



**APPLICANT'S COMMENTS ON THE ANGLIAN WATER
WRITTEN SUBMISSIONS AT DEADLINE 6**

PINS project reference: WS010005

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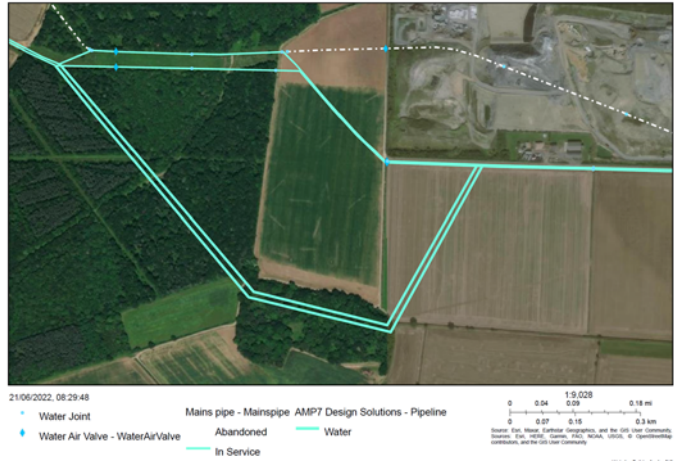
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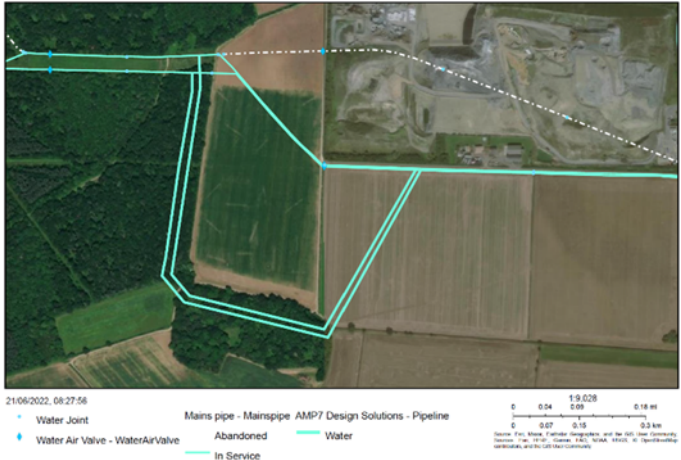
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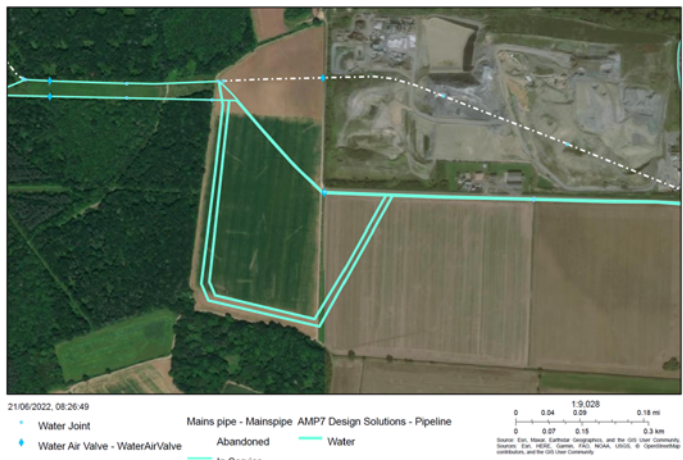


The Applicant's response to the 'Written summaries of oral contributions at hearings' submitted by Anglian Water at D6 (REP6-019)

