



**THE APPLICANT'S RESPONSE TO THE SECOND
WRITTEN QUESTIONS**

**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

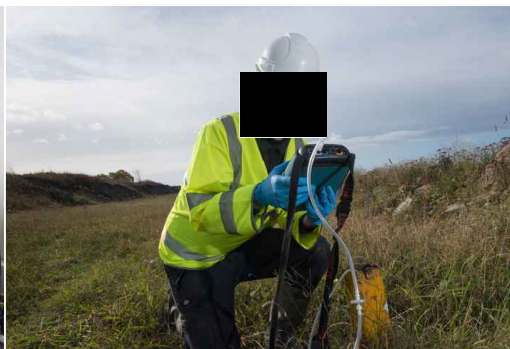
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Application by Augean South Limited for East Northants Resource Management Facility Western Extension

The Examining Authority's Written Questions and Requests for Information (ExQ2)

Issued on 27 April 2022

The following table sets out the Examining Authority's (ExA's) second round of written questions and requests for information – ExQ2. The questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annex B to the Rule 6 letter of 6 January 2022. The questions also have regard to the responses to ExQ1, matters raised in Issue specific Hearings 1 and 2 to the responses received at Deadlines 2, 3 and 4.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact enrmfextension@planninginspectorate.gov.uk and include 'East Northants Resource Management Facility Western Extension' in the subject line of your email.

The Examination Library

References in these questions set out in square brackets (e.g [APP-010]) are to documents catalogued in the Examination Library (EL). The Examination Library can be obtained from the following link: [Examination Library](#) and will be updated as the Examination progresses.

Responses are due by Deadline 5: Wednesday 11 May 2022

Abbreviations used:

Art	Article	NE	Natural England
BNG	Biodiversity Net Gain	NNC	North Northamptonshire Council
BoR	Book of Reference	NNR	National Nature Reserve
dDCO	Draft DCO	NPS	National Policy Statement
DEC	DCO Environmental Commitments	NSER	No Significant Effects Report
Defra	Department for Environment, Food and Rural Affairs	NPSHW	National Policy Statement for Hazardous Waste
EA	Environment Agency	NSIP	Nationally Significant Infrastructure Project
EM	Explanatory Memorandum	PA2008	Planning Act 2008
EMMAP	Ecological Management, Monitoring and Aftercare Plan		
ENRMFWE	East Northants Resource Management Facility Western Extension	PM	Particulate Matter
EP	Environmental Permit	R	Requirement
ES	Environmental Statement	RR	Relevant Representation
ExA	Examining Authority	SAC	Special Area of Conservation
HRA	Habitats Regulations Assessment	SoS	Secretary of State
LIR	Local Impact Report	SSSI	Site of Special Scientific Interest
LPA	Local planning authority	SWMP	Surface Water Management Plan
LSE	Likely Significant Effects	The Trust	Cecil Estate Family Trust
MP	Model Provision (in the MP Order)	UKHSA	UK Health Security Agency
MP Order	The Infrastructure Planning (Model Provisions) Order 2009	WFD	Water Framework Directive



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ExQ2: 27 April 2022**Responses due by Deadline 5: Wednesday 11 May 2022**

ExQ2	Question to:	Question:	Response from the Applicant
1.	General and Cross-topic Questions		
Q1.1	The Applicant and National Grid Gas	Please provide an update on the outstanding matters in the SoCG.	Discussions are ongoing with respect to the protective provisions. The SoCG will be signed off once the protective provisions are completed.
Q1.2	The Applicant and North Northamptonshire Council	Please provide an update on the outstanding matters in the SoCG.	The text of the SoCG has been agreed and the document is currently completing the final approvals process within NNC prior to final signature.
Q1.3	The Applicant and Natural England	Please provide an update on the outstanding matters in the SoCG.	The SoCG will be finalised with Natural England once the Letter of No Impediment is provided by the licensing team (See the Applicant's response to ExQ2 3.1)
Q1.4	The Applicant and Western Power Distribution	Please provide an update on the outstanding matters in the SoCG.	Discussions are ongoing with respect to the protective provisions. The SoCG will be signed off once the protective provisions are completed.
Q1.5	The Applicant and Butterfly Conservation	Please provide an update on the outstanding matters in the SoCG.	An updated SoCG has been provided to Butterfly Conservation. It is anticipated the final signed SoCG will be provided at Deadline 6.
Q1.6	The Applicant and Cecil Family Estate Trust	Please provide up update on the preparation of the SoCG.	A draft SoCG was provided to Maples Teesdale on behalf of the Trust on 11 April 2022 for their review and comment. A further request for comments from Maples Teesdale was sent on 26 April 2022. To date no response has been received. It is understood that a survey has now been carried out on behalf of the Trust to confirm the location of the land ownership boundary in the area of the swallow hole. The Trust's surveyors have installed posts along their interpretation of the boundary. The Applicant has inspected the locations of the boundary tape installed by the Applicant's surveyors and the posts installed by the Trust's surveyors (Annex A). The Applicant concludes that while there is a marginal difference between the two survey markers of between 0.5m and 1m the discharge point in the swallow hole is at least 2m from the boundary (as observed at the ASI) hence remains firmly within the land under option by the Applicant. The applicant has advised on 10 May 2022 the Trust's representative Maples Teesdale of this conclusion.

