
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 Responses to Other Parties' Deadline 2 Submissions

Examination Deadline 3



Applicant: EDF Energy (Thermal Generation) Limited
Date: 20 December 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 Generation) Limited.
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.

This document sets out the Applicant's responses to other parties' submissions to the Examining Authority (ExA) made at Deadline 2.

No attempt has been made to respond to every single submission. The responses have focused on issues thought to be of most assistance to the ExA with reference to the identified Principal Issues. Where points have been raised by various parties, the Applicant has responded only to one particular party, but the responses are applicable to all parties who have made the same point.

The Applicant also does not seek to respond to all the points made where its response is already contained within other submissions made as part of the examination of the Application, including:

- i. The Applicant's Comments on the Relevant Representations and any Additional Submissions (**REP1-005**) submitted at Deadline 1; and
- ii. The Applicant's Response to Examining Authority's Written Questions (**REP2-009**) submitted at Deadline 2.

save where it is thought helpful to repeat or cross refer to the information contained in the above documentation.

The Examination Library

PINS Examination Library references are included in these questions (e.g. APP-010) in addition to the Applicant's Application Document Numbers. The Examination Library can be obtained from the following link:

<https://infrastructure.planninginspectorate.gov.uk/projects/north-east/west-burton-c-power-station/?ipcsection=docs>

The Planning Inspectorate are updating the examination library as the examination progresses.

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Body / Individual (PINS reference)	Comment (Reference)	Applicant's Response
<p>Nottinghamshire County Council (REP2-018)</p>	<p>Response to Examining Authority's Written Questions (Q3.12) The applicant proposes to enhance the ecological value of an area identified at Bole Ings, to compensate for the net loss of habitat arising from the proposed scheme. They will use the Defra offsetting metric with the aim of demonstrating an uplift in value of the Bole Ings area arising from their enhancement works, sufficient to deliver no net loss of biodiversity. However, the area in question was previously enhanced as a requirement of another planning application at the site, and is, ostensibly, already an area of species-rich grassland - although there are no surveys available to demonstrate the current status of this area, and the offsetting metric calculation has not yet been carried out. The pertinent issues are that:</p> <ul style="list-style-type: none"> • The area in question at Bole Ings should already have been restored to species-rich grassland • If the area is not already species-rich grassland, then this suggests that the requirements of the aforementioned planning permission were not properly implemented • If the area is species-rich grassland, then the potential to further increase the value of this area will be limited. <p>If the latter is true, then it is not certain that the necessary level of uplift in ecological value will be achieved, which is where the suggestion came from that additional land may be required. This is also why in the SoCC it is recognised that the Defra offsetting metric and LBMEP provide an appropriate <i>framework</i>, but that an agreement on all details of proposed enhancements within the Bole Round area remains to be agreed. In short, there is a risk that the necessary level of ecological compensation cannot be achieved within the Bole Ings area.</p>	<p>The Applicant notes the comments by Nottinghamshire County Council's ecologist.</p> <p>The 2012 DEFRA offsetting metric, available at the time of the Application, was used to calculate the size of the areas required for landscape and ecological management and enhancement in order to provide no net loss and an overall net gain. The metric calculations were provided in Section 5.4 and Appendix B of the Landscape and Biodiversity Management and Enhancement Plan (LBMEP) submitted with the Application (APP-139 - Document 7.5) and in summary, included:</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>Data on habitats was obtained during the Phase 1 Habitat survey (2017 and ground-truthed 2019), the findings of which are presented in Appendix 9C: Preliminary Ecological Appraisal (Application Document Ref. 5.2). Habitat areas to</p>



		<p>be lost, reinstated and enhanced are quantified in Table 5-2 and accompanying Appendix B of the LBMEP (APP-139 - Document 7.5).</p> <p>The Applicant has explained the relationship between the ecological mitigation measures required for West Burton B Power Station and the proposals for landscape and biodiversity management and enhancement for the Proposed Development in the response to question 3.8 of REP2-009 (Document 9.2 - Applicant's Responses to Examining Authority's Written Questions), submitted at Deadline 2. To avoid repetition, reference should therefore be made to the Applicant's response at Deadline 2.</p> <p>Biodiversity Net Gain (BNG) calculations have now been updated using the Natural England Metric v2.0 published in July 2019, (post submission of the Application). Results are provided in the prescribed calculator template as Document 10.4 as part of this submission for Deadline 3. In updating the calculations, the Applicant has taken into account the future baseline condition of habitats associated with the 2012 WBB Power Station Landscape and Creative Conservation Plan (LaCCP), assuming successful implementation of the measures proposed (which focused on enhancement of the grassland, woodland and scrub areas in Areas 4 & 5 of the proposed Landscape and Biodiversity Management and Enhancement Plan (Figure 9.1), and enhancement of existing reedbed). In summary this approach establishes a revised future baseline scenario.</p>
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		Habitats and areas		Habitat distinctiveness		Habitat
		Habitat type	Area (hectares)	Distinctiveness	Score	Condition
		Urban - Vacant/derelict land/bareground	1.68	Low	2	Poor
		Woodland and forest - Other woodland; broadleaved	2.65	Medium	4	Good
		Woodland and forest - Other woodland; broadleaved	1.07	Medium	4	Good
		Urban - Developed land; sealed surface	1.39	V.Low	0	NA - Other
		Urban - Developed land; sealed surface	9.64	V.Low	0	NA - Other
		Grassland - Other neutral grassland	11.91	Medium	4	Good
		Sparsely vegetated land - Ruderal/Ephemeral	1.45	Low	2	Poor
		Grassland - Modified grassland	0.12	Low	2	Poor
		Heathland and shrub - Mixed scrub	6.04	Medium	4	Moderate
		Heathland and shrub - Mixed scrub	0.11	Medium	4	Moderate
		Lakes - Ponds (Priority Habitat)	0.002	High	6	Good
		Wetland - Reedbeds	0.13	High	6	Good
		Lakes - Ditches	0.03	Medium	4	Good

The metric models this revised future baseline scenario and uses the data on the Applicant's landscape and biodiversity management and enhancement proposals provided in Tables B1-B4 of **APP-139 (Document 7.5 - LBMEP)** to calculate biodiversity net gain achieved by the Proposed Development. Overall the Proposed Development would achieve a 32% net gain (see '_future baseline condition' workbook). This assessment used the following assumptions:

- 1) like for like replacement of habitats areas lost, aiming for 'good' condition;
- 2) enhancement of retained areas of tall ruderal and scrub habitat; and
- 3) 2.89ha of tree planting in Area 4.

Results using the new metric demonstrate that the Proposed Development will generate a net gain in biodiversity units,

<p>(REP2-019)</p>	<p><u>Written Questions and Request for Information</u> With regards to the above consultation NCC have considered the questions and have one comment to make at this stage.</p> <p>The Flood Risk Assessment is comprehensive and covers all the points we would expect. If the application is developed in line with the RA there should be no issues at all with regards to surface water.</p>	<p>relative to the baseline, with no additional areas of land required to meet these objectives. This assessment is based on the assumption that the condition of habitats present reflects those to be delivered under the 2012 WBB LaCC plan.</p> <p>The Applicant is committed to delivering a net gain in grassland quality when compensating for the habitat loss within the Bole lngs area.</p> <p>Nottinghamshire County Council's comments on the Flood Risk Assessment are noted.</p>
<p>West Lindsey District Council (REP2-020)</p>	<p><u>Response to Examining Authority's Written Questions</u> I write to you in response to the relevant written questions due by 6th December 2019 asked by the Examining Authority on the peaking plant national infrastructure project at West Burton Power Station. For reasons of clarity I will set out West Lindsey's answers after each question below.</p> <p>(Q1.8) <i>Has the shortlist of major projects in respect of the assessment of cumulative effects identified in Table 16-5 of ES Chapter 16 [APP-045] and on ES Figure 16.2 [APP-131] been agreed with/by the relevant local authorities?</i></p> <p>The shortlist of major projects is agreed, however since this time there have been a couple of extra major planning applications submitted for Land off, Foxby Lane, Gainsborough. These are:</p> <p>138921 - Planning application to vary conditions 1, 2, 3, 6, 11, 17, 19, 20, 21, 26, and 27, and remove conditions 4, 5, 7, 8, 9, 10, 12, 13, 18, 23, and 25 of planning permission 125020 granted 5th July 2011 – 29/08/19 - Granted time limit with conditions</p>	<p>The Applicant notes the confirmation by West Lindsey District Council (WLDC) that the shortlist of committed developments identified in Table 16-5 of ES Chapter 16 (APP-045) and shown on ES Figure 16.2 (APP-131) has been agreed with the authority. The Applicant notes that during the scoping process for the Proposed Development, a detailed Transport Scoping report was prepared and sent to Lincolnshire County Council (LCC), the responsible highways department for development affecting WLDC area, for their review and comments. This included a list of committed developments that would be incorporated within baseline flows. Land off Foxby Lane was not identified by either party at the time of Transport Scoping for this application. The Statement of Common Ground with</p>



