

White Rose Carbon Capture and Storage (CCS) Project

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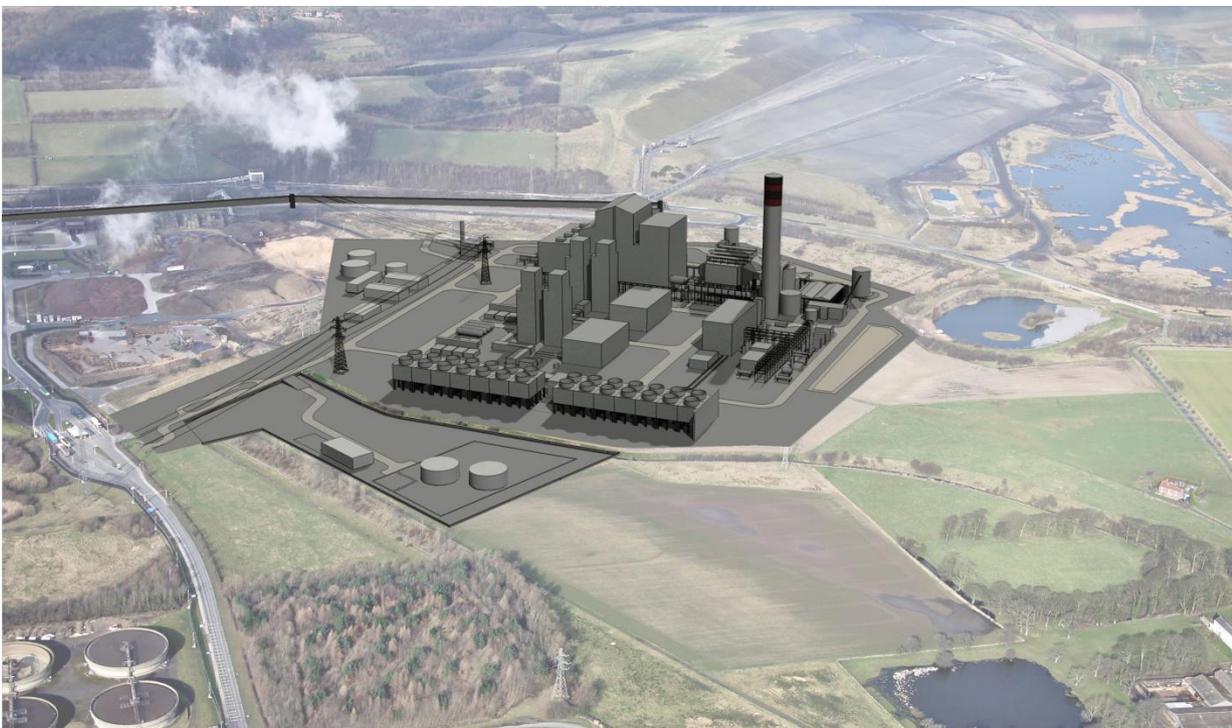
The White Rose CCS (Generating Station) Order

Land adjacent to and within the Drax Power Station, Drax,
near Selby, North Yorkshire

Applicant's Comments on Relevant Representations

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009



Applicant: Capture Power Limited
Date: May 2015

Document History

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Glossary	
AILs	abnormal indivisible loads
CAA	Civil Aviation Authority
CCS	carbon capture and storage
CEMP	Construction Environmental Management Plan
CO ₂	carbon dioxide
CPL	Capture Power Limited
CRT	Canal & River Trust
dB	decibel
DAS	Design and Access Statement
DCO	Development Consent Order
DGC	Defence Geographic Agency
DPL	Drax Power Limited
DWSZ	Drinking Water Safeguarded Zones
EA	Environment Agency
EIA	Environmental Impact Assessment
EP	Environmental Permit
EPR	Environmental Permitting Regulations 2010
ES	Environmental Statement
ExA	Examining Authority
FGD	Flue Gas Desulphurisation
FDO	Footpath Diversion Order
FRA	Flood Risk Assessment
FrAG	Freight Advisory Group
GWSZ	Ground Water Safeguard Zone
HGV	heavy goods vehicle
HoTs	Heads of Terms
HRA	Habitats Regulations Assessment
IDB	Internal Drainage Board
IED	Emissions Directive 2010/75/EU
LIR	Local Impact Report
m	metres
MMO	Marine Management Organisation
MoD	Ministry of Defence
MWe	Megawatts Electrical
NE	Natural England
NERC Act	Natural Environment and Rural Communities Act 2006
NFU	National Farmers' Union
NGCL	National Grid Carbon Limited
NGET	National Grid Electricity Transmission Plc

NPG	Northern Powergrid
NSIP	Nationally Significant Infrastructure Project
NYCC	North Yorkshire County Council
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SAC	Special Areas of Conservation
SDC	Selby District Council
SoCG	Statements of Common Ground
SoS	Secretary of State
SPA	Special Protection Areas
SSSI	Site of Special Scientific Interest
YWT	Yorkshire Wildlife Trust

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1.0 INTRODUCTION

- 1.1 This document has been prepared in respect of Capture Power Limited's (the 'Applicant') application (the 'Application') for a Development Consent Order (a 'DCO') that has been made to the Planning Inspectorate ('PINS') under Section 37 of The Planning Act 2008 (the '2008 Act').
- 1.2 The Applicant is seeking a DCO to authorise the construction, operation and maintenance of a new thermal generating station (an ultra-supercritical oxy-fuel coal-fired power plant of up to 448 megawatts 'MWe' gross with the ability to co-fire biomass) that will be fitted with carbon capture and storage ('CCS') technology and associated development (together the 'Project').
- 1.3 The Project is known as the White Rose CCS Project and would be located on land within and adjacent to the existing Drax Power Station site, Drax, near Selby, North Yorkshire, YO8 8PH, within the administrative areas of Selby District Council and North Yorkshire County Council.
- 1.4 The Application was submitted to PINS on 21 November 2014 (received 24 November 2014) and accepted for examination on 17 December 2014.
- 1.5 The document is being submitted for Deadline 1 of the Examination and sets out the Applicant's comments on the Relevant Representations submitted in respect of the DCO Application by Interested Parties (the deadline for the submission of Relevant Representations was 12 February 2015). It also includes the Applicant's comments on the representations made by the Royal Mail that were submitted after the deadline for Relevant Representations (these were submitted on 13 February 2015). The Applicant's comments are provided in Section 2.

2.0 APPLICANT'S COMMENTS ON RELEVANT REPRESENTATIONS

- 2.1 This section provides the Applicant's comments on the Relevant Representations. These are contained in Table 2.1. Table 2.1 includes the reference number for each Relevant Representation, the name of the body or person that submitted the representation, the representations themselves and the Applicant's comments.
- 2.2 The Applicant's comments cross-refer where relevant to the responses that the Applicant has prepared to the Examining Authority's ('ExA's') first set of written questions (Document Ref. No. 9.1) and other documents that have been prepared for Deadline 1, such as draft Statements of Common Ground ('SoCG').

Table 2.1: Applicant's Comments on Relevant Representations

Ref.	Interested Party	Relevant Representation	Applicant's Comments
1	Civil Aviation Authority ('CAA')	<p>Consistent with input provided throughout the planning process, on the basis that the tallest associated structure would be a 120 metres (m) high chimney stack, I offer the following comments:</p> <ul style="list-style-type: none"> • Aerodromes. In respect of any potential aerodrome related issue, I should highlight the need to check any safeguarding maps lodged with relevant planning authorities to identify any aerodrome specific safeguarding issues. Noting the presences of several relatively small aerodromes in the general location and that aerodrome safeguarding responsibility rests in all cases with the relevant aerodrome operator / licensee, not the CAA, it is important that the related viewpoints of relevant aerodrome license holders / operators is established and planning deliberations take appropriate consideration of any issues highlighted. <p>From the apparent lack of comment related to these issues, I take it an assessment has been undertaken and established that there is no aerodrome safeguarding issue</p> <ul style="list-style-type: none"> • Aviation Warning Lighting. Notwithstanding the close proximity of the existing power station's cooling towers, even if there proves to be no aerodrome-related requirement, given the maximum height of associated structures (120m), I believe that it would be sensible to install aviation warning lighting to the 120m high chimney stack. Note that, unless there was an aerodrome-related requirement, this lighting suggestion comes as a recommendation as opposed to a legal 	<p>Aviation was not identified by the Applicant during Environmental Impact Assessment ('EIA') scoping process as a topic that required consideration within the Environmental Statement ('ES') for the DCO Application. The Applicant understands that there are no issues relating to the safeguarding requirements for civilian airfields. Furthermore, the response received to the Applicant's Section 42 consultation from the Ministry of Defence ('MoD') dated 26 September 2014 confirmed that the Project site lies outside any MoD safeguarding areas and that as a result it had no safeguarding objections, while the response from NATS (30 September 2014) stated that it did not anticipate any impacts from the Project.</p> <p>Aviation warning lighting would be installed during the construction and operational phases of the Project. Requirement 27(1) 'Aviation warning lighting' of the draft DCO (Document Ref. 2.1) requires that the Applicant to submits details of the proposed aviation warning lighting to the relevant planning authority for approval. The requirement stipulates that before approving the details the planning authority must consult with the CAA. Paragraph (2) of the requirement states that <i>"All cranes used in the construction of the authorised development must comply with applicable Civil Aviation Authority guidance with respect to aviation warning light."</i></p> <p>There would not be hydrocarbon gas flaring or venting associated with the Project. There would be continuous venting of nitrogen (as is associated with many oxygen production facilities) and, with respect to carbon dioxide, a continuous emission of a small flue gas stream and occasional venting of larger volumes (similar to but much less than a conventional thermal power station). This would not present a danger to overflying aircraft.</p> <p>Requirement 28 of the draft DCO requires the Applicant to submit</p>

