ENVIRON

8 July 2009

Richard Kisby
Environment Agency
Waterside House
Waterside North
Lincoln
Lincolnshire

LN2 5HA

Our Ref: NS/CD/L_UK1214701_A

Dear Richard,

SPALDING ENERGY EXPANSION – FLOOD RISK ASSESSMENT

Following the provision of a FRA for the above-mentioned site, the Environment Agency (EA) in their letter of 27 May 2009, has objected to the development on flood risk grounds. The reason provided is that the flood risk assessment (FRA) submitted to accompany the application for Section 36 Consent for the Spalding Energy Expansion is not considered to comply with the requirements set out in Annex E, paragraph E3 of PPS25.

Further consultation with the EA was undertaken upon receipt of the letter of objection (telephone conversation and e-mail, between Nathan Swankie of ENVIRON and Emma Kirk, EA). Table 1 below reproduces the specific points raised by the EA within their letter of 27 May 2009 and the associated information/response intended to address these points.

Table 1 – Summary of issues and actions

Item	Description	Response
1	Consider within the breach analysis the time taken for floodwaters to affect the site, the velocity of floodwaters add the implications for the site in terms of ensuring all workers can evacuate the site safely.	Refer to draft Flood Warning and Evacuation Plan (enclosed as Appendix A).
2	Provide a flood warning evacuation plan informed by the above. If evacuation is not possible an area of safe refuge on site should be considered. The Local Planning Authority should be consulted on the details of the evacuation plan.	Refer to draft Flood Warning and Evacuation Plan (enclosed as Appendix A).
3	Consider the developments potential affect on third parties and ensure the proposed development does not push flood waters elsewhere during a flood event.	This is addressed in Volume 2 of the Environmental Statement, Chapter 12 Water Resources and Flood Risk, paragraphs 12.121 and 12.143, and Volume 3, Technical Appendix 12.1 Flood Risk Assessment, paragraphs 5.1.1 to 5.1.12. It is understood that no further information is required as the principal flood risk is tidal and therefore no flood compensation is necessary.

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Item	Description	Response
4	Include a cross section showing finished floor levels, ground levels and all other relevant levels in relation to potential flooding.	All relevant levels have been provided in Volume 2 of the Environmental Statement, Chapter 12 Water Resources and Flood Risk, paragraphs 12.113 to 12.122. Please also refer to Figure 1 Cross-Section of Site and Flood Levels enclosed as Appendix B.
5	Clearly identify the extent of impermeable area on site pre and post development.	The Environmental Statement includes a value of 21% based on measurements for the pre-development situation and assumes a conservative value of 70% for the post development situation. Refer to Volume 2, Chapter 12 Water Resources and Flood Risk, paragraph 12.128.
6	Provide calculations of all storm durations up to and including the 6 hour event. This will ensure that a calculation for the worst case storm event is considered within the FRA.	The Environmental Statement states that the critical storm duration was determined to be less than 30 minutes, but the Flood Estimation Handbook Depth Duration Frequency modelling should not be used for durations lower than 30 minutes. Refer to Volume 2, Chapter 12 Water Resources and Flood Risk, paragraph 12.128. Refer also to Note on Drainage Assessment (enclosed as Appendix C)
7	Provide details of the attenuation methods to be used on site.	The conceptual drainage system is described in the Environmental Statement in Volume 2, Chapter 12 Water Resources and Flood Risk, paragraphs 12.137 to 12.144.
8	Include details of how the surface water scheme will be maintained and managed after completion of the proposed development.	The drainage system will be owned and operated by Spalding Energy Expansion Limited. The drains will be subject to an annual maintenance inspection, and ongoing maintenance as required.

I trust that you find the enclosed helpful, however if you require any further information, please do not hesitate to contact the undersigned.

Yours sincerely

Nathan Swankie

Nathan Swankie
Manager

Enc Appendix A – Draft Flood Warning & Evacuation Plan
Appendix B – SEE Cross-section
Appendix C – Note on Drainage Assessment

cc: Neil Anderson InterGen UK Ltd.
Keith Dalton Dalton Warner Davis
Gary Mohammed Department of Energy and Climate Change