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Subject: White Rose Carbon Capture and Storage Project
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FAO Case Team for White Rose Carbon Capture and Storage Project

Further to the representation submitted by Royal Mail on 13 February 2015 at the 'Relevant Representations' stage as attached, our client has taken specialist Transportation Consultancy advice from PFA Consulting, a summary report of which is also attached for the information of the Examining Authority.

Royal Mail will not be making any further representations to the Examination, but in line with the advice received from PFA Consulting Royal Mail hereby requests that the applicant is required by the Examining Authority to:

1. include major road hauliers such as Royal Mail in its proposed public communications strategy, and
2. keep Royal Mail fully informed in advance of all road closures and/or delivery of Abnormal Indivisible Loads.

Royal Mail looks forward to receiving the Examining Authority's response to this request. Please respond to myself in the first instance.

Many thanks.

Dan Parry-Jones



Daniel Parry-Jones
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WHITE ROSE CARBON CAPTURE AND STORAGE PROJECT NEAR SELBY, NORTH YORKSHIRE

REVIEW OF POTENTIAL IMPACT OF CONSTRUCTION ON ROYAL MAIL OPERATIONS

1. Introduction

- 1.1. Capture Power Limited (the Applicant) has submitted to the National Infrastructure Planning Unit of the Planning Inspectorate an application for a Development Consent Order for proposed development known as the White Rose Carbon Capture and Storage Project (the Project).
- 1.2. The Project comprises a coal-fired oxy fuelled super-critical power plant, an air separation unit, flue gas cleaning system, and a gas processing unit to prepare the CO₂ for transport and storage. The project will link to a CO₂ transport pipeline and storage facility, which is being developed by National Grid as a separate project. The project is proposed immediately to the northeast of the existing Drax Power Station complex.
- 1.3. Access to the Project site exists via internal access roads which are part of the Drax Power Station. These internal roads link to the local road network via New Road which runs along the eastern edge of the existing Drax Power Station complex.
- 1.4. A rail link for fuel delivery, a cooling water supply, and utility services provision exist at the Drax Power Station complex. The proposal will be designed to use and connect to these existing facilities.
- 1.5. The Applicant has included an existing jetty on the River Ouse and is considering its use for the import of Abnormal Indivisible Loads (AILs).
- 1.6. This note provides a summary of the results of a review of key traffic construction documents produced by consultant Waterman Transport and Development and submitted as part of the application. The principal documents reviewed include:-
 - Environmental Statement – Volume 2 Chapter E – Transport Assessment Version 4
 - Construction Management Framework Plan Version 4
 - Framework Construction Staff Travel Plan 1st Draft
- 1.7. PFA Consulting, highway and transport consultant, has undertaken the review on behalf of Royal Mail to identify whether the construction and operation of the Project would likely have a detrimental impact on the transport operations of Royal Mail.
- 1.8. The key consideration is the potential impact of the construction of the Project on the local highway network and, in particular, the route to the M62, on Royal Mail's transport operations. The assessment considers the impact on the Royal Mail depots at Selby, Goole, Snaith and Eggborough. The impact of the Project during operation and the impact of the AILs from Immingham Port on the local and wider highway network have also been considered.
- 1.9. The existing road network operates with significant reserve capacity and no adverse highway impacts are currently experienced.

