from the Worksop/Retford catchment area west of Site and therefore use the A620, which passes through North and South Wheatley. At the peak of construction, 20 of the 318 vehicles travelling to/from the north on C2 Sturton Road are assumed to distribute to/from</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
			<p>the A620 Gainsborough Road. These are worker vehicles only using route 2 (green) in Annex E of Appendix 7A: Transport Assessment, as the A620 Gainsborough Road is not permitted for HGVs.</p> <p>The Transport Assessment also assumes that a percentage of the construction workforce may come from the Newark on Trent catchment area south of Site and therefore travel to Site from the south via the A57, turning right onto Laneham Road and continuing straight onto Gainsborough Road, having passed through the villages of South Leverton and Treswell. At the peak of construction, 20 of the 338 vehicles travelling to/from the Site are assumed to enter/depart from the south. These are worker vehicles only using route 5 (brown) in Annex E of Appendix 7A: Transport Assessment) as no HGVs are permitted to travel to/from Site using roads to the south of the power station entrance.</p> <p>In order to reduce the impact of construction worker's traffic, a range of measures are provided in the Framework CWTP (APP-140, Document 7.6), which the contractor would be required to consider in producing their Travel Plan - construction staff, secured by Requirement 18 of the draft DCO (APP-004, Document 2.1). This includes, for example, contractors being encouraged to provide minibuses for transporting their workers from the key points of construction worker origin to the Site. This would have the benefit of reducing the number of vehicular trips on the local road network.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>[6] The PC would like to encourage the use of local labour during construction and operation since Cottam Power station will be decommissioned with the loss of jobs.</p>	<p>including agreed routes, the number of abnormal loads to be delivered by road and measures to mitigate traffic impact will be set out in a Traffic and Routing Management Plan. Requirement 17 of the draft DCO (APP-004, Document 2.1) requires the submission of this plan to Highways England, the highway authority (NCC), Lincolnshire County Council and West Lindsey District Council and approval by the relevant planning authority, Bassetlaw District Council.</p> <p>In addition to the AIL strategy, Requirement 17 of the draft DCO (APP-004, Document 2.1) requires that the submitted plan must include any necessary measures for the temporary protection of carriageway surfaces, the protection of statutory undertakers' plant and equipment and any temporary removal of street furniture.</p> <p>As noted in paragraph 2.5.2 of the Framework CWTP (APP-140, Document 7.6), residents will be updated on the construction of the Proposed Development via a regular update bulletin posted on the Applicant's website and on the Sturton Ward website if they elect to host this. This will include information on the timing and routing of AIL deliveries and a 24-hour contact name and number for members of the public to contact should they have any issues regarding construction traffic.</p> <p><u>Applicant's Response to Item 6</u> Construction - Chapter 13 (paragraph 13.6.4) of ES Volume I (APP-042, Document 5.2) states that the Proposed Development is anticipated to create an average of approximately 95 temporary construction jobs, with an</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
			<p>assumed peak of circa 200 workers per day. It is estimated that approximately 66 people from within the Worksop and Retford travel to work area (TTWA) could benefit from working at the Proposed Development during the construction phase (i.e. the local labour force). It is, however, recognised that the appointed contractor(s) may require specialist support or support from their wider supply chain, which would necessitate additional personnel to be employed from outside the Worksop and Retford TTWA.</p> <p>The Applicant is committed to encouraging employment, skills and training development opportunities for local residents during the construction phase. This commitment is secured by Requirement 25 of the draft Development Consent Order (APP-004, Document 2.1).</p> <p>Operation - Chapter 13 confirms that the Proposed Development is anticipated to create up to 15 operational roles. It is estimated that approximately 10 people from the Worksop and Retford TTWA could benefit from working at the Proposed Development. Some of the roles are expected to be undertaken by existing West Burton/Cottam Power Station employees. Temporary and contractor employees associated with maintenance activities would also be employed as required.</p>
RR-011	North Leverton with Hablesthorpe Parish Council	<p>North Leverton Parish Council broadly supports sustainable energy projects but would like local concerns to be addressed i.e.</p> <p>Traffic management during the construction phase</p>	<p>The Applicant welcomes North Leverton with Hablesthorpe Parish Council's support for sustainable energy projects.</p> <p>Management measures are proposed to be secured through requirements of the draft DCO (APP-004, Document 2.1) to</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		Use of local labour if possible	<p>manage traffic during the construction of the Proposed Development, in respect of both construction workers and construction traffic.</p> <p>Requirement 18 of the draft DCO (APP-004, Document 2.1) secures the submission and approval of a Travel Plan for construction staff. The Travel Plan will provide aims and measures to promote sustainable travel to the Site by the construction workers, which will be managed and monitored by the appointed Travel Plan Co-ordinator.</p> <p>Alongside this, Requirement 17 of the draft DCO (APP-004, Document 2.1) secures the submission and approval of a Construction Traffic and Routing Management Plan. This will define measures to manage HGV traffic associated with the construction of the Proposed Development and the routing of such vehicle.</p> <p>Construction - Chapter 13: Socio-economics (paragraph 13.6.4) of ES Volume I (APP-042, Document 5.2) explains that the Proposed Development is anticipated to create an average of approximately 95 temporary construction jobs, with an assumed peak of circa 200 workers per day. It is estimated that approximately 66 people from within the Worksop and Retford travel to work area (TTWA) could benefit from working at the Proposed Development during the construction phase (i.e. the local labour force). It is, however, recognised that the appointed contractor(s) may require specialist support or support from their wider supply chain, which would necessitate additional personnel to be employed from outside the Worksop and Retford TTWA.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>Management of any flood risk from hardened land under the solar panels.</p>	<p>The Applicant is committed to encouraging employment, skills and training development opportunities for local residents during the construction phase. This commitment is secured by Requirement 25 of the draft Development Consent Order (APP-004, Document 2.1).</p> <p>Operation - Chapter 13: Socio-economics explains that the Proposed Development is anticipated to create up to 15 operational roles, of which approximately 10 people from the Worksop and Retford TTWA could benefit from working at the Proposed Development. Some of the roles are expected to be undertaken by existing West Burton/Cottam Power Station employees. Temporary and contractor employees associated with maintenance activities would also be employed as required.</p> <p>The Proposed Development does not include proposals for solar panels. On this basis, no further dialogue on this point is deemed necessary.</p>
RR-012	Nottinghamshire County Council - Transport	<p>NCC have reviewed the Transport Assessment and other supporting documents and have the following observations. The findings in the Transport Assessment are accepted, as is the Framework Construction Environmental Management Plan, and Framework Construction Workers Travel Plan. The provisions of which are considered appropriately secured in the Draft Development Consent Order relating to matters including stopping ups, agreements with street authorities, construction management, protection of highway surfaces, construction traffic routing, travel planning, and decommissioning.</p>	<p>The Applicant acknowledges the response from Nottinghamshire County Council on transport related issues and notes that no further dialogue is deemed necessary.</p> <p>Reference should be made to the agreed Statement of Common Ground (Document 8.10) submitted at Deadline 1.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
RR-013	Nottinghamshire County Council - Ecology	In terms of Ecology, Nottinghamshire County Council is currently working with EDF energy to resolve matters that have been raised by the Natural Environment Manager. It is anticipated that these matters will be resolved and the Statement of Common Ground Agreed.	The Applicant acknowledges the response from Nottinghamshire County Council. The Statement of Common Ground has now been agreed between the parties and is contained at Document 8.10 as part of the Deadline 1 submission.
RR-014	South Leverton Parish Council	<p>South Leverton PC on behalf of its residents have concerns regarding the following:-</p> <p>[1] Contractor traffic using the village lanes as rat runs to get to the Power Station during the construction phase</p> <p>[2] Contractor traffic speeding through the village</p> <p>[3] Increase in HGV traffic through the village</p> <p>[4] Damage to trees / verges during the construction phase / bringing in large pieces if kit</p> <p>[5] Damage to roads / increase in pot holes etc</p> <p>[6] The PC would like to encourage the use of local labour during construction and operation since Cottam Power station will be decommissioned with the loss of jobs.</p> <p>[7] The PC would like a strategic overview of all projects which may impact the village - not just this one i.e. Cottam Power station decommission and new projects / Tarmac quarry. If they were all to come on stream at similar times it could have a massive impact on a small rural community.</p>	<p>The Applicant acknowledges the response from South Leverton Parish Council. The content of the response under Items 1 to 6 is a duplication of the response from North and South Wheatley Parish Council (RR-010) and the Applicant's comments are provided against that RR in this table.</p> <p>South Leverton Parish Council has raised a separate issue, requesting a strategic overview of all projects which could impact the village, and the Applicant's comments on this is provided below.</p> <p><u>Applicant's Response to Item 7</u></p> <p>Chapter 16: Cumulative and Combined Effects of Volume I of the ES (APP-045, Document 5.2) assesses all relevant committed developments within the study area for each subject area, including ID1 – quarry access road and wider mineral extraction site authorised by Nottinghamshire County Council (16/00354/CDM).</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
			<p>Taking into account the mitigation measures described for other committed developments, such as the quarry, in Chapter 16: Cumulative and Combined Effects, and those reported in the technical chapters 6 – 15 of the ES for the Proposed Development, no significant residual cumulative effects are anticipated.</p> <p>The likely closure of Cottam Power Station has been acknowledged in Chapter 13: Socio-economic Effects of the ES (APP-042, Document 5.2). Chapter 13 explains that some of the 15 operational roles for the Proposed Development are likely to be met by current workers at Cottam/West Burton Power Stations and notes that the Proposed Development would generate employment during the construction phase, contributing to sustainability of employment of current workers at the West Burton and/or Cottam Power Station sites.</p> <p>In accordance with the Planning Inspectorate's Advice Note 17 (August 2019 - Version 2), the Applicant continues to review the list of developments which may give rise to cumulative effects. In September 2019, the Planning Inspectorate's National Infrastructure Planning website, together with the planning portals of Bassetlaw District Council, West Lindsey District Council and Nottinghamshire County Council were searched for relevant applications made. No new planning applications likely to result in cumulative effects with the Proposed Development have been identified.</p>
RR-015	Sturton-le-Steeple Parish Council	Sturton-le-Steeple PC on behalf of its residents have concerns regarding the following:-	The Applicant acknowledges the response from Sturton-le-Steeple Parish Council.

