

# The Drax Power (Generating Stations) Order

Land at, and in the vicinity of, Drax Power Station, near Selby, North Yorkshire

## Applicant's Responses to Relevant Representations

(Submitted for Deadline 1)



The Planning Act 2008

## **Drax Power Limited**

Drax Repower Project

Applicant: DRAX POWER LIMITED  
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## Document History

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## Glossary

Term	Definition
Abnormal Indivisible Load	An ‘abnormal Indivisible load’ (AIL) is a vehicle that has any of the following: a weight of more than 44,000 kilograms, an axle load of more than 10,000 kilograms for a single non-driving axle and 11,500 kilograms for a single driving axle, a width of more than 2.9 metres, a rigid length of more than 18.65 metres.
Above ground installation (AGI)	AGIs will include a Minimum Offtake Connection (MOC) and a PIG Trap Launching station (PTF-L) which will be operated by Drax. The AGI is described as Work No. 6 in Schedule 1 of the draft DCO (Examination Library ref AS-012).
Application	The DCO Application
The Applicant	Drax Power Ltd
Biodiversity	Abbreviated form of ‘biological diversity’ referring to variability among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part.
Carbon capture readiness	Carbon Capture readiness, with respect to a combustion plant’s emissions of CO <sub>2</sub> , is achieved when the following conditions are met: <ul style="list-style-type: none"> <li>(a) suitable storage sites are available</li> <li>(b) it is technically and economically feasible to retrofit the plant with the equipment necessary to capture that CO<sub>2</sub>; and</li> <li>(c) it is technically and economically feasible to transport such captured CO<sub>2</sub> to the storage sites</li> </ul>
Carbon capture readiness reserve space	Space to be set aside to accommodate future carbon capture equipment, making the proposed plant in effect “carbon capture ready” (CCR).  The Carbon capture readiness reserve space is described as Work No. 10 in Schedule 1 of the draft DCO (Examination Library ref AS-012).
Climate Change	Large scale, long term shift in the planet’s weather patterns or average temperature.

Term	Definition
Combined Cycle Gas Turbine (CCGT)	<p>A combined cycle gas turbine is an assembly of turbines that convert heat into mechanical energy.</p> <p>Combustion of a fuel within a gas turbine produces hot gases that expand over a complex series of blades that cause the turbine to rotate which in turn drives an electrical generator. The principle of combined cycle is that the exhaust gases from the turbine is used as a heat source in a heat recovery steam generator (HRSG), increasing the system's overall efficiency by utilising energy from the fuel that would otherwise be wasted.</p>
Combined Heat and Power (CHP)	<p>Combined Heat and Power is the simultaneous generation of electrical power and usable heat in a single process, and is also known as co-generation. A CHP station may either supply steam direct to customers or capture heat from low-pressure steam after it has been used to drive electricity generating turbines for hot water or space heating purposes.</p>
Construction Environmental Management Plan (CEMP)	<p>Document setting out methods to avoid, minimise and mitigate environmental impacts on the environment and surrounding area and the protocols to be followed in implementing these measures in accordance with environmental commitments during construction.</p>
DCO Application	<p>The application for a DCO in respect of the Proposed Scheme.</p>
Designated Heritage Assets	<p>World Heritage Site, scheduled monument, listed building, protected wreck site, registered park and garden, registered battlefield or conservation area.</p>
Development Consent Order (DCO)	<p>A Development Consent Order (DCO) is made by the Secretary of State (SoS) pursuant to the Planning Act 2008 (PA 2008) to authorise a Nationally Significant Infrastructure Project (NSIP).</p>
Drax Power Station	<p>The existing biomass and coal fired power generation facility near Selby, North Yorkshire.</p>
Effect	<p>The consequence of an impact on the environment.</p>
Emission	<p>A material that is expelled or released to the environment. Usually applied to gaseous or odorous discharges to the atmosphere.</p>
Environment Agency	<p>A non-departmental public body sponsored by the United Kingdom government's Department for Environment, Food and Rural Affairs</p>