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		<p>requirement.</p> <p>I note that associated Requirement 27 appears to acknowledge the perceived lighting requirement in that there is reference to further consultation with the CAA and references to CAA guidance material related to crane operations.</p> <ul style="list-style-type: none"> • Gas Venting and/or Flaring. It is assumed that the White Rose Project is not intended to vent or flare gas either routinely or as an emergency procedure such as to cause a danger to overlying aircraft. If that is not the case parties are invited to use myself as an appropriate point of contact for any further related discussion. From the apparent lack of comment related to these issues, I take it an assessment has been undertaken and established that there is no aerodrome safeguarding issue and that gas venting/flaring will not take place such as to cause a danger to overlying aircraft. • Aviation Promulgation. There is a civil aviation requirement in the UK for all structures over 300 feet (91.4 meters) high to be formally notified and charted on aviation maps. It follows that, at a 120m high, there is related need for the chimney to be notified and charts for civil aviation purposes. When construction timeframes are known, appropriate details need to be passed by the developer to the Defence Geographic Agency (DGC) (dvof@mod.uk). <p>I note that associated Requirement 28 acknowledges the requirement for related details to be passed to the DGC</p> <ul style="list-style-type: none"> • Other Aviation Stakeholders. For completeness, the 	<p>details of the information required by the Defence Geographic Agency of the Ministry of Defence (MoD) to chart the Project site for aviation purposes prior to the construction of any buildings or structures at the site.</p> <p>The Applicant consulted the Yorkshire Air Ambulance service as part of its Section 42 consultation and also notified the body of the Application's acceptance pursuant to S.56? No response was received in respect of either consultation/notification.</p>

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		<p>Ministry of Defence position in regards to the proposed development and military aviation activity should be established. I should also add that that due to the unique nature of associated operations in respect of operating altitudes and potentially unusual landing sites, it would also be sensible to establish the related viewpoint of local emergency services air support units.</p> <p>I note that the MoD appears to have been involved in related consultation. However, it is not immediately evident that the related viewpoint of the emergency services air support units have been established. It appears to be an outstanding requirement.</p> <p>Whilst none of the above negates any need to consult in line with Government requirements associated with the safeguarding of aerodromes and other technical sites (Government Circular 1/2003 refers), I hope this information matches your requirements. Please do not hesitate to get in touch if the Planning Inspectorate requires any further comment or needs clarification of any point.</p>	
3	Marine Management Organisation ('MMO')	<p>The Marine Management Organisation (MMO) is an interested party for the examination of Development Consent Order (DCO) applications for Nationally Significant Infrastructure Projects (NSIPs) in the marine area.</p> <p>The MMO is satisfied following discussions with Capture Power Limited on 8th August 2014 that their intentions to use an existing jetty situated on the River Ouse to transport materials to the project site does not require a marine license, as no improvements are to be made</p>	<p>As referred to by the MMO in its Relevant Representation, the DCO Application includes the option of utilising the existing jetty on the River Ouse during the construction phase of the Project. The jetty would be used for the delivery of some abnormal indivisible loads ('AILs') by barge. A mobile (wheeled or tracked) crane would be placed at the end of the jetty and used to lift AILs from the moored barges delivering them. From the jetty, AILs would be transported by road vehicle to the Project site the short distance along Redhouse Lane and Carr Lane.</p> <p>The DCO Application does not include any works to the jetty itself, although it proposes the creation of new hardstanding area adjacent to</p>

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		<p>within the UK marine licensing area. However, the MMO remains an interested party for the examination of the Development Consent Order (DCO) application and wishes to be made aware of any potential change to the discussed activities.</p> <p>Please note these are our initial comments, and that the MMO reserves the right to make further comments on this application throughout the examination process and modify its present advice in view of any additional information that may come to our attention.</p>	<p>the jetty to provide a laydown area for AILs and space for the parking and circulation of vehicles. The creation of this laydown area would involve some vegetation clearance and topsoil stripping and the import of road base material to provide a suitable surface. No works would take place within the Marine Licensing Area.</p>
4	National Farmers' Union ('NFU') North East	<p>I write in the capacity of local representative of the National Farmers' Union (NFU) with particular interest in planning and economic development in rural areas. The NFU North East region represents 6,000 farmer and grower members, including those within the scope of your Project. The NFU is interested in avoiding any adverse effect that this Project may have on farmland and our member's farm businesses.</p> <p>The NFU have liaised with the applicant during the PEIR stage (Table 12.2: Section 42 Consultation Responses Pages 125-126 - http://infrastructure.planningportal.gov.uk/wp-content/uploads/projects/EN010048/2.%20Post-Submission/Application%20Documents/Reports/5.1%20Consultation%20Report.pdf). While we are pleased to see the applicant has addressed some of our initial points, we still wish to make the below representation:</p> <ul style="list-style-type: none"> • Impact of emissions on Drinking Water Safeguarded Zone – We appreciate the ongoing dialogue the applicant is having with the Environment Agency (page 	<p>In response to the NFU's Relevant Representation, the Applicant has undertaken an investigation of the potential for significant effects on Drinking Water Safeguarded Zones ('DWSZ') as a result of emissions from the operation of the Project.</p> <p>The modelling results for the Project indicate that nitrogen deposition would increase most to the east of the Project site. When considering the design life of the Project (circa 30 years), even in the worst-case scenario model (where the carbon capture system or Air Separation Unit are not available and the plant is functioning in 'air mode'), the nitrogen deposition in this area would only result in 10.8 kg of nitrogen per hectare. As a comparison, this quantum of deposition equates to only two conventional sacks of grassland NPK fertiliser (each sack contains approximately 5 kg of nitrogen) spread over a hectare, over the course of 30 years.</p> <p>In terms of the DWSZ themselves, the following conclusions can be drawn:</p> <p><i>Surface Water Safeguarded Zone</i> The Surface Water Safeguarded Zone to the north and north-east of the Project site is designated by the Environment Agency to reduce</p>

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		<p>126), in relation any impact this Project may have upon the Drinking Water Safeguard Zone in East Yorkshire. This area is currently designated for Nitrates, with power stations identified as one source. While the Project may intend to capture up to 90% of emissions, the impact of the remaining percentage and total emissions when the capture system is not in operation needs clarification.</p> <ul style="list-style-type: none"> • Temporary use of agricultural land – The NFU request details on how the applicant will address works affected by the Basic Payment Scheme (replacing the Single Farm Payment). We have concern that unless appropriate measures are put in place, landowners may lose entitlements (and payment) if they are unable to claim against them in 2015. We are looking for the assurance that the Grantee shall compensate the Grantor or the Occupier (as appropriate) for any loss of Payment under the Basic Payment Scheme and/or payment under any other statutory land management support scheme (including losses arising from a breach of cross compliance or other land management obligations) unavoidably incurred by the Grantor or the Occupier (as appropriate) where: <ul style="list-style-type: none"> (a) The Grantor's Land includes land which is eligible for compensation under the Basic Payment Scheme or land management support scheme; (b) Such land is taken out of production after Completion; and (c) Such land does not qualify for Basic Payment and/or payment under any other land management support scheme as a direct result of the carrying out of Construction by the Grantee. <p>The Grantee shall use its reasonable endeavours to provide to the Grantor or the Occupier (as appropriate)</p>	<p>pesticide use (metaldehyde). Nitrogen deposition resulting from the Project would not therefore affect the status of this zone nor be of any relevance to it.</p> <p><i>Ground Water Safeguarded Zones</i> In geological terms, the Ground Water Safeguard Zone (GWSZ) to the south of the Project site lies beneath a substantial thickness of clay (around 8-10 metres). As such, there is no pathway for nitrogen deposition on the surface to connect with the relevant groundwater body (notwithstanding the fact that nitrogen deposition would in any event be insignificant). The GWSZ further to the south-west has a more limited thickness of clay (around 1-3 metres) or non-existent clay layer, overlying the sandstone unit. However, this area would experience the lowest level of nitrogen deposition.</p> <p>The additional investigations undertaken have therefore concluded that there is negligible risk of the Project resulting in significant effects on DWSZ.</p> <p>Additional information on DWSZ is provided in the response to ExA Q.7.11 (Document Ref. 9.1).</p> <p>The NFU's comments in relation to land management schemes are noted. There is one tenant of agricultural land (the land is owned by Drax Power Limited) who is affected by the Project. Heads of Terms ('HoTs') have been agreed with the tenant in relation to the surrender of the land required permanently for the Project and the surrender and re-grant of the land required temporarily. The HoTs include an Agreement Notice to Quit, an Agreement for the Grant of New Tenancies and Option to Lease, a Long Farm Business Tenancy and a Periodic Farm Business Tenancy. Compensation provisions are included in the various agreements, each of which is at an advanced stage of negotiation and these will be entered into with the tenant very shortly.</p>