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>[1] Contractor traffic using the village lanes as rat runs to get to the Power Station during the construction phase</p> <p>[2] Contractor traffic speeding through the village</p> <p>[3] Increase in HGV traffic through the village</p> <p>[4] Damage to trees / verges during the construction phase / bringing in large pieces if kit</p> <p>[5] Damage to roads / increase in pot holes etc</p> <p>[6] The PC would like to encourage the use of local labour during construction and operation since Cottam Power station will be decommissioned with the loss of jobs</p> <p>[7] The PC would like a strategic overview of all projects which may impact the village - not just this one i.e. Cottam Power station decommission and new projects / Tarmac quarry. If they were all to come on stream at similar times it could have a massive impact on a small rural community.</p>	<p>The content of the response is a duplication of the response from North and South Wheatley Parish Council (RR-010) and South Leverton Parish Council (RR-014). The Applicant's response to Items 1 to 6 are provided against no. 10 in this table and Item 7 against no. 11 in this table, to avoid repetition.</p>
RR-016	West Lindsey District Council	<p>As a neighbouring authority West Lindsey we will be making comments on the scale of impact of the development on West Lindsey. This will primarily focus on Visual Impact, Heritage Impact, Highways Impact and Noise.</p>	<p>The Applicant acknowledges the response from West Lindsey District Council. The Applicant will provide a full response to WLDC's Written Representation required at Deadline 2, which is anticipated to include further detail on the Council's focus of issues.</p> <p>Notwithstanding, reference should be made to the agreed Statement of Common Ground (Document 8.9), also submitted at Deadline 1.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
RR-017	Councillor James Naish on behalf of Sturton Ward, Bassetlaw District Council	<p>PROPOSALS FOR THE DEVELOPMENT OF WEST BURTON C (EN010088): THE FORMAL RESPONSE FROM BOLE VILLAGERS</p> <p>1. BACKGROUND On Wednesday 12th June 2019, there was a public consultation in the village of Bole about EDF Energy's proposal to develop a new gas-fired electricity generating power station within the boundary of the existing West Burton power station site, near Gainsborough, Lincolnshire. EDF Energy's application was submitted to the Secretary of State for Business, Energy and Industrial Strategy – via the Planning Inspectorate – on 30th April 2019 and accepted for examination on 23rd May 2019.</p> <p>2. EDF ENERGY'S PROPOSAL EDF Energy is seeking permission to construct, operate and decommission an open cycle gas-fired electricity generating power station with a gross output capacity of up to 299 megawatts (MW), together with associated buildings, structures and plant. The principal components of the proposed development include: a. the power station; b. gas supply connection works, a gas receiving area, gas treatment and control facilities, compression station, and gas pipeline from the existing West Burton B gas receiving facility and to the gas turbine; c. electrical connection to an existing 400kV switchyard within WBB, with an extension to the existing switchyard; d. auxiliary buildings, structures and equipment, including: i. above ground water storage tanks and associated infrastructure; ii. storm water attenuation system or similar; iii. internal access roads and car parking; iv. landscaping, fencing and security provisions; v.</p>	<p>The Applicant acknowledges the response from Bole villagers and thanks Councillor Naish for gathering and collating comments from residents.</p> <p>The Applicant continues to engage with the parish, through Councillor James Naish, and a further update will be included in the Deadline 2 submission. However, the following updates are provided below.</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>construction laydown areas and a rail offloading area from the existing rail loop that is present on the West Burton Power Station site; vi. other minor infrastructure and auxiliaries/services; e. a new surface water drainage system; f. water supply and pipeline; g. low voltage electrical, control, metering and other related equipment; h. landscaping and biodiversity management and enhancement area.</p> <p>3. THIS DOCUMENT At the public consultation on Wednesday 12th June 2019, it was agreed that the most effective way of communicating Bole villagers' concerns about EDF Energy's proposal was for individual villagers' responses to be aggregated. James Naish, the District Councillor for Sturton Ward, offered to anonymously gather resident comments and has documented these below.</p> <p>4. BOLE VILLAGERS' RESPONSES TO THE PROPOSAL From the responses, it can be concluded that Bole's residents are generally opposed to the proposed development of West Burton C by EDF Energy. Typical comments include "totally against any development on the West Burton site" and "strongly prefer planning to be refused". In almost all cases, however, residents provided a balanced response. In the words of one resident: "We understand that extra capacity for generating electricity following closure of coal fired stations will be required, and accept that this application will almost certainly be granted. We do however feel that consideration for local residents and the cumulative impact of the three stations on our environment is most important, and just as important as</p>	<p>The Environmental Statement considers the effects of the Proposed Development in conjunction with WBA and WBB Power Station as part of the baseline conditions established for the main assessments within Chapters 6-15 of the ES (APP-035 – APP-044, Documents 5.2), as they are existing operational facilities in the existing environment.</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>that of flora and fauna and the natural environment.” The following themes have been identified as key resident concerns in both written and online responses, and represent the village’s collective position:</p> <p>A. EXCESSIVE TRAFFIC VOLUMES</p> <p>This concern is rooted in genuine grievances about traffic volumes observed during the construction of West Burton B (2008-2013) which were perceived to much higher than EDF Energy’s projections. Example comments included:</p> <ul style="list-style-type: none"> • “Our main concern... [is] the increase in traffic during construction”; • “Traffic eg volume and time of day”; • “Traffic increase while under construction” Specific comments about EDF Energy’s planning application included the following: • “The transport reports give figures for the peak months of construction (25 – 27) but what about the 2 years before that when groundworks are being completed – will there not be a continuous stream of HGVs with raw materials such as stone, sand, gravel, cement, tarmac, drainage” • “Traffic flows should be managed more effectively than last time - there should be no traffic queueing on the main road into the site which is a blind bend and therefore highly dangerous” 	<p>The Applicant has used the ‘Rochdale Envelope’ approach in all environmental assessments, including traffic and transport. The Rochdale Approach is used where the nature of the Proposed Development means that some details cannot be confirmed when the Application is submitted, and flexibility is sought to address uncertainty. As explained in PINS Advice Note 7: Cumulative and Combined Effects (July 2018), <i>‘the assessment should establish those parameters likely to result in the maximum adverse effect (the worst-case scenario) and be undertaken accordingly to determine significance’</i>. For this reason, the likely significant effects presented in Chapter 7: Traffic and Transport of ES Volume I (APP-036, Document 5.2) and Appendix 7A: Transport Assessment of ES Volume II (APP-052, Document 7.6) focus on the peak of construction. It follows that effects in any period prior to, or after the peak of construction, are assessed within the Rochdale Envelope. Paragraph 7.3.19 of Chapter 7: Traffic and Transport explains this, i.e. the results presented in this assessment are representative of earlier assessment years and the overall effect of the Proposed Development may be less than that presented, as background traffic is expected to increase year on year.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • “Perhaps the railway could be utilised ref the following extract from the site description document APP-032 (Rail Offloading Laydown Area 3.3.14 The rail offloading laydown area is located to the west of the Site, forming part of the rail loop for WBA Power Station. The land is currently unused but could have a concrete pad installed on it to facilitate construction material deliveries, if rail deliveries are a feasible option for the construction contractors to use.)” <p>B. PARKING AT THE ENTRANCE OF THE VILLAGE Another key concern raised by Bole residents is HGV parking which was perceived to be a significant problem during the construction of West Burton B. Example comments about this matter included:</p> <ul style="list-style-type: none"> • “The other [problem] is the amount of vehicles that used the old road at the entrance of Bole. If the Power Station want to use timed deliveries they should have parking on their own land” • “We do not want construction workers parking in the lay-by at Bole corner. Parking should be provided on site” • “More consideration should be given to monitoring the use of the lay-bys, perhaps by CCTV, to avoid mis-use” • “Overnight stays at the entrance to the village which has a 	<p>It is not possible to commit to the use of rail or water-borne transport at this time, because it is not certain where materials required for the construction of the Proposed Development would be sourced from. It is likely that this would not be known until after a DCO is secured and a contractor is appointed. Notwithstanding this, the Applicant is committed to reviewing the viability of transporting materials by sustainable modes of transport during the construction of the Proposed Development. Paragraph 1.8.1 of the Framework Construction Traffic Management Plan confirms that the appointed contractor will review options for the use of rail and water when sourcing construction materials. This is proposed to be secured through Requirement 17 of the draft DCO (APP-004, Document 2.1).</p> <p>As noted in paragraph 1.8.3 of the Framework CWTP (APP-140, Document 7.6), HGV arrivals, including deliveries, will be managed as far as reasonably practicable, such that they are spread evenly over the day between the hours of 07:00 and 19:00 Monday to Friday (except bank holidays) and 08:00 to 18:00 on Saturday (if required) to avoid on-site congestion. Paragraph 2.1.2 explains that the HGV routing plan will be distributed to all drivers during their induction. It will be a condition of contract between the Applicant and the appointed contractor to ensure that all construction HGV deliveries are instructed to use the designated route to access and egress the construction site. Sanctions will be put in place to deal with non-compliance with the aim of ensuring no repeat events.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>weight limit and is a public highway so should not really be parked on for any length of time. There was human excrement left on numerous occasions last time. West Burton claimed that the lorry drivers were provided with waiting areas and facilities but I feel that this should be monitored more closely by the security staff that West Burton employ and possibly council officials and the police”</p> <ul style="list-style-type: none"> • “Unlike during the last project we would want to see a formal enforceable ban on the use of the layby at the entrance to Bole village as an ad hoc camp for the labour force. We had major issues with noise, litter and filth not only in the layby but also in adjacent fields. Our preference as a village is for the layby to be closed to traffic completely to remove the fly tipping temptation but as this seems to be a lengthy process perhaps a ban on overnight parking could be more rapidly implemented” 	<p>Arrangements for parking on-site have been considered and are presented in the Framework CWTP (APP-141, Document 7.7). The Framework CWTP is designed to promote and encourage the use of sustainable transport modes and reduce reliance on the private car by workers during the construction phase of the Proposed Development. The availability of car parking has a major influence on the means of transport people choose for their journeys, and is, therefore, an important measure in promoting sustainable travel to and from the Site.</p> <p>Paragraph 2.5.1 explains that a parking area would be set aside within the construction laydown area on Site and that in addition, satellite parking may be provided within the West Burton Power Station site and a shuttle system used to transport workers to the construction site.</p> <p>A responsibility of the Travel Plan Co-ordinator would be to monitoring parking to ensure no off-site parking is undertaken on any public highway leading to the Site, with sanction measures taken against those offending.</p> <p>It will be a condition of contract between the Applicant and the appointed contractor to ensure that anti-social behaviour policy is adhered to, by both HGV drivers and construction workers. This policy will be reinforced during staff inductions and will include HGV drivers being made aware not to park on the local public highway, with sanctions put in place to deal with non-compliance with the aim of ensuring no repeat events. Full details of the proposed traffic management</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>C. VISUAL, LIGHT, NOISE AND ENVIRONMENTAL IMPACTS Other concerns raised by local residents included:</p> <ul style="list-style-type: none"> • Visual pollution: "the screening of existing and new build, to reduce the cumulative visual impact, should be seriously considered"; "This will be another blot on the horizon to marr the view. Trees need to be planted to overcome the issue" 	<p>measures can be found in the Framework Construction Transport Management Plan (APP-140, Document 7.6). Any further details would be agreed with the local planning authority and highway authority through the discharging of the requirements.</p> <p>The Applicant notes the concerns regarding the visual impact of the existing site, however, controls over effects relating to the existing power stations are not matters for this Application.</p> <p>ES Volume I, Chapter 10: Landscape and Visual Amenity (APP-039, Document 5.2) has taken account of the existing WBA and WBB power stations. The contribution made by the existing WBA and WBB power station structures, as well as the effect of existing screening to the representative viewpoints, are provided in Table 10-8: Representative Viewpoints in Chapter 10.</p> <p>Paragraph 10.5.3 of Chapter 10 explains the development design, impact avoidance and mitigation measures that have been considered to reduce significant effects relating to visual amenity, including retention and management of existing vegetation along the Site boundary, to ensure its continued presence to aid the screening of low level views into the Site. This has been incorporated into the submitted Landscaping and Biodiversity Management and Enhancement Plan (APP-139, Document 7.5) and is proposed to be secured by Requirement 6 of the draft DCO (APP-004, Document 2.1).</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
			<p>The assessment presented in Chapter 10 concluded that the Proposed Development would result in a significant adverse effect at Viewpoint 4, located at the intersection of Bole Footpaths 3B and 4 and that the effects on visual amenity would be largely due to the tallest structures (stacks).</p> <p>Consideration has been given to the ability of landscape planting to screen views at this viewpoint in order to assimilate the Proposed Development into the local landscape. However, due to the size and scale of the stacks (up to 45m), the addition of landscape features such as trees and woodland would not be effective in reducing the effects on visual amenity.</p> <p>The proposals for landscape and biodiversity enhancement are set out in the submitted Landscaping and Biodiversity Management and Enhancement Plan (APP-139, Document 7.5) and include the planting of native tree species such as ash, oak, elm, cherry, apple and willow, to replace any trees lost to the Proposed Development and to enhance the green infrastructure network adjacent to the Site. Further detail is provided in paragraphs 5.2.28 – 5.3.2 of the Management and Enhancement Plan, with ongoing maintenance proposals in Appendix C. Planting is proposed along the band of scrub and trees at the northern boundary of Area 4 (Bole Round) illustrated on Figure 9.1 of Volume III of the ES (APP-086, Document 5.2), to the south-east of Bole. New groups of trees planted in this area would broaden the existing narrow wooded corridor and provide enhanced habitat connectivity.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Light pollution: "One [concern] is the light pollution which spills out especially when there is no leaf cover, this is a permanent problem"; "Bole suffers enough with [sight] of the two existing power stations and gets 'sunlight' NOT 'sunshine' when the steam blocks it out"; "There are so many lights on now at night at both power stations that West Burton C will increase the pollution even further" 	<p>The Applicant notes the concerns regarding existing site lighting, however, controls over existing lighting are not a matter for this Application.</p> <p>The Applicant has undertaken an assessment of night-time lighting effects from the Proposed Development which considers the cumulative effect of lighting from WBA and WBB. This is presented in paragraphs 10.6.11 – 10.6.14 of Chapter 10: Landscape and Visual Amenity of the ES Volume I (APP-039, Document 5.2).</p> <p>The Applicant has sought to limit the impact of light pollution from artificial light on local amenity during both construction and operation through the Lighting Strategy (APP-138, Document 7.4). The philosophy has been to design a 'reduced light site' as the Proposed Development would be only intermittently in operation and remotely operated. Permanent lighting would only be provided for: general pedestrian movement, safety and security purposes; lighting for maintenance using temporary lighting set specific to task; and lighting further reduced to only critical lighting from 23.00 to 05.00hrs to reduce the impact on the local environment.</p> <p>The Applicant notes the conclusion drawn at paragraph 10.6.14 of the ES Volume I Chapter 10: Landscape and Visual Amenity (APP-039, Document 5.2) that due to the screening effect of intervening vegetation and restrictions placed on lighting by the Lighting Strategy (APP-138, Document 7.4) the effects of night-time lighting at sensitive</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Noise pollution: "Working patterns during construction should be limited to 0600 -1800hrs weekdays only to minimise noise and disturbance to the local communities" 	<p>receptors resulting from the Proposed Development will not significantly increase above current baseline level from WBA and WBB power stations. External lighting controls are proposed to be secured by Requirement 7 of the draft DCO: External lighting (APP-004, Document 2.1).</p> <p>An assessment of the effects of construction noise is presented in Chapter 8: Noise and Vibration of Volume I of the Environmental Statement (ES) (APP-037, Document 5.2). In determining the likelihood for significant effects, a quantitative assessment has been undertaken and results compared to construction noise thresholds (limit values) presented in Table 8-8. The construction noise Significant Observed Adverse Effect Level (SOAEL) and Lowest Observable Adverse Effect Level (LOAEL) for relevant time periods (daytime, evenings, night-time and weekends) is set out in this table. As described in paragraph 8.3.22, consideration is given to effects at Noise Sensitive Receptors where it is predicted the LOAEL will be exceeded in order to ensure that any adverse effects are mitigated and minimised.</p> <p>Construction activities will be undertaken between 0700 and 1900 hours on Monday to Friday and 0800 and 1800 hours on a Saturday), although some works may take place outside of core working hours, provided they do not exceed a noise limit at locations to be agreed with BDC. This is proposed to be secured by Requirement 19 of the draft DCO: Construction hours (APP-004, Document 2.1).</p> <p>As described in paragraphs 8.6.8 – 8.6.10, construction</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
			<p>noise effects at all NSR are predicted to be negligible (not significant) during the daytime period, due largely to the distances between the construction works and NSR. It may be necessary for some construction activities to take place continuously over day, evening and night periods during peak construction times of the Proposed Development, although the exact nature of the works is unknown. Effects could be minor adverse (not significant) if work were to take place at the same intensity as assessed for the daytime period during evenings and/or weekends. A range of measures are provided in the Framework CEMP (APP-137, Document 7.3) to control noise and vibration during such periods including:</p> <ul style="list-style-type: none"> • abiding by construction noise limits at locations to be agreed with BDC; • ensuring that all appropriate processes are in place to minimise noise before works begin and ensuring that BPM are being achieved throughout the construction programme, including the use of localised screening around significant noise producing plant and activities; • ensuring that modern plant is used, complying with the applicable UK noise emission requirements; • selection of inherently quiet plant where possible; • hydraulic techniques for breaking to be used in preference to percussive techniques where reasonably practicable; • if piling is required, use of lower noise piling (such as rotary bored or hydraulic jacking) rather than driven piling techniques where reasonably practicable;