Term	Definition
	(DEFRA), with responsibilities relating to the protection and enhancement of the environment in England.
Environmental Impact Assessment (EIA)	A systematic means of assessing a development project's likely significant environmental effects undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
EIA Regulations 2017	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which prescribe the information to be included in the Environmental Statement and the consultation to be carried out in connection with development requiring an Environmental Statement.
Electrical connection	Underground electrical cables and associated works and removal of existing overhead lines and existing towers.
Environmental Statement (ES)	A statement that includes the information that is reasonably required to assess the environmental effects of a development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile, but that includes at least the information required in the EIA Regulations 2017 and which is prepared in accordance with the latest Scoping Opinion adopted by the Secretary of State (where relevant).
Existing Drax Power Station Complex	Land and facilities comprising the existing Drax Power Station.
Gas Receiving Facility (GRF)	<p>This is required to receive the natural gas from the Gas Pipeline. The GRF will contain the following equipment:</p> <ul style="list-style-type: none"> <li>○ Emergency control valve.</li> <li>○ Filtration.</li> <li>○ Custody transfer metering stream.</li> <li>○ Preheating boilers.</li> <li>○ Heat exchangers.</li> <li>○ Pressure regulations.</li> <li>○ Gas compression.</li> </ul> <p>The GRF is described as work number of 5 in Schedule 1 of the draft DCO (Examination Library ref AS-012).</p>
Gas Pipeline	The approximately 3 km underground pipeline which connects the Gas Receiving Facility to the National Gas Transmission System. The Gas Pipeline is described as work number 7 in Schedule 1 of the draft DCO (Examination Library ref AS-012).

Term	Definition
Gas Turbine	<p>Gas turbines produce electricity. Air is drawn into the compressor of the gas turbine and is compressed. The fuel is then injected into the combustion chamber. The mixture of fuel and compressed air is ignited, producing gases at high temperatures. As the gas expands, it rotates the turbine to produce electricity.</p> <p>The Gas Turbines form part of Work No. 1A and Work No. 2A in Schedule 1 of the draft DCO (Examination Library ref AS-012).</p>
Generating station equipment	Equipment comprising electricity generating stations, battery storage facilities and gas insulated switchgear buildings.
Habitat	The environment in which populations or individual species live or grow.
Habitats Directive	Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017.
Habitats Regulations Assessment (HRA)	An assessment of the implications of development that may affect the designated interest features of European sites (as defined in Regulation 8 of the Habitat Regulations).
Heat Recovery Steam Generators (HRSG)	<p>HRSGs recover the hot flue gases from the gas turbines. The heat is used to produce steam that will drive the existing steam turbines. HRSGs are required where the generating station is operated in CCGT mode.</p> <p>The HRSGs form part of Work No. 1A and Work No. 2A in Schedule 1 of the draft DCO (Examination Library ref AS-012).</p>
Heritage	The historic environment and especially valued assets and qualities such as historic buildings and cultural traditions
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage Assets include Designated Heritage Assets and Non-Designated Heritage Assets.
Impact	A physical or measurable change to the environment attributable to the Proposed Scheme.
Landscape	An area, as perceived by people, the character of which is a result of the action and interaction of natural and/or human factors

Term	Definition
Landscape and Visual Impact Assessment	A tool used to identify and assess the likely significant effects of change resulting from development both on the landscape as an environmental resource in its own right and on people's views and visual amenity
Nationally Significant Infrastructure Project (NSIP)	The Proposed Scheme constitutes a Nationally Significant Infrastructure Project (NSIP) by virtue of s.14(1)(a) and s.15 of the PA 2008 which include within the definition of a NSIP any onshore generating station (except wind) in England of 50 MW capacity or more.
Non-Designated Heritage Asset	Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets
Open Cycle Gas Turbine (OCGT)	An open cycle gas turbine converts heat into mechanical energy. Combustion of a fuel within a gas turbine produces hot gases that expand over a complex series of blades that cause the turbine to rotate which in turn drives an electrical generator.
Photomontage	A visualisation which superimposes an image of a proposed development upon a photograph or series of photographs.
Pipeline Area	The area required in connection with the construction, operation and maintenance of the Gas Pipeline, the AGI and the GRF, comprising the Pipeline Construction Area and the Pipeline Operational Area.
Planning Inspectorate (PINS)	The government agency responsible for examining planning applications for development consent for NSIPs under the Planning Act 2008 on behalf of the SoS.
Power Station Site	Areas within the Existing Drax Power Station Complex where: <ol style="list-style-type: none"> <li>1. the Site Reconfiguration Works are proposed to take place;</li> <li>2. the temporary construction laydown area is to be located (described in Work No. 9A in Schedule 1 of the draft DCO (Examination Library ref AS-012));</li> <li>3. the generating station equipment is proposed to be located. The generating station equipment is described as Work Nos. 1, 2, 3 and 4 in Schedule 1 of the draft DCO (Examination Library ref AS-012) ;</li> <li>4. the electrical connection is proposed to be located. The electrical connection is described as Work Nos. 8 and 13 in Schedule 1 of the draft DCO (Examination Library ref AS-012) ; and</li> </ol>