	<p>140081 - Reserved matters application for Phase 1 to erect 460no. dwellings, considering appearance, landscaping, layout and scale, following outline planning permission 138921 granted 29 August 2019 – Still under consideration</p> <p>For your reference these two applications relate to growth point outline planning permission 125020 granted on 5th July 2011 with a 12 year commencement condition. This outline permission was for:</p> <p>Outline planning application for 2500 (Two thousand five hundred) new homes with associated employment land (use classes B1-Business and B2 -General industry); community services and facilities (use classes A1 -Shops,A2-Financial & Professional,A3- Restaurants & cafes, A4- Drinking establishments,A5-Hot food take aways,D1-Non-residential institutions and D2-Assembly and Leisure); formal and informal open space and landscaping; together with the construction of new access junctions, cycleways and footways and associated infrastructure and facilities (access to be considered and not reserved).</p>	<p>LCC (REP1-011) submitted at Deadline 1 reflects agreement on the content of the TA Scoping Report.</p> <p>In accordance with the Planning Inspectorate Advice Note 17 (V2, August 2019) the Applicant has re-considered at the examination stage the potential for cumulative effects between the Proposed Development and these additional planning applications now identified by WLDC (138921 and 140081). It is noted that the temporal scope of these applications could coincide with the Proposed Development given that Condition 1 of consent 138921 states that 'the development hereby permitted shall be begun before the expiration of two years from the date of approval of the last of the reserved matters to be approved'.</p> <p>Consideration has therefore been given to the location, nature and scale of development, in determining whether the applications require consideration in relation to the cumulative effects assessment.</p> <p>The applications relate to the allocated sustainable urban extension (CL1239) of the Central Lincolnshire Local Plan, adopted in April 2017. Application 138921 sought permission to vary conditions 1, 2, 3, 6, 11, 17, 19, 20, 21, 26 and 27 and remove conditions 4, 5, 7, 8, 9, 10, 12, 13, 18, 23 and 25 of outline planning permission 125020 granted 5th July 2011 for 2,500 new homes with associated employment land, community services at Foxby Lane, Gainsborough, approximately 3km north-west of the Proposed Development Site. These conditions relate to phasing, drainage, landscaping, construction management, construction times, archaeology, design codes, BREEAM, roads and footways. There were no changes to the original consented application in terms of vehicle generations or assignment of traffic to the network that might have an influence on traffic, noise, or air quality assessments in relation to the Proposed Development. The application to vary and remove the conditions was granted on 29 August 2019. A reserved matters application for Phase</p>
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		<p>1 of outline planning permission 138291 for 450 residential units was submitted on 30 September 2019 and is still to be determined.</p> <p>A review of the Transport Assessment (TA) prepared for the consented outline application (Ref: 125020) and the reserved matters application (Ref: 140081) show that the highway network used for assessment does not extend to the network study area for the Proposed Development. The zone of influence of the Proposed Development is therefore not considered to interact with the consented outline application and reserved matters application (under consideration) directly. Notwithstanding this, it is of note that the outline consent requires the submission of a Travel Plan for each phase to ensure that access to the site is sustainable and to reduce the dependency on private car journeys; and details of cycleways, footpaths and crossings for each phases, to encourage the use of alternative forms of transport to the site other than public car.</p> <p>APP-052 (Appendix 7A: Transport Assessment) for the Proposed Development used traffic growth factors of 16% for the Bassetlaw District (between 2017 and 2029) derived from TEMPRO software, which takes into account national projections of population, employment, housing and car ownership based on Local Plan allocations and provides a local adjustment to provide localised growth factors for geographical areas. As the Foxby Lane site is a Central Lincolnshire Local Plan allocation, it should already be included in the TEMPRO growth rate applied to the 2017 baseline flows.</p> <p>The reserved matters application for Phase 1 of the Foxby Lane development to erect 460no. dwellings does not add to the quantum of this consented outline development. It is therefore considered that the growth factor of 16% used for the APP-052 (Appendix 7A: Transport Assessment) for the</p>
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	<p>(Q2.2) <i>In relation to the assessment of Air Quality, do the Statutory Parties agree with the methodology adopted to determine the baseline information and the baseline information itself, specifically whether the 2019 baseline is, as the Applicant notes in Paragraph 6.3.26 of ES Chapter 6 [APP-035], conservative?</i></p> <p>Agreed in Air Quality section on page 6 of the Statement of Common Ground (SoCG).</p> <p>(Q6.3) <i>Are Historic England, Bassetlaw District Council and West Lindsey District Council satisfied with the extent of the search areas for designated and non-designated heritage assets as set out in ES Chapter 14 [APP-043] and as shown on ES Figure 14.1 [APP-127] and ES Figure 14.2 [APP-128]?</i></p> <p>Agreed in Cultural Heritage section on page 8 of the SoCG</p> <p>(Q6.6) <i>Is Historic England, Bassetlaw District Council and West Lindsey District Council satisfied that the five designated and non-designated heritage assets identified within ES Chapter 14 [APP-043] are the only ones with the potential to be affected?</i></p> <p>Agreed in Cultural Heritage section on page 8 of the SoCG</p>	<p>Proposed Development is robust and that the development traffic generated by the outline consented development (including that covered by the reserved matters application for 450 dwellings at Phase 1 which is under consideration) would be incorporated within background growth applied to the 2017 baseline flows.</p> <p>Taking into account the distance from the Proposed Development and the study area for the other disciplines presented in the ES, it is not considered likely that there would be the potential for any other cumulative effects on other topics considered in the ES during either construction, or operation.</p> <p>West Lindsey District Council's (WLDC) comments on the Air Quality baseline and agreed position in the signed Statement of Common Ground (REP1-012) are noted.</p> <p>WLDC comments on the extent of search areas for designated and non-designated heritage assets and agreed position in the signed Statement of Common Ground (REP1-012) are noted.</p> <p>WLDC comments on the appropriate identification of designated and non-designated heritage assets and agreed position in the signed Statement of Common Ground (REP1-012) are noted.</p>
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	<p>(Q7.1) Have viewpoints and photomontage locations as shown on ES Figure 10.5 [APP091] been agreed with the relevant local authorities?</p> <p>Agreed in July 2017 section on page 3 of the SoCG</p> <p>(Q8.3) Have noise monitoring locations been agreed with the relevant local authorities?</p> <p>Agreed in Noise and Vibration section on page 7 of the SoCG.</p>	<p>WLDC comments on the agreement of viewpoints and photomontage location shown in APP-091 and confirmation of this agreed position in the signed Statement of Common Ground (REP1-012) are noted.</p> <p>WLDC comments on the agreement of noise monitoring locations via the signed Statement of Common Ground (REP1-012) are noted.</p>
<p>Environment Agency (REP2-025)</p>	<p><u>Response to Examining Authority's Written Questions</u></p> <p>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:</p> <p>(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.</p> <p>(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.</p> <p>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.</p>	<p>The Environment Agency's comments on the suitability of the existing abstraction licence for use without variation are noted.</p> <p>The Applicant has explained the basis for using a 2019 baseline in their response to question 2.1 of REP2-009 (Document 9.2 - Applicant's Responses to Examining Authority's Written Questions), submitted at Deadline 2.</p> <p>At the time of the assessment the Defra background maps used to derive the background concentrations were based on 2015 background data, projected forward. The concentration used for the background in the assessment was 9.3ug/m³</p>