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Q1.7	The Applicant and Defence Infrastructure Organisation	Please provide up update on the preparation of the SoCG.	Discussions are continuing with the Defence Infrastructure Organisation with a view to reaching agreement on the details of the Bird Hazard Management Plan.
Q1.8	The Applicant and Anglian Water	Please provide up update on the preparation of the SoCG.	Discussions are continuing with Anglian Water with a view to reaching agreement on the appropriate standoffs from the water pipes. Further detail is provided in response to the questions in section 8 below.
2. Environmental Controls			Response from the Applicant
Q2.1	The Applicant and the EA	<p>Please provide an update on the applications for the new EPs including:</p> <ul style="list-style-type: none"> • the scope of the applications; • any outstanding issues and/or requirements for additional information; • anticipated control mechanisms, management plans, limitations, conditions and monitoring requirements; • the timetable for issuing decisions. 	<p><i>Treatment facility application</i></p> <p>Further information was submitted to the Environment Agency on 29 April 2022 in response to the requests for additional details. There are currently no outstanding requests for further information from the Environment Agency. The application was published by the Environment Agency for public consultation on 5 May 2022 and the deadline for the receipt of consultation responses is 6 June 2022.</p> <p>It is anticipated that the control mechanisms, management plans, limitations, conditions and monitoring requirements will be similar to those in the current permit but with additional requirements to reflect the proposed changes in processing and throughput as well as recent guidance issued by the Environment Agency (Chemical waste: appropriate measures for permitted facilities).</p> <p>The applicant has no information from the Environment Agency on the timescale for determination of the permit.</p> <p><i>Hazardous waste landfill application</i></p> <p>A request for further details on the application is expected to be requested in a Schedule 5 Notice to be issued shortly with the information to be provided by an agreed date which is likely to be in June 2022. A meeting is scheduled with the Environment Agency on 12 May 2022 to discuss the details of the proposed site design. The additional details requested relate to further examination of different</p>

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			<p>assumed management control periods in the Hydrogeological Risk Assessment, proposals for additional monitoring borehole(s) for the proposed western extension, the provision of additional drawings and cross sections to illustrate the site setting and further detail on the approach to the assessment of the limestone features in the central doline area of the proposed western extension.</p> <p>It is anticipated that public consultation on this application will commence shortly.</p> <p>It is anticipated that the control mechanisms, management plans, limitations, conditions and monitoring requirements will be similar to those in the current permit.</p> <p>The applicant has no information from the Environment Agency on the timescale for determination of the permit.</p> <p><i>LLW landfill application</i></p> <p>Work is continuing on the preparation of the Environmental Safety Case (ESC) but will not be completed until the details of the Hydrogeological Risk Assessment which is submitted to support the hazardous waste landfill application are agreed with the Environment Agency. Following completion of the ESC the application will be submitted to the Environment Agency.</p> <p>It is anticipated that the control mechanisms, management plans, limitations, conditions and monitoring requirements will be similar to those in the current permit.</p>
3.	Protected species		Response from the Applicant
Q3.1	The Applicant and NE	Please provide an update on progress towards the issue of a LONI for the great crested newt licence application.	The draft GCN EPS Licence was submitted to Natural England on 6 May 2022. Natural England are aware of the timescales for the project and have committed to providing the LONI by Deadline 6.

