White Rose Carbon Capture and Storage (CCS) Project

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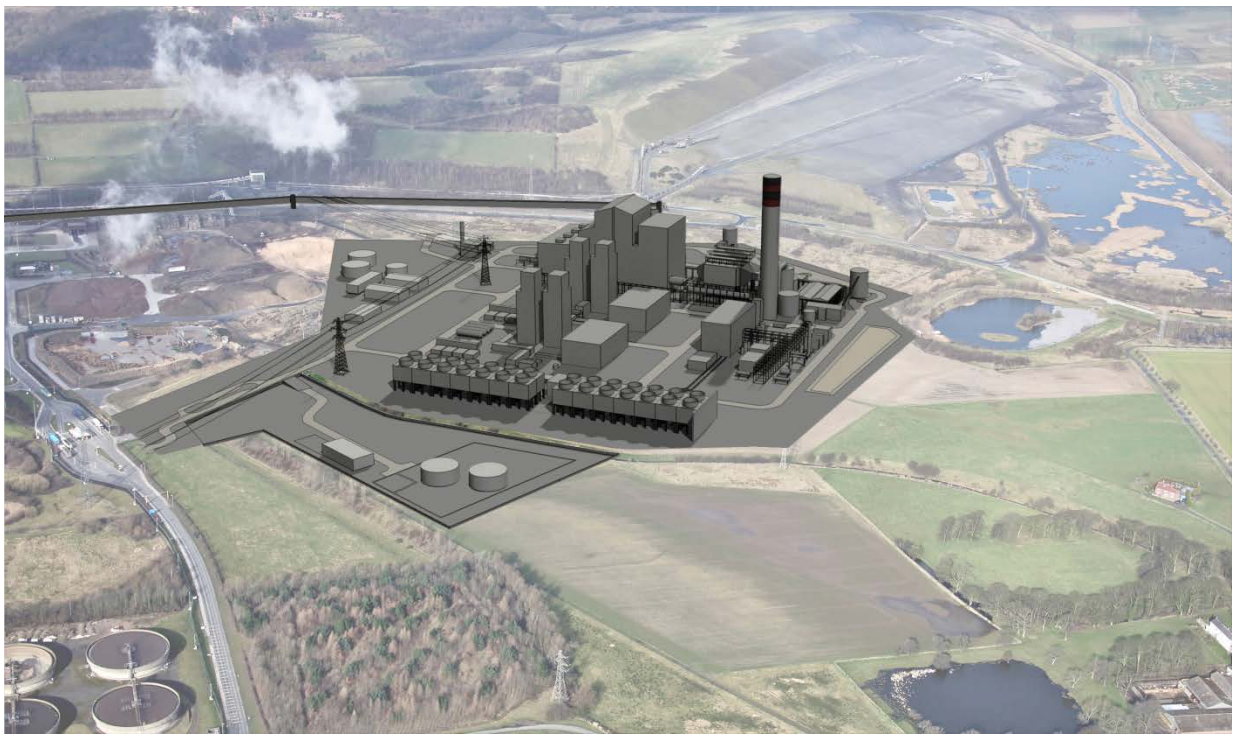
The White Rose CCS (Generating Station) Order

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

Applicant's Statement of Common Ground with the Canal & River Trust

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 5(2)(q)



Applicant: Capture Power Limited
Date: June 2015

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1	19.05.15	First draft for discussion.	GB
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Glossary	
AILs	Abnormal indivisible loads.
CCS	Carbon Capture Storage.
CO_2	Carbon dioxide.
CPL	Capture Power Limited.
CRT	Canal & River Trust.
DCO	Development Consent Order.
EN-1	National Policy Statement for Energy.
EN-2	National Policy Statement for Fossil Fuel Generating Infrastructure.
km	Kilometres.
SoCG	Statement of Common Ground.
SoS	Secretary of State.
the Power Station site	The existing Drax Power Station site.
the 2008 Act	The Planning Act 2008.

CONTENTS

1.0 INTRODUCTION

OVERVIEW

1.1 This is the Statement of Common Ground ('SoCG') between Capture Power Limited (the 'Applicant') and the Canal & River Trust ('CRT') relating to the application (the 'Application') that has been made to the Secretary of State ('SoS') for a Development Consent Order ('DCO') under Section 37 of the Planning Act 2008 (the '2008 Act').

1.2 The Application seeks development consent for the construction, operation and maintenance of the White Rose Carbon Capture and Storage (CCS) project (the 'Project'). The Application was submitted in November 2014 and accepted for Examination on 17 December 2014.

1.3 The Project would be located on land within and adjacent to the operational boundary of the existing Drax Power Station site (the 'Power Station site'), near Selby, North Yorkshire.

THE BACKGROUND TO THE PROJECT

1.4 The Project comprises a new thermal generating station (an ultra-supercritical oxy-fuel coal-fired power plant of up to 448 MWe gross with the ability to co-fire biomass) that will be fitted with carbon capture and storage ('CCS') technology and associated development.

1.5 The CCS technology would capture up 90% of the carbon dioxide emissions from the new power plant. The carbon dioxide would be transported via the National Grid Carbon Limited Yorkshire and Humber CO_2 Pipeline (a separate project) for permanent storage beneath the North Sea.