Paragraph number	Comment in the submission from Anglian Water	Response from the Applicant
<i>Suggested Diversion Routes</i>		
A	Anglian Water have initially considered three potential diversions of the twin 800mm water mains:	<p>It is understood that Anglian Water (AW) have considered the potential diversion routes following the request of the Examining Authority (ExA) at the ISH3 on 8 June 2022.</p> <p>The Applicant reiterates that it considers that there is no need for the pipeline to be diverted based on risk assessments and assessments of access needs for maintenance and repair. Diversion is not contemplated in the Application. It is understood from the discussions at the meeting on 5 July 2022 and the responses of AW to the draft Protective Provisions on 8 July 2022 that AW have indicated that they will agree to a standoff distance to allow the pipes to remain in situ.</p>
	Route 1: the longest and most environmentally damaging option – this completely avoids the proposed land take for the extended operations.	<p>This proposed diversion is for a total length of approximately 1,460m for the outside pipe and approximately 1,420m for the inside pipe. Approximately 430m of the diversion crosses agricultural fields and the remaining 1,030m cuts through woodland to the south and west of the application site. The woodland to the west is a local wildlife site (Fineshade Wood/The Assarts as shown on Figure ES1.2, APP-079). In the areas of woodland the trees and vegetation would have to be removed over a width of approximately 45m or more for the entire length of the pipeline (approximately 4.64ha) based on the stated ideal requirements of AW. The trees would need to remain absent from this corridor in order to avoid potential damage to the pipelines caused by the roots. The current route of the pipelines to be diverted runs for approximately 550m through cleared woodland therefore the proposed new route would result in a net additional 480m of permanent removal of woodland, assuming that the cleared area along the current route of the pipes will be allowed to be replanted.</p>

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	<p style="text-align: center;">Route 1</p> 	<p>It is noted that no change is proposed to the majority of the length of the pipes which currently are located adjacent (within 15m to 20m) and to the south of the current ENRMF landfill site which is formed in the same geology, based on the same construction principles and is filled with the same types of waste (LLW and hazardous waste).</p>
	<p>Route 2: a shorter version of the above, introducing more 90-degree bends in the system which would need further consideration/assessment.</p>	<p>This proposed diversion is for a total length of approximately 1,310m for the outside pipe and approximately 1,270m for the inside pipe. Approximately 430m of the diversion crosses agricultural fields and the remaining 880m cuts through woodland to the south and west of the application site. The woodland to the west is a local wildlife site (Fineshade Wood/The Assarts as shown on Figure ES1.2, APP-079). In the areas of woodland the trees and vegetation would have to be removed over a width of approximately 45m or more for the entire length of the pipeline based on the stated ideal requirements of AW. The trees would need to remain absent from this corridor in order to avoid potential damage to the water pipelines caused by the roots. The current route of the pipelines to be diverted runs for approximately 550m through cleared woodland therefore the proposed new route would result in a net additional 330m of permanent removal of woodland. In addition the route adjacent to the western boundary would destroy in the short to</p>

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	<p style="text-align: center;">Route 2</p>  <p>Route 3: the least environmental impact option but does mean that the land take for the Application would be less.</p>	<p>medium term the grassland boundary which has been demonstrated by the ecological surveys to host a diversity of flora and fauna.</p> <p>It is noted that no change is proposed to the majority of the length of the pipes which currently are located adjacent (within 15m to 20m) and to the south of the current ENRMF landfill site which is formed in the same geology, based on the same construction principles and is filled with the same types of waste (LLW and hazardous waste).</p> <p>This proposed diversion is for a total length of approximately 1,050m for the outside pipe and 1,000m for the inside pipe. 340m of the diversion crosses agricultural fields and the remaining 710m is located inside the areas proposed for landfill construction along the southern and western sections of the proposed western extension. The majority of the length of the diversion, excluding that in the agricultural field, would be adjacent to the landfilled areas therefore any perceived benefits of this as an option rather than leaving the pipes in situ are not apparent.</p> <p>The proposed development is a NSIP and the need for the void and the space that it provides is nationally significant as explained in the Planning Statement (APP-103). If any diversion were to be contemplated within the confines of the proposed development, this would reduce the void available to the disbenefit of being able to manage safely the nation's waste.</p>

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		<p>It is noted that no change is proposed to the majority of the length of the pipes which currently are located adjacent (within 15m to 20m) and to the south of the current ENRMF landfill site which is formed in the same geology, based on the same construction principles and is filled with the same types of waste (LLW and hazardous waste).</p>
B	<p>Please note that:</p> <ul style="list-style-type: none"> - To prepare potential diversion routes of an asset is an involved, lengthy and often costly process. Environmental and conservation issues together with financial implications (extending to compensation claims and, potentially, compulsory purchase issues as well as the cost of building the asset) need to be considered and often cannot be accurately calculated until formal surveys or investigations have been carried out which may involve access to third party land. The three routes proposed in this document have not been subject to this process/due diligence and, as such, please be aware that the attached proposals could be subject to change. 	<p>For all of these reasons, coupled with the clear demonstration in the Pipeline Risk Assessment (AS-025) and the pipeline engineering (AS-026) reports that there is no need for the pipelines to be diverted based on risk assessments and assessments of access needs for maintenance and repair and the lack of any technical evidence or justification to the contrary, the Applicant concludes that proposals for diversion are completely unwarranted.</p> <p>As AW state, the options for diversion put forward by them have not been assessed in any detail or properly formulated in order for them to be even considered as potentially preferable alternatives to retaining the pipes in situ.</p>