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Air pollution: "EDF advertise on TV that they produce clean electricity ... [but] 8.065 lb of CO2 emissions will be produced for every Mega Watt hour of electricity produced 	<ul style="list-style-type: none"> off-site pre-fabrication where reasonably practicable; all plant and equipment being used for the works to be properly maintained, silenced where appropriate, operated to prevent excessive noise, and switched off when not in use; all contractors to be made familiar with current legislation and the guidance in BS 5228 (Parts 1 and 2) (Ref 8-17 and Ref 8-18), which should form a prerequisite of their appointment; loading and unloading of vehicles, dismantling of site equipment such as scaffolding or moving equipment or materials around the Site, to be conducted in such a manner as to minimise noise generation as far as reasonably practicable; all vehicles used on-Site shall incorporate broadband reversing warning devices as opposed to the typical tonal reversing alarms to minimise noise disturbance where reasonably practicable; appropriate routing of construction traffic on public roads and along access tracks (see Chapter 7: Traffic and Transport); provision of information to BDC and local residents to advise of potential noisy works that are due to take place; and monitoring of noise complaints and reporting to the Applicant for immediate investigation and action. <p>As the UK moves toward net zero carbon emissions by 2050, a secure low carbon electricity system will be needed to support that transition. Electricity supply and demand must be continuously balanced by National Grid to ensure</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>by these inefficient turbines. According to IPIECA (ipieca.org), Open Cycle Gas Turbines are only 35-40% efficient in producing electricity”</p>	<p>stable operation of the grid and security of supply to homes, transport and businesses. That means that we need sources of flexible and quickly dispatchable (capable of being scheduled in advance, sometimes at very short notice, to operate, independently of weather conditions) “back up” capacity for those times when the wind doesn’t blow or the sun doesn’t shine sufficiently and to secure electricity supplies against insufficient availability or failure of other plant. As the proportion of renewable generation increases, due to its intermittency, there is a corresponding requirement for more back up capacity.</p> <p>Open Cycle Gas Turbines (OCGT), which are proposed for WBC, are well-suited to provide this back up or peaking capacity. They are more flexible than a Combined Cycle Gas Turbine, can be started more quickly when needed, and will run for a limited number of operating hours (and controlled by the Project’s Environmental Permit).</p> <p>The selection of open cycle gas turbine/s, rather than a Combined Cycle Gas Turbine plant is consistent with and recognised to represent Best Available Technique (BAT) for plant operating up to a maximum of 1,500 hours per year on a rolling five year average, as defined by the Environment Agency.</p> <p>The Applicant has prepared a Greenhouse Gas Emissions Assessment (Appendix 15A of ES Volume II) and this is presented in APP-069, Document 5.2. An operational annual greenhouse gas footprint of the Proposed Development has been calculated, using the Greenhouse</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • Missing documentation: “the content of the Badger Survey and Breeding Bird Survey Reports are not available so the proposed actions are not known”; “it doesn’t appear that all the responses from previous consultations are included”; “I wasn’t sent a USB by EDF despite asking on two occasions” • Access to the countryside: “EDF should be asked to arrange suitable alternative arrangements for the local walkers and riders who enjoy the area at the moment and who expect access to be reduced” 	<p>Gas Protocol, which provides a methodology for calculating the carbon footprint of a project.</p> <p>Whilst the UK is moving towards decarbonising the grid, efficient gas fired power stations are required as an important element of the overall transition fuel mix in order to ensure the UK's energy security.</p> <p>The Applicant acknowledges the interest from a Bole resident in the Badger Survey Report (confidential Appendix 9D of ES Volume II) and the Breeding Bird Survey Reports presented in Volume II of the ES (APP-056 & APP-061, Document 5.2). The Applicant has followed the advice provided by the Planning Inspectorate which states that information about the presence and locations of rare or sensitive species, where disturbance, damage, persecution or commercial exploitation may result from publication should be marked as 'confidential'. For this reason, the Badger Survey Report (Appendix 9D of ES Volume II) and Figure 9H4 of the Breeding Bird Survey Reports presented in Volume II of the ES (APP-056 & APP-061, Document 5.2) have only been disclosed to certain stakeholders.</p> <p>The Applicant has identified and assessed the impacts on users of public rights of way (PRoW) including footpaths and bridleways, in the vicinity of the Proposed Development and the wider West Burton Power Station site, on both sides of the River Trent. The northern and southern drainage connection corridor options associated with the Proposed Development, would terminate prior to, and therefore not</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>5. BOLE VILLAGERS' REQUESTS OF EDF ENERGY Given the proximity of the proposed development to the village of Bole and the presence of two working power stations nearby, we would like residents' needs to be purposefully prioritised as part of planning application EN010088. EDF Energy has already indicated that it plans to work closely with Bole and other local communities to minimise anticipated impacts, and the appointment of a Community Liaison Officer is universally welcomed. It has hoped that this individual will hold EDF Energy to account for promises being made as part of this application. In the interests of open dialogue with EDF Energy, we have compiled a list of small but meaningful actions which we believe EDF Energy can deliver as part of the planned development. These requests are not financially prohibitive for EDF and will make a big difference to lives of Bole residents if West Burton C goes ahead:</p> <p>1. We would like EDF Energy to commit to working with relevant local authorities and regulatory bodies to do</p>	<p>cross, the designated PRoW (West Burton FP4), which follows the western flood embankment of the River Trent. This PRoW connects with a second PRoW (Bole FP9#1), which branches off the River Trent immediately north of the sewage works and leads in a north-westerly direction, passing around Bole Ings. Access for users of these footpaths will therefore not be affected by construction of the Proposed Development and the routes will remain available for use once the Proposed Development becomes operational.</p> <p>Requirement 24 of the draft DCO (APP-004, Document 2.1) proposes to secure the establishment of a Local Liaison Committee prior to the commencement of the authorised development that would be required to liaise with local residents and local organisations on matters relating to the Proposed Development.</p> <p>The Applicant's website and Sturton Ward website (if they elect to host this) will also host a 24-hour contact name and number for members of the public to contact should they have any issues regarding construction traffic.</p> <p>Please refer to the Applicant's response above regarding measures proposed in respect of construction traffic.</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>everything within its power to limit, and ideally stop, Bole lay-by being used by construction-related traffic. This should be a top priority from the moment planning is approved, and we would like EDF Energy to commit to throwing its legal expertise behind this matter if needed. We would like this lay-by to be closed permanently if possible.</p> <p>2. To facilitate the above, we would like EDF Energy to commit to providing sufficient parking for all contractor vehicles on site, 24 hours per day. We would like this commitment – and a suitable site to be identified, with appropriate facilities – as part of planning application EN010088. We would also like correct geographical coordinates to be shared with all contractor vehicles, to prevent HGVs getting stuck in Bole village.</p> <p>3. We would also like EDF Energy to commit to investing in the effective visual screening of all West Burton developments for the village of Bole, including West Burton A and West Burton B. Similar commitments were made when West Burton B was built but these were not – unfortunately – effectively implemented. It would be unacceptable for this to happen again. Bole villagers would like to be consulted about such schemes as early as possible, and for them to be executed before on-site construction at West Burton C begins.</p> <p>4. There is appetite from Bole villagers to gain access to EDF Energy land east of the village for dog-walking and other recreational purposes. We would like EDF Energy to</p>	<p>Please refer to the Applicant's response above regarding measures proposed in respect of construction traffic.</p> <p>Please refer to the Applicant's response above regarding proposed 'visual pollution'.</p> <p>The Applicant has responded to the request by Nottinghamshire County Council (NCC) to consider the creation of a number of non-definitive footpaths as definitive</p>