ExQ2 4.	Question to: Landscape and Visual	Question:	Response from the Applicant
Q4.1	The Applicant	<p>In response to the queries raised in ExQ1 and ISH2, [REP4-006] includes further assessments of the landscape and visual effects of Works 2 and 3. The assessment of Work 2 appears to be based on the parameters set out on the dDCO [REP4-004] and DEC Appendix DEC D [APP-110] and, therefore, accords with the Rochdale envelope approach to EIA assessment. The assessment of Work 3 still appears to be based on the premise of individual building of similar scale to the existing buildings being constructed under the dDCO. Whilst this may be the most likely scenario, the assessment does not take into account the full effect of the potential development which would be permitted under the parameters set out in the dDCO and the DEC (that is 8m tall structures covering the whole of the Work 3 area). Please respond by means of a further assessment or revision to the parameters for Work 3.</p>	<p>The Applicant is content to commit to a control in a revised version of the dDCO which makes it clear that no more than one 8m tall building would be present at any one time at any location in Works 3. The proposed revision to the dDCO will be submitted at D6. No limit is proposed for the number of smaller buildings or infrastructure of dimensions similar to the other buildings present at site reception area (Work No 3) as they are not visible from off site.</p>

5. Noise and Odour			Response from the Applicant
Q5.1	The Trust	Please provide any further evidence in support of your concerns regarding the effects of noise and odour from the Proposed Development on the proposed commercial storage facility on the land Trust land to the north of the existing site. In doing so, please have regard to the comments of the Council's Environmental Health Officer [REP4-012] (ISH2 agenda Item 4).	
6. Draft Development Consent Order			Response from the Applicant
Q6.1	NNC	Art 10 The version of this Art submitted at D4 now refers to work at the existing access location. Please comment on the terms of this version of the Art.	
7. Land use, soils and socio-economic effects			Response from the Applicant
Q7.1	The Applicant and NNC	Requirement 4 of the D3 version of the dDCO requires the provision of public access to the site and aftercare works to be carried out for a minimum period of 20 years in accordance with an approved phasing, landscaping and restoration scheme. The phasing, landscaping and restoration scheme is required to be accordance with the principles set out in the	<p>The elements of the restored site necessary to support public access comprise the car park and footpaths. Any fencing necessary will be in place to restrict access to developing habitats on the restored site and the need for, maintenance of and retention periods for this fencing will be determined based on the principles in the EMMAP and the Phasing, Landscaping and Restoration Scheme arrangements in Requirement 4, including the regular reviews.</p> <p>Any security necessary would relate to the protection of infrastructure relevant to the ongoing management and monitoring of the landfill site and will therefore be the subject of</p>

		<p>ecological management, monitoring and aftercare plan (EMMAP [APP-110] DEC Appendix DEC E). Whilst the EMMAP sets out the requirements for management and maintenance of the restored habitats, it says little about the management and maintenance of the elements of the restored site necessary to support public access (for example, the car park, outdoor furniture, physical features of controls necessary for security, litter collection). Should these matters be included in the EMMAP or elsewhere in the dDCO?</p>	<p>the landfill aftercare arrangements although they will be integrated with the restoration scheme and public access requirements the Phasing, Landscaping and Restoration Scheme arrangements in Requirement 4 including the regular reviews.</p> <p>The Restoration Concept Scheme plan [APP-011] includes details of the principles of the car park comprising: <i>'Public car park with space for approximately 12 vehicles located on very gently sloping land to the south of the site entrance. Surfaced with crushed granular material or grasscrete. Suitable security gate installed to prevent unwanted access'</i>.</p> <p>Further, final details will be included through the Phasing, Landscaping and Restoration Scheme arrangements in Requirement 4.</p> <p>Requirement 4 includes as items to be included in the phasing, landscaping and restoration scheme the following items (emphasis added):</p> <ul style="list-style-type: none">(a) <i>programme for the progressive filling, capping and phased restoration of the land including all landscaping, restoration and aftercare works which are in accordance with the phasing sequence table;</i>(b) <i>the location, number, species, size and planting density of any proposed planting;</i>(c) <i>how invasive species will be managed;</i>(d) <i>soil testing and preparation, cultivation, importing of materials and other operations to maximise plant establishment;</i>(e) <i>details of proposed finished ground level contours in accordance with restored landform profile plan;</i>(f) hard surfacing materials;(g) vehicular and pedestrian access, parking and circulation areas;
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(h) **minor structures, such as furniture, refuse or other storage units, signs and lighting;**

(i) *proposed and existing functional services above and below ground, including drainage, power and communications cables and pipelines, manholes and supports;*

(j) *details of existing trees to be retained, with measures for their protection during the operations; and*

(k) *the location of fuel storage and leachate tanks, extraction and monitoring facilities and any other infrastructure required for the aftercare works.*

It is considered that the details regarding the design and construction of these items, including the specifications for and the maintenance of the footpaths will be in accordance with the advice and guidance of the local planning authority in place at the time and this may change as guidance changes. Any maintenance requirements will be carried out as part of the 20 year aftercare obligation under the DCO.