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	<p>- These are not CAD layout quality drawings and should not be relied upon as such, for example the plans should not be used for measurements.</p> <p>- Whilst Anglian Water's preliminary assessment indicates that the mains are in the location as mapped, further GPS investigations would need to be undertaken to confirm this.</p> <p>Copies of these documents have also been sent directly to the Applicant.</p>	<p>The Applicant notes that AW state that '<i>Copies of these documents have also been sent directly to the Applicant</i>'. No copies of these documents were provided directly to the Applicant until 5 July 2022.</p>
<i>Written summary of oral contribution on 8 June 2022 (ISH3)</i>		
1	<p>Agenda item 4c. Anglian Water (Meyric Lewis of Counsel) confirmed that they had concerns about the recently proposed amended protective provisions proposed by the applicant (ie to the effect that "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..."). The issue was not just stand-off distances – although that it of course relevant to the stability and integrity of their infrastructure – the fundamental issue is that the infrastructure should be relocated off site, as occurred previously. Anglian Water do not wish to be constrained as to the amount of manoeuvring space they have to access their equipment.</p>	<p>It is demonstrated clearly in the Pipeline Risk Assessment (AS-025) and the pipeline engineering (AS-026) reports that there is no need for the pipelines to be diverted based on risk assessments and assessments of access needs for maintenance and repair, the Applicant concludes that proposals for diversion are unwarranted.</p> <p>It is understood from recent discussions with AW (5 July 2022) that they do not propose to present any direct challenges to the findings of the risk assessments but that the main issue of concern is sufficient space for access in the unlikely event that this section of the pipeline were to catastrophically fail. It is clear from the risk assessments presented in the Pipeline Risk Assessment (AS-025) that the standoff distances needed for access for repairs is the limiting factor (ie the greatest distance) to determine the standoff from the water pipes. This is because the risk assessments demonstrate that the calculated crater diameter following a catastrophic failure event and the standoff distance needed so that there is no effect from the landfill activities on the structural integrity of the pipes are less (ie shorter) than the distance</p>

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		identified as necessary for repair access purposes. The estimates for the space needed for access range from 8.5m to 20m to the side of each pipe.
2	There are also questions as to the accommodation of the Western Power apparatus.	It is concluded that the location of the diverted electricity cable could be located wholly or partly outside the finally agreed standoff from the northern water pipe.
3	So far as Anglian Water are concerned, relocation could be achieved by some form of Grampian provision to secure relocation (but the examining authority indicated that he would not regard that as a non-material amendment and/or covered by the Rochdale envelope).	As confirmed during the ISH, it would not be possible as part of the current Application to contemplate any relocation of the pipes as per the options outside of the Order Limits by reference to a Grampian requirement. Instead it would require a material change to the Application to be made which the Applicant does not consider is necessary for all the reasons already stated.
4	Agenda item 6 – Anglian Water pipelines and other infrastructure crossing the site. This matter falls to be addressed at this stage in the application process because of the inadequacies on the scoping of the ES identified previously. AW are agnostic as to the visual effects of wider standoffs. But Anglian Water does not wish to be constrained in accessing their apparatus even with 20m stand-offs either side. A main burst with a massive plume of water causing considerable damage would have knock on consequences for the integrity of the soil and foundations of the pipes and the ultimate potential for affecting the stability of the landfill itself. So AW contends for the zero risk option of relocation.	<p>The Applicant notes that AW were actively involved in consultation associated with the early stages of the proposed development, including the scoping stage. No concerns were raised by AW during the scoping process or the pre-submission consultation or at any other time before March 2022; therefore the Applicant does not consider that the scoping process was inadequate; the Applicant responded directly to all matters raised as a result of the scoping process.</p> <p>The potential size of a crater which could form as a result of a catastrophic failure has been calculated for a number of different burial depths and assuming a worst-case scenario of both pipelines failing. The calculations are presented in the pipeline engineering report (AS-026) and it is calculated that if both pipes failed and the worst case burial depth of the pipes is assumed, a crater diameter of approximately 12.6m could be formed. The distance of the crater to the side of each pipe is calculated as 3.41m if the pipe is at a depth of 3m. There would remain a significant buffer distance between the extent of any ground disturbance resulting from the failure and the landfill structure which is</p>