	<p>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.</p> <p>(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.</p> <p>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</p>	<p>(refer to Table 6-15 of APP-035 (Chapter 6: Air Quality)). Had this not been projected forward, as recommended by the Environment Agency, the 2015 background value of 9.9 ug/m³ would have been used for the assessment.</p> <p>Since the assessment, the background maps have been updated by Defra to be based on 2017 background data. The data for the baseline year of 2017, and the projected year of 2019, has therefore been checked for the new background maps and were found to be 9.0 ug/m³ and 8.3 ug/m³ respectively, which are both lower than the background concentration of 9.3ug/m³ used in the assessment. It is therefore considered that the assumption that the baseline data used in the assessment is conservative is correct, based on the updated and most recent published 2017 Defra background mapping.</p> <p>The assessment predicts that the impacts arising from the operational phase of the Proposed Development would not be significant at all identified receptors, regardless of the background concentration applied. Had the 2015 background concentration been used in the assessment (as recommended by the Environment Agency), the assessment outcome would remain unchanged and the assessment findings are therefore considered to be both conservative and robust.</p> <p>The Environment Agency's comments on the risks posed by the site to ground conditions and appropriateness of existing investigation data are noted.</p> <p>The Applicant has agreed with the Environment Agency the timing of provision of a piling and penetrative foundation risk assessment. Please refer to Appendix 2.3 of the Statement of</p>
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	<p>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.</p> <p>(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;</p> <p><i>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.</i></p> <p>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.</p> <p>(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.</p> <p>(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</p>	<p>Common Ground with the Environment Agency (REP1-016) and Requirement 23 of the draft DCO (REP2-003 – Document 2.1A) which provides the mechanism for this being secured.</p> <p>The Environment Agency's comments on the suitability of the Applicant's assumptions for the Flood Risk Assessment are noted.</p> <p>The Environment Agency's comments on the suitability of the Applicant's assumptions for the Flood Risk Assessment are noted. Nottinghamshire County Council as Lead Local Flood Authority (LLFA) commented (REP2-019) at Deadline 2 confirming that the Flood Risk Assessment is considered comprehensive and covers all the points expected are noted by the Applicant, including that they foresee no issues at all with regards to surface water.</p> <p>The Environment Agency's comments on the approach to the Flood Risk Assessment are noted, including confirmation that a Flood Risk Activity Permit (FRAP) is no longer required. The Applicant notes that as this position had been agreed via the Statement of Common Ground with the Environment Agency</p>
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<p>(REP2-026)</p>	<p>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).</p> <p><u>Written Representations</u> Please find below our written representation for the West Burton C (Gas Fired Generating Station).</p> <p>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 the sea.</p>	<p>(REP1-016) submitted at Deadline 2, the Schedule of Other Licences and Consents was updated on this basis and submitted at Deadline 2 (REP2-005).</p>
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	<p>Since issuing our Relevant Representations (dated 18 September 2019, reference LT/2019/124504/01-L02) we have been working with the Applicant on our Statement of Common Ground. This has resulted in a number of the issues raised in our Relevant Representations being resolved. We have also provided our responses to the Written Questions asked by the Inspector. Our Written Representation provides an update for the Inspector following the above actions.</p> <p>Flood risk Our comments remain the same as those provided in our Relevant Representations. Our comments regarding the surface water drainage scheme remain in place at this time for the reason that the final drainage scheme has yet to be agreed. We accept, however, that the likelihood is that the northern and southern outfall corridors will not be required as part of the surface water drainage scheme.</p>	<p>The Applicant notes the Environment Agency's comments and has responded to the Additional Submission (AS-003) in Table 3-1 of REP1-005 (Document 8.2 - Applicant's Response to Relevant Representations and Additional Submissions) at Deadline 1. The Applicant notes that the Environment Agency refers to 'northern and southern outfall corridors'. Potential outfalls to the River Trent were previously under consideration and presented in the PEI Report for consultation. Direct outfalls to the River Trent are no longer proposed or included within the Proposed Development. As clarified, all three potential drainage connection options remain under consideration, however, none of these involve new outfall corridors to the river. Only one of the three drainage connection 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 updated draft DCO (REP2-004, Documents 2.1A and 2.1B), following consultation with the Environment Agency.</p>
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	<p>Foul drainage We have worked with the Applicant regarding the concerns we raised on the initial proposal for a non-mains foul drainage scheme. We are now satisfied that new Requirement 9A of the Development Consent Order (as provided in the agreed Statement of Common Ground) will ensure a foul drainage scheme which is NPPF compliant.</p> <p>Protection of controlled waters The requests for information made in our Relevant Representations have now been received (Appendix C Appendix 2.3 of the agreed Statement of Common Ground). The information submitted satisfactorily addresses the points we raised in our Relevant Representations.</p> <p>Biodiversity Our comments remain the same as those provided in our Relevant Representations.</p> <p>Informative – Potential Abstraction Licence Our comments remain the same as those provided in our Relevant Representations.</p> <p><u>EPR/CP3035MK West Burton C Permit variation Application – December 2019</u> We wish to provide the following updates regarding the status of the substantial variation Permit application submission. The update details the stages which have been reached in the Permitting process. All the</p>	<p>The Applicant notes the Environment Agency's comments and agrees that agreement on wording has been reached via the signed Statement of Common Ground with the Environment Agency (REP1-016) submitted at Deadline 1. As noted, in REP1-016, the Requirements have been renumbered. Foul water drainage is now referenced as Requirement 10 (referred to in the Environment Agency's response as requirement 9A) and Surface water drainage as Requirement 9 of the updated draft DCO (REP2-004, Document 2.1A and 2.1B) submitted at Deadline 2.</p> <p>The Applicant notes the Environment Agency's comments in relation to controlled waters and confirmation that the information provided in response to the Additional Submission (AS-003) in Table 3-1 of REP1-005 (Document 8.2 - Applicant's Response to Relevant Representations and Additional Submissions) at Deadline 1 is satisfactory to address previous concerns.</p> <p>The Applicant notes the Environment Agency's response to the Additional Submission (AS-003). Furthermore, the Applicant acknowledges the agreement reached on aspects relating to biodiversity with the Environment Agency set out in the Statement of Common Ground REP1-016 submitted at Deadline 1.</p> <p>The Applicant notes the Environment Agency's comments, including those in REP2-025 which confirm that the existing licence would not need varying as a result of the Proposed Development.</p> <p>The Applicant acknowledges the update from the Environment Agency in relation to the substantial variation application.</p>
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	<p>points made in our Relevant Representations regarding what the Permit will cover remain valid and relevant.</p> <ul style="list-style-type: none"> • The substantial variation Permit application was duly made in early October 2019. • The application has been externally publicised. • We have consulted with external stakeholders, e.g. the Local Planning Authority, Local Authority Environmental Health, Health and Safety Executive. • We have consulted with internal colleagues. <p>We currently expect the determination of the substantial variation to take until at least late spring/summer 2020.</p>	
<p>Historic England (REP2-027)</p>	<p><u>Response to Examining Authority's Written Questions</u></p> <p>(Q6.4) <i>The ExA notes the explanation within Paragraph 14.3.14 of ES Chapter 14 [APP-043] that moderate or major effects are considered to be significant in terms of the ES though moderate effects or lower are considered to represent 'less than substantial harm' to the significance of a heritage asset in the terms of the National Planning Policy Framework. Can the Applicant clarify this approach and is this an approach that Historic England considers appropriate?</i></p> <p>In the specific context of the proposed development and the assets concerned HE is content that this approach to reconciling between EIA and NPPF/NPS language is appropriate.</p> <p>(Q6.6) <i>Is Historic England, Bassetlaw District Council and West Lindsey District Council satisfied that the five designated and non-designated heritage assets identified within ES Chapter 14 [APP043] are the only ones with the potential to be affected?</i></p> <p>We are content that assessment is sufficient and addresses those assets we highlighted in preapplication advice. We cannot certify the completeness of an applicant's work.</p> <p>(Q6.7) <i>Are Historic England and Bassetlaw District Council satisfied that the significance of the five designated and non-designated heritage assets and their settings (which includes West Burton Medieval</i></p>	<p>Historic England comments on the appropriate use of the framework in APP-043 (Chapter 14 – Cultural Heritage) to correlate significant effects with 'substantial harm' to historic assets in the National Planning Policy Framework (NPPF) is noted, as is the position agreed in the signed Statement of Common Ground (REP1-010) submitted at Deadline 1.</p> <p>The Applicant notes Historic England's comments regarding the Applicant following pre-application advice, and the comments provided by WLDC above in relation to the appropriate identification of designated and non-designated heritage assets.</p> <p>Historic England comments on the appropriate classification of significance (value) of designated and non-designated assets in APP-043 (Chapter 14 – Cultural Heritage) are noted,</p>