Term	Definition
	<p>5. the decommissioning and demolition of sludge lagoons and construction of replacement sludge lagoons, described as Work No. 12 in Schedule 1 of the draft DCO (Examination Library ref AS-012).</p>
<p>Project or Proposed Scheme</p>	<p>Drax Power Limited is proposing to repower up to two existing coal-fired units (known as unit 5 and unit 6) with gas. Each unit would comprise CCGT and OCGT technology and have a capacity of up to 1,800MW. Each unit would also have a battery storage capability of up to 100MW (subject to technology and commercial considerations). Should both units be repowered, the new gas-fired units would have a combined capacity of up to 3,600 MW and a combined battery storage capacity of up to 200 MW.</p> <p>Drax is seeking consent for the flexibility to either repower one unit (with 1,800MW generating capacity and a 100MW battery storage capacity) or to repower two units (two single units each with a 1,800MW generating capacity and each with its own 100MW battery storage capacity, totalling a capacity of up to 3,800MW). The decision as to whether Drax repowers two units as opposed to a single unit is a commercial decision that can only be taken post any consent being granted.</p> <p>In order to repower to gas, a new gas pipeline needs to be constructed from the Power Station Site to the National Transmission System (NTS).</p> <p>The Proposed Scheme includes the Site Reconfiguration Works (although as at the submission of this document, the Applicant will be making an amendment to the DCO Application to remove the Site Reconfiguration Works from the Proposed Scheme).</p> <p>Drax's Proposed Scheme is described in more detail in Chapter 3 (Site and Project Description) of the ES Volume 1 (Examination Library ref APP-071).</p> <p>Schedule 1 of the draft DCO submitted in support of the DCO Application (Examination Library ref AS-012) lists out the elements comprised within the Proposed Scheme.</p>
<p>Site</p>	<p>The Site refers to the Power Station Site, the Carbon capture readiness reserve space (which is also the location of temporary construction laydown described as Work No. 9B in Schedule 1 to the draft DCO (Examination Library ref AS-012) ) and the Pipeline Area.</p>
<p>Site Boundary</p>	<p>The Site Boundary refers to the outer perimeter of the Site.</p>
<p>Site Reconfiguration Works/Stage 0</p>	<p>The Site Reconfiguration Works or Stage 0 refers to the works described below that are required to prepare the Power Station Site</p>



