

On 23 March Anglian Water wrote to Augean seeking the provision of information to enable consideration of the stand off distances for the two mains pipelines. On 29 March at the Issue Specific Hearing Anglian Water set out these concerns. These concerns are summarised below.

â€¢ Environmental Safety Case (ESC)

In our meeting with Augean on 1 March 2022 Anglian Water agreed to review Augean's ESC when this was submitted by Augean to the Examining Authority (ExA). Augean's email of 16 March advises that the ESC will not be submitted to the ExA and instead will only be provided to the Environment Agency as part of the permit application. Augean refer to the Environmental Statement but do not identify the sections which cover the impact on the water pipelines, then impact of the proximity of LLW to the potable water supply and human health or the impact on human health in the event that the construction or operation of the ENRMF causes a burst in one or both pipes. In the absence of that information Anglian Water object to the NSIP application.

â€¢ Stability Risk assessment

In the absence of the consideration of the risks to the water pipelines, Anglian Water advises that our first preference is for the water pipelines to be relocated to land outside of the construction and operational area for the ENRMF. The limited information provided by Augean suggests that standoff distances either side of the two pipelines would need to be in excess of 20 metres to enable safe access. The relocated Western Power electricity transmission cable would need to be outside the 20m plus standoff and therefore next to the landfill cell area. The standoff distance is in part to enable safe work given there are two pipelines, the area is not flat farmland but between two engineered cells and work by Anglian Water or Western Power would require both a plant and machinery, a running area for vehicles and lay down areas for materials and excavations.

â€¢ Contamination

As set out by Anglian Water at the 1 March meeting with Augean the risk from contamination is not solely from leachate. There are other pathways including the risk of a burst pipeline causing both pipes to fail and then the pressure from the pipelines blowing out the cell wall. One further pathway is from water runoff from the engineered restored landfill slopes into the area between the cells through which the pipelines run. This additional flow of water into the area in and around the pipes increases the risk of a burst. It is for Augean to set out in its ESC and SRA within the ES how all the risks have been assessed, designs changed and mitigation measures included. That assessment should include ground investigations near to the two pipelines.

â€¢ Crossing

Anglian Water does not enter into crossing agreements. We have found that each site and project require specific engineer to engineer and contractor discussions to work through the specifics of the project. Anglian Water's oral evidence on 29 March identified this as a specific risk which would require bespoke mitigation.

In order to consider the questions posed by the ExA further and respond with further information on the potential solution Anglian Water has requested that Augean provide the:

- a. Updated Environmental Safety Case (ESC)
- b. The assessment or sections in the ES and / or other application documents which consider the risk to the two pipelines from construction and operation of the ENRMF including Ground Investigation reports and assessment and the impact of runoff from the restored slope
- c. The assessment or sections in the ES or ESC which consider the risk to the two pipelines and human health from all potential pathways from and to the ENRMF LLW and the two water pipelines

Anglian Water is undertaking further consideration of the above points with the limited information provided in the application. Anglian Water will be attending Issue Specific Hearings and the site visit and making further submissions in order to set out the objection and advise the ExA on the two questions of stand off distances and protective provisions. Should detailed investigation work be required by Anglian Water to address gaps in Augean's application, Anglian Water reserves the right to charge Augean for that work.