	<p><i>Deserted Village, Segelocom Roman Town, Bole Manor House, Church of St Martin in Bole and West Burton Power Station) identified in ES Chapter 14 [APP-043], and the effect of the Proposed Development on their significance, has been adequately assessed?</i></p> <p>Yes</p> <p>(Q6.9) <i>Is Historic England satisfied with the approach of the Outline Written Scheme of Investigation [APP-143] in respect of archaeology?</i></p> <p>Yes</p>	<p>including that the effect of the Proposed Development on these assets has been adequately assessed. The Signed statement of Common Ground (REP1-010) provides further confirmation of agreement between the Applicant and Historic England on this matter.</p> <p>Historic England comments on the Outline Written Scheme of Investigation (APP-143) are noted.</p> <p>The Signed statement of Common Ground (REP1-010) provides further confirmation of agreement between the Applicant and Historic England on this matter.</p>
<p>Natural England (REP2-028)</p>	<p><u>Response to Examining Authority's Written Questions</u></p> <p>2. Air Quality and Emissions (Q2.2) In relation to the assessment of Air Quality, do the Statutory Parties agree with the methodology adopted to determine the baseline information and the baseline information itself, specifically whether the 2019 baseline is, as the Applicant notes in Paragraph 6.3.26 of ES Chapter 6 [APP035], conservative?</p> <p>Yes, Natural England is satisfied with the methodology used.</p> <p>3. Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessments (HRA)) (Q3.3) Considering that some species (for example, great crested newts and bats) are internationally protected species, is Natural England satisfied with the application of sensitivity to the list of ecological receptors as set out in Table 9-7 of ES Chapter 9 [APP-038]?</p> <p>Yes, Natural England has reviewed the ES Chapter 9 which sets out the assessment of ecological receptors and is satisfied with the approach and the information provided.</p>	<p>Natural England comments on the use of 2019 as a conservative baseline for the purposes of assessing effects on air quality in Chapter 6 (APP-035) are noted. The Signed statement of Common Ground (REP1-009) provides further confirmation of agreement between the Applicant and Natural England on this matter.</p> <p>Natural England comments on the appropriate classification of sensitivity of ecological receptors for the purposes of assessing effects on ecology in Chapter 9 (APP-038) are noted. The Signed statement of Common Ground (REP1-009) provides further confirmation of agreement between the Applicant and Natural England on this matter.</p>



	<p>(Q3.10) Hibernacula which was used as mitigation for West Burton B is to be dismantled and reconstructed in an alternative area to allow for construction of the Proposed Development. Can the Applicant justify how/why this does not undermine the mitigation implemented for West Burton B and how such mitigation measures and their ability to reduce effects are not being inflated when they were applied to a different development? Also, can Natural England confirm whether it is content with the application of this mitigation and its subsequent impact on assessment of significance and provide reasoning in the response?</p> <p>Natural England confirms that we have been in consultation with the applicant regarding the proposed mitigation. Natural England's Wildlife Licensing Service (NEWLS) has provided pre-application advice in the form of an assessment of a draft licence application and has given feedback and comments on the proposed mitigation strategy through our PreSubmission Screening Service response. Provided the recommendations within that response are met within the formal licence application, then Natural England would be in a position to grant the licence for great crested newts.</p> <p>Further to this, given the time elapsed between the West Burton B development and the proposed C development, the impact on newts from the relocation of the hibernacula will be minimal, as will be the risk from double-handling.</p> <p>(Q3.15) Is Natural England satisfied with the No Significant Effects report [APP-027] in relation to European protected sites</p> <p>Natural England is satisfied that that there would be no impact on European protected sites.</p> <p>(Q3.16) Has the Applicant prepared a draft European Protected Species mitigation licence in respect of great crested newts for review by Natural England? If not, when can this be expected? If so, is Natural England satisfied that a licence is likely to be granted?</p>	<p>The Applicant has received and submitted into examination the advice provided by Natural England at Deadline 2 (REP2-010). This confirms that, on the basis of the information provided in the Draft European Protected Species Mitigation licence application (great crested newt) by the Applicant, Natural England sees no impediment to a licence being issued, should the DCO be granted and a formal licence application be submitted.</p> <p>The Applicant confirms that any formal application for a great crested newt mitigation licence following the granting of a DCO would take this advice into account.</p> <p>Natural England confirmation that there is no potential for significant effects on international statutory designated sites is noted. The Signed statement of Common Ground (REP1-009) provides further confirmation of agreement between the Applicant and Natural England on this matter.</p> <p>The Applicant notes this response and has provided comments in Q3.10.</p>
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	<p>The applicant has prepared and submitted a draft GCN mitigation licence and this has been assessed and commented on through Natural England's PreSubmission Screening Service (PSS). Provided the comments in our PSS response are addressed, Natural England sees there being no impediment to our granting the licence.</p> <p>(Q3.17) <i>Is there likely to be a need for a protected species mitigation licence in respect of any other protected species? If so, has this been progressed?</i></p> <p>Natural England's Wildlife Licensing Service has only been consulted for pre-application advice with respect to badgers and GCN. We are not aware of the need for any other species licences at the site.</p> <p>Q4,5 Questions/comments relating to Requirements (R)</p> <p>(g) R14) <i>Does Natural England consider it reasonable to request precommencement surveys?</i></p> <p>Yes, we consider it reasonable to ask for pre-commencement surveys as this would ensure that survey information on protected species is up to date. NEWLS has requested up to date surveys prior to the formal licence application in order to ensure that the licensed mitigation habitat is appropriate to the level of impacts on protected species affected by the proposed development.</p>	<p>The potential need for a Natural England licence to interfere with setts for development purposes (badger) was acknowledged in the Application (including paragraph 9.5.9 of APP-038 (Chapter 9: Ecology) and paragraph 5.1.3 of Confidential Appendix 9D: Badger Survey Report, but the need for this consent was inadvertently omitted from APP-026 (Document 4.2). This has now been included in the updated Schedule of Other Licences and Consents submitted at Deadline 2 (REP2-005).</p> <p>The Applicant notes the comments of Natural England on this matter and has set out those surveys that will be updated prior to the start of construction in the response to question 3.1 of REP2-009 (Document 9.2 - Applicant's Responses to Examining Authority's Written Questions), submitted at Deadline 2. To avoid repetition, reference should therefore be made to the Applicant's response at Deadline 2.</p> <p>The Signed statement of Common Ground (REP1-009) provides further confirmation of agreement between the Applicant and Natural England on this matter.</p>
<p>Anglian Water Services Limited (REP2-021)</p>	<p><u>Written Representations</u></p> <p>Anglian Water Services Limited ("Anglian Water") is appointed as the water and sewerage undertaker for the Anglian region, by virtue of an appointment made under the Water Industry Act ("WIA") 1991. Anglian Water is a wholly owned subsidiary of AWG plc. The principal duties of a water and sewerage undertaker are set out in the WIA.</p>	