It is not envisaged that any additional specific controls or obligations need to be in place with respect to aspects such as litter collection and there is no obligation to provide outdoor furniture. The site will be inspected and managed regularly throughout the aftercare period as a result of schemes agreed in the Phasing, Landscaping and Restoration Scheme and as a result of the aftercare obligations of the Environmental Permit. Any ancillary works such as general maintenance and upkeep of the site will be carried out as part of both these overarching schemes as well as a result of the general responsibilities of the landowner.

It is considered that no further controls are necessary through the DCO with respect to these items.

Following discussions with NNC regarding the frequency of review meetings carried out under Requirement 4, it is proposed that for clarity, Requirement 4(3)(a) of the dDCO is amended to add *'and*

			for the programme of review meetings' at the end. The revised DCO will be submitted at D6.
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8. Infrastructure			Response from the Applicant
Q8.1	The Applicant	What provisions have been made to ensure the integrity and longevity of the Anglian Water (AW) pipelines during the construction and operational phases and following restoration? In your response, please address the issues of bank stability, hydrogeology, ingress of potential contaminants into the pipeline, the proximity of surface water storage lagoons, the potential for corrosion and physical impact from changes to external loadings and crossings.	<p>The need to protect the integrity and longevity of the Anglian Water (AW) pipelines and to allow for suitable access to the pipelines for maintenance and repair has been recognised since the early stages of consideration of the design options for the proposed western extension. Following earlier consultation and detailed discussions, meetings and consultation took place with AW (and the other companies with services at the site) from January 2021 as evidenced in the example documentation provided at Appendix ES5.1 [APP-083]. The objective of the early discussions was to agree a standoff distance that would be acceptable to AW in order to protect the integrity of the pipelines and to allow appropriate access.</p> <p>Many developments of all kinds are carried out in proximity to services infrastructure and there is a frequent need for all services companies, including AW, to consider the risks to their infrastructure presented by development and to set out the standoff distances that they consider are necessary. Guidance is prepared by AW for precisely this purpose and a copy of the current guidance 'Anglian Water's Cross Sector Infrastructure Access Statement' dated March 2019 is provided as document reference 12.2.8.1. The guidance (page 6) identifies standard easements where developers are working near AW assets. The guidance states that any work undertaken outside the standard easement widths along pipelines may proceed without reference to AW. The widths are shown in the table provided on page 6. Based on the table and pipe diameters</p>
Q8.2	The Applicant	What provisions have been made to enable access for maintenance and repair of the AW pipelines during the construction and operational phases and following restoration?	

of 800mm it is understood that the default easement widths are generally between 7m and 12m (based on a depth to pipeline crown of 0.9m).

A standoff distance of 7m from the centre of each of the pipes was discussed with AW and incorporated into design of the development as seen in the example documentation provided at Appendix ES5.1 [APP-083].

An additional operational standoff of 2.5m is maintained from the edge of the standoff distance to the edge of the excavation slope.

The Applicant also engaged with AW, through the discussions on Protective Provisions, to agree with AW their requirements for the specification for crossings over the pipes. In the Anglian Water guidance [12.2.8.1], it is stated in section 5.2 on page 6 that *'We do not require infrastructure providers crossing a water main or sewer to seek consent from us. However, any damage to a sewer would comprise a civil liability and certain damage to a water main would comprise a criminal liability under Section 174 of the Water Industry Act. We can provide advice on how to cross these assets safely and charge the cost price for these services'*. The Applicant has intended throughout to seek and pay for the services of AW on the specification for a safe crossing well before operations commence in the south of the proposed western extension (at least 8 years from commencement of development). This is consistent with Anglian Water's position as stated in the submission at Deadline 4 *"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."* (Document REP4-014). Augean accepts that the design of the crossing will be bespoke.