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		such reasonable information in the Grantee's possession (provided such information is not confidential) to assist the Grantor or the Occupier (as the case may be) in obtaining SP and/or other like payments under a LMSS.	
5	Kirkwood Stewart Young	I would like to submit that the proposed plans shall cause massive unwanted and unwarranted changes to what is in essence a rural landscape. It shall remove almost 1/5 of the current rural environment of the hamlet of Long Drax. It shall make that area a virtual "no go" area for the planned 5 years of construction. It shall remove current designated footpaths and pathways. The pipe line shall cut through half of the hamlet of Long Drax. It will have a massive visual impact on our property which is one of the closest to the planned construction. We have had FGD constructed, then we have had the Biomass and plasterboard factory buildings. I understand the theory yet we have a huge coal fired power station with the current plans, in essence, to build another coal fired coal station next to the existing one. I suggest that this plans be rejected and that further studies be set in place to view the possibility of modifying the current station to " clean burn " local coal and introduce carbon capture to that station rather than subject us all to this unwanted and unfair further industrialization of our small rural environment.	<p>The Applicant notes that there appears to be some confusion between the White Rose CCS Project and the National Grid Carbon Limited ('NGCL') CO₂ pipeline. They are separate Projects and the White Rose Project would not have a direct impact upon Long Drax, being confined to land to the north of the existing Drax Power Station site, some of which lies within the operational boundary of the Power Station. In addition, much of the Project site is subject to the extant Section 36 consent for the Ouse Renewable Energy Project.</p> <p>The Applicant has applied for a Footpath Diversion Order ('FDO') in respect of the footpaths that would be affected by the Project. The FDO was confirmed by NYCC on 13 February 2015. The FDO provides that the existing footpaths are stopped up on provision of the relevant new footpath(s) and certification by NYCC as to their provision. The draft DCO includes a power to temporarily stop up footpaths during construction or maintenance in addition to a requirement (requirement 7), which requires a rights of way management plan to be submitted and approved by the relevant planning authority and then to be implemented. As such appropriate provision would be made for replacement footpaths.</p> <p>Section 3 of the Design and Access Statement (Document Ref. 5.5) describes the Project site's context and provide an appraisal of its characteristics. In terms of landscape character and topography, the site and the surrounding are generally flat and low-lying, comprising of agricultural land with some tree and hedgerow planting to field boundaries and small blocks of woodland. The landscape is already dominated by the large mass of the buildings and structures associated</p>

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			<p>with the Drax Power Station site as well as other man-made influences. Therefore this landscape has been assessed as having a low sensitivity to change.</p> <p>The flat and low-lying nature of the land, combined with the need to raise the level of the Project site (to mitigate flood risk) and the scale of the buildings and structures (largely dictated by engineering and technical considerations) means that there is limited scope to minimize the Project's landscape and visual effects. However, Section 6 of the DAS explains how the approach taken to design and layout has been to locate (primarily on the site of the consented Ouse Renewable Energy Project) the generating station as close as possible to the existing Drax Power Station so as to consolidate its built form with that existing thereby seeking to limit its landscape and visual effects. Furthermore, the Applicant has selected hybrid cooling towers, which are lower than conventional cooling towers and reduced the size of the air separation unit. The landscaping proposals shown upon the Indicative Landscaping and Biodiversity Framework Plan (Document Ref. 4.10) also reflects the field boundary planting within the locality and link with existing planting adjoining the Project site. It is therefore considered that the Applicant has sought to appropriately minimise the impacts of the Project.</p> <p>The Project forms part of the Government's CCS Commercialisation Programme, which is intended to demonstrate the deployment of CCS technology on a commercial scale. National energy policy in the form of EN-1 states that the commercial scale CCS demonstration projects are a priority for UK energy policy and that the need for these projects to come forward is urgent. The need for new clean-coal generating capacity is also reinforced by EN-2. To remove electricity generating capacity from the system through the suggested conversion of the existing Drax Power Station would be contrary to national policy, which seeks to maintain security of supply. Notwithstanding this, the NGCL CO₂ pipeline, to which the Project would connect, has been 'over-sized' and therefore it would be able to receive carbon dioxide from</p>

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			<p>other major emitters in the future.</p> <p>There are four main reasons why modifying the existing Drax Power Station was not considered appropriate for the Project; the age of the Drax coal-fired power plant; the lower efficiency of the existing plant compared to a modern coal-fired plant; the large size of the additional units required; and space restrictions within the existing Power Station layout.</p> <p>Please see the response to ExA Q17.4 in Document 9.1 for further detail.</p>
6	Northern Powergrid (Yorkshire) PLC ('NPG')	<p>Northern Powergrid (Yorkshire) PLC (NPG) wish to make objections and representations on the powers contained within the draft Development Control Order and within the schedule 12 which contains protective provisions for utility undertakers.</p> <p>The power to compulsorily acquire land and buildings is seen as having significant adverse effects upon NPG's assets and apparatus which will have serious knock on effects upon its system of electricity distribution.</p> <p>The powers of the promoter to temporarily and permanently alter streets in which NPG has apparatus or gains access to its plant and other buildings and/or interests in land will also have significant effects upon NPG's ability to efficiently and economically run its electricity distribution network.</p> <p>At the present time no negotiations or discussions have been entered into with the promoter and therefore in order to preserve its position NPG feels that it has no alternative but to make these initial objections and</p>	<p>Detailed discussions have been held with NPG concerning the diversion of a section of its 11kV overhead electric line, which crosses part of the temporary construction laydown area required for the Project. Discussions are underway concerning NPG's wider protective provisions.</p> <p>Please see the response to ExA Q1.1 in Document 9.1.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		representations.	
7	National Grid Electricity Transmission Plc ('NGET')	<p>Representation by National Grid Electricity Transmission Plc (NGET) to the White Rose Carbon Capture and Storage Project</p> <p>National Grid Electricity Transmission Plc wishes to make a relevant representation to the White Rose Carbon Capture and Storage Project DCO in order to protect its position in light of its infrastructure which is located within and in close proximity to the proposed DCO boundary. National Grid's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted.</p> <p>The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on NGET's existing apparatus located within this area, and NGET will require protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. NGET will liaise with the promoter to agree a form of protective provisions for inclusion within the DCO.</p> <p>NGET has the following assets located within the proposed order limits and these assets form an essential part of the electricity transmission network in England and Wales:</p> <p>- Drax Substation – Freehold Ownership</p>	<p>The Applicant is currently in negotiations with NGET in respect of NGET's protective provisions. This is with a view to securing the removal of NGET's objection to the provisions currently contained at Schedule 12 of the draft DCO. The Applicant is also liaising with NGET in order to secure the necessary agreements required in order to enable the Applicant to withdraw the request for compulsory acquisition rights in relation to NGET's land within the Order Limits.</p> <p>Please see the response to ExA Q1.8 in Document 9.1.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> - 2 x 66kV Underground Electricity Cables - 4 x 400kV Underground Electricity Cables - 4VJ 400kV Drax to Eggborough Overhead Line - 4VC 400kV Drax to Thornton Overhead Line - 4VH 400kV Drax to Thorpe Marsh Overhead Line <p>As a responsible statutory undertaker, National Grid's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.</p> <p>National Grid reserves the right to make further representations as part of the examination process but in the meantime will continue negotiations with the promoter with a view to reaching a satisfactory agreement.</p>	
8	Andrew Wilson	<ol style="list-style-type: none"> 1. What consideration has been given to the value of property being effected in the vicinity of the work and intended finished site? 2. We already suffer from large cloud build up on sunny days due to the power stations current output, can you confirm there will be no emissions what so ever including steam, which creates large cloud mass. 3. What will be the working hours of the site work, will this include weekends, what noise levels are expected (in dB) and what guarantees can you give against disruption we can complain against? 4. Where is the access point to the working area expected to be? 5. Can you give details as to the size of the building (specifically heights) and shading it may cast especially during winter months. 	<p>Property values are not a relevant planning consideration. Notwithstanding this, it is important to recognise that the existing Drax Power Station has been in-situ for several decades and other industrial development has been consented adjacent to it since it became operational. As such, there is a long history of power generation and industrial activity in this location. In addition, the principle of power generation use on much of the Project site has already been established by the Section 36 consent granted for the Ouse Renewable Energy Project, while local development plan policy recognises the importance of the location for power generation and is supportive of power generation and related development. As such, the suitability of the location for power generation use and related industrial has therefore been examined and confirmed through the development plan process and has been reflected in the existing situation on the ground. Accordingly, the additional development represented by the Project would be unlikely to have any effect.</p>

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			<p>Please also see the response to ExA Q.11.4 in Document Ref. 9.1.</p> <p>Emissions from the proposed coal-fired plant would be regulated as under an Environmental Permit ('EP') granted by the Environment Agency ('EA'). An application to vary the current Drax EP has been submitted to the EA. During operation in air-mode (non-carbon dioxide capture mode) the plant would comply with the limits prescribed within the Industrial Emissions Directive. Discussions are underway with the EA regarding how the plant would be regulated in oxy-mode (capture mode). The impacts of the emissions to air have been modelled and assessed as part of the Environmental Statement (Document Ref. 6.3.1, ES Volume 2 Chapter A Emissions to Atmosphere Technical Report). Document Ref. 6.4.5, ES Volume 3 Section L - Habitats Regulations Assessment Report provides an assessment of the impact of specific emissions on European sites. It has been agreed by Natural England that the Project would not have an adverse impact on the integrity of European sites.</p> <p>With regard to visible plumes generated by the coal-fired power plant, the Project would employ hybrid cooling towers which are specifically designed to significantly reduce the occurrence of visible plumes. The cooling system is designed for 'no visible plume' down to ambient conditions of 5°C and 95 % relative humidity. Analysis of historical meteorological data shows that, on average, a visible plume would only have occurred for 132 daylight hours per year or 2.58% of the daylight hours in a year.</p> <p>Please also see the response to ExA Q.3.6 in Document Ref. 9.1.</p> <p>The draft DCO includes a requirement (requirement 20) that will limit the hours during which construction work can take place, except where the activity would not exceed a specified noise limit at the boundary of the Project site, or where the prior approval of the relevant planning authority has been obtained, or where it is associated with an emergency. In addition, requirement 18 of the draft DCO will require</p>