	<p>Once agreement has been reached, there are a number of applications required to deliver the necessary infrastructure. These are outlined below:</p> <p><u>Provision of infrastructure:</u> Water Section 51a Water Industry Act 1991</p> <p>Draft Development Consent Order 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.</p>	<p>The Applicant notes Anglian Water's comments.</p>
<p>Canal and River Trust (REP2-022)</p>	<p><u>Written Representations</u></p> <p>Clarification of Land ownership and interest Further investigations have been identified that whilst the Trust is not landowner of the River Trent, it is a tenant in respect of the river and immediate river bank, with obligations to the landowner, who is the Crown Estates). It is unknown to what extent the Crown Estate (as freehold owner) has elected to respond to these proposals.</p> <p>The Canal & River Trust also has an obligation to maintain navigation upon the river as part of our role as Navigation Authority.</p> <p>The Need for Protective Provisions – Background As summarised in our relevant representations, the Canal & River Trust ("Trust") in its capacity as navigation authority, is concerned with ensuring that there are no adverse impacts on navigation or navigational safety on the River Trent arising from the proposed development, including as a consequence of any detrimental impact on the structural integrity of the river and river banks.</p> <p>The site boundary extends to approximately 30m from the river in respect of an area required for 'work no.5', which relates to the provision of a surface water drainage system.</p>	<p>The Applicant confirms that the Crown Estate has made no representations on these proposals. As set out in the Consultation Report (APP-025 – Document 4.1), the Crown Estate was consulted on the Proposed Development as at this time the scheme included the potential for a new outfall to the River Trent. However, this new outfall was not included within the submitted Application, thereby avoiding any impact on either the Crown Estate or the Trust.</p> <p>As stated in the Applicant's response to the ExA's written question 4.3 (REP2-009, Document 9.2), the Applicant's position is that protective provisions for the benefit of the the Trust are neither necessary nor appropriate because the relevant waterway falls outside of the Order limits and there are no new outfalls or abstraction/drainage systems proposed and therefore no potential for the River Trent, which the Trust has responsibility for, to be affected by the Proposed Development.</p> <p>The Applicant has provided additional information to the Trust (REP2-024) explaining the nature of the works proposed for</p>



