

From: t.west@cboa.org.uk
To: [West Burton C](#)
Subject: West Burton C
Date: 28 January 2020 16:41:58
Attachments: [wpp_letter.pdf](#)

Dear Sirs,

I write on behalf of the Commercial Boat Operators Association (CBOA) to request that you consider a representation regarding the maximising of the freight carrying potential of the River Trent during the construction phase of West Burton C Power Station. I am aware that as an organisation the CBOA are not registered in this application as an 'interested party', but as the topic of waterborne freight carriage and the use of the River Trent has been raised by a number of interested parties we wanted to support those representations.

The CBOA is the national trade organisation for the inland waterways freight industry. We have nearly 100 members, including associates. Our members operate craft with a carrying capacity between 2,700 tonnes and 25 tonnes on the tidal estuaries and the canals and rivers linked to them. Cargoes carried include; aggregates, oil products, grain, steel industry materials and products, construction materials, containers, residual domestic waste, abnormal indivisible loads and bagged domestic coal and other fuels.

We have read the applicants submissions regarding the use of the River Trent (contained within the Transport Assessment, Draft Construction Traffic Management Plan and draft Development Consent Order) including the movement of the large abnormal indivisible loads, and in particular the applicants responses recently to the Canal & River Trust on this issue. It is clear that to date no thinking has been undertaken on how this project might seek to maximise the freight carrying potential of the River Trent, a waterway deemed by statute (1968 Transport Act, section 104) to be '*principally available for the commercial carriage of freight*'.

The applicant cites a lack of available infrastructure as the reason not to consider direct delivery of abnormal indivisible loads, yet there is no evidence of investigation in to the feasibility of the creation of a facility to effect direct delivery. This is seemingly justified purely on the basis that West Burton B station managed to get planning without being required to consider the feasibility and benefits of direct delivery of construction materials and abnormal loads via the Trent. It should be noted that North and South Wheatley Parish Council highlighted the not insignificant impact on the local residents and environment when large abnormal loads were road routed via the berth at Cottam Power Station for delivery to West Burton B .

Our point is rather proven when reference is made by the applicant to the Cottam Power Station berth, a berth that was created to directly serve the power generation and transmission sites at Cottam so to maximise the benefit of waterborne delivery of the largest and heaviest abnormal indivisible loads. It should be noted that it was not created to be a strategic interchange, that by default has unfortunately facilitated the movement of abnormal loads on unsuitable local roads in rural Nottinghamshire.

The government Water Preferred Policy for the movement of abnormal loads and accompanying guidance is clear, and was recently restated in correspondence (attached) from Under Secretary of State, Jessie Norman MP to Mark Southgate, Chief Executive of the Planning Inspectorate. This

correspondence stated that he, on behalf of the Government were ***“keen for all reasonable opportunities to be taken to use waterborne transport for the public benefit, including through proportionate planning conditions”*** .

We would therefore request that you consider the inclusion of a condition of planning, which requires the developer of West Burton C to thoroughly investigate the opportunities for the creation of appropriate waterside infrastructure at West Burton, such to maximise the opportunities for direct delivery of abnormal loads and other materials during the construction and operation phase of this development. A facility that would be able to be used for the B station as well during its operational phases and ultimate decommissioning. A condition of planning that could be discharged following dialogue and consideration by The Canal & Rivers Trust as the navigation authority, Highways England as owners of the Government Water preferred policy for the movement of abnormal loads and the Local Authority (as with the Construction Traffic Management Plan (CMTP)).

For interest, I attach 2 images of the waterside facility at Cottam Power Station. A facility which I am sure you will note is not significant in size or imposing on the local landscape, all be it is now being considered as a significant freight interchange for numerous power generation sites along the Trent!

We remain available to provide further input on this matter and request that as the examining authority you consider our representations, government policy and best practice in this area.

Kind regards,

Tim West
Vice Chairman
CBOA



Department for Transport

Mark Southgate
Planning Inspectorate
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BS1 6PN

From the Parliamentary
Under Secretary of State
Jesse Norman MP

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Dear Mark Southgate

I am writing to you to underline the importance of the Water Preferred Policy when examining planning material for major power generation projects. It is a long standing policy, but I am keen for it to continue to be implemented vigorously, and it is relevant to a number of major electricity and manufacturing industry planning proposals.

In addition, the Government issued a grant in 2001 to manufacture a vessel that can carry specialist equipment in the form of an abnormal indivisible load (AIL). By definition, an AIL is one that cannot be divided into two or more loads for the purpose of being carried on a road without undue expense or risk of damage. This is a commitment by Government to reduce congestion on roads and mitigate the risk of a long term economic and environmental impact. There is a AIL Team at Highways England which oversees this and undertakes a reasonableness test to assess whether movement by water is economically viable.

Key parts of the water preferred policy guidelines for the movement of abnormal indivisible loads include the following: (The full document is available on the GOV.UK website).

www.gov.uk/government/publications/movement-of-abnormal-loads-by-water

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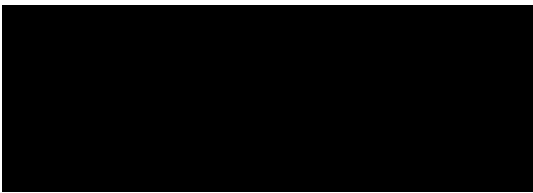
It is recognised that the manufacturing and electrical industries need to transport abnormal loads internally within GB (many movements of which originate from overseas) and also for export. However, this has to be balanced with the disruption and traffic congestion to other road users, together with the impact this has on the UK economy, when compared to any extra costs or difficulty associated with using alternative transport modes.

3.6.1

Loads that cause the most traffic congestion and impact adversely on journey time reliability are generally heavy (loads over 150 tonnes gross vehicle weight which are subject to a speed restriction of between 12 – 25 mph dependent on vehicle type) and wide (loads over 5m in width). Primarily such loads are moved by the power industry, as well as heavy manufacturing industries. These businesses should undertake a strategic review of their operations in collaboration with the AIL team. The aim would be to agree individual strategies on whether a road or a water route is to be used for abnormal load movements on a site-by-site basis. Shipping to the nearest coastal port is expected to be the minimum requirement but the use of inland waterways should also be considered for each operational site.

Highways England, on behalf of the Secretary of State, can advise on some of the technical possibilities through its planning and abnormal load teams. I am keen for all reasonable opportunities to be taken to use waterborne transport for the public benefit, including through proportionate planning conditions.

Yours sincerely

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JESSE NORMAN



TERRA MARIQUE
NEWPORT GWENT

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ALSTOM

