



**THE APPLICANT'S COMMENTS ON THE SUMMARY OF  
THE ORAL CONTRIBUTIONS AT THE HEARING**

**FOR THE DEVELOPMENT CONSENT ORDER  
APPLICATION FOR THE ALTERATION AND  
CONSTRUCTION OF HAZARDOUS WASTE AND LOW  
LEVEL RADIOACTIVE WASTE FACILITIES AT THE EAST  
NORTHANTS RESOURCE MANAGEMENT FACILITY,  
STAMFORD ROAD, NORTHAMPTONSHIRE**

*PINS project reference: WS010005*

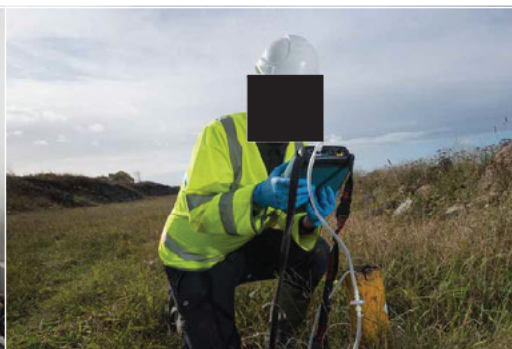
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## The Applicant's response to the 'Written summaries of oral contributions at hearings' submitted by Anglian Water at D4 (REP4-014)

Paragraph number	Comment in the submission from Anglian Water	Response from the Applicant
1	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.	-
2	<p><b>Environmental Safety Case (ESC)</b>            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.</p>	<p>This is a misunderstanding in communications. Information was requested by Anglian Water (AW) on where the risks to water resources have been assessed and this information was provided. AW were referring specifically to risks to the water in the pipelines whereas the Applicant understood that the risk assessment they were referring to was for the risk to water resources (groundwater and surface water) and this is the risk assessment section in the Environmental Statement (ES APP-049] (Section 17. Water Resources) to which AW were referred.</p> <p>In all the previous consultation responses and discussions with AW there was no request or requirement for an assessment of risk to or of the pipelines based on the principle that the recommended and previously agreed standoff (7m either side) would be implemented. Accordingly the Environmental Impact Assessment and the developing ESC were scoped and the site was designed on this basis.</p> <p>The Applicant believes that the appropriate response to the concerns now raised by AW is by robust risk assessment based on which any changes to design matters can be considered. The Applicant is working proactively to elucidate as precisely as possible the concerns of AW in order to carry out and present the appropriate risk assessments now requested by AW.</p>
3	<p><b>Stability Risk assessment</b>            In the absence of the consideration of the risks to the water pipelines, Anglian Water advises that</p>	These comments relate to access to the pipelines in order to carry out repairs rather than stability risk assessments.

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	<p>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.</p>	<p>The Applicant accepts that there is the potential for Mains to leak and fail catastrophically, as for all water pipes, and that there will be a need for access to be available so that they can be repaired. This is what the standoff distance is intended to allow for and what the Applicant thought had been agreed. The Applicant is working proactively to elucidate as precisely as possible the access needs of AW so that the appropriate standoff distance can be determined.</p> <p>The Applicant has requested information on the distance of standoff to be maintained from landfill operations and any ground structures such as hedges and fences as well as details on any limitations of restoration soil depth and/or gradient placement in the standoff area.</p> <p>It is considered that the provision of laydown areas does not need to be accommodated within the standoff area as an agricultural field with an access track is available at the eastern end of the pipeline area.</p> <p>We draw to the Examining Authority's attention that the pipeline to the south of the existing landfill was installed by AW approximately 15m - 20m to the south of the landfill. In addition, the water pipelines are bounded by a gas main approximately 4m to the south. It is also observed that to the west of the development the pipelines pass through the Assarts and are between 11m and 13m from the trees. From discussion with AW on 9 May 2022 it is understood that a 20m standoff would be acceptable from an operational access perspective and, we are informed by AW, is consistent with the standoff requirement for the current Strategic Pipeline Alliance Pipeline currently being developed in the region. The Applicant is considering the comparative appropriateness of this proposal within the risk assessment process.</p>
4	<p><b>Contamination</b> As set out by Anglian Water at the 1 March meeting with Augean the risk from contamination is</p>	<p>Now that this concern regarding the effect of a mains burst on the integrity of the landfill containment has been raised, the Applicant proposes to carry out a risk assessment for this eventuality. AW has been requested to provide basic factual information regarding the pipelines and the</p>

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	<p>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.</p>	<p>guidance used by AW to enable the Applicant to estimate the size of the crater which could form in the event of a catastrophic failure. In addition, the Applicant is seeking advice from a pipelines specialist on this matter.</p> <p>It is understood that AW may be concerned that surface water run-off from the landfill will result in inundation of the pipe bedding around the pipeline resulting in increased corrosion. However, the pipelines are at a depth of over 1m below ground level beneath and within the natural low permeability clays of the site, in addition surface water run off from the landfill will be directed away from the route of the pipelines. As the ground above the pipes will no longer be farmland it is more likely that there will be less water infiltrating the soils and possibly reaching the pipe bedding rather than more as the field will no longer be ploughed and the ground will no longer be broken up. Nevertheless, it is understood that it is possible to monitor the level of water around the pipeline and the Applicant is prepared to offer to monitor the water levels around the bedding in the 10 years prior to landfilling near to the pipeline and following landfilling so that if additional drainage measures are identified as necessary, they can be implemented.</p> <p>The concerns which now have been raised will be properly addressed by risk assessment based on which final design decisions can then be made.</p>
5	<p><b>Crossing</b> 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.</p>	<p>The Applicant agrees that the detail of an appropriate crossing point will be based on engineering design. The Applicant is working with AW to agree the appropriate arrangements with AW to secure this design and the Protective Provisions will cover this. Crossing points will not be needed until work commences in the southern area of the proposed western extension (Phase 15).</p>
6	<p>In order to consider the questions posed by the ExA further and respond with further information</p>	<p>See above.</p>

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	<p>on the potential solution Anglian Water has requested that Augean provide the:</p> <ul style="list-style-type: none"> <li>a. Updated Environmental Safety Case (ESC)</li> <li>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</li> <li>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</li> </ul>	<p>The concerns which now have been raised will be properly addressed by risk assessment based on which final design decisions can then be made. The ESC will not be updated until the details of the HRA have been agreed with EA. The risk assessments relevant to the concerns raised by AW will be presented.</p>
7	<p>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.</p>	