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		a total distance of 9.5m from each pipe based on the original design of the standoff distances.
5	AW emphasised the implications of there being two parallel pipes within the landfill and a landfill containing low level, hazardous waste with potential for contamination.	The Applicant considers that it is important to state clearly that the water pipes would not be located within the landfill. The pipes would remain located in natural ground, between two separate areas of engineered containment landfill.
6	Mark Froggatt, AW's Chief Engineer, stated AW's fundamental position of wanting to protect both the public's drinking water and AW's assets. The fact is the main was diverted last time and AW sees no reason why the same should not apply this time. AW had engaged with the applicant (although it seems MF's latest email had not been received).	<p>Augean is also committed to protecting the public and to ensure that the assets of third parties are not affected hence why it has undertaken comprehensive assessments of all issues raised during the application process.</p> <p>The water main was diverted as part of the previous development (including mineral workings and the current landfill) as there was no proposal to landfill in separate areas, only to deposit waste in a single engineered landfill area and so diversion was the only option.</p> <p>The information reported to have been provided by AW on 1 June was not received by the Applicant until 21 June 2022 despite chasing it up with AW immediately following the ISH. The Applicant's response to the plans and associated information provided by Anglian Water on 21 June 2022 is provided at document reference 15.2.6.2 (REP6-017).</p>
7	Mr Froggatt confirmed that, since 2010, AW had had 31 major bursts on 343 kilometres of trunk mains and so AW is concerned that there is a real risk of bursts and leaks/failures. As AW's evidence would suggest from their analysis of 31 bursts within 343 kilometres effectively, one burst per 11 kilometres.	<p>The Applicant notes that at a meeting on 5 July 2022 Mr Froggatt referred to 88,000km of pipelines managed by AW. No data are provided regarding leaks on the wider pipe network.</p> <p>Based on the data provided for the 343km of trunk mains from 2010 to date (ie for a 12 year period) the failure rate equates to approximately 2.6 failures per year and approximately 0.008 failures per kilometre per year. This failure rate can also be expressed as a 1 in 133 year chance</p>

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		<p>of failure in any 1km section or 1 in 400 year chance of failure for the 330m section which runs through the site the subject of the application.</p> <p>The pipeline failure data provided by AW does not distinguish between pipes formed of steel, cast iron and asbestos cement. In the pipeline engineering report (AS-026) it is explained that the pipes formed of more brittle materials, such as cast iron and asbestos cement, are far more likely to be subject to a catastrophic burst than for pipes formed of steel which is a more ductile material. The water pipes which cross the site are formed of steel therefore it would be reasonable to expect that the failure rate which is relevant to steel pipes such as those at the site would be lower than the average that is calculated above.</p>
8	<p>With a burst the problem comes with how much disturbed stabilisation there would be in the area that they have before they finally let go. The existing steel mains seem to be genuinely in good condition. But there is a risk within the next 10 to 20, even 50 years of potential failure.</p>	<p>The suggestion that the pipe could fail within the next 10 to 50 years is speculative and not consistent with the risk analysis presented in the previous paragraph which represents a 1 in 400 year risk of failure. Notwithstanding the low risk of failure, the risk assessments have been carried out based on the assumption that there will be a failure.</p>
9	<p>AW would wish to see the applicant's calculations (not seen before) that have been made to assess the potential for long term exposure of ground conditions with extreme weather conditions or even swell, which will possibly lead to stress in that pipe work, along with vehicle movements, excavation, vibration, etc. All these things can actually impact upon our pipeline, whether it's in a fragile or a semi fragile state, or whether it's in a robust state. NB though we have to consider the fact that the moment this pipeline sits within an agricultural land and the only loadings it generally has from its stable condition is occasional</p>	<p>The assessments and calculations regarding the potential effects of the proposed development on the structural integrity of the pipes are presented in the Pipeline Risk Assessment report (AS-025) submitted with the request for a Non Material Change to the application. The risk assessments demonstrate that the calculated crater diameter following a catastrophic failure event and the standoff distance needed so that there is no effect from the landfill activities on the structural integrity of the pipes are less (ie shorter standoff distance) than the standoff proposed in the original design as submitted.</p>