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		<p>consult villagers about this specific matter and to do everything possible to enable access by removing and/or reconstructing fencing near the railway line.</p>	<p>public rights of way with the status of footpath. A number of these routes are within the landscape and biodiversity management and enhancement area shown on Works Plan No 10 (APP-008 – APP-018, Document 3.2). In this area, a number of measures are proposed to mitigate the potential impacts and effects of the Proposed Development on landscape and biodiversity features, and to enhance the biodiversity, landscape and green infrastructure value of the Proposed Development. Details of the measures proposed are provided in the Landscape and Biodiversity Management and Enhancement Plan (APP-139, Document 7.5) and include</p> <ul style="list-style-type: none"> • thinning out, diversification and ongoing management of existing areas of scrub habitat; • management of existing pockets of reedbed to improve their structure and diversity and prevent succession to Carr Woodland; • botanical enhancement of existing areas of seeded semi-improved neutral grassland to increase the proportion and diversity of wildflowers, with the aim of creating Local Biodiversity Action Plan (LBAP) quality lowland neutral grassland habitat; • creation of hibernacula and habitat piles using materials generated during site clearance to provide refuge and hibernation opportunities for a range of fauna; and • new tree planting to compensate for the loss of trees as a consequence of the Proposed Development. <p>Therefore, although the Applicant is supportive of the use of</p>

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		<p>5. We would like EDF Energy to commit to reversing all plans for weekend work outside the peak construction period. Given the lengthy timescales for the overall build, the time-saving resulting from weekend work is likely to be minimal. Conversely, the impact on local communities will be considerable and should, therefore, be avoided.</p> <p>If any of these items cannot be delivered for any reason, in its place, we would like EDF Energy to set-up a community benefit fund or equivalent which ward residents can access in future to:</p> <ul style="list-style-type: none"> • Provide, maintain or improve community buildings; • Provide community and public transport improvements; • Improve digital and mobile connectivity in the local 	<p>existing non-definitive PRoW in these area, it is proposed that these footpaths shall be maintained as non-definitive footpaths to prevent increase in human presence, which could impact on wildlife susceptible to disturbance, e.g. grass snakes, breeding birds.</p> <p>In accordance with Requirement 19 of the draft DCO (APP-004, Document 2.1), core working hours exclude Sundays and bank holidays, with exceptions only allowed under specified circumstances. This work pattern is consistent with similar projects and work is routinely carried out at both WBA and WBB at weekends.</p> <p>Further restricting these hours would correspondingly extend the overall duration of the construction works, with potential impacts on both the commercial viability of the project and its availability to meet the requirements of the electricity market.</p> <p>Certain construction and commissioning works may require continuous operations to be carried out, potentially requiring work outside of Core working hours.</p> <p>Planning obligations may only be sought where they are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. The Applicant intends to provide a Community Fund, the detail of which will be confirmed at Deadline 2.</p>