1.6 The Project forms part of the UK Government's CCS Commercialisation Programme and would assist in demonstrating new coal-fired power plant fitted with CCS at a commercial scale. The Project would make an important contribution toward the delivery of national energy policy, which is aimed at ensuring the security of energy supplies while moving toward a low carbon electricity generation mix.

THE APPLICANT

1.7 The Applicant, CPL, is an English private limited company that was incorporated in December 2011 as a fully owned subsidiary of Drax CCS Limited (a company fully owned by Drax Group plc) to promote the Project.

1.8 In December 2013 ALSTOM UK Holdings Limited (an Alstom Group company) and The BOC Group Limited (a Linde Group company) each acquired a one-third interest in CPL. The Applicant (CPL) is therefore currently a joint venture company equally owned by Drax CCS Limited, ALSTOM UK Holdings Limited and The BOC Group Limited.

THE CANAL AND RIVER TRUST

1.9 The CRT is a charity that is responsible for approximately 3,200 kilometres (km) of inland waterways in England and Wales.

1.10 The CRT has responsibilities in respect of the River Ouse, which is located approximately 1km to the north-east of the existing Power Station site.

1.11 The River Ouse is a navigable waterway and the CRT as a Navigation Authority is responsible for maintaining the navigable channel within the River.

THE PURPOSE AND STRUCTURE OF THE SOCG

1.12 The purpose of this SoCG is to set out the agreement that has been reached between the Applicant and the CRT specifically in respect of the use of water-borne transport during the construction and operational phases of the Project.

1.13 The SoCG also sets out any matters that are not agreed.

2.0 MATTERS AGREED

2.1 The Overarching National Policy Statement for Energy (EN-1), Part 5 'Generic Impacts' provides guidance to applicants and the SoS in respect of the assessment and consideration of particular impacts associated with nationally significant energy infrastructure projects.

2.2 Section 5.13 of Part 5 deals with 'Traffic and transport'. In referring to the mitigation of transport impacts, paragraph 5.13.10 states that water-borne or rail transport is preferred over road transport at all stages of a project, where cost-effective. This is reiterated by the National Policy Statement for Fossil Fuel Electricity Generating Infrastructure (EN-2), which states at paragraph 2.2.6 that:

"Government policy encourages multi-modal transport and materials (fuel and residues) may be transported by water or rail routes where possible… Although there may in some instances be environmental advantages to rail or water transport, whether or not such methods are viable is likely to be determined by the economics of the scheme…."

USE OF WATER-BORNE TRANSPORT WITHIN THE DCO

2.3 It is agreed that while national policy (in the form of EN-1 and EN-2) seeks to promote the use of water-borne and rail transport, it does not favour one mode over the other, or indeed place a requirement upon applicants to utilise both modes for their projects. Furthermore, it is agreed 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.

2.4 With regard to water-borne transport, 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.

2.5 The Project site (the DCO limits) 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 transported to the Power Station site (and in turn the Project site) via Redhouse Lane and Carr Lane.

2.6 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.

2.7 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 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.

2.8 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, which is estimated to be around months 12 and 13.

2.9 It is therefore agreed that the DCO Application as submitted makes appropriate provision for the use of water-borne transport during the construction phase of the Project.

SCOPE FOR ADDITONAL USE OF WATER-BORNE TRANSPORT

2.10 Since the submission of the DCO Application in November 2014 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. It would not be possible to deliver such loads within the scope of the DCO Application as submitted, for the following reasons.

2.11 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 500 tonnes and for these to be lifted from a moored barge. These works adjacent to the jetty 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.

2.12 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 Environmental Impact Assessment 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.

2.13 It is agreed that CRT as Harbour Authority for this part of the River Ouse has the necessary powers to carry out any dredging that may be required adjacent to the jetty to facilitate its use during the construction phase without the need for a Marine Licence provided the conditions of section 75 of the Marine and Coastal Access Act 2009 are met.

USE OF RAIL

2.14 In terms of rail, 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.

2.15 The primary fuel source for the Project would be coal. The Applicant proposes that this would be delivered making use of the existing rail infrastructure that serves the Power Station site, 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. It is agreed that the construction of the new conveyors or rail link that would be required to transport deliveries of coal from the jetty to the Project site (over a distance of approximately 1.5km across agricultural land) would result in additional environmental impacts. Such works would also require additional third party land, which would increase the footprint of the Project site.

SUMMARY

2.16 Subject to the matter not agreed in Section 3 (below) it is agreed that the Project would make appropriate use of sustainable transport modes during its construction and operational phases and that it accords with EN-1 (paragraph 5.13.10) and EN-2 (paragraph 2.2.6).

3.0 MATTERS NOT AGREED

3.1 The following matter is not agreed:

- The need for the inclusion of a requirement within the draft DCO to secure a 'Sustainable Transport Management Plan' to assess and promote the economic viability and environmental sustainability of the alternative (to the use of rail) of using the jetty for the delivery of coal and removal of waste to the Project site, with these materials being transported between the jetty and site via Redhouse Lane and Carr Lane.

Signed

Print name and position

On behalf of Canal & River Trust

Date . ……..

Signed

Print name and position

On behalf of Capture Power Ltd

Date . ……..