2. Construction Information

- 2.1. The Project will be phased with construction anticipated to take about 6 years with staffing levels due to peak at around 3,300 construction staff daily during the peak month of construction (an average of 1,000 staff per day is expected across the construction period).
- 2.2. The construction working hours will be:
- Monday to Friday 07:00 – 19:00
 - Saturday 07:00 – 13:00
- 2.3. As a worst case scenario, a car occupancy level of two persons per vehicle across the whole construction period has been used.
- 2.4. The busiest period of construction traffic for HGVs is during the twelve month platform formation period. The peak in this twelve month period will be during the first month when 180 HGVs are expected to access and egress the site.
- 2.5. A maximum of 5 AILs per month are expected during the peak of the construction period. As a worst case scenario all AILs have been assumed to be delivered by road.
- 2.6. In terms of vehicle impact, the peak periods are expected to generate 1,700 vehicle movements into and out of the Project site (construction staff and HGVs combined).
- 2.7. In terms of distribution the assessment assumes that 66% of construction employee traffic will use New Road to the A645 and the M62 (Junction 36) to the south, east and west, and 34% will travel via New Road to the A645 (towards Camblesforth and Selby) to the north and east. All HGVs will route along the dedicated HGV route from the M62 Junction 36 to the Project site via the A645.
- 2.8. The impact analysis considers a worst case scenario when the existing Drax Power Station is subject to maintenance and servicing with associated contractor numbers peaking at 1,000.
- 2.9. The link assessment for proposed daily flows indicates that, in terms of environmental impact, all roads with the exception of New Road will be negligible (<30%). New Road will be subject to a major impact (>90%). During the peak hours, the roads which record an impact are New Road (moderate impact, 60% – 90%) and the A645 (between New Road and Rawcliffe Road (minor impact, 30% - 60%).
- 2.10. Capacity analysis, during the AM and PM peak hours, of the key junctions in the vicinity of the Project indicates that the local highway network would continue to operate with reserve capacity at all junctions with the exception of one junction.
- 2.11. Only the A614 (north) arm of the northern M62 roundabout junction during the PM peak shows queues of 40 vehicles over a 30 minute period when modelled using the 'ODTAB' method of analysis in ARCADY (roundabout modelling program). A flat profile ('DIRECT') analysis indicates that the junction will operate below maximum capacity.
- 2.12. The Transport Assessment has also assessed the cumulative impacts of the NGCL Pipeline, Pollington Airfield Biomass Project and Thorpe Marsh Gas Pipeline committed developments and has determined, due to the relatively small traffic levels and the expected completion dates, that the local highway network can accommodate all traffic associated with The Project and the committed developments.
- 2.13. The Applicant has submitted a Construction Environmental Management Plan (CEMP) which sets out a framework and environmental safeguards for the construction of the proposed

development. Sections are included in the CEMP regarding communications during construction but the strategy is lacking detail. The CEMP states that the Applicant will have a Stakeholder Communications Plan and that information regarding the Project will be available via the CPL website.

- 2.14. The Applicant has submitted a Framework Construction Staff Travel Plan (FCSTP) which sets out measures that could be introduced to reduce the level of traffic associated with the construction of the Project. However, without an appointed contractor, no specific targets or confirmed measures have been established.

3. Abnormal Indivisible Loads Information

- 3.1. The immediate route for AILs from the M62 via the A645 has undergone vehicle swept path analysis. It is considered that the potential effects on the junctions can be minimised by temporarily removing street furniture or marshalling of traffic. With marshalling of the AILs by the Police and some road closures it is expected that the very largest of cargoes and vehicles would be able to use the oncoming traffic lanes to pass through the junctions unimpeded. AILs will be delivered outside of the peak network hours.
- 3.2. The bridge on the A645 over the River Aire will be upgraded by East Riding of Yorkshire Council prior to the construction of the Project enabling heavy AILs to be accommodated.
- 3.3. Analysis of AILs on the wider network has not been assessed and further information is to be provided by specialist haulage operators when more details of the size of equipment being transported is known. The anticipated route from Immingham Docks, with the exception of some taller items that may be unable to pass underneath some of the over bridges, will be along the A160, A180, M180, M18 and M62.

4. Operational Information

- 4.1. Operational traffic movements are expected to be relatively small in number, with an operational workforce of 60 staff over two or three shifts.
- 4.2. Fuel will arrive by rail directly into the Project site. Export of materials is also expected to be undertaken by rail, however, if HGVs were used it would result in 96 movements per day.

5. PFA Consulting Comments

- 5.1. Construction traffic associated with the Project has been assessed by the Applicant's consultant for a worst case scenario and would not have a significant impact on the transport operations of Royal Mail.
- 5.2. Whilst there will be an increase in traffic on the network and increased delays at junctions the capacity of the junctions is not compromised and will continue to operate without major issues.
- 5.3. No improvements works are required to accommodate the traffic generated by the construction of the Project.
- 5.4. The CEMP states that there will be a Stakeholders' Communications Plan but offers no detail of with whom or how communications will be undertaken.
- 5.5. Whilst there will be no significant capacity impact at junctions the level of traffic generated by the construction of the Project will increase delay. The FCSTP has made an initial start on mitigating the effect and more detail will be forthcoming when a contractor is appointed. The delivery of AILs will have a short-term effect on the local highway network due to slow moving vehicles and possible road closures.