Term	Definition
	<p>for the construction of the generating station equipment and the electrical connection. The works comprise:</p> <ol style="list-style-type: none"> <li>1. Demolition of the private squash court (no replacement), Learning Centre (consolidated into existing facilities); and</li> <li>2. Demolition of and reconstruction of car parking, turbine outage stores, contractor’s compounds and welfare facilities.</li> <li>3. Construction of a cooling water spray screen between relocated facilities and the southern cooling towers.</li> </ol> <p>The Site Reconfiguration Works were the subject of a separate planning application under the Town and Country Planning Act 1990 (planning reference 2018/0154/FULM) which was approved by Selby District Council on 24 May 2018. The Applicant has started to carry out the Site Reconfiguration Works by implementing planning permission 2018/0154/FULM. At the time of submitting this document, the Site Reconfiguration Works remain part of the Proposed Scheme, although it is the Applicant's intention to remove these works from the Proposed Scheme being authorised under the DCO. The DCO Application makes it clear that these works may be carried out under either:</p> <ol style="list-style-type: none"> <li>1. Any TCPA planning permission that may be granted; or</li> <li>2. The DCO.</li> </ol>
Statement of Common Ground	<p>A Statement of Common Ground is a means of capturing the areas of agreement and material differences between the Applicant and third parties</p>
Unit X	<p>The construction of a gas fired generating station capable of operating in CCGT and OCGT modes and which would have a generating capacity of up to 1,800 MW. Unit X would be connected to a battery storage facility, with a capability of up to 100MW. The total output from Unit X would be 1,900MW.</p> <p>Unit X is described in Work No. 1 of Schedule 1 to the draft DCO (Examination Library ref AS-012).</p>
Unit Y	<p>The construction of a gas fired generating station capable of operating in CCGT and OCGT modes and which would have a generating capacity of up to 1,800 MW. Unit Y would be connected to a battery storage facility, with a capability of up to 100MW. The total output from Unit Y would be 1,900MW.</p> <p>Unit Y is described in Work No. 2 of Schedule 1 to the draft DCO (Examination Library ref AS-012).</p>

<b>Term</b>	<b>Definition</b>
Visual Effects	Effects on specific views and on the general visual amenity experienced by people.

## Abbreviations

Abbreviation	Term in full
AGI	Above Ground Installation
AIL	Abnormal Indivisible Load
CCGT	Combined Cycle Gas Turbine
CEMP	Construction Environmental Management Plan
CHP	Combined Heat and Power
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement
FRA	Flood Risk Assessment
GRF	Gas Receiving Facility
HE	Historic England
HER	Historic Environment Record
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
kV	Kilovolt
LVIA	Landscape and Visual Impact Assessment
M	Meters
MW	Megawatts

<b>Abbreviation</b>	<b>Term in full</b>
NE	Natural England
NG	National Grid
NGET	National Grid Electricity Transmission
NGG	National Grid Gas Plc
NGR	National Grid Reference
NSIP	Nationally Significant Infrastructure Project
NTS	Non-technical summary
NYCC	North Yorkshire County Council
PA 2008	Planning Act 2008 (as amended)
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SDC	Selby District Council
SoCG	Statement of Common Ground
SoS	Secretary of State

# Contents

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<b>1</b>	<b>INTRODUCTION</b>	<b>4</b>
1.1	Purpose of this document	4
1.2	Oral representations made at open floor hearing	4
1.3	Applicant's Responses to Relevant Representations	5
<hr/>		
<b>2</b>	<b>LOCAL AUTHORITIES</b>	<b>6</b>
2.1	North Yorkshire County Council (RR-309)	6
2.2	Selby District Council (RR-315)	9
2.3	Durham County Council (RR-163)	13
<hr/>		
<b>3</b>	<b>OTHER STATUTORY CONSULTEES</b>	<b>14</b>
3.1	The Coal Authority (RR-151)	14
3.2	Forestry Commission (RR-152)	14
3.3	Natural England (RR-212)	18
3.4	Public Health England (RR-228)	21
3.5	Historic England (RR-236)	21
3.6	Environment Agency (RR-292)	22
3.7	National Grid (RR-308)	26
<hr/>		
<b>4</b>	<b>PARISH COUNCILS</b>	<b>28</b>
4.1	Newland Parish Council (RR-239)	28
<hr/>		
<b>5</b>	<b>NON-STATUTORY ORGANISATIONS</b>	<b>29</b>
5.1	Introduction	29
5.2	Climate change	29
5.3	Source of gas	36
5.4	Use and need for gas capacity	37
5.5	Renewables	40
5.6	Water transport	41
5.7	Water abstraction	42
5.8	Environmental impacts	43
5.9	Biodiversity	44
5.10	Landscape	45
5.11	Health	46
5.12	Engagement and consultation	47
5.13	Cost	48
5.14	Security	49

