



The Planning Inspectorate

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Dear Mr Jim Doyle

Below are the Planning Inspectorate's comments and queries on the draft documents submitted in August 2014. Detailed comments from our Environmental Services Team on the draft Habitats Regulations Assessment report can be found at Appendix 1.

The following comments are without prejudice to any decision made under section 55 of the Planning Act 2008 (as amended) or by the Secretary of State on any submitted application.

Please do not hesitate to contact me if you have any queries.

Kind regards

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Comments on draft documents submitted in August 2014

Introduction

These comments and queries relate solely to the draft documents submitted in August 2014, and not the merits of the proposal. They are provided without prejudice to the acceptance or otherwise of the eventual application. They are provided to assist the preparation of the next iteration.

The Planning Inspectorate made the following observations in relation to draft the documents submitted by the applicant in August 2014.

General comments

Although it is noted that all submitted documents are working drafts, the applicant is encouraged to undertake a final proof read of all documents, particularly checking for punctuation and typographical errors.

In addition, the applicant is encouraged to ensure that all application documents provide consistent cross referencing when referring to other application documents.

1. Draft Plans

It is noted that a different scale is used for the key plans to the one as prescribed under The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009, the applicant should explain the rationale for this, and any other deviations from the regulations, in the applicant's covering letter and Explanatory Memorandum (EM).

Land Plans

It is noted that a red line is used to outline both the red line boundary of the Order Limits and to separate plots on the land plans. Please note that red lines should perhaps be reserved to outline the Order Limits only. The Planning Inspectorate therefore advises that the applicant uses different a different colour to show the distinction between plots on the land plan for clarity. In addition, the Inspectorate advises that the red line boundary showing Order Limits on all plans should be clear and solid.

The Key on the Land Plans currently refers to 'Consultation Land'. Although this may helpfully be submitted as a separate plan, perhaps as part of the Consultation Report, the red line boundary of the land plans should refer to the Order Limits.

It is noted that there is no reference made on the plans to plots in terms of temporary or permanent rights that the applicant may wish to compulsorily acquire for the purpose of proposed development. The applicant is encouraged to identify these on the land plans, and could usefully refer to the Land Plans submitted with the Yorkshire and Humber Carbon Capture Pipeline application as a good practice example.

It is noted that plot no. 35 currently appears twice on the Land Plans (Sheet 2 and 4) as two separate parcels of land. Should the description in the Book of Reference (BoR) relate to two different parcels of land, the applicant is encouraged to make this distinction in the BoR and on the land plans. The applicant is encouraged to consider

re-numbering one of the plots marked on the plans as '35' to a new number and provide an accurate description of it within the BoR.

Access and Public Right of Way Plans

Although it is noted that the draft Development Consent Order (DCO) is partly incomplete; there is currently no reference made within the DCO or EM to '*Access and Public Rights of Way Plans*'. The DCO currently refers to '*land plans*', '*works plans*', '*street plans*' and '*other plans*' only. For instance Schedule 5: '*Public Rights of Way to be Temporarily Stopped Up*' within the DCO currently refers to '*street plans*' (see p37 of the draft DCO and p10 - 14. Public Rights of Way). Should '*street plans*' be referring to the '*Access and Public Rights of Way Plans*' please ensure this is corrected and that consistent titles are used across all application documents.

In addition, it is noted that the plans currently do not show many 'reference points', it may therefore be helpful if the applicant includes sheet numbers when referring to parts of land within its application documents. The applicant could usefully refer to the Access Plans submitted with the Yorkshire and Humber Carbon Capture Pipeline application as a good practice example.

It is noted that:

- Sheet 2 – the 'Public Rights of Way (to be created)'; 'Unclassified roads (minor roads)' appear to fall outside the red line boundary.
- In some instances roads and public rights of way appear within the Order Limits only, in other instances they extend beyond the Order Limits. For example, within Sheet 4 the area depicting 'Private Roads' is only coloured within the Order Limit boundary, whereas the area depicting 'Unclassified roads (minor roads)' extends beyond the Order Limits.

It is advisable that plans include specific reference numbers to show for instance footpaths, temporary/permanent public rights of way, permanent/temporary access required and temporary stopping up streets. Should the applicant consider using such referencing, please ensure that consistent references to plans are provided across all application documents. The applicant could usefully refer to the Access Plans submitted with the Yorkshire and Humber Carbon Capture Pipeline application as a good practice example.