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	<p>traffic in from agricultural vehicles. But then we are looking at taking that main into a position where we are having significant excavations local to it, with significant traffic movements around and over it which is a great concern. AW have yet to see proof of how that is to be managed (ie not seen before).</p>	<p>During a meeting with AW on 5 July 2022 it was understood that AW do not intend to challenge any of the details or conclusions of the risk assessments.</p> <p>It was also confirmed at the meeting and within draft Protective Provisions that the design of the vehicle crossing can be addressed through the Protective Provisions.</p>
10	<p>AW's principal concerns are the behaviour of clays when they're "unloaded" from their current position. When you move the load away, the clay wants to actually then expand and rise and AW wants to understand how that differential loading could occur. What if there was another "beast from the east", where we had a really cold spell across the region across the country. A lot of water companies lost provision to provide water to customers because of the effects of that on their ground conditions with heave and swell. Also there is the corrosivity of ground conditions to address resulting from the mixing of the groundwater with the clays.</p>	<p>As explained in the Pipeline Risk Assessment report (AS-025) changes in ground pressures caused by the excavation and filling of the landfill reduce quickly as distance between the landfill and pipeline increases and these have been assessed based on the ground conditions, pipeline surround and nature of the pipeline. It is concluded that the original design stand-off dimension proposed by Augean of 7m from the fence line and a total of 9.5m from the landfill excavation is more than adequate in all cases to make sure that the pipelines will be unaffected by any excavations taking place, and the presence of the excavation activity will not increase the likelihood of pipe failure from any shrink/swell effects associated with the excavation of the clay.</p> <p>The proposed development does not affect the 'corrosivity' (ie the chemical nature) of the natural clay in which the pipes are already located, nor does it affect the meteorology of the area.</p>
11	<p>A key fundamental concern is the period of construction and fill. Landfill changes the properties in and around that pipeline which are exposed to long term deposition from the first initial excavation to the final capping with the potential for more extremes of rain and other weather conditions over time. No evidence to suggest that has been catered for. Remains a risk until quantified.</p>	<p>Each phase is excavated, engineered and filled in a relatively short time period (typically no more than two to three years) therefore no excavated slopes will remain open and unsupported for more than a few months and both stability risk assessment and experience from the ongoing current site development have demonstrated that these open slopes will remain stable well in excess of this period. Once the engineered landfill cell is filled to above the ground level there will be no unsupported excavated slopes and the waste is placed to achieve the final approved levels followed by the placement of an engineered cap</p>

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		<p>and restoration soils. Due to the phasing of the landfill operations it is unlikely that unsupported excavated slopes would be present either side of the pipeline route at the same time.</p> <p>An assessment has been carried out and is reported in the Pipeline Risk Assessment (AS-025) of the potential impact on the structural integrity of the pipes as a result of the landfill operations. As a result of the factors of safety incorporated into the landfill design, the Construction Quality Assurance implemented to verify the landfill is constructed in accordance with the design, the ongoing monitoring of the slopes in accordance with the Environmental Permit and the distance from the edge of the excavation to the pipes of 9.5m, it is concluded that there would be no significant potential for the stability of the slopes of the adjacent landfill phases to be detrimentally affected as a result of instability of or damage to the water pipes.</p>
12	<p>There is an assumption that the ground is “virgin class”, and the reinstatement and the area that trench with initially was as we assume, so again, this information that needs to be confirmed. AW more than happy to share what information that they can from our GIS model. Last point, there is always groundwater permeating through to our pipeline.</p>	<p>It was indicated by AW that the pipelines are bedded on gravel up to approximately half the pipe diameter, and that the remaining material within the pipeline trench is backfilled clay from the excavation of the trench.</p> <p>Available information from the GIS model was provided by AW on 21 June 2022 and, following a request for clarification on 28 June 2022, further details were provided on 5 July 2022.</p> <p>The GIS data and associated information provided by AW do not change any of the assumptions made in the risk assessments presented in the pipeline engineering report or the Pipeline Risk Assessment report.</p>
13	<p>Vehicle movements and crossings are also a great concern since AW’s own investigations into main failures often highlight the risk of external loading</p>	<p>It is demonstrated in the pipeline engineering report (AS-026) that a suitable crossing over the pipelines can be constructed readily, using standard methods that will protect the integrity of the pipelines. A</p>