---

5.15	The Applicant	50
5.16	Aviation and defence interests	51
<b>6</b>	<b>MEMBERS OF THE PUBLIC / BUSINESSES</b>	<b>52</b>
6.2	Biodiversity	52
6.3	Climate change	52
6.4	Source of gas	58
6.5	Use and need for gas capacity	61
6.6	Renewables	64
6.7	Health	67
6.8	Battery storage	67
6.9	Security	68
6.10	Energy distribution	69
6.11	Carbon capture and Combined Heat and Power	69
6.12	General opposition comments	71
<b>APPENDIX A</b>		
	RELEVANT REPRESENTATIONS – LOCAL AUTHORITIES	78
	RELEVANT REPRESENTATIONS – PARISH COUNCILS	78
	RELEVANT REPRESENTATIONS – OTHER STATUTORY CONSULTEE	78
	RELEVANT REPRESENTATIONS – NON-STATUTORY ORGANISATION	78
	RELEVANT REPRESENTATIONS – MEMBERS OF THE PUBLIC / BUSINESS	79

## Table of Tables

<i>Table 5-1: Summary of RRs – non-statutory organisations – climate change</i>	<i>29</i>
<i>Table 5-2: Summary of RRs – non-statutory organisations – source of gas</i>	<i>36</i>
<i>Table 5-3: Summary of RRs – non-statutory organisations – use of gas</i>	<i>37</i>
<i>Table 5-4: Summary of RRs – non-statutory organisations – renewables</i>	<i>40</i>
<i>Table 5-5: Summary of RRs – non-statutory organisations – water transport</i>	<i>41</i>
<i>Table 5-6: Summary of RRs – non-statutory organisations – water abstraction</i>	<i>42</i>
<i>Table 5-7: Summary of RRs – non-statutory organisations – water abstraction</i>	<i>43</i>
<i>Table 5-8: Summary of RRs – non-statutory organisations – biodiversity</i>	<i>44</i>
<i>Table 5-9: Summary of RRs – non-statutory organisations – landscape</i>	<i>45</i>
<i>Table 5-10: Summary of RRs – non-statutory organisations – health</i>	<i>46</i>
<i>Table 5-11: Summary of RRs – non-statutory organisations – engagement</i>	<i>47</i>
<i>Table 5-12: Summary of RRs – non-statutory organisations – cost</i>	<i>48</i>
<i>Table 5-13: Summary of RRs – non-statutory organisations – security</i>	<i>49</i>
<i>Table 5-14: Summary of RRs – non-statutory organisations – the Applicant</i>	<i>50</i>
<i>Table 5-15: Summary of RRs – non-statutory organisations – aviation and defence interests</i>	<i>51</i>
<i>Table 6-1: Summary of RRs – members of the public/business – biodiversity</i>	<i>52</i>
<i>Table 6-2: Summary of RRs – members of the public/business – climate change</i>	<i>52</i>
<i>Table 6-3: Summary of RRs – members of the public/business – source of gas</i>	<i>58</i>
<i>Table 6-4: Summary of RRs – members of the public/businesses – use of gas</i>	<i>61</i>
<i>Table 6-5: Summary of RRs – members of the public/business – renewables</i>	<i>64</i>
<i>Table 6-6: Summary of RRs – members of the public/business – health</i>	<i>67</i>
<i>Table 6-7: Summary of RRs – members of the public/business – battery storage</i>	<i>67</i>
<i>Table 6-8: Summary of representations – members of the public/business – security</i>	<i>68</i>
<i>Table 6-9: Summary of RRs – members of the public/business – energy distribution</i>	<i>69</i>
<i>Table 6-10: Summary of RRs – members of the public/business – carbon capture</i>	<i>69</i>
<i>Table 6-11: Summary of RRs – members of the public/business – general opposition</i>	<i>71</i>
<i>Table 6-12: List of Interested Parties who submitted the template objection letter</i>	<i>72</i>

# 1 INTRODUCTION

## 1.1 Purpose of this document

- 1.1.1 On 29 May 2018, Drax Power Limited ("Drax" or "the Applicant") submitted an application ("the Application") for a Development Consent Order to the Secretary of State for Business, Energy and Industrial Strategy ("the SoS"). The Application relates to the Drax Repower Project ("the Proposed Scheme") which is described in detail in chapter 3 of the ES (Examination Library ref APP-071).
- 1.1.2 The Application was accepted for examination on 26 June 2018.
- 1.1.3 This document contains the Applicant's responses to Relevant Representations ("RR"), submitted to the SoS by Interested Parties by the relevant deadline of 29 August 2018 notified under section 56(4) of the Planning Act 2008 (as amended) (the "PA 2008").
- 1.1.4 This document has been submitted for Deadline 1 of the Examination.