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			<p>the Applicant to secure the approval of a Construction Environmental Management Plan ('CEMP'), including measures to control and mitigate the construction effects of the Project. The approved CEMP must also include <i>"a scheme for the notification of any significant construction impacts on local residents and for handling any complaints received from local residents relating to such impacts during the construction of the authorised development."</i></p> <p>ES Volume 1, Chapter 5 Project Description, Section 5.2.3 (Document 6.2) provides details of the highway works associated with the Project. Three new junctions would be constructed to provide access to the temporary construction laydown area. Two on New Road and on Pear Tree Avenue. One of those on New Road would consist of a four-arm crossroad junction to facilitate access to the construction laydown areas either side of the road. In order to accommodate this junction, a stretch of carriageway along New Road around 150 metres in length would be realigned and widened to provide two full lanes. The four-arm junction formed would be controlled by traffic signals during construction. The junction would be retained during the operational phase of the Project, although prior to operation the eastern arm would be removed, leaving it as a simple T-junction. The junction on Pear Tree Avenue would solely be used for emergency ingress/egress. Requirement 10 'Highway accesses' of the draft DCO would restrict this junction to emergency use only.</p> <p>The dimensions of the main buildings and structures comprised within the Project are set out in Table 5.1 of the Design and Access Statement (Document Ref. 5.5), which forms part of the DCO Application. In terms of scale, massing and height, the proposed buildings and structures would be significantly smaller than the existing buildings and structures, notably the cooling towers that make up the existing Drax Power Station. In terms of its siting and layout, the Project has been located as close to the existing built form of Drax Power Station as possible in order to assist in minimising its visual effects. Given the size of the existing Power Station, and the degree of</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
			<p>separation from the nearest residential properties, it is not considered that the Project would have any material impact in terms of shading.</p>
9	The Coal Action Network	<p>The White Rose Project should not be allowed to go ahead because it will lock this country into producing coal from opencast mining which is already causing great problems from people living in or near the nation's coal fields.</p> <p>We need to move away from conventional fossil fuels such as coal. The impact is greater than just the CO2 emissions which are released at the point of combustion. There is strong opposition to coal mining in this country and abroad. The coal for this plant would cause local and international environmental issues at the time of mining and in many countries human rights violations as well.</p> <p>We do not need to store carbon dioxide under the sea. This is simply dumping a waste product in a manner which has the potential for disastrous consequences for the marine environment as well as for global warming.</p> <p>The Coal Action Network works with communities fighting coal mining close to their homes and opposes this project.</p>	<p>The 'need' that exists for the Project in policy terms is outlined at Section 4 of the Planning Statement (Document Ref. 5.4) that forms part of the DCO Application.</p> <p>Part 3 of EN-1 'The need for new nationally significant energy infrastructure projects' defines and sets out the 'need' that exists for nationally significant energy infrastructure. Paragraph 3.1.1 states that the UK needs all the types of energy infrastructure covered by EN-1 (this covers a range of electricity generating capacity, including new fossil fuel generating stations with carbon capture and storage technology) in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions. Paragraph 3.1.2 of EN-1 goes on to state that it is for industry to propose new energy infrastructure and that the Government does not consider it appropriate for planning policy to set targets for or limits on different technologies.</p> <p>Notably, paragraph 3.1.3 stresses that the Secretary of State ('SoS') should assess applications for development consent for the types of infrastructure covered by the energy NPSs "...on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need..." is as described for each of them. Paragraph 3.1.4 continues that the SoS should give substantial weight to the contribution that all projects would make toward satisfying this need when considering applications under the 2008 Act.</p> <p>The Project is also part of the Government's CCS Commercialisation Programme, which is intended to demonstrate the deployment of CCS technology on a commercial scale. EN-1 states that the commercial scale CCS demonstration projects are a priority for UK energy policy and that the need for these projects to come forward is urgent. The</p>

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			<p>need for new clean-coal generating capacity is also reinforced by EN-2.</p> <p>The need that exists for new energy infrastructure, such as that proposed, is not therefore open to debate or interpretation and is clearly confirmed by EN-1.</p> <p>Additional information on the need that exists for the Project is provided in the response to ExA Q.1.2 (Document Ref. 9.1).</p> <p>In terms of sourcing coal for the Project, it is relevant to note that Drax Power Limited ('DPL') currently sources coal from a range of suppliers, including indigenous supplies. Information regarding coal supplied to Drax is publically available in the company's Annual Report. DPL is focused on responsible procurement, its continued membership of Bettercoal, an organisation that promotes continuous improvement in corporate responsibility in the supply chain, supports that focus.</p> <p>With regard to the storage of the carbon dioxide that would be captured, it is important to note that there is already considerable international experience of injecting carbon dioxide deep underground for storage at a number of industrial-scale CCS projects. Further information is available on the Carbon Capture & Storage Association website: http://www.ccsassociation.org/faqs/ccs-storage/ Storage sites are subject to a stringent regulatory regime, including the need to obtain a carbon capture and storage licence under section 17 of the Energy Act 2008.</p>
10	North Yorkshire County Council ('NYCC')	<p>The proposed development would be located within the boundary of North Yorkshire County Council and accordingly the County Council will be a statutory consultee in the decision process.</p> <p>Following assessment of the application the Council will,</p>	<p>The Applicant met with NYCC and Selby District Council (Selby DC) on 8 May 2015 to discuss a draft of the authorities' joint Local Impact Report, in addition to a draft SoCG.</p> <p>A draft SoCG (Document Ref. 8.1) with NYCC and Selby DC has been submitted at Deadline 1. The Applicant is currently in dialogue with</p>

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		<p>in due course, submit a Local Impact Report (LIR) to the Planning Inspectorate, either jointly with Selby District Council or separately, which will comment upon issues relevant to the County Council including: ecology, water resources, the landscape and visual impact, waste management, traffic and transport, cultural heritage and public rights of way. This is an indicative and not exhaustive list.</p>	<p>both authorities with a view to agreeing a final SoCG.</p>
11	Yorkshire Wildlife Trust ('YWT')	<p>The Yorkshire Wildlife Trust would like to be certain that the WRCCS application does not lead to a loss of biodiversity and for such a large application a significant enhancement should be sought as suggested in our previous letter. Specific points include:</p> <ul style="list-style-type: none"> • Lack of data. The results of desk top research including data searches from North and East Yorkshire Ecological Data Centre do not appear to be included in the Ecology Chapter or annexes. The Trust is aware that there will be a considerable amount of data available from previous surveys for other applications on the Drax site over the last few years. The lack of data makes it difficult to assess the value of the area for wildlife. • Lack of survey information. The original surveys for protected species by Whitcher Wildlife Ltd do not appear to be provided within the annexes of the Ecology Chapter. In our pre application comments it was suggested that to fully consider the protected species information the original data should be provided. • Water bodies and wetland habitat. There are a large number of very valuable water bodies and ditches within the site. Previous surveys have shown the presence of water voles and other wildlife using the water bodies. The present surveys also show the use of the water 	<p>The Applicant has entered into dialogue with the YWT concerning its Relevant Representation and has prepared a draft SoCG (Document Ref. 8.5) that has been submitted at Deadline 1.</p> <p>The Applicant's understands that based on the discussions that have taken place to date the following is agreed with the YWT:</p> <ul style="list-style-type: none"> • That the survey data contained within the ES represents a robust baseline for the assessment of effects upon ecology. • The existing waterbodies within the Project site make some contribution to biodiversity. • With appropriate design the flood attenuation pond that would be constructed as part of the Project would make a contribution to mitigating biodiversity impacts resulting from the loss of wetland habitat. • The reptile surveys carried out for the Project do not indicate anything other than a small population of grass snake at the Project site and consequently the proposed mitigation for grass snake is adequate. • The application of biodiversity off-setting calculations would not be appropriate. • The Project would provide for on-site habitat mitigation, including some mitigation of the reduction in wetland habitat through the provision of the flood attenuation pond, but this would not fully off-set the loss of habitat at the Project site.