	<p>The existing river banks are re-enforced with sloping masonry in this location and as such may be vulnerable to the impact of, for example, vibrations caused by construction works, the movement of heavy plant and equipment etc. which could adversely impact the stability of the riverside bank and necessitate future repair work.</p> <p>The Trust would also wish to be assured that any amended volumes of discharge and/or impact on water flow and velocity will not impact upon safe navigation or the structural integrity of the waterway.</p> <p>Furthermore, in the event of any damage being caused to the river, the Trust do not wish to face the risk of potential costs and losses to repair any damage through no fault of its own. Given the above risks, we respectfully request that a future Development Consent Order (DCO) should include protective provisions to secure the position of the Trust in our capacity as Navigation Authority.</p> <p>The Need for Protective Provisions – Current Position Following submission of its relevant representation the Trust has been in communication with the applicant, and has provided a list of suggested Protective Provisions (set out in Appendix A.)</p> <p>These suggested provisions are more limited in scope than those that have been included in recent Development Consent Orders affecting the Trust's interests elsewhere, such as the Eggborough CCGT DCO (your ref: EN010081). They have been intentionally redrafted to reflect the more limited scale to which the development is considered likely to affect the waterway, given that the current development boundary does not extend to the waterway itself.</p> <p>We consider that the proposed protective provisions are necessary to secure the interests of the Trust and are proportionate to the nature of the development and its potential impact on our property and interests.</p>	<p>Work No. 5 (surface water drainage) and confirming the Applicant's position that the works do not require protective provisions. As has been made clear and demonstrated to the Trust by the Applicant, the works are not proposed in close proximity to the River Trent. There will be no impacts on navigation of the River Trent. Protective provisions are therefore not proportionate or reasonable.</p> <p>As set out in REP2-024, the Applicant has proposed amendments to Requirement 5 (detailed design) and Requirement 9 (surface water drainage) to ensure that the Trust is consulted on the final design of Work No.5 (surface water drainage scheme), which is the scheduled work proposed in closest proximity to the watercourse. The Applicant has also proposed amendments to Section 3: Design Principles and Section 7: Construction Site Lighting of the Lighting Strategy (APP-138, Document 7.4) to ensure that any impacts on navigation of the watercourse are minimised. The Applicant considers that these proposals represent a reasonable approach to address the Trust's concerns.</p> <p>The Applicant acknowledges the revised protective provisions that have been provided by the Trust (REP2-023). The Applicant notes that the only amendment made to this version of the Trust's proposed protective provisions is to remove the requirement to prevent causing pollution. The draft provisions therefore remain unnecessarily onerous for the Applicant where there are no direct work being proposed to the river and no risk of creating harm to the waterway.</p> <p>The Applicant is aware that protective provisions have been included for the Trust in other DCOs, however this is where works are proposed in close proximity to, or could directly affect, the assets the Trust manages. This is simply not the case here and it is important to therefore distinguish between those cases.</p>
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	<p>It is understood that the applicant disagrees with this assessment and would prefer for the protective provisions to not be included within the DCO.</p> <p>To this end, the applicant has provided further documentation to the Trust in respect of the three possible options currently being considered (Appendix B).</p> <p>Whilst it is appreciated that the specific scheme has yet to be finalised, in the absence of any certainty as to which of the three options proposed is to be used and the lack of detail relating to proposed works methodology it is submitted the Trust is of the opinion that they lack sufficient detail to fully negate the possibility of harm to the waterway.</p> <p>The Trust's position is that the applicant should be the appropriate party to take on development risk. The Trust do not believe that we should not be expected to take on the risk of harm and accordingly, it is submitted that the use of Protective Provisions should be considered for this application.</p> <p>Potential for Waterborne Freight</p> <p>Our relevant representation highlights the potential for use of the waterway for the transportation of waterborne freight (especially bulk materials and abnormal loads) as a form of sustainable transport, which would help in reducing greenhouse gas emissions, reduce congestion on the local highway network and, in the case of abnormal indivisible loads, accord with guidance contained in the governments water preferred policy www.gov.uk/government/publications/movement-of-abnormal-load-s-by-water. The Trust has indicated that it would be willing to work with the applicant in respect of this matter and would wish to be consulted on the Framework Construction Transport Management Plan (CTMP) in respect of this issue.</p> <p>Table 2.1 of the applicant's response on the relevant representation made by the Trust indicates, amongst other things, that the appointed contractor "will review options for the use of rail and water when sourcing construction materials". The applicant does not however</p>	<p>The Trust was consulted as part of the statutory consultation on the Preliminary Environmental Information (PEI) Report when new outfalls to the river were being considered. As explained in Q10.22 of REP2-009 (Applicant's Responses to ExA First Written Questions) if it is considered, in consultation with Highways England and the highways authority, that waterborne 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 commitment is reflected in paragraph 3.1.8 of an updated version of the CTMP (REP2-007 and REP2-006 - Document 7.6A and Document 7.6B), submitted at Deadline 2.</p> <p>The Applicant has referred to the possibility of delivering Abnormal Indivisible Loads by water in Section 3: Abnormal Indivisible Loads of the Framework Construction Traffic Management Plan (APP-140, Document 7.6). As stated in that document, detailed consideration will be given to the appropriate AIL routes (road or water) during detailed design.</p> <p>The plan submitted pursuant to Requirement 18 (construction traffic management plan), as numbered in the updated draft DCO submitted at Deadline 2, must be in accordance with the Framework Construction Traffic Management Plan. Therefore, the DCO does secure consideration of the use of waterborne freight. The Applicant does not consider that there is any benefit in the Trust being consulted as part of discharging Requirement 18. If the Applicant, in consultation with Nottinghamshire County Council and Highways England,</p>
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<p>(REP2-023)</p> <p>(REP2-024)</p>	<p>consider it appropriate to include reference to consultation with the Trust on the CTMP given the plans focus on the movement of transport by road (although the Trust will be consulted at a later time if it is considered that waterborne freight should be used.)</p> <p>The applicant has indicated that they are committed to reviewing the viability of transporting materials by sustainable modes of transport during the construction of the Proposed Development and that this is proposed to be secured through Requirement 17: Construction Traffic and Routing Management Plan of the draft Development Consent Order (APP-004, Document).</p> <p>It is notable that this Requirement does not include the Trust as a consultee to the traffic and routing management plan and does not overtly comply with the water preferred policy and advisory letter to PINS in respect of this matter which seeks that “all reasonable opportunities should be taken to use waterborne transport for the public benefit”. It instead includes reference to the traffic and routing management plan including “details of the routing strategy and procedures...for the conveyance of abnormal indivisible loads, including agreed routes, the number of abnormal loads to be delivered by road and measures to mitigate traffic impact”</p> <p>The Trust has seen no evidence to substantiate why the use of inland waterways has not been adequately considered within this Requirement and would ask that Requirement 17 should be amended to ensure that all reasonable opportunities are taken to use waterborne transport. As Harbour and Navigation authority for the River Trent, the Trust is able and willing to work with the applicant to advise on the transportation of abnormal loads by river to site, and would also wish to be consulted on the CTPM in respect of this matter.</p> <p>Appendix A – Trust’s Suggested Draft Protective Provisions</p> <p>Appendix B – Technical Documentation for Work no.5</p>	<p>elects to use waterbourne freight, the Trust will be consulted on any consents required to deliver that approach.</p>
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<p>Peter Coomber (REP2-029)</p>	<p><u>Written Representations</u></p> <p>FAO: Planning Inspectorate Reference: EN010088 Application by EDF Energy (Thermal Generation) Limited for an Order Granting Development Consent for the West Burton C power station</p> <p>I am writing to follow up on the requirement to submit further detail on my representation for the above, by the 6th December 2019.</p> <p>Robert Vickers has contacted me by letter dated 29th November, and I have replied today (copy enclosed/attached).</p> <p>Topics for Subject:</p> <ul style="list-style-type: none"> - Road Traffic - Road Traffic Plan - Accumulation of air pollution and noise- impacting on my property - from vehicles and turbines - Accumulated effects of proposed gravel excavation/development- from vehicles - Associated noise levels - Solar Farm at Wood Lane Sturton-Le-Steeple - New building works being carried out at Sturton-Le-Steeple - Other associated developments within the Borough - Bassetlaw Council baseline monitoring - Non-Statutory Consultation - Public Health England <p>Road Traffic</p> <p>I am deeply concerned EDF have only considered the impact of traffic from their development, However, there will be accumulation/increase of traffic from West Burton Power Station, AND the new gravel pit development, AND the solar farm, and other building projects.</p>	<p>The Applicant notes that the correspondence between Robert Vickers and Mr Coomber is not included in REP2-029. The Applicant has therefore not commented on this.</p> <p>The Environmental Statement (ES) submitted with the Application considered the potential for cumulative effects from the Proposed Development together with other developments in the vicinity. The Applicant followed the advice provided by the Planning Inspectorate in <i>Advice Note 17</i> in considering the potential for cumulative effects arising from the Proposed Development and a number of additional developments within the study area for each environmental topic. Developments within Bassetlaw District Council (BDC) and West Lindsey</p>
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	<p>Road Traffic/ Transport Plan During the application for the gravel pit, it was considered that there was an opportunity to use rail and/or transport via the River Trent, this is unlikely to happen as ReadyMix concrete have now applied to have the clause taken out of the application for the use of the River Trent as a means of transport, although this was a condition of the planning application being approved. They now have their new application finalised with Bassetlaw District Council, and this now means that they have the right to bring all material from the site down the which passes by my property. I understand that the volume of lorries was planned be in excess of 200 vehicles per day (just for the gravel pit), and this new consent means that this may increase considerably. This is IN ADDITION to the transport plan that EDF have proposed- which is subject to the same restrictions (IE: can't go through the village), which means all vehicles relating to EDF will also go past my property (excluding large loads that can't get under the bridges and/or are over the weight allowances)</p> <p>Accumulation of air pollution and noise- impacting on my property- from vehicles Accumulated effects of proposed gravel excavation/development – from vehicles Due to the above changes there will be an associated increase in noise and air pollutions as a result of the increased volume of vehicles- as all the transport from all the sites are not allowed to travel through the village of Sturton- so will all have to travel past my property.</p>	<p>District Council (WLDC) that either had planning consent, (but had not yet begun construction), or applications that had been submitted, but were being determined were considered. The shortlist of developments assessed included the 'gravel pit' (in the Application, referred to as 'Sturton Quarry' access road and wider mineral extraction), as well as a further three residential developments in WLDC.</p> <p>As explained in Table 16-7 of APP-045 (Chapter 16: Cumulative and Combined Effects), traffic from the Sturton Quarry development and a number of other committed developments, has been incorporated into the future year analysis of traffic and transport effects for the Proposed Development. This means that the future baseline flows for the purposes of network impact analysis and junction capacity assessments include these committed developments, including Sturton Quarry (please refer to Table 18-21 of APP-052 (Appendix 7A: Transport Assessment) which identifies flows in the AM and PM peak, and also Table 7-12 of APP-036 (Chapter 7: Traffic and Transport) which presents the total daily (24hr) flows forecast on the local network, including the committed developments, against which effects of the Proposed Development are assessed. The cumulative traffic and transportation effects of the Proposed Development, including Sturton Quarry and the other committed developments are as reported in APP-052 (Appendix 7A: Transport Assessment) and APP-036 (Chapter 7: Traffic and Transport) (negligible and therefore not significant).</p> <p>This assessment presented in APP-045 (Chapter 16: Cumulative and Combined Effects) covers all environmental topics considered in the assessment; including air quality and noise and vibration both from the proposed generating station and the associated construction traffic. No potentially significant cumulative effects were predicted as a consequence of the Proposed Development with the other committed developments under consideration.</p>
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	<p>Accumulation of air pollution and noise- impacting on my property- from turbines The new turbine is to be 299 Megawatts, the purpose of this is to remove the need to have a carbon capture facility.</p> <p>Associated noise levels from the development and Bassetlaw Council baseline monitoring Noise monitoring was completed by Bassetlaw District Council, at the new, approved receptors to establish a noise and vibration baseline. And they have since said that the development work and/or the plant is not expected to increase the current noise pollution by more than 5db. 5db is nothing more than a 'quiet whisper' and this is not a realistic forecast of the increased noise that will happen as a result of this work. In addition, I have reviewed the report from the monitoring - which was carried out in June/July 2017 (over a 14-day period). It is unclear from the figures supplied, if they were based on data gathered during the June/July 2017 monitoring (as listed), or from another source or power station (based on the methodology and/or software applied). The answer to this potentially has a significant impact on the actual baseline data that was used, and continues to be used, and potentially makes the baseline data not fit for purpose, and all other assessments and projections of noise flawed (using the ABC method of calibration).</p>	<p>The comments of Mr Peter Coomber are noted including the observation that a sound level of 5 dB would be very quiet. The Lowest Observable Adverse Effect Level (LOAEL) is not based on a sound level of 5 dB but a difference between the pre-existing background sound level¹ (which generally reflects the level of the sound in the lulls in between individual transient events like passing cars or aircraft) and the <i>rating level</i>² of the Proposed Development (which is the actual sound level of operation of the Proposed Development, with further penalties added for various sound characteristics, if they are present). As such, the assessment does not conclude that sound levels either before or after the Proposed Development is completed will be 5 dB; rather it concludes that the levels produced during operation of the Proposed Development (with penalties added), with mitigation, will not exceed the existing background level by more than 5 dB. For BS 4142 assessment purposes, the LOAEL is set at a rating level above the background sound level of +5 dB. Differences between the two of less than 5 dB are considered not to constitute a significant effect.</p> <p>Evidence in respect of agreement to this LOAEL is provided in the Statement of Common Ground between the Applicant and WLDC (REP1-012) submitted at Deadline 1. The same approach is taken in the Statement of Common Ground in discussion with BDC, which the Applicant anticipates will be</p>
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¹ Defined in BS4142: 2014 : 'The background sound level is an underlying level of sound over a period, T, and might in part be an indication of relative quietness at a given location. It does not reflect the occurrence of transient and/or higher sound level events and is generally governed by continuous or semi-continuous sounds'.

² Defined in BS4142: 2014: 'The specific sound level plus any adjustment for the characteristic features of the sound. Certain acoustic features can increase the significance of impact over that expected from a basic comparison between the specific sound level and the background sound level. Where such features are present at the assessment location, add a character correction to the specific sound level to obtain the rating level.'



