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National Infrastructure Planning  
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**Our ref:** LT/2019/124818/01-L01  
**Your ref:** EN010088  
**Date:** 02 December 2019

Dear Sir/Madam

**WEST BURTON C (GAS FIRED GENERATING STATION)  
WEST BURTON POWER STATION SITE  
WRITTEN QUESTIONS.**

I refer to the Examining Authority's Written Questions and requests for information (ExQ1), issued on 06 November 2019.

Here are answers to the questions which have been directed to the Environment Agency:

**Q1.4**

We can confirm that the Applicant holds an abstraction licence for the West Burton Power Station site. During our pre-application discussions with the Applicant we confirmed that the existing licence would not need Varying as a result of the new development.

**Q2.2**

The Applicant has considered locally available monitored data, including both automatic monitoring and diffusion tubes. The closest available monitoring is located in Gainsborough, approximately 4km to the North East of the site. Background concentrations recorded in Gainsborough may not be representative of the concentrations at receptors and therefore the Applicant has used Defra mapped concentrations. We agree that this is appropriate.

The most recent Defra mapped concentrations were produced in 2015 and can be projected forwards for future years. As a conservative approach however, we recommend using the 2015 data without projecting forwards to future years. The Applicant has used the 2015 data and projected to 2019. We consider this is likely to be

representative of current baseline concentrations, rather than being conservative. We note, however, that the operation is not proposed to start until 2023.

Our comments are based on a review of the background data in isolation. We note that the Applicant predicts that all process contributions are not significant. We will review this in our full audit of the Applicants air modelling. We will also consider the appropriate selection of baseline information and conduct sensitivity analysis to more conservative background data if we consider it necessary.

### **Q5.3**

We are satisfied with the site investigation, sampling and assessment of risk posed by the site to ground conditions. Groundwater sampling has shown that contaminants within the made ground have leached and have had an impact on groundwater quality beneath the site. Surface water sampling however has not shown that this leachable contamination has significantly impacted surface water receptors.

Our principle concern regarding the protection of the water environment is the construction phase of the development and how contaminant mobilisation will be minimised; hence our request for a piling and penetrative foundation risk assessment. We expect this risk assessment to be submitted and agreed prior to any development commencing on site. This requirement is reflected in Requirement 22 of the agreed Statement of Common Ground.

### **Q11.2**

The site lies within Flood Zone 1 and therefore has less than a 0.1% chance of flooding in any given year. The most current climate change guidance (<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>) states the following;

*In flood zone 1 use the central allowance for essential infrastructure, highly vulnerable, more vulnerable and less vulnerable developments. For water compatible developments use none of the allowances.*

The climate change guidance for the Humber region indicates that it is appropriate for essential infrastructure to be considered within the central allowance which, for the Humber region is a 20% climate change allowance. Therefore we concluded that given the above guidance it was appropriate to utilise the current Tidal Trent hydraulic model which contains a 20% climate change allowance for the 1 in 100 year flood outlines when considering the suitability of the development.

### **Q11.12**

The application of the Sequential and Exceptions Tests is not predominantly a matter for the Environment Agency to consider unless we have specific concerns. Notwithstanding this, we consider that the proposals to use the existing drainage network on site would not in itself constitute new development. There would be the requirement to ensure appropriate run-off rates are applied, and this element would be considered by the Lead Local Flood Authority. The Applicant will also need to ensure that any discharge rates back in to the River Trent are in line with the sites discharge consents.

### **Q11.13**

The Environment Agency are satisfied that the flood risk assessment and the approach to flood risk is adequate. As mentioned previously the footprint of the proposed development lies fully within Flood Zone 1 and therefore is at very low risk of fluvial

(river) flooding. There were concerns raised about earlier proposals for two outfall corridors which were intended to be installed to the east of the development. However these corridors were subsequently removed from the final proposals prior to formal submission of the Development Consent Order. This removed the need for further investigation through the site specific FRA and the need for a Flood Risk Activity Permit (FRAP).

Yours faithfully

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