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		<p>bodies and wet grassland areas by a variety of wildlife including grass snake. Mitigation for the development should ensure that high quality connected waterbodies remain within the Drax boundary and connect to wider areas of habitat. It may be necessary also to develop such habitat outside of the development footprint.</p> <ul style="list-style-type: none"> • Reptiles. The recent surveys showed the presence of grass snake on the site, previous surveys have shown good populations of grass snake. Is there sufficient mitigation for grass snake and other species in the application? • Mitigation for the development. Plan 4.10 Indicative Landscaping and Biodiversity Framework Plan shows an area which appears to be mitigation for loss of badger foraging habitat, and some planting around the outside of the site. A flood attenuation pond is also included on the plan and the Trust is pleased to see that it will be landscaped in a way to support biodiversity. However landscaping a flood attenuation pond cannot be seen as mitigation for loss of habitat as it is also provided as part of a surface water management system. • An Ecological Habitat Management plan will need to be in place and fully funded before permission is given for the application. • The Trust considers that for such a large application, that best practise would be to carry out a biodiversity offsetting assessment. A biodiversity offsetting exercise will show whether or not sufficient new habitat is being provided to offset the habitat losses from the development 	<ul style="list-style-type: none"> • Requirement 16 'Biodiversity management plan' would provide an appropriate mechanism to secure the on-site biodiversity mitigation identified within the ES in addition to the on-going management of such habitat. . • The principle of providing further habitat mitigation off-site and that the priority for such mitigation should be the improvement and or provision of wetland habitat. <p>The Applicant and YWT (along with the EA) have agreed to work together to identify options for further mitigation with the objective of reaching agreement on a preferred option and an appropriate mechanism to secure this before the close of the DCO Examination.</p> <p>The Applicant is currently in dialogue with the YWT with a view to agreeing the SoCG.</p>
12	National Grid Carbon Limited	National Grid Carbon Limited ("National Grid") wish to register as an Interested Party in respect of the application by Capture Power Limited ("CPL") for the	A Memorandum of Understanding has been entered into by the Applicant, NGCL and Drax Power Limited, which sets out the position in relation to Applicant's and NGCL's respective projects and

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	('NGCL')	<p>White Rose CCS Development Consent Order.</p> <p>In 2014, National Grid made an application for a Development Consent Order to PINS for the Yorkshire and Humber CCS Cross Country Pipeline (PINS REF EN070001) that will provide carbon dioxide transportation services to the White Rose CCS Project. National Grid's project is currently in examination and includes an application for land rights on land that is also the subject of the White Rose CCS Development Consent Order Application.</p> <p>Land rights discussions with CPL are positive and ongoing but until a time that matters are successfully resolved National Grid wishes to be registered as an interested party in the examination of this application.</p>	<p>negotiations between the parties.</p> <p>Additional information on the position between these parties is provided in the response to ExA Q.1.1 (Document Ref. 9.1).</p>
13	Selby District Council ('Selby DC')	<p>The White Rose Project would be located within the administrative boundary of Selby District Council (SDC) and accordingly the Council under the Planning Act 2008 are a relevant authority in the Development Consent Process.</p> <p>Following assessment of the Development Consent Order the Council will, in due course following the preliminary meeting, submit a Local Impact Report (LIR) to PINS which will comment upon issues including: Ecology and Nature Conservation, Archaeology and Cultural Heritage, Landscape and Visual, Drainage (Water Resources and Flood Risk), Emergency Planning, Highways, Air Quality, Noise and Socio-economic impacts. This is an indicative and not exhaustive list.</p>	<p>As confirmed above in respect of Relevant Representation Ref. 10, the Applicant met with NYCC and Selby DC on 8 May 2015 to discuss the authorities' draft LIR and a draft SoCG.</p> <p>A draft SoCG (Document Ref. 8.1) has been submitted at Deadline 1. The Applicant remains in dialogue with both authorities with a view to agreeing a final SoCG.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>The Council will also be in discussions with Developer/Promoter with a view to agreeing a Statement of Common Ground which will set out areas of agreement and disagreement with the information and/or assumptions contained in the Development Consent Order as appropriate.</p> <p>The Council will also advise PINS of any representations received.</p>	
14	Canal & River Trust ('CRT')	<p>The Canal & River Trust set up the Freight Advisory Group (FrAG) in 2012 to develop and recommend for the Trust's consideration a draft policy on waterborne freight and the commercial waterways. FrAG produced a report 'A Proposed Policy for Waterborne Freight' (Feb 2014) and proposed 'a priority freight route approach' to identify canals and sections of the canal in Yorkshire that are linked to the Humber. As such, the River Ouse is classified as a priority freight waterway in order to promote the transportation of waterborne freight.</p> <p>In light of this and in our response to the Promoter relating to the notification in accordance with pre-application publicity under Section 48 of the Planning Act 2008, we welcomed that the Promoter noted in the Preliminary Environmental Information Report (PEIR) the option to deliver abnormal indivisible loads (AIL) along the River Ouse.</p> <p>We are currently engaged in constructive discussions with the Promoter in relation to utilising the River Ouse for the delivery of AIL.</p> <p>However, we also recommended that in addition to the</p>	<p>National policy (in the form of EN-1, Part 5, Section 5.13, paragraph 5.13.10) promotes the use of water-borne and rail transport. However, it does not favour one mode over the other, or indeed place a requirement upon applicants to utilise both modes for their projects. Furthermore, policy recognises that whether or not such modes are feasible will be dependent upon a number of factors, including the ability to access a navigable waterway and the rail network, the cost and feasibility of providing the necessary infrastructure and the overall economic viability of the project.</p> <p>With regard to water-borne transport, the existing Drax Power Station site (the 'Power Station site') has ownership and use of a jetty on the River Ouse. The jetty is located approximately 1.5 km to the east of the Power Station site and is linked to it by the public highway (Redhouse Lane and Carr Lane). The jetty was constructed by the Central Electricity Generating Board to facilitate the construction of Drax Power Station.</p> <p>The Project site encompasses the jetty and adjacent land. The DCO Application includes the option of utilising the jetty during the construction phase of the Project for the delivery of some abnormal indivisible loads ('AILs') by barge. A mobile (wheeled or tracked) crane would be placed at the end of the jetty and used to lift AILs from the moored barges delivering them. From the jetty, AILs would be</p>

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		<p>transportation of AIL's, the Promoter fully considers, within the Environmental Statement, the use of the river for the transportation of construction material and fuel stock which could utilise an existing purpose built jetty at the Power Station, which is acknowledged by the Promoter as it is included within the red line boundary.</p> <p>We note that the Promoter (page 4, Vol 2, chap. E of ES) has included the existing jetty on the River Ouse within the Development Consent Order (DCO) site boundary and comments that they are considering its use for the import of AILs. However, the Promoter states that as the contractors are yet to be appointed, it is not possible to confirm exactly what loads might be delivered via this facility but when a contractor is appointed further investigation will be undertaken to assess the viability of using this facility.</p> <p>Furthermore, we also note that the Promoter has not made reference to assessing the possibility of transporting fuel stock to the site by the river navigation.</p> <p>As such, we consider that it would be appropriate for the inclusion of a Requirement within the Draft DCO of a 'Sustainable Transport Management Plan' which specifies that the Promoter sets out the measures to be taken during the operation of the authorised development to promote the sustainable transport of construction materials, fuel and combustion by-products by means other than road and rail, including barge.</p> <p>The Requirement would help promote the use of the jetty and the waterway for the transportation of construction materials during the construction stage and the transportation of fuel stock and waste during the</p>	<p>transported to the Power Station site (and in turn the Project site) via Redhouse Lane and Carr Lane.</p> <p>The DCO Application does not include any works to the jetty itself, although it proposes the creation of new hardstanding area adjacent to the jetty to provide a laydown area for AILs and space for the parking and circulation of vehicles. The creation of this laydown area would involve some vegetation clearance and topsoil stripping and the import of road base material to provide a suitable surface.</p> <p>The Applicant has identified that the load capacity of the jetty (factoring in the weight of the mobile crane that would be employed) would allow AILs of up to 200 tonnes to be lifted from a moored barge. Table 2.4 of the Transport Assessment contained within Volume 2, Chapter E of the Environmental Statement (Document Ref. 6.3.7) provides details of the approximate dimensions and weights of the AILs that would be delivered during construction. The table therefore confirms that it would be feasible to deliver a substantial number of AILs via the jetty (using a mobile crane) without any modifications to the structure.</p> <p>It is anticipated that use of the jetty would commence approximately 18 months into the construction phase of the Project and that the duration of use would be 24 months. There would be approximately 50 loads delivered over this period, with a peak of two loads a week, estimated to be around months 12 and 13.</p> <p>Since the submission of the DCO Application and receipt of the CRT's Relevant Representation, further discussions have taken place with potential contractors to consider the scope for use of the jetty to deliver single loads of up to 500 tonnes. In order to facilitate the delivery of such loads via the jetty the Applicant would need to employ a much larger crane. Due to the weight of these loads the crane would need to be positioned on the bank area behind the jetty. This area would need to be infilled to create a suitable load bearing platform for the crane. This would then allow the contractor to pre-modularise loads of up to</p>

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		<p>operation stage; thereby, helping to reduce CO2 emissions and congestion on the local highway network, according with the aims of paragraph 30 of the National Planning Policy Framework.</p>	<p>500 tonnes and for these to be lifted from a moored barge.</p> <p>These works are not included within the scope of the draft DCO and would require separate consents. With regard to these, the Applicant is currently preparing applications for planning permission and flood defence consent for submission to Selby District Council and the Environment Agency respectively.</p> <p>If the large crane option cannot be utilised it would not be possible for the contractor to undertake such pre-modularisation work and it would be necessary for such items to be delivered as smaller loads by road. The EIA of the Project has been based upon the 'worst case' scenario of all construction materials, AILs and other large loads being transported to the Project site by road. The assessment of transport effects confirms that the construction traffic can be accommodated on the highway network without resulting in significant effects and that it is feasible to transport AILs and other large loads to the Project site by road.</p> <p>With regard to transport fuel stock by water, it is important to note that the existing Power Station site is served by a dedicated rail spur from the national rail network, which is used for the delivery of coal and other bulk materials such as limestone. The rail spur enters the Power Station site from south-west, linking with the internal rail 'merry go round' system.</p> <p>The primary fuel source for the Project would be coal. This would be delivered making use of the existing rail infrastructure, with new conveyors being provided to move the coal from the existing delivery areas to the Project site. These works would largely be confined to the operational area of the Power Station site. In contrast, the use of the jetty for coal deliveries would necessitate the construction of new conveyors or a rail link over a distance of approximately 1.5km across agricultural land. The only other alternative for moving coal from the jetty would be by road along Redhouse Lane and Carr Lane. These</p>