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		<p>area;</p> <ul style="list-style-type: none"> • Increase access to activities or services for the community within the area of benefit; • Encourage skills, employment and improve rural business opportunities and social enterprise; • Community owned energy projects; • Offer sport, recreation and improved health and wellbeing. <p>Finally, there are concerns about air pollution in the evenings coming from West Burton B. We would kindly ask EDF Energy to investigate this further and provide assurances that everything is in order.</p> <p>6. CLOSING REMARKS The villagers of Bole and the residents of Sturton Ward understand that the area has an important role to play in energy production for the UK; and while we are generally opposed to the development due to the presence of two working power stations on the site, we do not wish to unnecessarily impede EDF Energy's progress. We recognise that the company seeks to actively engage the local community about planned developments and appreciate these endeavours. However, having lived through the development of West Burton B between 2008 and 2013, we know that promises and best endeavours do not always translate into reality. We, therefore, politely ask that this short but important list of asks is openly and fairly considered by EDF Energy as part of its ongoing planning application, and that it will publicly commit to fully meeting these demands in an effort to protect Bole village during and beyond the construction of West Burton C. If so, we</p>	<p>The Applicant notes the concerns regarding air pollution in the evenings from West Burton B, however, controls over existing emissions are not a matter for this Application.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>look forward to working closely with EDF Energy employees over the coming months once – as expected – planning application EN010088 is approved.</p> <p>James Naish, District Councillor for Sturton Ward, on behalf of Bole villagers 29th August 2019.</p>	
RR-018	J John Collins	<p>I am concerned about the increase in lorries and other heavy goods vehicles accessing the site throughout the construction period; particularly the A620 from Retford. This is not an acceptable route for such vehicles. There is a diversion for high vehicles along Smeath Road/lane which has a 7.5 tonnes limit. All traffic accessing the site needs to use the A631 (at the Tickhill junction o the A1 M).</p>	<p>The Applicant acknowledges the response from Mr J John Collins.</p> <p>The design and impact avoidance measures that the Applicant is committed to include HGVs arriving or departing the West Burton Power Station site travelling to/from the north via the A620 and onwards to/from the A631 near Beckingham. It is recognised that the A620 towards Retford is not an acceptable route due to a bridge height restriction in place at two locations and it is not proposed that this route be used by construction HGVs.</p> <p>Signage is already in place at the West Burton Power Station site entrance directing HGVs north towards the A620. In addition, a routing plan would be provided, which HGV drivers would be required to adhere to, controlled by Requirement 17 of the draft DCO (APP-004, Document 2.1). As described in para 2.1.2 of the Framework Construction Transport Management Plan (CTMP) (APP-140, Document 7.6), the HGV routing plan will be distributed to all drivers during their induction. It will be a condition of the contract between the Applicant and the appointed contractor to ensure that all construction HGV deliveries are instructed to use the designated route to access and egress the construction site. Sanctions will be put in place to deal</p>

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		<p>Better still. All heavy goods and equipment should be transported directly to the site via rail.</p>	<p>with non-compliance with the aim of ensuring no repeat events.</p> <p>It is not possible to commit to the use of rail or water-borne transport at this time, because it is not certain where materials required for the construction of the Proposed Development would be sourced from. It is likely that this would not be known with certainty until after a DCO is granted and a contractor is appointed. However, the Applicant is committed to reviewing the viability of transporting materials by sustainable modes of transport during the construction of the Proposed Development. This is secured through Requirement 17: Construction Traffic and Routing Management Plan of the draft DCO (APP-004, Document 2.1).</p>
RR-019	Julian May	<p>Dear Sir or Madam, with this note I would like to register as an interested party. In my contribution I would like to: show evidence why climate change is a more serious threat than the established views that lead to the current system suggest, the nature of the risk, and how this may and will effect the general public, -brief summary of climate science -effects on society -migration and conflict - potential destabilization of political landscape -water and food, farming -extreme weather events -... -effects on the economy -Stern Report -risks - (impact and probability) when it come to human life - precautionary principle - scientific scrutiny and the IPCC ... have a look at the political Landscape with regards to the power sector, -IPCC recommendations -CCC -Climate Change Act -Climate Emergency and new targets -National Grid ESO - Zero Carbon Operation 2025 show how the necessary transition,</p>	<p>The Applicant acknowledges the response from Mr Julian May.</p> <p>Section 104(3) of the Planning Act 2008 sets out that decisions on Nationally Significant Infrastructure Projects where a National Policy Statement (NPS) has effect must be taken in accordance with the relevant national policy statement except where one or more of subsections (4) to (8) of Section 104 applies.</p> <p>The Energy NPSs (specifically EN1 and EN2) are clear in stating that the need for new energy infrastructure is not open to debate or interpretation and that the Secretary of State should give substantial weight to the contribution that all developments would make towards satisfying this need.</p>



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		<p>that will likely have to happen much more swiftly than anticipated, will effect and be effected by the proposed development, -economy -price of electricity from centralized power stations at low load factors -running out off merit - logistics -fuel supply -combined heat and power electrics - ROCOF -reactive power correction - too much in Humber region -increasing need of system services at decreasing demand and show possible alterations and alternative options that would both economically and environmentally be better alignment with future needs. -modifications - synchronous condenser like setup -alternatives -peaking plants -synchronous condenser -mix of other solutions e.g. demand shifting, batteries, tidal... ... Many Thanks, Julian May</p>	<p>The NPSs set out a number of considerations that should be taken into account by applicants in preparing applications and also the Secretary of State in its decision making. This is re-affirmed in the recent Secretary of State's Decision Letter on the Drax Power (Generating Stations) Order (dated 4th October 2019), in that paragraph 4.13 states:</p> <p><i>"The Secretary of State's view is that these policies, including the presumption in favour of granting consent for energy NSIPs in EN-1 have already taken account of the need to achieve security of supply, affordability and decarbonisation at a strategic level. The NPSs do not, therefore, require decision makers to go beyond the specific and relevant policies they contain to assess individual applications against those high level objectives."</i></p> <p>It is, therefore, not necessary for the Applicant, or the Examining Authority as the decision-maker, to consider the principal of the Proposed Development in respect of climate change or national energy targets.</p> <p>The Planning Statement (APP-135, Document 7.1) provides the Applicant's assessment of the conformity of the Proposed Development against the planning considerations in NPS EN-1 and EN-2, as well as any other matters that may be considered relevant and important by the Secretary of State for the purpose of decision making.</p> <p>The Applicant notes that a number of different topics and items have been referred to in Mr Julian May's relevant representation. It is anticipated that further detail on these</p>

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			<p>items will be provided by Mr Julian May in his Written Representation (required at Deadline 2) and to which the Applicant will respond as necessary.</p>
RR-020	Mrs Lisa King	<p>I fully support the proposals put forward by the village of Bole, as collated and submitted on our behalf by Councillor James Naish of Sturton Ward. I am a resident of Bole and will therefore be impacted by the proposed development of West Burton C.</p>	<p>The Applicant acknowledges the response from Mrs Lisa King. The Applicant's response to Councillor James Naish is provided under RR-017 in this table.</p>
RR-021	Mrs Anne Phipps	<p>Open cycle gas turbines are only 35-40% efficient (ipieca.org) when new. Even less efficient when carbon build up occurs when running. We have a lot of mist and fog in this area. These gas turbines are even less efficient in these conditions. The CO2 emissions from a 40MW gas turbine, operating at 37% efficiency are 1.079lb/Mwh. EDF wishes to produce 299MW so the CO2 emissions would be greater by 7.475 times. Therefore 8.0655lbs of CO2 emissions would be produced for every Mwh of electricity.</p> <p>EDF advertise on TV that they are the largest UK provider of green electricity, why then are they investing in this environmentally damaging method of electricity production?</p>	<p>As the UK moves toward net zero carbon emissions by 2050, a secure low carbon electricity system will be needed to support that transition. Electricity supply and demand must be continuously balanced by National Grid to ensure stable operation of the grid and security of supply to homes, transport and businesses. That means that we need sources of flexible and quickly dispatchable (capable of scheduled in advance to operate, sometimes at very short notice, independently of weather conditions) "back up" capacity for those times when the wind doesn't blow or the sun doesn't shine sufficiently and to secure electricity supplies against insufficient availability or failure of other plant. As the proportion of renewable generation increases, due to its intermittency, there is a corresponding requirement for more back up capacity.</p> <p>The Proposed Development is a gas-fired 'peaking' generation station to provide flexible 'back-up' for intermittent renewable energy sources. Open Cycle Gas Turbines (OCGTs) are well-suited to provide this 'back up' or peaking capacity. They are more flexible than Combined Cycle Gas Turbines, can be started more quickly when needed, and would run for a limited number of operating hours; controlled</p>