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	factors – proximity to roadways and major traffic areas has been a contributory if not a leading cause of failure. The concern is both with loading and vibration. So again we would like to see the calculations for these assessments. But AW’s overriding position remains that they would wish for the mains to be moved.	specification for design of the crossing will be discussed and agreed with AW. This is allowed for in the proposed AW Protective Provisions. It was confirmed by AW in the meeting on 5 July 2022 that this approach to the development of an agreed crossing design was acceptable.
14	Impact of failure of the pipeline eg flooding, mobilisation, contamination, access and effect on other infrastructure. AW’s concerns are based on eg bank stability and main burst impact The assumed size of crater is very theoretical. Plenty of evidence to suggest that there is a real risk of breaching the sidewall in the event of a failure – and that would lead to a risk of a burst actually filling up the adjacent cell areas. Provision to stop water flowing is not one which happens automatically. It’s a phased time period in which AW try to maintain the pressure within the pipeline to avoid any reflux into the pipeline and contamination so that during that time period, we have a real risk, we believe that we could actually fill up the excavation area – a risk that we never had before and that was not assessed.	Please see the comments in response to paragraph 4 above. The consequences of the discharge of the water from a burst pipe into the landfill have been assessed and are reported in the Pipeline Risk Assessment report (AS-025). It is concluded that in the unlikely event that all the water from two failed pipes entered the adjacent landfill void, there would be no significant effect which could not be managed by the site operator or unacceptable environmental consequences.
15	AW still has issues when we are talking about theoretical crater edge. With plant and equipment, you do not put a 20 tonne excavator next to a crater you have a back distance away from there. Also, access would only be from the two “ends” of the “channel”. Reference was made to SPA and the easement for the strategic pipeline. What we have learned from that is	Augean is experienced in operating plant and the safety requirements when operating close to voids or on slopes. An assessment has been carried out of the access requirements should it be necessary to repair the pipes and is presented in the Pipeline Risk Assessment report (AS-025) and takes into account the safety requirements. The estimates for the space needed, depending on the assumptions made and the flexibility allowed for in locating the plant and items required, range from

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	<p>that we've found that easement a little bit too tight for us (and that's in an ideal construction environment). Also access would be reduced by sloped banks and only meaning that we can get access from both ends for our plants and equipment means that we would require a maximum potential to actually try and dissipate that water not the minimum.</p>	<p>8.5m to 20m to the side of each pipe which is well within the range of standoff distances included in the Non Material Change request.</p> <p>In addition safe access to the pipeline area also would be available through the landfill site (as used by road going waste delivery vehicles on a routine and daily basis) and arranged by Augean other than during the limited period when the engineered liner has been constructed on the slope where access is sought and before waste has been placed. The fences will be in place only during the operational period and can be removed for a temporary period during an emergency. The gradient of the restored slopes does not restrict access other than to the largest types of plant.</p> <p>It is demonstrated in the Pipeline Risk Assessment report (AS-025) that there is no justification for the concern that following catastrophic failure of the pipe the flow of water would inundate the pipeline route and restrict access for repairs as a result of the presence of deep water. Water will drain readily from the area and is unlikely to pond in the area of the pipelines.</p> <p>The Applicant therefore concludes that the pipeline will remain safely accessible throughout the operational life of the landfill and following restoration and that it will be significantly more accessible than where the pipelines pass through the woodland to the west of the application site where access beyond the pipeline corridor is constrained by trees.</p>
16	<p>Social and economic implications. NB this is a trunk, critical main not a minor water supply. It provides wholesome water to the north and east sides of Peterborough and then feeds into the main city area – ie approximately 80,000 people relying on this</p>	<p>There are no direct socio-economic effects as a result of the failure of a pipe as the risk of failure as a result of the development has been demonstrated in the risk assessments to be very low. In terms of perception it is very important that it is understood correctly that the pipe runs between two discrete areas which will receive Hazardous waste</p>