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			<p>options would not be cost-effective given the presence of the existing rail infrastructure and would result in additional and unnecessary environment impacts. It is therefore the Applicant's view that use of the existing rail infrastructure represents the most appropriate means by which to transport coal to the Project site. Furthermore, national policy seeks to promote both rail and water-borne transport and, as stated above, does not favour one over the other.</p> <p>It is therefore considered by the Applicant that the Project would make appropriate use of sustainable transport modes during its construction and operational phases. On this basis, a requirement for a sustainable transport management plan is not considered necessary.</p> <p>The Applicant has drafted a SoCG that covers the above matters and is in the early stages of discussing this with the CRT. The draft SoCG (Document Ref. 8.2) has been submitted at Deadline 1.</p>
15	Natural England ('NE')	<p>1. Introduction</p> <p>1.1. Natural England is a non-departmental public body established under the Natural Environment and Rural Communities Act 2006 ('NERC Act'). Natural England is the statutory adviser to Government on nature conservation in England and promotes the conservation of England's wildlife and natural features. Natural England's remit extends to the territorial sea adjacent to England, up to the 12 nautical mile limit from the coastline.</p>	<p>The DCO Application includes a Habitats Regulations Assessment ('HRA') Report in Volume 3, Section L of the Environmental Statement (Document Ref. 6.4.5). The scope of the HRA Report has been discussed and agreed between the Applicant and Natural England ('NE') at meetings held on 24 July and 13 November 2014.</p> <p>For the purposes of the HRA, the relevant European designated sites which could be affected by the Project were identified as those falling within the maximum area of influence adopted for the air quality modelling. It was agreed with NE that this area of influence extends 15 km from the Project site in all directions (a 15 km radius) based on the 'worst case' scenario for air quality effects (i.e. the Project being for a</p>

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		<p>1.2. Natural England is a statutory consultee:</p> <p>1.2.1. in respect of plans or projects that are subject to the requirements of the Conservation of Habitats and Species Regulations 2010 (as amended) (the "Habitats Regulations") which are likely to have a significant effect on European protected sites – that is, sites designated as Special Areas of Conservation ("SACs") and Special Protection Areas ("SPAs") for the purposes of the EU Habitats and Birds Directives;</p> <p>1.2.2. in respect of proposals likely to damage any of the flora, fauna or geological or physiographical features for which a Site of Special Scientific Interest ("SSSI") has been notified pursuant to the Wildlife and Countryside Act 1981 (the "1981 Act"); and</p> <p>1.2.3. in respect of all applications for consent for Nationally Significant Infrastructure Projects which are likely to affect land in England.</p> <p>1.3. It is also the Government's policy to consult Natural England in respect of sites listed for the purposes of the Convention on Wetlands of International Importance especially as Waterfowl Habitat signed at Ramsar on 2nd February 1971 ("Ramsar sites") as if they were European protected sites.</p> <p>1.4. Natural England's advice in these relevant representations is based on information submitted by</p>	<p>large coal fired power plant, as defined by Environment Agency Guidance Note H1¹).</p> <p>It has been agreed (as noted in NE's Relevant Representation) that the Applicant has demonstrated beyond reasonable scientific doubt that the Project would not have an adverse effect on the integrity of the Skipwith Common Special Area of Conservation ('SAC'), the River Derwent SAC or the Thorne Moor SAC or any other European sites.</p> <p>Annex C of the ExA's Rule 8 letter issued on 29 April 2015 requested that the footnotes to the HRA screening and integrity matrices (contained with the HRA Report submitted as part of the DCO Application) be updated to cross-refer to the location of the evidence supporting the conclusions drawn. A revised version of the HRA Report (including the updated matrices) was sent by the Applicant to NE on the 11 May 2015 and has been submitted at Deadline 1. The conclusions of the HRA Report remain the same.</p> <p>The Applicant notes that bats (a European protected species) and badgers and reptiles (nationally protected species) may be affected by the Project.</p> <p>ES Volume 1 (Document Ref. 6.2) and Volume 2, specifically Chapter 1 Ecology Technical Report and Annexes (Document Refs. 6.2.13 and 6.2.14) submitted as part of the DCO Application, demonstrate that the Project would not result in significant residual effects on bats or reptiles.</p> <p>With regard to badgers, the Applicant is in on-going dialogue with NE with regard to mitigation measures to avoid impacts on badgers, which</p>

¹ The Environment Agency for England and Wales (2010) Horizontal Guidance Note H1: Annex F.

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>Capture Power Ltd in support of its application for a Development Consent Order ('DCO') in relation to White Rose Carbon Capture and Storage (CCS) Project ('the project').</p> <p>1.5. Natural England has been working closely with Capture Power Ltd to provide advice and guidance since early 2012. Natural England has also been working with the Environment Agency to provide coordinated advice. Following the Planning Inspectorate's acceptance of the application, Natural England will be working with Capture Power Ltd over the next three months to develop statements of common ground as part of the examination process.</p> <p>1.6. These relevant representations contain a summary of what Natural England considers the main nature conservation issues to be in relation to the DCO application, and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. It may have further or additional points to make, particularly if further information about the project becomes available.</p> <p>1.7. Part I of these representations provides an overview of the issues and a summary of Natural England's advice. Section 2 identifies the natural features relevant to this application. Section 3 summarises Natural England's overall view of the application and the main issues which it considers need to be addressed by the Secretary of State.</p> <p>1.8. Part II of these representations sets out all the significant issues which remain outstanding, and which</p>	<p>would in turn be used to update the draft Badger Licence Method Statement. The Applicant has agreed the scope for a further bait marking surveys with NE. These were undertaken in April/May 2015 and the results will be reported in June 2015. It has been agreed that, if, as a consequence of the further surveys, a replacement sett is required, this would be constructed by the Applicant in accordance with the agreed Badger Licence Method Statement.</p> <p>The Applicant has prepared a draft SoCG for discussion with NE (Document Ref. 8.3) that has been submitted at Deadline 1.</p>

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		<p>Natural England advises should be addressed by Capture Power Ltd and the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. These are primarily issues on which further information would be required in order to allow the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and to flesh out mitigation and compensation proposals to provide a sufficient degree of confidence as to their efficacy.</p> <p>1.9. Section 4 identifies the matters where further details about the project are required in order to assess its impacts.</p> <p>1.10. Natural England intends if possible to continue discussions with Capture Power Ltd to seek to resolve these concerns through the provision of further assessment and/or information which can then lead to the agreement of outstanding matters in statements of common ground. Failing satisfactory agreement, Natural England advises that the matters set out in sections 4 to 6 will require consideration by the Examining Authority as part of the examination process.</p> <p>1.11. The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process.</p> <p>PART I: OUTLINE OF NATURAL ENGLAND'S PRINCIPAL SUBMISSIONS</p> <p>2. The natural features potentially affected by this</p>	

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		<p>application</p> <p>2.1. The designated sites relevant to this application are:</p> <p>2.1.1. Skipwith Common SAC 2.1.2. River Derwent SAC 2.1.3. Thorne Moor SAC 2.1.4. Humber Estuary SAC</p> <p>2.2. The following European protected species may be affected by the proposed project:</p> <p>2.2.1. Bats</p> <p>2.3. The following nationally protected species may be affected by the proposed project:</p> <p>2.3.1. Badger 2.3.2. Reptiles</p> <p>3. The overall position of Natural England</p> <p>3.1. Natural England's advice is that in relation to nature conservation issues within its remit there is no fundamental reason of principle why the project should not be permitted, but that further information is required to ensure that unacceptable environmental impacts either do not occur or are sufficiently mitigated.</p> <p>3.2. Natural England is satisfied that sufficient information has been presented to rule out likely significant effects from the project on the Humber Estuary SAC.</p> <p>3.3. Natural England is satisfied that it can be demonstrated beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of Skipwith Common SAC, River Derwent SAC</p>	

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>or Thorne Moor SAC.</p> <p>3.4. Natural England considers that further information needs to be provided with regard to mitigation measures to avoid impacts on badgers, in order to determine whether a badger license will be required. Capture Power Ltd has provided information on badgers to support a license application, but this is not sufficient at this stage and Natural England is working with the applicant to provide additional information as detailed in Section 4.1.</p> <p>3.5. Natural England is satisfied that all issues relating to other protected species listed in section 2 have already been addressed.</p> <p>PART II: OUTSTANDING MATTERS REQUIRING ATTENTION</p> <p>4. Further details about the project in order to enable assessment</p> <p>4.1. Confirmation is required as to whether a 30m buffer can be maintained around badger setts 3 and 25, in order to avoid the need for a badger license as described in Section 4.4.1 of Document 6.3.15 of the Confidential Badger Report. Natural England has requested further information from Capture Power Ltd on the method by which badgers will be excluded from setts in relation to a draft badger license application that has been submitted.</p>	
16	Environment Agency	In response to the above consultation we would like to provide the following Relevant Representation.	With regard to Flood Risk, we acknowledge the Applicant notes the EA's Relevant Representation and welcomes the confirmation that the