As the Examining Authority is aware, it was only in March 2022 that the Applicant was notified that the 7m standoff was no longer considered satisfactory by AW. Since then the Applicant met with the

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			<p>Chief Engineer of AW on 5 April 2022 and proposed to set out and agree with AW the scope of additional risk assessments needed to demonstrate appropriate standoffs to address the issues raised followed by the provision of those risk assessments. In order to understand and mitigate the possible effects of changes in external loadings on the pipelines, the Applicant has engaged the services of a specialist pipelines engineer. The specialist pipelines engineer also is examining the likely effect of a pipeline burst, with a view to determining the stand-off distances that are appropriate to safely facilitate repairs.</p> <p>On 29 April 2022 a table comprising a Scoping Table of Scenarios for Risk Assessment was provided to AW with the objective of setting out methodically and comprehensively the technical and operational issues which the Applicant understands may be of concern to AW and a second table with Proposals to Address the Key Risk Scenarios also was provided. The second table draws from Table 1 with the objective of focusing on how the risks will be addressed and which identifies the information (including information from AW) that will be necessary to undertake the risk assessments. The specialist pipeline engineer is assisting the Applicant in reviewing and preparing the risk assessments. All correspondence with AW since the meeting on 5 April 2022, including the initial risk assessment tables, is provided in response to Q8.5 (Document reference 12.2.8.5).</p> <p>Following the meeting on 5 April 2022 and the provision of the risk assessment proposals on 29 April 2022 the Applicant has sought to arrange discussions and/or a meeting with the Chief Engineer of AW in order to agree the scope of and approach to the risk assessments. A meeting was held on 9 May 2022 to progress matters and review the proposals for the risk assessments as well as to discuss the approach to reaching an agreed position on stand-off distances.</p> <p>In the Proof of Evidence prepared by the Chief Engineer for AW</p>
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			<p>[REP4-013] it is stated at paragraph 30 that '<i>...the only reasonably practical solution is for the Mains to be diverted to avoid any risk...</i>'. The Applicant does not accept or agree with this statement as it is not justified or based on any factual risk assessment outcome. It is evident from the location of the same water pipes to the south of the current ENRMF landfill site that the presence of water pipes can be accommodated satisfactorily in the proximity of a hazardous waste and LLW landfill site. The closest pipe is approximately 15m to 20m to the south of the excavation boundary of Phase 7 of the current ENRMF landfill which is constructed in the same way as the proposed extension to the landfill.</p> <p>Given the limited remaining period in the Examination process the Applicant is working with a specialist pipelines engineer and other specialists involved in the site design in order to confirm and explain clearly the findings of previous assessments in the context of the risks to the water pipes and to complete new risk assessments to determine the appropriate stand off distances from the pipes taking into account the concerns raised by AW in the documents REP4-13 and REP4-14. While those reviews and assessments are not yet complete it is anticipated that the outcome is likely to identify a suitable and safe stand off distance, which is consistent with the AW guidance in the guidance document attached [12.2.8.1], or may be greater taking into account additional concerns and allowing for additional factors of safety.</p> <p>In parallel with the risk assessments, alternative restoration contours for the areas of landfill in the proposed western extension to the north and south of the water pipelines have been prepared to allow for potential additional stand off distances should these be required and an assessment of the potential landscape and visual implications of the adjusted profiles is being carried out to determine whether there is any likelihood of a significant effect if the standoff distances do need to be increased</p>
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			<p>within defined parameters. Initial indications suggest that consistent with the findings of what has previously been assessed the most visible operational stages will result in notable visual effects for a limited number of visual receptors, but there is no likelihood of significant long term visual effects. As determined from the previously assessed landforms there will be no significant effects on landscape features or character except for topography during the operational stages. It is concluded in the initial assessments that there are no new or materially different effects compared with those identified during the original assessment. The conclusions will be confirmed when the full details of the assessment are provided.</p> <p>Assessments are also being carried out to consider whether the impacts associated with any other aspects which have been assessed in the Environmental Statement submitted with the application may need to be reassessed if the standoff needs to be increased to a greater distance.</p> <p>As it is considered that it may not be possible to agree all of the outcomes of the risk assessments with AW in a timescale which does not delay the Examination programme the Applicant proposes to submit Non Material Change to the Application which incorporates Limits of Deviation to the proposed stand offs from the water pipelines. These Limits of Deviation will be between the 7m as proposed in the submitted application and the greatest distance, including an allowance for uncertainty, derived from the additional risk assessments currently being carried out.</p> <p>It is proposed that the Non-Material Change to the Application including a Supplement to the Environmental Statement with a Supplementary LVIA will be submitted together with amended documents such as the Restoration Concept Scheme, dDCO, Explanatory Memorandum and Appendices DEC B and DEC D of the DEC.</p>