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			<p>by the Project's Environmental Permit.</p> <p>The selection of open cycle gas turbine/s, rather than a Combined Cycle Gas Turbine plant is consistent with and recognised to represent Best Available Technique (BAT) for plant operating up to a maximum of 1,500 hours per year on a rolling five year average, as defined by the Environment Agency.</p> <p>The Applicant has prepared a Greenhouse Gas Emissions Assessment (Appendix 15A of ES Volume II) and this is presented in APP-069, Document 5.2.</p> <p>Whilst the UK is moving towards decarbonising the grid, efficient gas fired power stations are required as an important element of the overall transition fuel mix in order to ensure the UK's energy security.</p> <p>Notwithstanding the provision of the GHG emissions assessment, in respect of CO₂ emissions, it is not considered necessary for the Applicant, or the ExA as the decision maker, to consider the Proposed Development against carbon emissions. Notably, paragraph 5.2.2 of EN-1 states:</p> <p><i>“Government has determined that CO₂ emissions are not reasons to prohibit the consenting of projects which use these technologies or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR and, for coal, CCS requirements). Any ES on air emissions will include an assessment of CO₂</i></p>

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			<p><i>emissions ... The IPC does not, therefore need to assess individual applications in terms of carbon emissions against carbon budgets."</i></p> <p>This has recently been reinforced by the Secretary of State in its Decision Letter on the application for the Drax Power (Generating Stations) Order (paras 4.16-4.17). Notably, the Secretary of State states that whilst <i>'the amount of greenhouse gases that will be emitted to atmosphere is acknowledged, the policy set out in the relevant NPSs makes clear that this is not a matter that should displace the presumption in favour of granting consent'</i>.</p> <p>The Applicant is the largest producer of low-carbon electricity in the UK. It is investing in new nuclear and renewable generation, including Hinkley Point C, the first new nuclear plant to be built in the UK in over twenty years, and the 450MW Neart Na Goithe offshore wind farm. The Applicant also operates one of Europe's largest battery storage projects at West Burton.</p> <p>The Applicant is also helping its customers to use energy more efficiently, reduce their carbon emissions and helping to contribute to providing the flexibility needed for a low carbon energy system.</p>
RR-022	Peter Coomber	<p>I have lived at Sturton Road, Bole for 48pprox.. 20 years. Recently EDF have made a formal application for development of a new peaking plant.</p> <p>Since 2014 to current date I have suffered a considerable amount of related illnesses which are and have been</p>	



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>investigated by medical professional.</p> <p>Since April 2017, EDF have relied on using renewable gas turbines in replacement of coal generation 'A' plant. I believe that prior to this to this date EDF were using the renewable gas turbines at various times, which I consider relates to my ongoing medical issues. During this time I have started experiencing vibration within my property, which I associate with low frequency sound waves, and/or extra low frequency (ELF), and low magnetic field.</p> <p>EDF and Basset Law Council undertook monitoring, The results of which I disagree with and am challenging. I have contracted the environmental agency with a request to remonitor the frequencies inside and outside my property. We are not expecting a response until the 9th August 2019, , at which time I will be in a better position to make further representation.</p> <p>I also wish to challenge the scoping as it stands; in relation to the transport by my property- 20 meters from the only access road to the station. There have been a widely</p>	<p>The Applicant notes the comments from Mr Peter Coomber, however, controls over existing matters related to the West Burton Power Station are not a matter for this Application.</p> <p>The Applicant has undertaken an assessment of noise and vibration effects associated with the Proposed Development. This is presented in Chapter 8: Noise and Vibration of the ES (APP-037, Document 5.2).</p> <p>As explained in paragraphs 8.3.36 and 8.6.18 of Chapter 8, given the considerable distance to residential receptors, no significant vibration (medium or high magnitude impacts) are expected to result at residential receptors from the proposed construction activities.</p> <p>Table 4 of the Framework Construction Environmental Management Plan (CEMP) (APP-137, Document 7.3) provided with the Application describes the best practicable means that would be applied to minimise noise and vibration during construction, including ensuring, for example, that where reasonably practicable, noise and vibration is controlled at source (e.g. the selection of inherently quiet plant and low vibration equipment). The final CEMP will be secured by Requirement 15 of the draft DCO (APP-004, Document 2.1).</p> <p>The Applicant notes the comment from Mr Peter Coomber. It is assumed that this refers to submitted Chapter 7: Traffic and Transport and Appendix 7A: Transport Assessment</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>varying number of suggested vehicles, predicted in the scoping completed and issued by EDF.</p> <p>There is a possibility of the quarry at Sturton le Steeple starting up, adding further, considerable, vehicle movement outside my property with possible standing vehicles.</p>	<p>(APP-052, Document 5.2), rather than the EIA Scoping report (Appendix 1A of APP-047, Document 5.2) as no traffic projections were provided in the EIA Scoping Report. Without further details it is difficult to respond to Mr Coomber's concerns. In addition the Applicant would be grateful for clarification if we are incorrect regarding the documents being referred to.</p> <p>Chapter 16: Cumulative and Combined Effects of Volume I of the ES (APP-045, Document 5.2) assesses all relevant committed developments within the study area for each discipline, including ID1 – quarry access road and wider mineral extraction site authorised by Nottinghamshire County Council (16/00354/CDM). All information available within the public domain on the proposed quarry was accessed and taken into account (described in paragraph 16.5.10 of ES Volume 1 Chapter 16). The Applicant has continued, throughout the pre-examination period, checking relevant planning portals and sources of information such as the Sturton Ward website for updates on the status of the quarry and no further details have been noted regarding the quarry application.</p> <p>Appendix 7A: Transport Assessment (TA) presented in Volume II of the ES (APP-052, Document 5.2) assumed that proposals such as the quarry, as well as a number of other schemes (refer to Section 7 of the Transport Assessment in Appendix 7A of APP-052, Document 5.2), would be implemented prior to construction of the Proposed Development. This means that the traffic flows associated with the quarry development, as well as the other committed</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
			<p>developments, have been assumed to be on the network at the time the Proposed Development is implemented, to ensure that the effects of this traffic on the local network could be taken into account in the future year analysis before the traffic generated by the construction of the Proposed Development was assessed. The quarry development, if it goes ahead, would result in a maximum of 192 two-way HGV movements each day (96 loads into the site and 96 loads out of the site) over the hours commencing 07:00 – 09:00 and 16:00 – 18:00 i.e. 16 (8 in and 8 out) each hour.</p> <p>The junction impact assessments are provided in Section 9 of Appendix 7A: Transport Assessment (APP-052, Document 5.2). As a general guide, a junction operating within a threshold of 0.85 ratio to flow capacity (RFC) is considered to operate within its design capacity. The Sturton Road arm of the A620/ Sturton Road Roundabout (mentioned within the relevant representation) has been assessed to be operating at a maximum RFC of 0.19 during the PM peak. With inclusion of the quarry and other committed developments in the area, this is predicted to increase to 0.24. Subsequently, it is considered that the junction would continue to operate well within its design capacity, with the inclusion of the quarry, and would not generate a significant transport effect.</p> <p>Taking into account the mitigation measures described for other committed developments, such as the quarry, in Chapter 16: Cumulative and Combined Effects, and those reported in the technical chapters 6 – 15 of the ES for the Proposed Development, no significant residual cumulative</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>This is only a brief outline as there are other possible objections that I have to the overall development and as we are required to summarise this representation I can expand at a later date.</p> <p>This development has devalued my property to the point that it is virtually unsaleable.</p> <p>I await the disclose of the consultation papers in September. I am applying for a FOI to Bassett Law District Council and EDF for data relating to the operational equipment usage since 2013- current date.</p>	<p>effects are anticipated. As such, no off-site highway improvement works are required at any of the off-site junctions to accommodate construction traffic over what is a temporary period.</p> <p>The Applicant acknowledges the additional comments from Mr Peter Coomber and considers that no further dialogue is necessary at this time. The Applicant will respond, as required, to any subsequent representations from Mr Peter Coomber through the relevant examination stages.</p> <p>The Applicant sent a full suite of the application documents to Mr Coomber on 6 November 2019, following his request at the Preliminary Meeting (30 October 2019).</p>
RR-023	Victoria Wilson	<p>I live at North Wheatley within sight of the Power Station.</p> <p>I live on the side of the A620 meaning much of the construction traffic will come past making me an interested party. I would like to be kept aware of the process as it develops as I feel it will make an impact on me. As it is a large construction within 2 miles of my home I feel I want to be aware of its progress.</p>	<p>The Applicant acknowledges the response from Ms Victoria Wilson and her interest in the Project.</p> <p>In relation to traffic flows on the A620, Appendix 7A: Transport Assessment of the ES Volume II (APP-052, Document 5.2) assumes that a percentage of the construction workforce may come from the Worksop/Retford catchment area west of Site and therefore use the A620, which passes through North and South Wheatley. At the peak of construction, 20 of the 318 vehicles travelling to/from the north on C2 Sturton Road are assumed to distribute to/from the A620 Gainsborough Road. These are worker vehicles only using route 2 (green) as indicated in Annex E of Appendix 7A: Transport Assessment). The A620</p>



Ref.	Interested Party	Relevant Representation	Applicant's Comments
		I am also very interested in how construction effects the biodiversity.	Gainsborough Road is not permitted for HGVs. ES Volume 1, Chapter 9: Ecology (APP-038, Document 5.2) provides the assessment of effects of construction on biodiversity and is accompanied by a Landscape and Biodiversity Management and Enhancement Plan (APP-139, Document 7.5) which explains the biodiversity management and enhancement measures the Applicant is proposing.