## 1.2 Oral representations made at open floor hearing

- 1.2.1 An open floor hearing was held on 4 October 2018 to allow Interested Parties to make comments about the Proposed Scheme. The following additional points were raised at the open floor hearing, and these will be responded to in more detail by the Applicant following the submission by Interested Parties of their written summaries of their oral representations made at the open floor hearing (due at Deadline 1) and/or their written representations (which are due at Deadline 2).
- 1.2.2 Mr Brennan, on behalf of Friends of the Earth, referred to a 2010 report by the Department for Environment, Food and Rural Affairs ("DEFRA") and that the effects it reported on 213 people in Selby in connection with air quality impacts. We have been unable to substantiate what the claimed air quality impacts are based on that report and therefore we are not clear which report Friends of the Earth was referring to in its oral submissions. However, a later report titled "*Estimating Local Mortality Burdens associated with Particulate Air Pollution PHE-CRCE-010*" (Public Health England, 2014) provides data on air quality by local authority. It shows that mean particulate pollution in Selby ( $9.0 \mu\text{g}\cdot\text{m}^{-3}$ ) is lower than the average for England ( $9.9 \mu\text{g}\cdot\text{m}^{-3}$ ), with Selby ranking 214<sup>th</sup> out of 324 authorities across England, where the most polluted is ranked 1<sup>st</sup>. In relation to deaths attributable to air pollution age 25+ and associated life years lost, per head of population, Selby ranks 279<sup>th</sup> and 296<sup>th</sup>, respectively (where the worst is ranked 1<sup>st</sup>). It should also be noted that this paper concentrates on fine particulate matter, as "*the effect of long-term exposure to air pollution on mortality is most closely associated with ambient levels of fine particulate matter (PM2.5)*." The Proposed Scheme, being gas fired energy generation, is not a significant source of primary particulate matter and the ES Chapter 6 – Air Quality (Examination Library APP-074) states "potential impacts from emissions [particulate matter] are... negligible".
- 1.2.3 Mr Law, on behalf of Biofuelwatch, also made an oral submission but no new or additional points were raised over and above those contained in the RR submitted by Biofuelwatch and which are therefore covered in this document.



### **1.3 Applicant's Responses to Relevant Representations**

- 1.3.1 The Applicant's responses on the RRs submitted by Interested Parties are set out in the following sections of this document. The Interested Parties have been grouped by the same categories used on the Planning Inspectorate ("PINS") website: Local Authorities, Parish Councils, Other Statutory Organisations, Non-Statutory Organisations, and Members of the Public / Businesses.
- 1.3.2 A summary of the RRs is provided in each section, including the name and the PINS' reference of the RR. The RRs have also been categorised by the different themes raised and a response is provided to each of these themes.
- 1.3.3 As many of the non-statutory organisations and members of the public / businesses raised similar themes (either as part of a bespoke response or by submitting a response based on pro-forma template text understood to be provided by Biofuelwatch), these sections have been categorised by theme first, with a summary of the issues raised by each Interested Parties within these themes. As above, a response is provided to each of these themes.
- 1.3.4 A list of all RRs received can be found in Appendix A for reference.

## 2 LOCAL AUTHORITIES

### 2.1 North Yorkshire County Council (RR-309)

#### Statements of Common Ground (SoCG)

##### Summary of representation:

- Supportive of the project in principle and of the consultation undertaken with North Yorkshire County Council ("NYCC"). NYCC considers that the Applicant has taken on board comments from NYCC officers from earlier rounds of consultation and appropriate amendments made in the Application.
- There remain some areas for discussion as part of the SoCG. NYCC is confident that any issues will be worked through in an effective way.

##### Response to representation:

The Applicant notes the positive comments from NYCC. The Applicant will continue to engage with NYCC throughout the examination process. Areas of agreement and areas still under discussion are set out in the Statement of Common Ground submitted for Deadline 1 (document ref. 8.1.3).