Works Plans

Work Plan, Sheet 2 currently refers to Work No. 1B as 'National Grid PIG Trap Site', however DCO, Schedule 1 (p30) refers to Work No. 1B as:

'Development comprising site rising and levelling including:

- *Raw water storage;*
- *Diversion of [11kv] overhead transmission line between [x] and [x]'*

The applicant should ensure that consistent references/titles are provided to Works descriptions throughout all application documents.

2. Draft Development Consent Order and Explanatory Memorandum

General/formatting (Legal)

- All statutes / statutory instruments referred to need footnotes setting out the references and relevant amendments
- Double check that the most recent Statutory Instrument template is used and contact us if there are any problems.
- Cross references to other articles within the order need to be completed (see draft DCO).
- Many articles still use "shall". Modern drafting convention is that this should be reworded (to "must" or "is to be", for example) to avoid ambiguity.
- The left margins currently vary between sections and need to be made consistent
- The document should be formatted so that article headings are on the same page as the section (e.g. Article 3).
- The Part headings should be in title case ("Preliminary") rather than all in upper case

Requirements

- Requirement 1. This is worded positively ("development must commence within 5 years"); under this wording, the undertaker would be in breach if the project were to be abandoned. The more usual wording is negative; "development must not commence later than 5 years...".
- There are several points where terms will need to be defined. For example, "commissioning" in requirement 2, or "preliminary works" in requirement 38.

Article 2 – Interpretation

- "Authorised Development". This currently includes "any other development authorised by this Order". What is meant by this? Can this additional development also be defined in Schedule 1?
- "Order Land". The land plan currently identifies the shaded land as "Consultation Land" and so does not identify the land to be acquired.
- "Statutory Undertaker". This includes reference to sections 128(5) and 129(2) of the 2008 Act, which have now been repealed.
- "Undertaker". No company number has been provided for Capture Power Ltd

Article 4 – Maintenance of the authorised development

- There is nothing to limit the scope of maintenance to works which have been assessed in the Environmental Statement. This is usually achieved by defining "maintain" accordingly or in the article giving the power of maintenance.

Article 7 – Consent to transfer benefit of the Order

- Paragraph (3) refers to Capture Power Ltd rather than to "the undertaker"

Article 9 – Street works

- This needs to be limited to works on land within the order limits, as otherwise it would apply the power to any section of the named streets, which could extend considerably further. This has been done for some of the rows in Schedule 3, but not all.

Article 11 – Construction and maintenance of new or altered means of access

- In paragraph (3), should the reference to article 9(3) be to 9(1)?

Article 14 – Public rights of way

- The model provision includes wording which prevents the closure of the existing footpath until the alternate route has been created to a defined standard. This clause does not include a similar provision, and Requirement 10 (Public rights of way diversions) does not make it explicit that the rights of way management plan must provide for diversions to be in place before closure. Is this adequate to protect users of the current path?

Article 23 - Compulsory acquisition of rights

- Paragraph (1) refers to creation and acquisition of “the new rights described in the book of reference and shown on the land plans”. Where are these identified? Column 2 of Part 2a and Column 2 of Part 3 of the BoR are titled “Extent, description and situation of land or right to be acquired”, but seem only to repeat the description of the land and do not describe any new rights.

Article 24 – Private rights

- In paragraph (7), should the range of affected paragraphs instead be (1) to (4)?

Article 29 – Temporary use of land for carrying out the authorised development

- Paragraph (1)(a)(i) refers to column 4 of Schedule 8, which is currently formatted as only three columns.

Article 41 – Procedure in relation to certain approvals

- Would it be simpler to replace Article 41(2) and Schedule 12 by a provision similar to Article 4 of the Brechfa Forest DCO (requirements to be treated as conditions)?

Explanatory Memorandum (Legal)

- Paragraph 4.5 refers to article 4(1) of the order, which does not exist (it appears that this should be article 4).
- Generally, where an article has been based on a precedent from a previous DCO, rather than a model provision, it would be useful to identify the source within the Explanatory Memorandum. Useful examples can be found in the Heysham road project – DCO Article 14 and the M1 Junction 10A project Article 24.