3. Applicant's Comments on any Additional Submissions

- 3.1 The Applicant's comments on the Additional Submissions submitted by Interested Parties are set out in Table 3.1 on the following pages of this document.
- 3.2 Table 3.1 includes the reference number for each of Additional Submission, the name of the Interested Party, the full text of the Additional Submission and the Applicant's comments.

Table 3.1 – Applicant's Comments on any Additional Submissions

Ref.	Interested Party	Additional Submission	Applicant's Comments
AS-001	Highways England	Highways England has been invited to provide comments on the Notice of Acceptance of an Application for a Development Consent Order, in a letter dated 26 June 2019, regarding the proposed West Burton C open cycle gas-fired electricity generating station, located at West Burton Power Station, Retford, DN22 9BL. Highways England previously responded to this proposal in August 2017 following review of a Transport Assessment Scoping Report, raising no objections as the impact on the Strategic Road Network would be negligible. We have now reviewed the Transport Assessment of April 2019 submitted in support of the proposal and as there is no change to the size or use of the development our previous comments remain unchanged.	The Applicant acknowledges the response from Highways England and notes that no further dialogue is deemed necessary.
AS-002	Harlaxton Gas Networks Limited	Thank you for sending the relevant information and material regarding the West Burton C (Gas Fired Generating Station). Harlaxton Gas Networks Ltd. at this time has no assets in this area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this project.	The Applicant acknowledges the response from Harlaxton Gas Networks and notes that no further dialogue is deemed necessary.
AS-003	Environment Agency	The Environment Agency issued our Relevant Representation for the West Burton C (Gas Fired Generating Station) NSIP on 28 August 2019 (our letter dated 19 August, reference LT/2019/124504/01- L01). We would like to	The Applicant acknowledges the response from the Environment Agency.



