

Mr Andrew Goodchild
West Somerset District Council
Killick Way
Williton
Taunton
TA4 4QA

Our ref: WX/2010/114863/01-L01

Your ref: JH/01

Date: 13 May 2010

Dear Mr Goodchild,

**ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT APR '10 -
PROPOSED HINKLEY 'C' - SITE PREPARATION WORKS AT HINKLEY POINT,
BRIDGWATER.**

Thank you for consulting us on the scoping report for the above development. We consider that this application is an Annex 1 project, subject to article 4 (1) and that the developer is required to carry out a full Environmental Impact Assessment (EIA).

The views we express in this letter are our response to the Scoping Report only and does not represent our final view in relation to any future planning/ permit application. Should new information/updates to guidance occur in relation to this application we may review our position.

Information contained in the scoping report is sufficient with the addition of the areas highlighted below.

General Comments:

Waste

In order to develop both the Hinkley Point site and any associated development an overarching waste management strategy is required. This should cover all non nuclear construction and demolition waste associated with this work.

It is a legal requirement to have a site waste management plan (SWMP) (for all new construction projects worth more than £300,000). This SWMP should integrate with the overarching waste management strategy discussed above.

Further information can be found at <http://www.netregs-swmp.co.uk>

Permit/ Consents

A number of permits and consents will be required for this stage. We recommend that NNB Genco meet with us at the earliest opportunity to discuss the permits and consents required for this development.

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Email: enquiries@environment-agency.gov.uk
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Detailed comments on the scoping report:

Fig 1.3

The map shows a Raw Water Supply (underground), we require further information on this. If water is taken from this supply an abstraction licence may be required.

2.2 Design

2.2.23 - Discharge of surface and groundwater drainage onto the foreshore is a particular concern because of risk to water quality.

The details of discharges in terms of location, volume, contaminant concentrations, etc, must be provided and proposals for pollution reduction and mitigation of potential impacts to the area must be defined.

This will include an assessment to ensure that changes in water quality will not impact on the designated features of the Severn Estuary Natura 2000 site or other foreshore ecology, such as *Corallina* species.

2.3 Construction Method

2.3.1. The developer must show what measures will be taken to manage and protect areas that are of importance to wildlife. This must link with NNB Genco's wildlife strategy.

2.3.25 Construction Environmental Management Plan (CEMP)

The CEMP should incorporate management procedures for accidental releases to both surface water (terrestrial and marine) and groundwater.

3.4 Hydrology and Flooding

Consent to Discharges will be required for some of the proposed drainage activities. This will be dependent on volume, nature of discharge, and any treatment methods installed to prevent pollution. Further detail on this will be required to establish what consents are necessary.

2.6 Enabling works

2.6.1 Any enabling works should be incorporated into the EIA process and will be subject to the same overarching management strategies as the main site development.

3.3 Groundwater

3.3.9 The appropriate management measures indicated in this section must be linked to a comprehensive construction management plan.

3.12 Freshwater Quality

3.12 We would expect the developer to prepare an Environmental Monitoring Strategy for Water Quality, both at the main site and any associated development site.

3.3 Ground water- Dewatering

Dewatering of the site for earthworks excavations will form a significant part of the operation. The hydrogeology of Built Development Area (BDA) West has been characterised in a previous technical report forwarded by NNB Genco's- Onshore geological, geotechnical and hydrogeological interpretive report (step 1)'. Based on this earlier work, the assessment should contain estimates of required drawdown, required pumping rates and duration, and zone of influence of pumping.

In order to assess the impacts of dewatering detailed information must be provided.

Site West - NNB Genco's- Onshore geological, geotechnical and hydrogeological interpretive report (step 1)'. Characterised the hydrology of the built development area West. Based on this earlier work, the assessment of this area should contain estimates of required drawdown, required pumping rates and duration, and zone of influence of pumping

Assessment should be made across all areas of the site (particularly BDA East) for the potential migration of contaminants and contaminated groundwater due to the dewatering process. Monitoring and mitigation must be considered for this and outlined in the water monitoring strategy.

It has been noted that in the deeper groundwater in BDA West there are elevated parameters of dissolved heavy metals and total mercury. If this is going to be part of the dewatering operation, then the potential impact of pumping it to the surface must be assessed.

Flood Risk Management

3.4.5 We are pleased to see the inclusion of the area Shore line Management Plan (North Devon and Somerset SMP). Please note the publication of SMP(2) is imminent.

3.5 Land Contamination and Waste

3.5 Contaminated Land

Contaminated land issues should be dealt with according to Planning Policy Statement 23 Planning and Pollution Control (PPS23).

An estimated 3.2 million cubic metres of material is proposed to be excavated. Information to date suggests it is likely that, particularly in DBA East, some excavations will be contaminated. Measures should be documented and in place to chemically test and segregate any material that is contaminated from that which is clean. Suitable and sufficient storage space needs to be planned in advance.

This must be indicated as part of the site waste management strategy.

3.10 Hydrodynamics and coastal geomorphology

3.10.10 Have the baseline studies (one of which dates back to the 1960s) been updated to provide up to date data?

3.16 Radiology

This should read 'radiological' not radiology.

3.16.1 Please ensure the latest Radioactivity in Food and The Environment (RIFE) report (now 14) is incorporated into the EIA process.

4.2 Cumulative Impact Assessment

4.2.9 The cumulative/ in combination impacts of the multiple applications which include the main site and the associated development should be assessed. The assessment must include for example temporal cumulative effect of the dredging of the jettys berthing pocket and the thermal plume. The effect on Benthic populations that are resettling after dredging and new pressures felt from repeated discharges.

The timings of the development phases of the jetty are unknown. The worse case scenario should be assumed and incorporated into the assessment process.

4.2.11 When assessing the Hinkley development the developer must take account of the combined effects of related projects such as the Steart Managed re-alignment project and the Bristol Ports Development.

We are aware of proposals for further development at Oldbury power station site. If a development consent order is granted this may overlap with the construction phase of Hinkley point. The cumulative impact of these developments should be included in the assessment.

A example of such effects is the potential impact on bottom dwelling fish, firstly from construction of Hinkley Point, secondly from the thermal plume when operational, followed by the potential impacts of further development at Oldbury.

In order to facilitate an early response, please quote our reference on any future correspondence regarding this letter.

Yours sincerely

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Planning Liaison Officer

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