Explanatory Memorandum (Case Team)

The table on page ii of the EM titled *Glossary of Abbreviations and Definitions* currently refers to documents as required under the provisions of the Planning Act 2008 and its secondary legislation, for instance Book of Reference, Land Plans, Environmental Statement, Land Plan and Works Plan. The applicant may consider referring to relevant sections of the Act and / or the relevant Regulations under which the above documents are required for clarity.

The same table refers to consultation described as ‘informal’ and ‘formal’. As advised previously, the Planning Inspectorate encourages applicants to avoid using terms ‘informal’ and ‘formal’ to describe its ‘statutory’ and ‘non-statutory’ consultation. Feedback from previous applications has shown that the word ‘informal’ often discourages members of public to take part in consultation.

It is noted that page 5 of the EM currently refers to Work No. 1C as ‘*laydown and construction areas*’. The Key in the Works Plans currently refers to Work No. 1C as *Temporary Laydown and construction*. The Inspectorate advises the applicant to stay

consistent with cross referencing and encourages the applicant to update the title in the Explanatory Memorandum accordingly to the title shown on the Works Plans for consistency.

3. Book of Reference (Case Team)

The Book of Reference currently does not explicitly indicate which plots of land are to be temporarily or permanently compulsorily acquired by the applicant for the purpose of the proposed development. The Inspectorate encourages the applicant to include reference next to each plot of land within the Book of Reference, perhaps by including an additional column after column 2. Please ensure that all references are consistently marked on plans. You may wish to consider the example from the Yorkshire and Humber Carbon Capture Pipeline application below, and as per our comments on the land plans above, the applicant is encouraged to ensure that the temporary and permanent rights set out in the BoR are clearly marked on, and consistent with, the land plans.

In addition Part 1 of the BoR does not explicitly distinguish Categories 1 and 2. It would be clearer if an additional row would be added and to divide columns into Category 1 (columns 3 to 6) and Category 2 (Column 7) (see example below).

Part 1 – Persons within Category 1 and 2							
Plan Number	Reference Number on Plan	Description of Land with extent stated in square metres	Right to be acquired	Category 1 ¹ owners			Category 2 ² owners
				Owner	Lessee / Tenant	Occupier	
Sheet 1	Plot 1	454 Square Metres or thereabouts of land forming part of the public road known as New Road, Long Drax	Temporary - general Temporary - drainage	Drax Power Limited (Company Number 4883589), Drax Power Station, Selby, North Yorkshire, YO8 8PH (In relation to the subsoil)	-	North Yorkshire County Council, County Hall, Northallerton, N Yorks DL7 8AD (As Highway Authority in relation to the Highway Surface)	British Telecommunications Plc (Company Number 1800000), 81 Newgate Street, London, EC1A 7AJ (In respect of rights for telecommunications apparatus)
Sheet 1	Plot 2	285 Square Metres	Temporary	Drax Power Limited	-	Drax Power Limited	Barclays Bank PLC (Company

The Book of Reference should include an introduction which would helpfully set out the purpose of the BoR; the documents the BoR should be read in conjunction with; a summary of each Part of the BoR; an introduction to the land plans and to the compulsory acquisition (both temporary and permanent).

Book of Reference (Legal)

- Several parties are referred to throughout only using initials, rather than full name. The applicant is therefore encouraged to ensure full names are used wherever possible. Where this is not possible, and where reasonable enquiry has been made, the applicant is encouraged to state the reason why in the Introduction to the BoR.
- Unknown parties should be removed. Under s57 of the PA 2008, only parties which are known after making diligent inquiry need be listed.
- In Part 2, the division between Parts 2a and 2b is unusual. If Part 2a is intended to list those entitled to make a relevant claim under the Compulsory Purchase Act 1965, and Part 2b those under Land Compensation Act 1973, what provision has been made for those entitled to make a claim under s152(3) of the PA 2008? Those are the three categories of relevant claim under s57(6).

- For Part 3, the requirement is only to list those easements/private rights which it is proposed shall be extinguished, suspended or interfered with. Are all of these affected, or have they simply all been listed?
- In Part 4, the requirement is to list Crown land which is proposed to be used. There is no requirement to list plots where there is no Crown interest (plots 3 to 73), so these can be removed. Similarly, in Part 5, if there are no such interests, this can simply be stated rather than listing each plot where there is no such interest.
- The guidance (Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land”, Annex D, paragraph 10) suggests that “The book of reference should also cross-refer to the relevant articles contained in the development consent order”. This has not been done here.