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	<p>particular supply. NB also the public perception of running AW's pipeline through a waste facility. Empirical evidence of public perception is a trickier issue. But we do know AW customers are very keen that we have sustainable solutions, and especially low impact solutions. But we don't want to ask people directly because that would be effectively poking a hornet's nest.</p>	<p>and LLW, as opposed to "through" the landfill site. The Applicant also notes the pipeline already runs adjacent to a landfill site with the same types of waste in it (LLW and hazardous waste). The proper way to address public concern is through the provision of sound information and robust risk assessment. Part of the purpose of undertaking the risk assessments is to ensure that such information is available.</p> <p>So far no issues relating to public concern about the quality of water have been raised in the consultation or on any other occasion. The Applicant has been active in its communications for many years to ensure a high level of understanding and to overcome misperceptions. In order to achieve that it is important that information disseminated is as clear and consistent as possible. Perception is only material where supported by evidence in terms of planning consequences.</p> <p>In continuation of the approach adopted to date, the Applicant has circulated the Non Material Change proposals widely for consultation and feedback, including the risk assessments.</p>
17	<p>The question is about the possibility and probability – whether it remains slight or otherwise – but in the event of a burst we are dealing with a “food” product here so that we will have procedures and processes in place to actually ensure that we're operating the most utmost cleanliness that we can in a situation like that. The issue is always at the point where you isolate and you depressurize your main to actually get your final repair. That is the point where we could risk contamination, however slight that may be. The question I still have to understand is that we would have to flush any contamination out. AW's yet to see</p>	<p>Assessments have been carried out of the potential for contamination associated with the landfill operations to affect the quality of the water in the pipes and are reported in the Pipeline Risk Assessment report (AS-025). It is demonstrated that there is no conceivable pathway by which contaminants in the landfill site could migrate to and affect the quality of the water in the pipelines either during the period when the pipes are intact or when the pipes are being repaired. Similarly there is no risk that contaminants from the landfill will enter the bedding around the pipes and result in contamination of surface water or groundwater quality elsewhere.</p>

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	the evidence to support the applicant's assessment that there would not be any additional contamination as a result of the proximity of the landfill, beyond which that which might exist in any other circumstance like this.	No concerns have been raised by the Environment Agency with regard to the potential for contamination of the water in the pipes. The extensive and robust controls on the containment of contaminants in the landfill site are set out and regulated through the Environmental Permits.
18	AW's preferred outcome is for diversion of the pipeline around the landfill extension. The existing standoff distance may not be very much greater than the standoff distance which the applicant is currently proposing, but it the landfill would be to just to one side of that so you would have better, unfettered access, as it is now, ie not hemmed in by a corridor effect between graded land that we can only access from ends. AW does not think that would cause any significant environmental impact.	<p>AW do not consider that the proposed diversion of the pipeline '<i>...would cause any significant environmental impact.</i>' However, as noted in paragraphs A and B above, the potential impacts on the environment and ecology have not been assessed by AW for any of the proposed diversion route options. The applicant has identified in response to paragraphs A and B above a number of potential impacts associated with the proposed route options and concludes that there is no need for the pipelines to be diverted based on the risk assessments and assessments of access needs for maintenance and repair.</p> <p>It is evident from the recent discussions and correspondence that the main concern of AW is with respect to their ability to access the pipes safely for the purposes of maintenance and repair.</p>
19	AW committed to continue to engage constructively with the application over exchanges of information and their progression of their non-material amendment application. The applicant in turn committed to consulting Public Health England and the Drinking Water Inspectorate as part of that process.	<p>The Applicant confirms that the UK Health and Security Agency (formerly Public Health England) and the Drinking Water Inspectorate were consulted on the proposed Non Material Change to the application proposals. No comments on the proposals were received from either consultee.</p> <p>The correspondence between AW and the Applicant between 22 June 2022 and 20 July 2022 is provided with this submission at Deadline 7 as document reference 16.2.1.</p>