		<p>completed and submitted at the subsequent Examination Deadline.</p> <p>It is worth noting that the pre-existing <i>ambient sound level</i> (which is the average including transient events like passing cars and aircraft) is higher than the pre-existing <i>background sound level</i>, typically by as much as 20 dB. It is therefore likely that the rating level of the Proposed Development will be lower than the pre-existing <i>ambient sound level</i>.</p> <p>To set out an example for Crossing Keepers cottage: The pre-existing night-time <i>background sound level</i> was 33 dB LA (typical). The pre-existing night-time <i>ambient sound level</i> was around 55 dB LA. The predicted mitigated case plant operational <i>rating level</i> is around 23 dB LA (which is 10 dB below background sound level and therefore meets the criterion).</p> <table border="1" data-bbox="1339 758 2049 1348"> <thead> <tr> <th>Description</th> <th>dB LA</th> <th>Context outside Crossing Keepers Cottage</th> </tr> </thead> <tbody> <tr> <td>Boeing 737 or DC-9 aircraft at one nautical mile (6080 ft) before landing (97 dB); power mower (96 dB); motorcycle at 25 ft (90 dB). Newspaper press (97 dB).</td> <td>90</td> <td></td> </tr> <tr> <td>Garbage disposal, dishwasher, average factory, freight train (at 15 meters). Car wash at 20 ft (89 dB); propeller plane flyover at 1000 ft (88 dB); diesel truck 40 mph at 50 ft (84 dB); diesel train at 45 mph at 100 ft (83 dB). Food blender (88 dB); milling machine (85 dB); garbage disposal (80 dB).</td> <td>80</td> <td></td> </tr> <tr> <td>Passenger car at 65 mph at 25 ft (77 dB); freeway at 50 ft from pavement edge 10 a.m. (76 dB). Living room music (76 dB); radio or TV-audio, vacuum cleaner (70 dB).</td> <td>70</td> <td></td> </tr> <tr> <td>Conversation in restaurant, office, background music, Air conditioning unit at 100 feet.</td> <td>60</td> <td></td> </tr> <tr> <td>Quiet suburb, conversation at home. Large electrical transformers at 100 feet.</td> <td>50</td> <td>Pre-existing <i>ambient level</i> (55 dB LAeq)</td> </tr> <tr> <td>Library, bird calls (44 dB); lowest limit of urban ambient sound</td> <td>40</td> <td>Worst case plant noise prediction (44 dB LA)</td> </tr> <tr> <td>Quiet rural area.</td> <td>30</td> <td>Pre-existing <i>background sound level</i> (33 dB LAF90)</td> </tr> <tr> <td>Whisper, rustling leaves</td> <td>20</td> <td>Best case plant noise prediction (23 dB LA)</td> </tr> <tr> <td>Normal breathing</td> <td>10</td> <td></td> </tr> </tbody> </table>	Description	dB LA	Context outside Crossing Keepers Cottage	Boeing 737 or DC-9 aircraft at one nautical mile (6080 ft) before landing (97 dB); power mower (96 dB); motorcycle at 25 ft (90 dB). Newspaper press (97 dB).	90		Garbage disposal, dishwasher, average factory, freight train (at 15 meters). Car wash at 20 ft (89 dB); propeller plane flyover at 1000 ft (88 dB); diesel truck 40 mph at 50 ft (84 dB); diesel train at 45 mph at 100 ft (83 dB). Food blender (88 dB); milling machine (85 dB); garbage disposal (80 dB).	80		Passenger car at 65 mph at 25 ft (77 dB); freeway at 50 ft from pavement edge 10 a.m. (76 dB). Living room music (76 dB); radio or TV-audio, vacuum cleaner (70 dB).	70		Conversation in restaurant, office, background music, Air conditioning unit at 100 feet.	60		Quiet suburb, conversation at home. Large electrical transformers at 100 feet.	50	Pre-existing <i>ambient level</i> (55 dB LAeq)	Library, bird calls (44 dB); lowest limit of urban ambient sound	40	Worst case plant noise prediction (44 dB LA)	Quiet rural area.	30	Pre-existing <i>background sound level</i> (33 dB LAF90)	Whisper, rustling leaves	20	Best case plant noise prediction (23 dB LA)	Normal breathing	10	
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		<p>The representative baseline noise monitoring locations set out in Table 8-5 of APP-037 (Chapter 8: Noise and Vibration) were agreed with Bassetlaw District Council (BDC) and West Lindsey District Council (WLDC) in May 2017. Evidence in respect of agreement is provided in the Statement of Common Ground between the Applicant and WLDC (REP1-012) submitted at Deadline 1. The same approach is taken in the Statement of Common Ground in discussion with BDC, which will be completed and submitted at the subsequent Examination Deadline.</p> <p>The baseline noise monitoring used in the assessment was undertaken by the Applicant at the agreed noise sensitive receptors over the period 14 July – 24 July 2017 as described in paragraph 8.3.7 of APP-037 (Chapter 8: Noise and Vibration). The results of the monitoring were then processed in order to obtain representative background sound levels. The reasons for this processing are explained in paragraph 8.8.3 of APP-037 (Chapter 8: Noise and Vibration) i.e. given the large extent of sound level data obtained during the noise surveys, significantly different 'representative' background sound level values can be obtained using different statistical analysis methods. As there are no significant topographical features in the area surrounding the Proposed Development, the largest influence on sound propagation is wind direction. Therefore, the wind direction monitored over this period has been taken into consideration in the analysis of the data to produce a representative background sound level for each NSR so that the predicted level for each receptor is compared with the background sound levels in the same conditions.</p> <p>This baseline data then formed the basis against which the impacts of the Proposed Development were assessed during construction and during operation. A quantitative construction noise and vibration assessment was undertaken, in accordance with BS5228, using construction information from similar projects, using worst-case assumptions regarding % on-time for plant and machinery, proximity of plant working on-</p>
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	<p>Solar Farm at Wood Lane Sturton-Le-Steeple This is now at planning stage with Bassetlaw District Council, and they have now slightly reduced the size of the solar farm, however, I believe it runs into at least 200 acres. I am aware there are restrictions relating to power production within a geographical area. Therefore with this development in the pipeline, and the work proposed at West Burton Power Station, the combined forecast 'power production' should be taken into consideration when reviewing the planning application for West Burton Power Station.</p>	<p>Site to the closest boundaries to NSR and taking no account of screening provided by buildings or soft ground attenuation within the existing power station.</p> <p>The operational noise impact of the Proposed Development was assessed using a method based on BS 4142:2014, which uses a comparison of predicted plant noise levels with representative background sound levels. Predictions of operational noise emissions from the Proposed Development were made using data for conceptual plant configurations provided by a range of potential equipment suppliers. Using this data, the results for worst-case scenarios were established and presented for each plant option in the ES. It was determined that up to 5 smaller OCGTs was the worst-case that should be used for assessment purposes. The noise predictions and assessment were then undertaken on this basis.</p> <p>The Applicant has undertaken searches of relevant planning portals and the Sturton Ward website since submission of the Application. Sturton Ward website provides a link to the developer's website (https://woodlanesolarpvproject.co.uk/faqs). This notes that a public exhibition was held on 29 May 2019 and following this, the developer is reviewing the feedback provided by local stakeholders. The Solar Farm proposal at Wood Lane is therefore in the pre-application planning stage and a planning application has not yet been submitted to Bassetlaw District Council, nor has the BDC been consulted to provide an EIA screening opinion request. Planning Inspectorate Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects states the following: <i>"additional focussed assessment may be required during examination for newly identified 'other existing development and/or approved development' with potential to give rise to significant effects"</i>. As the planning application has not yet been submitted, nor an EIA screening opinion requested; no</p>
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	<p>New building works being carried out at Sturton-Le-Steeple Other associated developments within the Borough As you are aware, there are a number of developments, and these all present an increase in traffic and other associated factors (ie: pollution).</p>	<p>additional assessment is proposed as part of this DCO Examination process.</p> <p>Planning Inspectorate Advice Note 17 (updated in August 2019 (Version 2)) recommends that the list of developments to be included should be updated during the examination stage. The Planning Inspectorate's National Infrastructure Planning website, together with the planning portals of relevant authorities have been searched. The following applications have been made/validated/approved/determined over this period:</p> <ul style="list-style-type: none"> • 38 houses at Clarborough (18/01442/OUT – Validated 11.1.19 – not yet determined). This is an outline application with some matters reserved (approval sought for access) and is accompanied by a Transport Assessment which states that development will generate a limited level of peak hour traffic, with a maximum of 14 additional vehicle movements at any one location on the highway network which falls significantly below the accepted threshold for a traffic assessment. It is reasonable to conclude that the development will not have a detrimental impact on the operation of the local highway network; • 9 houses at North Leverton (19/00708/OUT – outline consent granted 16.8.19). This is outline consent with some matters reserved (e.g. access) for residential development consisting of up to 9 dwellings. No transport assessment provided but NCC Highways acknowledge that this is part of a larger adjacent application; and • 15 houses at North Leverton (19/00265/RES – consent granted 27.09.19). This is a reserved matters consent which sought approval of access, appearance, landscaping, layout and scale for 15