Review of the White Rose Carbon Capture and Storage (CCS) Draft Habitats Regulation Screening Assessment (HRSA) dated 28 August 2014)

Following the teleconference held on the 19 August 2014, Capture Power Limited (the applicant) supplied the Planning Inspectorate (the Inspectorate) with a draft HRSA on 29 August 2014 and requested the comments of the Inspectorate. The Inspectorate also subsequently attended both a Draft Documents and a Round Table meeting held on 18 September 2014.

The Inspectorate welcomes the opportunity to comment on draft documents as this enables us to provide advice about any omissions or procedural risks for the acceptance or examination stages. This advice forms parts of our pre-application service, details of which are available in the Inspectorate's pre-application prospectus which outlines the structured and facilitative approach to support the Inspectorate can offer during the pre-application stage.

Please see below the Inspectorate's comments on the applicant's draft HRSA. For ease of reference the comments are prepared following the order of the draft HRSA. Please note that the comments provided are without prejudice to any decisions taken by the Secretary of State during acceptance or the Examining Authority during examination, if the proposed development is accepted for examination. These comments are not intended to be a detailed review of the draft HRSA and its findings, but are a high level review intended to provide helpful comments/observations as appropriate.

Please note that reference to 'European sites' within this document is to Special Areas of Conservation (SAC), candidate SACs (cSAC), Special Protection Areas (SPA), potential SPAs (pSPA) and Ramsar sites.

Introduction (section 1 of the draft HRSA)

Section 1 of the draft HRSA sets out in brief the legislative context in which the draft HRSA has been produced. This section includes a reference to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. The Inspectorate reminds the applicant that the consideration of impacts to European sites and their features is required by The Conservation of Habitats and Species Regulations 2010 (the Habitat Regulations) and is separate from the EIA Regulations. Therefore, the applicant may wish to clarify this issue in completing the final report.

Section 1.1.3 of the draft HRSA contains a description of the project and refers to the 'upgrading of an existing jetty adjacent to the River Ouse, east of the main Drax'. The purpose of the jetty and details of when it would be used has not been identified in the draft HRSA, although the Inspectorate notes that the draft HRSA states the land adjacent to the jetty would be reinstated after the construction phase. The Inspectorate is unclear as to whether the jetty would be used during the operational phase of the project and advises the applicant to clarify these points. The applicant is also reminded of the need to ensure they assess all of the impacts associated with the jetty within the HRSA.

Methodology (section 2 of the draft HRSA)

Section 2.1.2 of the draft HRSA states that the screening has sought to conclude on one of the following three outcomes:

1. No likely significant effect;
2. A likely significant effect; and
3. It cannot be concluded that there will be no likely significant effect.

It is not immediately apparent how conclusions 2 and 3 differ and what impact this may have on the level of assessment required. The Inspectorate recommends that the possible outcomes are either rationalised or clarified in preparing the final report.

Section 2.1.3 of the draft HRSA provides a bullet point list of the information that should be included for Stage 2 – Appropriate Assessment. The Inspectorate notes there is no equivalent list of information to be provided for Stage 1 – Screening. The Inspectorate draws the applicant's attention to Advice Note 10: Habitat Regulations Assessment for nationally significant infrastructure projects (version 5) (April 2013) which details the information applicants should include within their HRA screening assessment.

Identification of European Sites (section 3 of the draft HRSA)

The Inspectorate recommends that decisions taken by the applicant to refine the scope of the assessment are clearly explained and justified. For example, Section 3.1 of the draft HRSA states that European sites within a 15km radius of the Project site have been identified. There is no explanation/justification provided as to why a 15km study area is appropriate in this instance. The Inspectorate recommends that justification is provided to explain why this study area was used.

The Inspectorate welcomes the inclusion of Table 3.1 which presents the sites and their qualifying features that have been considered in the assessment. It is noted that the qualifying features for the Lower Derwent Valley SPA do not correlate with those in the SPA Review site accounts on the JNCC website (<http://jncc.defra.gov.uk/default.aspx?page=1994>). The Inspectorate recommends that the applicant consults with the relevant statutory nature conservation body to agree the features to be assessed.