- 5.6. The effect of the delivery of AILs, from Immingham Docks, on the wider network is unknown as analysis has not been undertaken.
- 5.7. Operational traffic movements will be relatively small with the majority of inbound and outbound materials expected to be undertaken by rail.

6. Conclusions and Recommendations

Conclusions

- 6.1. The construction of the Project will lead to increased delay at the junctions along the dedicated HGV route (A645 to M62 Junction 36). However, the junctions will continue to operate within their design capacity and delays will not be significant. With the implementation of the proposed Travel Plan there should be a further reduction in impact of the Project on the highway network.
- 6.2. It is therefore concluded that the construction of the Project will not significantly impact Royal Mail vehicles operating from the sorting offices in the vicinity of the site.
- 6.3. It is concluded that the operation of the proposed development will not detrimentally impact on Royal Mail vehicles operating from the sorting offices in the vicinity of the site.
- 6.4. A method of communication with stakeholders affected by the traffic associated with the construction period has been pledged but the detail of the procedure and who will be consulted has not been provided.
- 6.5. An assessment of the impact of AILs on the dedicated HGV route has been undertaken and indicates that subject to mitigation AILs can be accommodated. There will be some short term delay/ rerouting whilst AILs are delivered.
- 6.6. The impact of AILs, routing from Immingham Docks, on the wider network has not been undertaken and the effect of these vehicle movements is not known.

Recommendations

- 6.7. PFA Consulting make the following recommendations to Royal Mail:-
 - 1. **Further detail of the proposed public communications strategy is required and the strategy should include major road haulers, including Royal Mail, who will be directly affected by construction vehicle numbers and the delivery of Abnormal Indivisible Loads.**
 - 2. **Royal Mail should be consulted on the impact of the AILs on the route between Immingham Docks and Junction 36 of the M62.**



White Rose Carbon Capture and Storage Project DCO application

Representation by Royal Mail to DCO Examination

Royal Mail Group Ltd (Royal Mail) is responsible for providing efficient mail sorting and delivery nationally. As a Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes on a daily basis.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, potentially affecting Royal Mail's ability to meet its obligations as a Universal Service Provider and resulting in financial loss.

In exercising its statutory duties, Royal Mail uses on a daily basis all of the roads that are expected to be affected by the construction of this proposed new coal fired power station to be constructed next to the existing Drax Power Station, Selby, North Yorkshire.

Royal Mail is aware that construction traffic will be regulated by a Travel Plan and Construction Traffic Management Plan and mitigation measures are being proposed. However, it is understood that there will be increases in traffic on the local network during the construction period notably on:

- A645 New Road
- A645 (toward M62)
- A614 Rawcliffe Road
- M62 (J36)
- A1041

It is understood that these increases in traffic may result in delays at peak hours and possibly at other times of the day.

There are a number of Royal Mail operational facilities in the area that utilise the local Road network on a daily basis. The Royal Mail operational properties which would have the highest risk of experiencing disruption to mail distribution activities are as follows:

1. Selby Delivery Office, Micklegate, Selby YO8 4EH
2. Goole Delivery Office, Larsen Road, Goole DN14 6DA

In addition, Royal Mail operations that are reliant of the M62, (particularly vehicle movements in the Leeds to Kingston upon Hull corridor) and the M18 also have potential to be disrupted if the construction of this proposed power station were to cause traffic delays at junction 36 of the M62 motorway.

Royal Mail has no issue with the principle of the proposed White Rose Carbon Capture and Storage Project going ahead. However, it is concerned about the potential for disruption to its mail collection, transport and delivery during the construction phase.



Royal Mail therefore wishes to be an Interested Party to the White Rose Carbon Capture and Storage Project Examination because it is concerned that its future ability to provide an efficient mail sorting and delivery service to the public in the area in accordance with its statutory obligations may be adversely affected during the construction of this proposed power station. Royal Mail has not been able to satisfy its concerns based on the information that has been made available to date. Royal Mail would be pleased to consider any further construction traffic information or proposals by the applicant that may help to address its concerns about operational impact.

Royal Mail reserves the right to alter its position or make further representations in due course once further information is available and advice is provided by its consultants on whether the further information satisfactorily addresses Royal Mail's concerns.