		<p>update the Inspector with the latest information we have regarding the Permit Variation application. To this end we have revised some of the wording under the heading EPR/CP3035MK West Burton C Permit variation Application - September 2019 and provided an updated response (letter dated 18 September 2019, attached). All the other comments we previously made remain valid and are reproduced in this latest letter. We would appreciate confirmation of receipt of this email and apologise for any inconvenience caused.</p> <p>The Environment Agency has undertaken significant pre application work with the applicant and their consultants.</p> <p>Flood risk</p> <p>The submitted Flood Risk Assessment (FRA) confirms that all of the proposed development site lies within Flood Zone 1, the area of land deemed at least risk of flooding, according to Environment Agency maps. We are therefore satisfied that the development will remain high, dry and safe even during extreme flood events.</p> <p>Further, AECOM, acting on behalf of EDF Energy, have also carried out site specific breach assessments to ensure that the site will remain safe during an extreme event. While a breach of the flood defences is a residual risk it is reassuring to see that the main site will remain</p>	<p>As outlined in the Outline Drainage Strategy (APP-142, Document 7.8) and Environmental Statement (Document 5.2) one of three potential drainage options would be used for discharge of uncontaminated surface water from the Site. Further information on these three options has been provided to the Environment Agency (30 September 2019) in relation to the 'duly making' of the Environmental Permit Application for the Proposed Development, these being:</p> <ul style="list-style-type: none"> • Option (A) south-east connection to WBB GMX/purge line chamber 7, (permitted discharge point W5 in the existing WBB Environmental Permit); • Option (B) north-east connection to purge line chambers P3 or P4; • Option (C) south-west connection to WBB GU36 hence onto the permitted discharge point W6 connected to purge line chamber 15. <p>Therefore, as clarified, all three potential drainage connection</p>
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		<p>dry even during a 1 in 1000 year breach scenario (in this case the 1 in 1000 year data has been used as a 'proxy' in the absence of 1 in 100 year 50% climate change allowances as agreed with the Environment Agency).</p> <p>Whilst it is not within the Environment Agency's remit to comment on or approve surface water drainage schemes (this role lies with the Lead local Flood Authority (LLFA), in this instance Nottinghamshire County Council) we wish to advice the Inspector as follows:</p> <p>The surface water drainage scheme for the development has yet to be finalised.</p> <p>We understand that it is the applicants intention for surface water to be managed using the existing infrastructure on site. The LLFA will therefore need to be satisfied that surface water can be adequately managed within the constraints of the existing infrastructure.</p> <p>In the event of the existing infrastructure not being sufficient to manage surface water then either the northern or southern (or both) outfall corridors are to be used. If this were to happen then the following two comments apply:</p> <ul style="list-style-type: none"> • The FRA has indicated that the northern and • southern outfall corridors are within flood zone 2 and 3. Neither outfall corridor has 	<p>options under consideration, including the northern/southern drainage connection corridor (Option B and A above respectively), would connect to the existing WBA drainage infrastructure (purge line) for subsequent discharge to the River Trent. Consequently, there is no need for the Proposed Development to construct any new outfall into the river and it is not envisaged that any works would be required in or around the existing flood defences that would require a separate permit from the Environment Agency. Only one of the three drainage options will be developed, and the decision as to which option will be used will be made at the detailed design stage. Details of the finalised drainage drawings clearly indicating the drainage routes and emissions points for the Proposed Development will be developed as part of the design process and supplied to the Environment Agency prior to commencement of commissioning, as part of the Environmental Permit. These details must also be approved with the relevant planning authority under Requirement 9 of the draft DCO (APP-004, Document 2.1), following consultation with the Environment Agency.</p> <p>The Flood Risk Assessment that accompanied the Application (Appendix 12A of ES Volume II – APP-066, Document 5.2) has assessed the potential effects of constructing and operating all of the three potential drainage options, including either of the northern or the two southern drainage connection corridors. All three options lead to insignificant effects on flood risk. It is recognised (and shown on Figure 4 of the FRA) that the drainage connections are located within Flood Zone 3. Therefore, the FRA (section 8) includes mitigation for both construction and operational stages in respect of the drainage connection corridors and connections into the WBA purge line.</p>
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		<p>been assessed as part of the FRA. Therefore if either or both of the outfall corridors need to be constructed then the FRA will need to be updated and resubmitted for review.</p> <ul style="list-style-type: none"> • The applicant will need to contact the Environment Agency regarding obtaining the relevant Flood Risk Activity Permits (FRAP). The outfall structures would interact with existing Environment Agency maintained flood defences and therefore we would need to ensure that they are constructed to the required standard. In such a scenario the applicant is advised to contact the Environment Agency for pre-Permit application advice. This would allow the Environment Agency to work collaboratively with the applicant in order to ensure there are no delays at the Permit application stage. <p>It is noted that the area identified as the construction laydown area partially lies within flood zone 2. However, given that a very small area within the north western section of the lay down area is affected by flood zone 2 and that the area in question is far in excess of 16 metres away from the Environment Agency maintained flood defences, a FRAP would not be required in this instance.</p>	<p>None of the drainage options under consideration require works under or adjacent to the existing Environment Agency maintained flood defences and no outfall structures are proposed. Therefore, no Flood Risk Activity Permit (FRAP) is considered to be required prior to any works being undertaken.</p>
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		<p>Foul drainage</p> <p>We note that, as currently submitted, the Outline Drainage Strategy does not include provision for the disposal of foul drainage associated with the welfare offices (either temporary or permanent provision). Whilst acknowledging that West Burton Sewage Treatment Works (STW) is within the wider site, the submitted FRA (paragraph 4.7.3) proposes foul drainage from any permanent welfare facilities would be directed to an on-site septic tank for storage and treatment. Conversely, the National Planning Policy Framework makes clear that discharge of foul drainage arising from developments should be directed to the mains sewage network where it is reasonable to do so. We therefore look forward to continue working with the applicant in ensuring the best solution for disposing of foul drainage, both temporary and permanent, is achieved.</p> <p>Protection of controlled waters</p> <p>As stated above, under 'Flood risk', we understand that the final surface water drainage scheme is yet to be decided upon, and once it is, this will need to be approved by the LLFA. However at this stage we wish to advise the following:</p> <p>Details of the site investigation undertaken has</p>	<p>The option for foul drainage to be discharged to the West Burton Sewage Treatment Works located to the east of the Proposed Development and owned and operated by Severn Trent Water was initially considered by the Applicant in recognition of policy favouring connection to the public foul sewer wherever it is reasonable to do so. Permanent welfare facilities are included in the indicative design of the development, however it is anticipated that for most of the time the WBC site will be unmanned. Given the employee numbers required for the operation of the Proposed Development (anticipated to create up to 15 operational roles, some of which are expected to be undertaken by existing West Burton/Cottam Power Station employees) and the relatively infrequent use of the welfare facilities, it was concluded that the more economical and practical approach would be to discharge foul drainage from any permanent welfare facilities to an on-site septic tank for treatment. The tank would then be emptied by road tanker as and when required. It is recognised that demand for welfare facilities during outages will also need to be met, it is considered that the welfare facilities already available on the West Burton site would provide for this demand.</p> <p>At this stage, an Outline Drainage Strategy has been prepared for the Proposed Development (provided as APP-142, Document 7.8), including indicative drainage plans for both waste water from site operations and uncontaminated surface water run-off.</p> <p>It is recognised that these plans represent an initial drainage approach, and the finalised drainage design, including drainage</p>
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		<p>shown that a limited number of contaminants are leachable and groundwater impact is locally significant, likely due to ongoing leaching of contaminants within the PFA/made ground at the site. Consequently, from the perspective of the protection of controlled waters, we would expect that any attenuation pond forming a part of the surface water drainage scheme would be lined to avoid infiltration into the PFA/made ground. We therefore look forward to continue working with the applicant and in particular look forward to receipt of the following: Further detail on the attenuation pond as (detailed above); the location of surface water samples which have already been taken on site; proposals for sealed surface water drainage systems.</p>	<p>infrastructure, routes and emission points from the site will be developed as part of the detailed design process once a contractor is appointed and supplied to the Environment Agency prior to commencement of commissioning. This is proposed to be secured through Requirement 9 (2) and (3) of the draft DCO (APP-004, Document 2.1).</p> <p>Although the detailed design of any pond or tank cannot be finalised at this stage, protection of controlled waters is a key consideration in the Outline Drainage Strategy which includes segregation of drainage to include an oily waste water drainage system, incorporating Class 1 full retention oil/ water interceptors or containment pits, to drain all areas where oil spillages could occur. Similar oil/ water interceptor arrangements are present at WBB Power Station, which are emptied periodically. As such, any attenuation pond required for the Proposed Development would contain only surface water run-off from the site which would be essentially uncontaminated, as it is segregated from any process areas and storage areas of the site. The attenuation pond would be impermeable and would be lined, if required, so that it retains the water directed into it.</p> <p>In the event of a fire, the surface water drainage system would be closed (via isolation valves) to prevent contaminated water being released off-site through the surface water attenuation system. All oil storage areas would be within a contained area with sufficient volume to capture spent fire-fighting water prior to removal to suitable waste water treatment facility via road tanker. For plant areas covered by hydrant systems, fire water would drain into the plant wide drainage system and be held within the attenuation pond/ tank through the use of the system shut-off valve. These areas do not contain oil, minimising the risk of</p>
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		<p>We note from the submitted Framework Construction Environmental Management Plan (CEMP) that a foundation risk assessment and proposed piling methodology is to be undertaken. We look forward to receipt of these by the applicant.</p>	<p>contamination of the fire water. The attenuation pond/ tank is designed to have the capacity to contain up to two hours of firewater. Any firewater retained would be contained on site and disposed off-site in accordance with waste management legislative requirements.</p> <p>The two surface water samples are known as SW01 and SW02. Further information on the surface water samples is detailed within Appendix 11B: Ground Investigation Environmental Support and Sampling Report (APP-065, Document 5.2).</p> <p>At this stage in the development of the Project, the final OCGT technology selection cannot yet be made, as it will be determined by various technical and economic considerations. The design of the Proposed Development, therefore, incorporates a necessary degree of flexibility in the choice of OCGT technology, plant dimensions and configuration of any enclosures or buildings, to allow for the future selection of the preferred technology and construction contractor. At this stage, it is envisaged that the appointed construction contractor would prepare and level the Proposed Power Plant Site, followed by piling (if required) and excavation for main foundations. The lighter buildings may be piled or have raft foundations.</p> <p>If piling is required, piling design and construction works would be completed following the preparation of a piling risk assessment, completed in accordance with the Environment Agency's 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention'. A piling and penetrative foundation design method statement would be submitted to and after consultation with the Environment Agency, agreed with Bassetlaw District Council prior</p>
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		<p>Biodiversity We expect the recommendations set out in the submitted Landscaping and Biodiversity Management and Enhancement Plan to be followed in full and on this understanding we have no objections to the proposals from a biodiversity and habitat perspective.</p> <p>Informative – Potential Abstraction Licence Activities associated with power stations, such as evaporative and non-evaporative cooling, may require an abstraction licence from the Environment Agency. Under the Water Resources Act 1991, any abstraction of water greater than 20 cubic metres per day, requires</p>	<p>to relevant works commencing. The ‘piling and penetrative foundation method statement’ is to be secured by Requirement 22 of the draft DCO (APP-004, Document 2.1) and must be approved by the relevant planning authority following consultation with the Environment Agency. Requirement 22 of the draft DCO states the following:</p> <p><i>“Piling and penetrative foundation design 22.—(1) No piling works for the construction of the authorised development must commence until for that stage a written piling and penetrative foundation design method statement, informed by a risk assessment has been submitted to and, after consultation with the Environment Agency, approved by the relevant planning authority. (2) All piling and penetrative foundation works must be carried out in accordance with the approved method statement unless otherwise agreed with the relevant planning authority.”</i></p> <p>The Environment Agency’s response is noted.</p>
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		<p>an abstraction licence.</p> <p>The Environment Agency is aware that West Burton Power Station currently has an existing abstraction licence (reference number: 03/28/69/0070). It should be noted that changes to abstraction locations, volumes or purpose would require the licence to be varied or a new abstraction licence to be applied for.</p> <p>The proposed development site lies within the Lower Trent and Erewash Abstraction Licensing Strategy (ALS). This ALS area is open to new applications for abstraction however local conditions may apply. Further information is available here https://www.gov.uk/guidance/water-management-abstract-or-impound-water.</p> <p>Draft Development Consent Order We have reviewed the submitted draft Development Consent Order and we are comfortable with its content/wording.</p> <p>EPR/CP3035MK West Burton C Permit variation Application - September 2019</p> <p>The proposed development will require the applicant to vary the existing Permit it holds for the site and we wish to advise the Inspector of the current status of the permit variation application and also what aspects of the</p>	<p>It is the intention of the Applicant to vary its existing water abstraction licence (reference number: 03/28/69/0070) to include the purpose of supplying WBC at an appropriate time, there will be no change to abstraction location or volumes.</p> <p>The Applicant notes that no further dialogue is deemed necessary.</p> <p>The Environment Agency confirmed that the Environmental Permit variation application EPR/CP3035MK/V008 was duly made on 23 October 2019.</p>
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		<p>development the granted (varied) Permit will cover.</p> <p>1.1 A permit variation application has been received by the Environment Agency (EA). This is to vary the current West Burton Combined Cycle Gas Turbine (CCGT) Power Station Environmental Permit EPR/CP3035MK/V008 to include the new West Burton C Power Station. The EA previously discussed with the applicant the benefits of parallel tracking the Development Consent Order (DCO) and permit application.</p> <p>1.2 The EA consider this to be a substantial variation. The variation is to add a new Open Cycle Gas Turbine (OCGT) Power Station with a gross thermal input of 750MWth to operate for a maximum of 2250 hours.</p> <p>1.3 Current Environment Agency Best Available Technique (BAT) guidance is for OCGT power stations to operate for 1500hrs per year on a rolling five year average with a maximum of 2250 hours in and one year.</p> <p>1.4 The technology has still to be decided but environmental assessment modelling has been undertaken and submitted on 5 OCGT units with individual stacks.</p> <p>1.5 As well as the permit variation application submission, the EA has also received an</p>	
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		<p>application for a part surrender to the West Burton A station permit. The substantial variation to West Burton B station's permit will include an extension of the installation boundary to include the aforementioned surrendered land, on which the applicant intends building West Burton C.</p> <p>1.6 The substantial variation is dependent on the surrendered land and therefore the surrender application needs to be duly made before the variation can be duly made. If no issues arise that require further information, duly making the surrender application will likely be complete within 2 weeks from the date of this letter. If further information is required it will take longer. The EA is not in a position to state at this time when the substantial variation will be duly made.</p> <p>1.7 Once the substantial variation application is duly made we have to publicise it and also carry out a number of internal and external consultations/assessments. We currently expect the determination of the substantial variation to take until at least February 2020. We intend to issue the two applications at the same time so that the surrendered land isn't unpermitted while the variation is being determined.</p> <p>1.8 Due to the above, no assessment of any information provided to us regarding emissions to air, land, water or amenity such as noise or odour has been undertaken.</p>	
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		<p>1.9 Adjacent to this site are 2 Environmental Permitted installations: West Burton A Coal Fired Power Station EPR/SP3039LW and West Burton Bole Ings Ash Disposal Landfill EPR/YP3134SC. Other than the transfer of land between the 2 Power Stations there are no expected permitting implications between the installations.</p> <p>2. Our determination of the permit variation will cover key points from the permitted activity, these being: Management: including general management, accident management, energy efficiency, efficient use of raw materials and waste recovery; Operating activities and techniques: including the use of Best Available Techniques for process design and management; Combined Heat and Power; Eels Management; Emissions to air and discharges to water, land and groundwater; Amenity issues such as odour, noise and vibration; Information: - monitoring, records, reporting and notifications.</p> <p>1.8 In determining the application for the permit we will set conditions to ensure the emissions</p>	
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		<p>and discharges are at a level that will not result in significant impact on people and the environment, reflecting current statutory requirements. We cannot grant a permit until we are satisfied that the operations will not cause significant pollution to the environment or harm to human health.</p> <p>1.9 Any waste from the activity applied for will be similar in nature to those already generated from the current site operations though an increase in these is likely.</p> <p>1.10 During the construction and decommissioning phases of the power station there may be a requirement for wastes generated to be either reused, treated or disposed. The applicant should be aware of the waste legislation applicable to the activity being undertaken (for example environmental permits, exemptions, regulatory position statements and codes of practice).</p>	
AS-004	ESP Utilities Group Ltd	<p>Thank you for your recent plant enquiry at: West Burton, Retford.</p> <p>I can confirm that ESP Utilities Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.</p> <p>ESP Utilities Group Ltd are continually laying new gas and electricity networks and this</p>	<p>The Applicant acknowledges the response from ESP Utilities Group Ltd and notes that no further dialogue is deemed necessary.</p>



		<p>notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.</p> <p>Important Notice Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espug.com.</p>	
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