Assessment of Likely Significant Effects (section 4 of the draft HRSA)

The potential impacts considered within the screening assessment are detailed in Table 4.1 but no information is provided to explain how they will/have been assessed. The Inspectorate advises that the HRSA should include a methodology section with details of the criteria used to determine whether there would be a likely significant effect.

The main impact considered in the draft HRSA is emissions to air from the operational phase of the power station. The Inspectorate understands and supports the aspiration to restrict duplication within the application. However, the Inspectorate considers that details of the air quality modelling undertaken should be provided and advises that as a minimum the following information is included in the HRSA:

- an overview of the assessment methodology, including the air quality model used and any relevant input data for example the stack height and explanation of the worst case scenario(s) considered (i.e. air-mode and/or oxy-mode; please see the conclusions section of this review for further comments regarding the operational mode) and an explanation of how significance has been determined with reference to any guidance used;
- clear identification of whether each of the qualifying features of the European sites is sensitive to emissions, along with their critical loads and an explanation of how these have been identified; and
- a clear presentation of the modelled process contributions and, if relevant, the predicted environmental concentrations applicable to each qualifying feature and clear identification of features at which critical loads are exceeded.

Section 4.1.1 of the draft HRSA provides some discussion on potential impacts with reference to the Summary Preliminary Environmental Information Report (PEIR), however the Inspectorate considers that the final HRSA to be submitted with the application should include up to date data, for example results of the finalised air quality modelling in the Environmental Statement (ES).

As appropriate the applicant should make use of cross referencing to supporting information provided elsewhere in the application including the Environmental Statement (ES).

The screening matrices

The screening matrices have been used as the primary method to present the outcome of the HRSA. The Inspectorate welcomes the inclusion of the matrices and appreciates the opportunity to provide comments prior to application. The Inspectorate considers that at present the footnotes contain conclusions which have not been sufficiently justified. For example, footnote 'a' states '*Power station operating in oxy-mode will not result in release of significant pollutants to atmosphere*'. In this case, the Inspectorate would expect the footnote to include a brief summary of and/or references to the results of air quality modelling which clearly justifies why the pollutants would not be significant. All footnotes should contain a robust justification to the conclusion drawn with cross reference to specific paragraphs in other application documents as appropriate (i.e. either to the HRSA itself or specific paragraphs of the ES). Furthermore, assertions such as 'it is unlikely these would have significant adverse effects on mobile qualifying features downstream of the SAC limit' (footnote 'h') should be fully justified.

The Stage 1 Matrix 1: River Derwent SAC footnote 'f' has been used to indicate a likely significant effect (i.e. a tick) for 'Water courses of plain to montane levels with the *Ranunculus fluitans* and Callitriche-Batrachion vegetation' and also no likely significant effect (i.e. a cross) for the remaining features. The Inspectorate considers that this approach is confusing and should be avoided; the same footnote should not be used to indicate both the screening in and screening out of a likely significant effect. This point has been discussed with the applicants consultants during the meeting held on 18 September 2014. The applicant has confirmed that this will be corrected before submission of the final document.

The applicant is also requested to provide both a PDF and Word copy of the matrices with the application.

Conclusion (Section 5 of the draft HRSA)

The Inspectorate notes that Table 5.1 of the draft HRSA identifies the qualifying features of each European site where there is uncertainty remaining about the level of potential effect and notes the conclusion that these would be taken forward to Stage 2 - Appropriate Assessment. The applicant is reminded of the need to provide sufficient information to enable the competent authority to undertake an appropriate assessment, should one be required. This would include consideration of adverse impacts on integrity of European sites with reference to the site's Conservation Objectives. The Inspectorate would expect such information to be provided and for the relevant integrity (Stage 2) matrices to also be completed for these features. The applicant is reminded that in this instance the report would no longer be limited to being a screening stage assessment or 'HRSA' and is advised to amend the title of the document accordingly. In the absence of such information within the draft HRSA, the Inspectorate cannot provide advice to the applicant on that stage of the assessment. The Inspectorate is committed to working with applicants during pre-application and would appreciate the opportunity to comment on these documents before they are submitted for acceptance.