Ref.	Interested Party	Relevant Representation	Applicant's Comments
	('EA')	<p>1.0 Flood Risk</p> <p>1.1 We have been involved with pre-application discussions regarding the proposed works in respect to flood risk and, in particular, breach analysis. We can confirm that the submitted FRA, and associated breach analysis, are acceptable. We are content that the risks are adequately understood and that suitable mitigation measures have been proposed.</p> <p>1.2 We would however like to request some minor amendments to proposed requirement 13, so that it more precisely reflects the mitigation measures put forward in the ES.</p> <p>13.(1) No part of the authorised development may commence until a scheme for the mitigation of flood risk during the construction and operation, has, for that part, been submitted to, and following consultation with the Environment Agency, been approved by the relevant planning authority. The scheme shall include, but will not necessarily be limited to, the following:</p> <ul style="list-style-type: none"> (a) A Flood Emergency Response and Contingency Plan; (b) Land-raising of the development platform to a minimum height of 5.0 metres Above Ordnance Datum; (c) Finished floor levels of all buildings shall be set at a minimum level of 5.13 metres Above Ordnance Datum; (d) Sensitive equipment shall be raised to a minimum level of 5.13 metres Above Ordnance Datum. <p>(2) The scheme submitted and approved must be in accordance with the principles set out in the environmental statement, in particular the FRA (ES Volume 2 Chapter C.1) and Indicative Site Raising Drawing (Work Nos. 1A and 1B).</p>	<p>Flood Risk Assessment ('FRA') and the breach analysis are acceptable and that the mitigation proposed is also acceptable. It is also useful that the EA has confirmed that the presence of the raised platform would not significantly increase the risk or severity of flooding on neighbouring land. The Applicant is prepared to accept the proposed amendments to requirement 13 'Flood risk mitigation'.</p> <p>The EA's direction regarding consent required for works close to a main river or a flood defence is acknowledged. The Applicant will obtain the necessary consents.</p> <p>With regard to surface water management, the EA's response that the Project includes sufficient means to manage contamination risks to surface waters from spills and leaks. Various other mitigation measures embedded in the design of the Project would prevent significant effects on water quality and secondary effects on ecology and other surface water users.</p> <p>The proposed amendments to requirement 12 of the draft DCO 'Surface and foul water drainage' are also accepted by the Applicant.</p> <p>With regard to aquatic biodiversity and associated habitat, the Project would aim to provide for on-site habitat mitigation, including some mitigation of the reduction in wetland habitat through the provision of the flood attenuation pond. It is accepted that this would not fully offset the loss of habitat at the Project site. Therefore the principle of providing further habitat mitigation off-site is agreed. It is also agreed that the priority for such mitigation would be the improvement and or provision of wetland habitat.</p> <p>The Applicant, EA and the YWT have agreed to work together to identify options for further habitat mitigation with the objective of reaching agreement on a preferred option and an appropriate mechanism to secure this before the close of the DCO Examination.</p>

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>(3) The flood risk mitigation must be constructed in accordance with the approved details unless otherwise agreed with the relevant planning authority.</p> <p>(4) The authorised development may not be commissioned until the flood risk mitigation has been constructed.</p> <p>(5) The approved flood risk mitigation scheme must be maintained throughout the construction and operation of the authorised development.</p> <p>1.3 It should also be noted the River Ouse is classified as a Main River. The formal consent of the Environment Agency will therefore be required, under either the Water Resources Act 1991, or the Yorkshire Land Drainage Byelaws, for any works in, over, under, or within 8 metres of a Main River and/or the toe of a flood defence. The works to the east of the site, referred to as Works No. 6 in Section 4.4 of the Design & Access Statement appear to fall under this requirement. This requirement does not appear to be reflected in the document '5.3 Other Consents and Licences' which should be updated accordingly.</p> <p>2.0 Surface Water Management</p> <p>2.1 We have reviewed the proposals for surface water management during both the construction and operation phases of development. We are content with the assessment provided but would like to request some amendments to proposed requirement 12, so that it more precisely reflects the mitigation measures put forward in the ES.</p> <p>12.(1) No part of the authorised development may commence until details of the temporary surface and foul water drainage systems (including means of pollution</p>	<p>With regard to the EP, an application to vary the current Drax EP has been submitted to the EA (received on 10 April 2015). At the time of writing the Applicant understands that a case officer has been assigned to deal with the application. The Applicant awaits a formal decision on 'duly made' status from the EA. Discussions with the EA have taken place regarding the scope and content of the application. Draft chapters of the application were sent to the EA in March 2015 with a further meeting held prior to the application being submitted in April 2015.</p> <p>With regard to the water abstraction license, it was originally envisaged that a minor amendment would be required to this would be required for the Project. Having checked the current designs no amendment would be required to the license. The EA's comment regarding water loss factors is noted as are the comments regarding new applications and substantial variations to licences.</p> <p>With regard to the EA's comments on the HRA, the application that has been submitted to the EA for the variation to the EP includes a HRA Report. As the emissions data has not changed since the DCO Application was submitted in November 2014, the results and conclusions of the HRA Report remain the same. The EA was involved in discussions regarding the scope of the HRA in relation to operation of the proposed coal-fired plant in air-mode and oxy-mode as were NE, prior to the submission of the DCO Application, to ensure that the assessment methodology was considered robust by all parties. The EA has made reference to the plant remaining within existing abstraction and discharge limits, which will have been previously assessed by the EA. The Applicant notes that the EA will assess other projects and relevant information regarding designated sites.</p> <p>With regard to waste management and the EA's request to amend requirement 25 'Waste management on site – construction and operational wastes' is accepted by the Applicant.</p>

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		<p>control, in accordance with the construction environmental management plan), have, for that part, been submitted to, and following consultation with the Environment Agency, approved by the relevant planning authority. The details shall include a management and maintenance schedule to ensure that the drainage system remains fully operational throughout the construction of the development.</p> <p>(2) Details of the permanent surface and foul water drainage systems (including a programme for their implementation) must be submitted to and approved by the relevant planning authority, in consultation with the Environment Agency, prior to the start of construction of any part of those systems. The surface water drainage details shall be based on sustainable drainage principles and shall include the following:</p> <p>(a) Provision of a minimum of 4,500 cubic metres of attenuation storage for the areas being drained north of Carr Dyke, which will be discharged along with the treated process water at a rate that is no greater than the existing permitted discharge for Drax Power Station;</p> <p>(b) Provision of a minimum of 1,150 cubic metres of attenuation storage for the area being drained south of Carr Dyke, which will be discharged at a rate to be agreed with the IDB;</p> <p>(c) A management and maintenance schedule to ensure that the drainage systems remain fully operational for the lifetime of the development.</p> <p>(3) The details submitted pursuant to sub-paragraphs (1) and (2) must be in accordance with the principles set out in the environmental statement, particularly Section 4.2, of the submitted FRA (ES Volume 2 Chapter C.1) and the Surface Water and Flood Risk Technical Report (ES Volume Chapter C).</p> <p>(4) The temporary and permanent surface and foul water</p>	<p>The Applicant will also amend requirement 18 'Construction and environmental management plan' to take account of the EA's comments.</p> <p>With regard to geology and hydrogeology, the EA's comments on the ES adequately identifying all potential sources of contamination existing at the Project site, as well as the environmental receptors and potential pathways is welcomed; the subsequent comments regarding construction risks and operational risks to receptors are also acknowledged.</p> <p>The EA's comments on their interests in the land affected by the Project are welcomed and gratefully acknowledged.</p>

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		<p>drainage systems must each be constructed in accordance with the relevant approved details unless otherwise agreed with the relevant planning authority. (5) The authorised development may not be brought into commercial use until the permanent surface and foul water drainage systems have been constructed.</p> <p>3.0 Biodiversity 3.1 We have reviewed the application and considered the proposed development's impact on those aspects of biodiversity which lie within our remit, i.e. water-related biodiversity. Matters of terrestrial ecology fall outside our remit and we would defer judgement on these issues to other more appropriate bodies such as Natural England.</p> <p>3.2 We believe that currently, the ecological enhancement measures outlined in the application are inadequate. There is no definitive list of enhancements which the applicant is committed to providing, and those measures discussed are vague and open-ended. At this stage, we would have expected to see a clear list of commitments from the applicant, demonstrating that, in accordance with 5.3.4 of EN-1, the applicant has taken advantage of opportunities to provide ecological enhancements. In addition it would also be helpful to be provided with additional clarity about those mitigation measures necessary under Requirement 16. As such, we would strongly recommend that the applicant be asked to produce a clear schedule of biodiversity enhancement and mitigation measures to be included with the project, and provide this to the ExA. Any such measures will then need to be properly secured in the DCO.</p> <p>4.0 Environmental Permit</p>	

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>4.1 The proposed project by Capture Power Ltd will fall under the Environmental Permitting Regulations 2010 (EPR) (as amended) which state that a permit is required for combustion of fuels in installations with a total rated thermal input of 50MW or above; this means that Capture Power Ltd or the operator, as defined in the Environment Agency RGN1 guidance, will need to apply for an Environmental Permit for the Project.</p> <p>4.2 The provisions of the permit, as set out in the Industrial Emissions Directive 2010/75/EU (IED), are to ensure:</p> <ul style="list-style-type: none"> - All the appropriate preventative measures are taken against pollution (note: pollution includes substances, vibrations, heat or noise that may be harmful to human health or the quality of the environment). - The best available techniques are applied. - No significant pollution is caused. - The generation of waste is prevented in accordance with Directive 2008/98/EC. - Where waste is generated, it is, in order of priority and in accordance with Directive 2008/98/EC, prepared for re-use, recycled, recovered, or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment. - Energy is used efficiently. - The necessary measures are taken to prevent accidents and limit their consequences. - The necessary measures are taken upon definitive cessation of activities to avoid any risk of pollution and return the site of operation to the satisfactory state defined in accordance with Article 22 of the IED, <p>4.3 We have discussed the proposal with the applicant and promoted the benefits of parallel tracking the</p>	