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			<p>If agreement on a suitable standoff distance cannot be reached with AW prior to the end of the Examination period, the Applicant has proposed to AW (in an email dated 29 April 2022) a potential draft Requirement as follows:</p> <p><i>[X]. (1) Subject to sub-paragraph (2) and (3), no part of phases [18], [19] and [20] of the authorised development, as shown on Figure ES5.1 'current and proposed landfill phases', can commence until the stand offs from the water pipes have been agreed in writing by the relevant planning authority in consultation with Anglian Water acting reasonably.</i></p> <p><i>(2) the stand offs as approved in sub-paragraph (1) must remain between 7 and [X] metres either side of the water pipes.</i></p> <p><i>(3) in default of agreement regarding the stand offs from water pipes in sub-paragraph (1) between the undertaker, relevant local planning authority and Anglian Water, such stand offs shall be settled by arbitration in accordance with article 20 (arbitration).</i></p> <p>The Applicant considers that as the area of the development in proximity to the water pipes will not be developed for approximately 8 to 10 years from commencement there is sufficient time to conclude the necessary discussions.</p> <p>Agreement of the final location and detailed design of the landfill boundary within the Order Limits will be agreed for each phase with the Environment Agency as is currently the case. It is considered that this proposed non-material change does not result in any change to the landfill proposals or assessments which form part of the landfill Environmental Permit applications.</p> <p>Responses to the issues raised by AW with respect to bank stability, hydrogeology, ingress of potential contaminants into the pipeline, the proximity of surface water storage lagoons, the potential for corrosion and physical impact from changes to external loadings and crossings are addressed in the responses to ExQ2 8.3 below.</p>
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Q8.3	The Applicant	<p>Please comment on the concerns of AW [REP4-013 and REP4-014] regarding the effect of the Proposed Development on its pipelines with regard to:</p> <ul style="list-style-type: none">a) the integrity and longevity of the pipelines;b) the potential for contamination of the water supply due to the presence of LLW;c) the potential for contamination of the water supply in the event of a failure of an AW pipeline;d) the potential for contamination of the site and surrounding area in the event of a failure of an AW pipeline due to the mobilization of LLW and other contaminants;e) the effect on other utilities infrastructure, including the proposed undergrounded electricity line and the high-pressure gas pipeline, in the event of a failure of an AW pipeline.	<p>Responses to the concerns of AW raised in REP4-013 and REP4-014 are provided in separate documents [Document references 12.3 and 12.4].</p>
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Q8.4	AW	<p>Please expand on the concerns set out in your D4 submissions [REP4-013 and REP4-014] with particular regard to:</p> <ul style="list-style-type: none">a) quantification of the increased risk of failure of an AW pipeline as a result of the Proposed Development;b) the options for avoiding/mitigating the increased risk of failure of the pipeline (for example, routes for diverting the pipelines or, if the pipelines were retained in their current positions, increased stand-off distances and/or enhanced protective measures or changes to the design of the Proposed Development;c) provisions to allow satisfactory access to maintain and repair the pipelines.	
Q8.5	The Applicant and AW	<p>Please provide an update on discussions following AW's D4 submissions.</p>	<p>Please see the responses to ExQ2 Q8.1 and Q8.2 above. A copy of all correspondence between the Applicant and AW is provided as document reference 12.2.8.5.</p>
Q8.6	EA, UKHSA, Health and Safety Executive, National Grid, Western Power Distribution	<p>Please comment on the matters raised in AW's D4 submissions [REP4-013 and REP4-014] and questions Q8.1 to Q8.4 above insofar as they affect your areas of responsibility.</p>	

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9. Water Environment			Response from the Applicant
Q9.1	The Trust	Please respond to the Applicant's submission [AS-006] and ISH2 contributions [REP4-007] (ISH2 agenda item 7(a)) insofar as they indicate that the majority of the swallow hole, including the surface water discharge point, is on land over which it has an option to purchase.	-
Q9.2	The Trust	If necessary, please expand on your concerns regarding the surface and ground water catchments in the vicinity of the proposed extension. In doing so, please have regard to the D4 submissions by the Applicant [REP4-007] and the EA [REP4-15] (ISH2 agenda item 7(a)).	-
Q9.3	The Trust	Please expand on your concerns regarding how / whether the water features and surface water drainage arrangements present close the northern boundary of the existing site have implications for the impact of the Proposed Development on Trust land.	-

ANNEX A

Photograph showing a comparison of the Augean marked land ownership boundary and the CEFT marked land ownership boundary

Annex A

Photograph showing a comparison of the Augean marked land ownership boundary and the CEFT marked land ownership boundary

Approximate location of the discharge point for the swallow hole



Line showing the CEFT boundary marker posts

Augean boundary marker flags