The Inspectorate reminds the applicant of the importance of providing sufficient evidence to support the conclusions in the HRSA. The Inspectorate considers that at present insufficient evidence has been provided in Box 4.1, Section 4.1.1 and the screening matrices of the draft HRSA to justify the conclusions reached and as detailed above advises that further justification is provided. The footnotes used in the screening matrices for these features (e.g. footnotes c, d, e, and f) should clearly justify the conclusions reached. The conclusion of the draft HRSA states that these sites and qualifying features (detailed in Table 5.1) should be taken forward to the Appropriate Assessment Stage (Stage 2 of the HRA process); however as stated above no further information has been provided in the draft HRSA.

As noted above, the Inspectorate advises that the HRSA provides further details on the potential operating modes of the power station. The conclusion section of the draft HRSA states that the air quality modelling has '*assumed a worst case operating scenario; namely that the plant will be operating for 8,760 hours per annum [24 hours per day 365 days per year] in both air-mode and oxy-mode*'. The Inspectorate notes that the draft DCO does not reference either of these modes, but assumes that the primary operational mode of the power station would be oxy-mode. The draft HRSA continues to explain that '*The assumed constant operation in air mode results in predicted exceedance of critical loads / levels for a number of pollutants at the European sites within the 15km. However, the likelihood of this scenario occurring is very low as although the plant will start up / shut down in air-mode, and use air-mode should the ASU / gas processing unit or the CO₂ pipeline be offline, these events are expected to be abnormal, infrequent and short term in nature. As such, the likelihood for the effects on European sites discussed in this HRA to actually occur requires the plant to only run in air-mode continuously.*' The Inspectorate queries the need for the power station to be able to operate 8,760 hours per annum in air mode, particularly given that in this mode critical loads at European sites are predicted to be exceeded. The applicant confirmed at the Draft Documents meeting held on 18 September 2014 that flexibility in relation to the operational mode needs to be maintained within the DCO (though there will be some legislative control) consequently the HRSA will need assess the worst case potential operating scenario.

In-combination effects

The draft HRSA states that in-combination effects have not been assessed at this stage as the list of plans and projects has recently been compiled and requires air quality assessment to be completed. The Inspectorate acknowledges the HRSA is currently in its draft form and advises that the final version includes an in-combination assessment and that the 'in-combination' effects column in the screening matrices is also completed.

The HRSA should describe how the 'other plans and projects' considered in the in-combination assessment have been identified i.e. what study area has been used and why. It would also be helpful to include a statement in the HRSA stating whether the list of 'other plans and projects' have been discussed and agreed with the local planning authority and Natural England. Where any 'other plans and projects' have been identified, but not included within the in-combination assessment, these should also be identified within the HRSA.

The Inspectorate acknowledges that the project intends to connect to a wider proposed CCS scheme being promoted by National Grid that includes the Yorkshire CCS Pipeline onshore project (to be consented under the Planning Act 2008) and offshore project (to be consented in accordance with the Petroleum Act 1998 and the Energy Act 2008). The applicant is reminded of the need under the Habitats Regulations to ensure all in-combination impacts are considered including those related to the CCS pipeline scheme.

The Inspectorate also advises that a plan is included with the HRSA that plots the location of 'other plans and projects' considered within the in-combination assessment.

Mitigation

The draft HRSA does not identify any mitigation measures that would be implemented. Should any mitigation measures be required, either to rule out a likely significant effect, or to prevent impacts upon the integrity of the site and features at the appropriate assessment stage, reference should be made to relevant requirements within the draft DCO. For ease of use during examination the Inspectorate would find it helpful if this information is provided in a Table.

Consultation with Natural England

The Inspectorate notes that the conclusion of the draft HRSA states '*An initial meeting has taken place between with Natural England (NE), CPL and ERM and NE have expressed an interest in working with CPL to develop a Statement of Common Ground on a number of matters including the basis of this HRA*'. The Inspectorate welcomes this engagement and advises that, where possible, evidence of agreement of the following is provided:

- all relevant European sites and features have been considered
- all relevant plans and/or projects have been considered in the in-combination assessment
- the conclusions of the HRSA

Consultation and on-going engagement with key statutory consultees was discussed at the Round Table meeting held on 18 September 2014 with particular focus on air

quality issues and European sites.

Presentation

On a presentation matter, the Inspectorate recommends each paragraph is numbered individually to enable easier referencing.