

National Infrastructure Directorate
Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our ref: RA/2015/131206/02-L03
Your ref: EN10048
Our ID: 10030429
Date: 20 May 2015

RELEVANT REPRESENTATION SUMMARY

Dear Sir/Madam

THE WHITE ROSE CCS (GENERATING STATION) DEVELOPMENT CONSENT ORDER. LAND WITHIN AND ADJACENT TO THE DRAX POWER STATION SITE, DRAX, NEAR SELBY, NORTH YORKSHIRE.

We would like to provide the following summary of our previously submitted Relevant Representation.

1.0 Flood Risk

- The submitted FRA and associated breach analysis are acceptable;
- The risks are adequately understood and suitable mitigation has been proposed;
- We request minor amendments to requirement 13 to improve its precision;
- The River Ouse is a Main River. EA consent will be required for any works in, over, under, or within 8 metres of it and/or the toe of its flood defence.

2.0 Surface Water Management

- We have reviewed the proposals for surface water management and are content with the assessment provided;
- We request some amendments to requirement 12, so it more precisely reflects the mitigation measures proposed in the ES;

3.0 Biodiversity

- We have reviewed the project's impact on water-related biodiversity;
- Matters of terrestrial ecology fall outside our remit;
- The ecological enhancement measures currently proposed are inadequate, vague and open-ended;
- We request a schedule of biodiversity mitigation and enhancement measures to which the applicant is committed.

4.0 Environmental Permit

- The proposed project will need an Environmental Permit;
- We have promoted the benefits of parallel tracking to the applicant;
- At the time of the Relevant Representation no permit application had been submitted;
- An EPR application would need to include a more detailed technical assessment of the operation of the installation;
- We have provided feedback to the applicant during permit pre-application stage on air emissions and about the use of guidance and methodologies for noise;
- We highlighted that we are unable to provide letters of no impediment in advance of Environmental Permit determination.

5.0 Abstraction Licence

- It is the applicant's position that a minor amendment to an existing Water Abstraction Licence will be needed;
- It will also be necessary to ensure that water loss-factors do not need amending;
- If loss-factors are increased, environmental impacts would need to be assessed as part of the abstraction licensing process;
- If a new licence or substantial variation is needed, the Canal and River Trust would need to be the licence holder.

6.0 Habitats Regulations Assessment

- We are the competent authority for the Environmental Permit under the Habitats Regulations;
- We have, to date, been unable to carry out a Habitats Regulations Assessment;
- We would be happy to engage in competent authority co-ordination;
- CPL's intention is to stay within existing permitted limits for water abstraction and discharge. We must still satisfy ourselves in relation to alone and in-combination effects based on the latest information about other projects and relevant designated sites.

7.0 Waste Management

- We requested a minor addition to requirement 25 to ensure that we are suitably involved with the proposals for waste management;
- We also recommended an amendment to requirement 18 to secure the soil management plan and sediment control plan cited in the ES.

8.0 Groundwater & Land Contamination

- We agree with the conceptualisation of the geology and hydrogeology of the site;
- The ES adequately identifies all potential sources of contamination, as well as the environmental receptors and potential pathways;
- The main environmental risks to groundwater come from the construction phase;
- We accept the proposed mitigation measures and agree that if implemented will reduce the risk to sensitive receptors;
- Dewatering on site during construction is expected to be temporary and small scale and unlikely to affect the discontinuous groundwater flow.

9.0 Dis-application & Protective Provisions

- There are no proposals in the draft DCO to dis-apply any legislation on which we rely to control certain activities through the issuing of other permits or licences;
- Our position is that paragraph 16 of Part 4 Supplemental Powers does not override the need for consent from the EA.

10.0 Land Interest

- We have no interest in land directly affected by the proposed project.

Should you require any additional information or clarification, please don't hesitate to contact me on the details below.

Yours faithfully

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