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	<p>Non-Statutory Consultation EDF have not supplied me with the consultation papers; although I have requested these on a number of occasions. This is despite there being a requirement for them to supply the papers to interested parties. I am making a request that you as the planning inspectorate enforce EDF to supply the consultation papers to me and other interested parties. It is unclear if you have had a view of these papers. The purpose of this request is to see comments from other stakeholders, to understand if there are mutual grounds of objections.</p>	<p>dwelling following outline application 15/00514/OUT. As no transport assessment was provided, it is reasonable to conclude that the development will not have a detrimental impact on the operation of the local highway network.</p> <p>Additionally, the Sturton Ward website was checked for local development updates on the 17/12/2019. No further details were noted regarding the Sturton Quarry application. However, it was noted that a housing needs analysis for the ward has been completed following the provision of a housing needs figure of 102 dwellings (6 per year) over the Plan Period 2018 – 2035 by Bassetlaw District Council. It is not considered that the Proposed Development has the potential to interact with this plan.</p> <p>Paragraph 1.1.11 of the APP-025 (Document 4.1 – the Consultation Report) confirms the approach undertaken by the Applicant to non-statutory consultation. This stage of consultation took place between 5 July 2017 and 2 August 2017. The local community consultation was communicated through newsletters posted to local residents and businesses, newspaper notices and a dedicated webpage on the Applicant's website. One public exhibition was held on 8 July 2017, where members of the public could access information, speak to members of the team and provide comments on the Proposed Development.</p> <p>Following the Preliminary Meeting on 30 October 2019, at the request of Mr Coomber, a full hard copy of all Application Documents, including APP-025 (Document 4.1 – the Consultation Report) was delivered to Mr Coomber by the Applicant. Delivery confirmation is contained at Document 10.3. Appendix 5.2 of APP-025 (Document 4.1 – the Consultation Report) contains copies of all non-statutory consultation materials issued.</p>
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	<p>Public Health England Regarding their scoping report: I was not aware of this report when I made my first representation. This report reports on the low frequency, electronic field, infrasound etc, and their report says that EDF should be taking all these aspects into account with their scoping; which EDF have not done.</p> <p>My GP had previously written to Public Health England for assistance and he was not made aware of this report (although it was in existence at the time of his request). My consultant completed an open search on the NHS website, as he wanted to understand the effects and causes of the low frequency in relation to my health. We have noticed that the inspectorate had requested comments/representation from Public Health England on the scoping reports.</p> <p>There has been insufficient consideration of the health effects of both the current running of West Burton Power Station, and the proposed changes, to both myself and the wider community, during this planning application process and monitoring.</p> <p>I have video and still footage/ recordings of 'magnetic field interference' on electronic items within my property.</p> <p>Looking at the planning application, it appears that EDF did not consider it appropriate to have any monitoring of the effects of electromagnetic electricity in the wider area; as it would not go further than 50m from the source (transformers).</p>	<p>Public Health England (PHE) was consulted by the Planning Inspectorate during the EIA Scoping stage in early 2017. They provided comment on the EIA Scoping Report via the Scoping Opinion in June 2017. This included a request for consideration of electro-magnetic field (EMF) effects within the ES. Therefore, EMF was considered and assessed within APP-067 (Appendix 13A: Human Health (ES Volume II)).</p> <p>The Applicant prepared a Preliminary Environmental information (PEI) Report taking into account the scoping opinion provided. This included a copy of the full Scoping Opinion from PHE and was issued for the statutory stage of consultation in September 2017 in accordance with Regulation 11 'Pre-application publicity under Section 48 (duty to publicise)' of the 2009 EIA Regulations. Relevant 'consultation bodies' were sent a copy of the PEI Report and it was also made available to the public (as stated in the Section 48 public notice) on West Burton C webpage (www.westburtonc.co.uk) and at deposit locations. Further information on how the Applicant has consulted can be found in APP-025 (Document 4.1 – Consultation Report).</p> <p>The EMF assessment included in Appendix 13A: Human Health (ES Volume II) used a distance of 50m from the source (electrical connection corridor to the 400kV switchyard). This was considered a conservative distance for the scope of the study area for the assessment. This is because the level of EMF diminishes rapidly with distance from the source, so the extent of any interference or harmful effects will be limited to only a short distance from this source. As there are no residential receptors within this 50m corridor, no significant effects were considered for the general public.</p> <p>Matters relating to the operation of the existing West Burton Power Station are not relevant to the content of this Application.</p>
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	<p>I consider it to be inconceivable that a power generating company are not aware of the possible wider effect of electromagnetic electricity in the area, and/or are not interested and/or are avoiding monitoring.</p> <p>During my investigations it has become apparent that there were changes in the cabling and transformers capacity from 50hz to 60hz. My understanding is that the reason for this is due to the introduction of Smart Meters; which emit 18hz 'low frequency noise'. It doesn't matter if you have one in your house or not (as the mainlines have been changed and the frequency travels down the electric line), this is important as this change impacts low frequency noise production in the house.</p> <p>Can you confirm that this is the case- and at what point was it changed?</p> <p>Can you also please send me HARD COPIES of the information relating to the next open floor meeting as I may wish to speak.</p> <p>Please also be aware that the FOI information that I requested from EDF has STILL not been received by myself, despite their promise to send by the 22nd November 2019.</p>	<p>WBC will export electricity on to the National Grid system at 400kV and will operate at 50Hz.</p> <p>The Applicant does not consider that smart meters have any impacts relevant to this application.</p> <p>The Planning Inspectorate provide information about the Open Floor Hearing on their website, However, they have advised on 16 December 2019 that it will take place on the 21st January at 6-00pm at the Best Western in Retford.</p> <p>With regard to the FOIA request made by Mr Coomber to EDF, this relates to the WBB power station and is therefore not relevant to this Application. Responses were provided to Mr Coomber in writing on 25 October and 15 November 2019.</p>
<p>John P Collins (REP2-030)</p>	<p><u>Written Representations</u></p> <p>I live in Retford on [redacted] which is an alternative route for high sided vehicles travelling from Retford towards Gainsborough on the A620 avoiding the low bridge at Welham. I am very concerned that any future construction works at West Burton may lead to a significant increase in the volume of heavy goods traffic along this rural country lane which has a grade II fragile bridge with a 7.5 tonne weight restriction limit.</p> <p>I wish to make my objections known to this route being and that the contractors can be instructed to access the West Burton site via the A620 at Bawtry. Better still, that maximum use of the rail network which serves West Burton direct.</p>	<p>Requirement 18 of the draft DCO (Document 2.1A and Document 2.1B) is proposed to secure the measures set out in APP-140 (Document 7.6: Framework Construction Traffic Management Plan).</p> <p>The Framework Construction Traffic Management Plan requires that HGVs associated with the construction of the Proposed Development would arrive and depart the Site to/from the A631 via a short section of the A620 Saundby Road. The A620 from Retford to the A620 Gainsborough Road/A620 Saundby Road/C2 Sturton Road roundabout and/or the alternative route via Smeath Lane/Tiln Lane avoiding low bridges at Welham will not be used. An HGV</p>



	<p>I look forward to hearing from you in due course.</p>	<p>routing plan will be distributed to all drivers during 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.</p> <p>The appointed contractor will maintain gatehouse records of construction HGVs entering and leaving the Site. Should any complaints be raised by members of the public with regards to construction HGVs not using the dedicated HGV route to the Site, gatehouse records along with CCTV footage obtained from the camera installed at the West Burton Power Station site entrance would be used to identify the offending HGV involved and appropriate sanctions put in place with the aim of avoiding repeat events.</p>
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