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		<p>planning and permit applications to give us the opportunity of identifying any key issues of concern and to enable these to be resolved. To date, no application has been submitted for a permit under the EPR that would allow us to carry out a full technical assessment of this proposal</p> <p>4.4 It should be noted that an EPR application would include a more detailed technical assessment of the operation of the installation than has been submitted with the DCO application. It is possible that the future submission for a permit under EPR may require alterations and amendments to the current proposal which we currently cannot foresee.</p> <p>4.5 We have provided feedback to the applicant during permit pre-application stage on air emissions and made several observations including specifying further information which will be required in the application for an Environmental Permit. An assessment of the air emissions modelling will be carried out during the full technical assessment of the permit application. It should be noted that we have not commented on the validity of the numerical predications presented in the reports as that will be conducted during the determination of the EPR application once full information is submitted with the complete application.</p> <p>4.6 We have also made several observations relating to the applicant's use of expected guidance and methodologies for noise assessment during pre-permit application discussions. Noise impact from the installation will form part of a full technical assessment of any EPR permit application.</p>	

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		<p>4.7 The ExA will be aware that the Environment Agency is unable to provide letters of no impediment in advance of Environmental Permit determination because we risk pre-determining the permit in breach of our duties to both consult and to have regard to those consultation comments we receive. In addition, the project's inclusion of novel and complex CCS technology means we are unlikely to be in a position during the course of the examination to provide any additional information to the ExA.</p> <p>4.8 There are only two points in our permitting process where we can give a more detailed view: at a consultation on our draft decision, and on final permit determination. If we were to give a view on the permit application outside of these circumstances this could leave us open to legal challenge if it were considered that we had pre-judged an application without going through due process of assessment and consultation.</p> <p>5.0 Abstraction Licence 5.1 It is the applicant's position, as set out in document '5.3 Other Consents and Licenses', that a minor amendment to an existing Water Abstraction Licence will be needed from the Environment Agency under Section 24 of the Water Resources Act 1991 (as amended) to reflect the change to who uses the water. We would like to clarify that it will also be necessary to ensure that the water loss-factors (i.e. the proportion of abstracted water which is actually lost from the system through processes such as evaporation from cooling towers) included in the existing license, do not need amending. If loss-factors are increased there may be an environmental impact which would need to be assessed as part of the abstraction licensing process. Any such impact would</p>	

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		<p>also need to be screened under the Habitats Regulations.</p> <p>5.2 We would also like to clarify that whilst minor amendments to the existing Abstraction Licence may be possible, if a new license or substantial variation is needed, the Canal and Rivers Trust (CRT), who now manage this part of the River Ouse, would need to be the license holder.</p> <p>6.0 Habitats Regulations Assessment 6.1 The Environment Agency is the competent authority for the Environmental Permit under the Conservation of Habitats and Species Regulations 2010. As we have no permit before us, we have, to date, been unable to carry out a Habitats Regulations Assessment. However, we would be happy to engage in discussions about the principles of competent authority co-ordination with PINS, DECC and Natural England, where appropriate.</p> <p>6.2 Capture Power's intention is that the White Rose project will stay within the existing permitted limits for water abstraction and discharge. Despite this, when considering subsequent applications, even if the limits aren't changing, we must still satisfy ourselves in relation to alone and in-combination effects based on the latest information about other projects and about relevant designated sites.</p> <p>7.0 Waste Management 7.1 We request that 'in consultation with the Environment Agency' is added to the end of the first part of proposed requirement 25. This is to ensure that we are suitably involved with the proposals for waste management.</p>	

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		<p>7.2 We also request that the Soil Management Plan and Sediment Control Plan mentioned in section 6.2.2 of ES document '6.2.6 ES - Vol 1 Ch 6 – Summary of Construction Stage Effects', are properly secured through an addition to the second part of proposed requirement 18. We would suggest the following wording:</p> <ul style="list-style-type: none"> - (e) A Soil Management Plan; and - (f) A Sediment Control Plan <p>8.0 Groundwater & Land Contamination</p> <p>8.1 We agree with the conceptualisation of the geology and hydrogeology of the site. The ES adequately identifies all potential sources of contamination existing on the site, as well as the environmental receptors and potential pathways.</p> <p>8.2 The main environmental risks to groundwater come from the construction phase and are identified in the report. Moderate risks to groundwater exist from the operational and decommissioning phases.</p> <p>8.3 The principal aquifer under the site is well protected by thick superficial deposits and the main environmental risks are to the shallow secondary aquifer beneath the site.</p> <p>8.4 We accept the proposed mitigation measures and agree that if implemented will reduce the risk to sensitive receptors and minimise the environmental effects.</p> <p>8.5 Dewatering on site during construction is expected to be temporary and small scale and unlikely to affect the discontinuous groundwater flow.</p>	

Ref.	Interested Party	Relevant Representation	Applicant's Comments
		<p>9.0 Dis-application & Protective Provisions</p> <p>9.1 We note that there are no proposals in the draft DCO to dis-apply any legislation we would rely upon to control certain activities through the issuing of other permits or licenses. As such, the requirements of the Water Resources Act and Yorkshire Land Drainage Byelaws remain in force.</p> <p>9.2 In the interests of clarity, our position is that paragraph 16 of Part 4 Supplemental Powers in no way over-rides the need for consent from the Environment Agency, or any relevant Lead Local Flood Authority or IDB under the Water Resources Act or the Yorkshire Land Drainage Byelaws.</p> <p>10.0 Land Interest</p> <p>10.1 The Environment Agency has no interest in land directly affected by the proposed project. As such we are not affected by any compulsory purchase proposals nor is there any need for way-leaves or easements to be agreed with us for the project to progress.</p>	
17	Royal Mail	<p>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.</p> <p>Royal Mail's postal sorting and delivery operations rely heavily on road communications. Disruption to the highway network and traffic delays can have direct</p>	<p>The Applicant notes that the Royal Mail's Relevant Representation relates to the potential impact on construction traffic associated with the Project on the highway network and the implication of this for its operations.</p> <p>The Applicant's assessment of construction traffic effects is provided within ES Volume 1, Chapter 6 Summary of Construction Stage Effects - Section 6.9 (Document Ref. 6.2). This has been informed by ES Volume 2, Chapter E Transport Assessment (Document Ref. 6.3.7).</p> <p>The transport assessment of the construction phase of the Project has</p>

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		<p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • A645 New Road • A645 (toward M62) • A614 Rawcliffe Road • M62 (J36) • A1041 <p>It is understood that these increases in traffic may result in delays at peak hours and possibly at other times of the day.</p> <p>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:</p> <ol style="list-style-type: none"> 1. Selby Delivery Office, Micklegate, Selby YO8 4EH 2. Goole Delivery Office, Larsen Road, Goole DN14 	<p>assumed a 'worst case' scenario of all construction materials, including abnormal indivisible loads ('AILs') being transported to the Project site by road. Furthermore, that all construction personnel would travel to the site by road. It has also been assumed that peak construction personnel numbers on-site would be around 3,300 staff, plus approximately 1,000 staff associated with outage works at the existing Power Station site. HGV traffic would peak at approximately 180 HGVs per day. Peak construction personnel number would occur around Year 4 of the construction phase (five years in total), with HGV numbers peaking in Year 1.</p> <p>Construction workforce travel to and from the Project site would lead to increased traffic flows, particularly on New Road, the A645 (towards the M62) the A614 Rawcliffe Road, the M62 (J36) and the A1041 leading to minor to moderate increases in peak hour traffic. Similarly HGV movements on the same roads would also lead to minor to moderate increases.</p> <p>AILs would move on dedicated pre-planned routes and would represent an obstruction or source of delay for normal vehicles. However the timing and management of AIL movements would result in minor effects at most to other road users.</p> <p>Analysis of junction capacity with the Project traffic indicates that the junctions which would be affected by the Project would, with one small exception, operate with sufficient reserve capacity in all scenarios, with limited queuing experienced. The exception is one arm of the M62 northern roundabout junction, but this would only apply for a few months of peak Project workforce construction traffic coinciding with outage work on the existing Drax Power Station site, and then only during the daily peak morning and evening periods.</p> <p>Overall, other than the one exception mentioned above, during the construction phase of the Project, all junctions are expected to operate with good levels of capacity and only limited queuing. Significant</p>

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		<p>6DA</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>effects in terms of driver delay are not anticipated.</p> <p>Construction traffic effects would be mitigated through a number of measures set out at section 6.9.2 of Chapter 6 of ES Volume 1, notably the implementation of a Construction Traffic Routing and Travel Plan that would be secured by requirement 19 of the draft DCO. The approved plan would set out agreed routes for the transport of construction materials and AILs (it is envisaged that all HGV traffic could use the existing dedicated HGV route from Junction 36 of the M62 via the A645) and measures to encourage the use of sustainable transport modes by construction personnel.</p> <p>Notwithstanding the above, the DCO Application includes the option of utilising the existing jetty on the River Ouse for AILs and additional detail in respect of this is set out in the response to the CRT's Relevant Representation (Ref. No. 14).</p> <p>The Applicant does not consider that the construction phase of the Project will interfere in any detectable way with the obligation of the Royal Mail to fulfil its mail delivery functions.</p>