#### Landscape and visual impact

##### Summary of representation:

- Satisfied that the Application includes an adequate landscape and visual impact assessment subject to minor amendments to some photographs and photomontages.
- Explanation for the choices related to design and alternatives, and their subsequent effect on the original power station design, needs further explanation.
- A thorough Landscape and Biodiversity Strategy is needed.
- The current proposals of the application do not seek to adequately mitigate or compensate for the effects identified in the Environmental Statement; discussion is ongoing regarding opportunities for mitigation and compensation.

##### Response to representation:

With respect to the minor amendments to the assessment, the Applicant spoke with NYCC who confirmed that what they meant by "*minor amendments to some photographs and photomontages*", was that they wanted some photographs and photomontages resubmitted due to a lack of clarity and oblique angles from which the photographs and LVIA photomontages were taken. The Applicant has made these amendments to the photographs and photomontages, which are submitted at Deadline 1 within the Revised Viewpoints submission, document ref 8.4.1. The photographs provide improved visibility and the new photomontage provides a close-up elevation of the Proposed Scheme. The consideration of alternatives and the explanation of choices in relation to layout, structures and technologies, which have influenced or provided parameters for the design of the Proposed Scheme, are set out in Chapter 4 of the Environmental Statement (Examination Library ref APP-072).

The objectives of the Proposed Scheme have driven the choices made, and these include utilising existing brownfield land forming part of the Existing Drax Power Station Complex and its associated infrastructure which has already been developed for energy generation. The reutilisation of existing brownfield land represents an efficient land use with fewer

environmental impacts during construction and operation than a new power station on previously undeveloped land, or on land that does not have an existing electricity generating use. The reutilisation of as much existing infrastructure as possible (such as the existing cooling systems, cooling towers and steam turbines at Drax Power Station) avoids such infrastructure potentially becoming redundant despite remaining within its operating life and being capable of contributing to a more efficient energy production and a lower carbon footprint (given it is already constructed). The Landscape and Visual Amenity Chapter of the ES (Examination Library ref APP-078) (referred to as the "LVIA") has assessed the effects of the Proposed Scheme which has resulted from those choices. Whilst reference is made to the original design, the LVIA in accordance with Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations 2017"), considers the effects of the Proposed Scheme on the current baseline environment. Whilst part of this baseline environment includes elements of the original design, it also includes development taken place since the original design in order to reflect the existing environment. It would not be appropriate for the Applicant to carry out an assessment of effects on the original design of Drax Power Station ignoring the development that has taken place in and around Drax Power Station since the original design was completed. The assessment in the Environmental Statement must be carried out against the baseline as of today (i.e. the Existing Drax Power Station Complex).

The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) is currently being revised and is being discussed with NYCC. The revised document will be submitted for Deadline 2.

In terms of addressing significant landscape and visual effects, the effects are mitigated as far as reasonably practicable (in accordance with National Policy Statement EN-1 and paragraph 2.6.8 of National Policy Statement EN-2) given the constraints associated with Best and Most Versatile agricultural land (Grade 1 and 2) in the immediate vicinity of the Existing Drax Power Station Complex. The benefits of providing further mitigation would be disproportionately low (the significance of effect would not change) compared to the disbenefits (primarily land take of Best and Most Versatile agricultural land) associated with such further mitigation. Accordingly, the Applicant considers that it has taken the necessary measures to minimise the effects of the Proposed Scheme on landscape and visual amenity as far as reasonably practicable as required by paragraph 2.6.8 of EN-2.

## Highways

### Summary of representation:

- Satisfied with the approach taken by the Applicant regarding the transportation part of the EIA.
- There is a need for a comprehensive Construction Workers Travel Plan.
- Road closures as a result of abnormal loads will have a significant impact on the network and will need to be managed effectively.
- Satisfied that the temporary closure of some minor roads can be managed.
- A temporary car park is to be constructed and a footway over New Road will be provided by the Applicant to accommodate additional staff.

### Response to representation:

The Applicant notes the positive comments from NYCC.

An outline Construction Worker Travel Plan (Examination Library ref APP-090) forms part of the Application. Requirement 18 in Schedule 2 of the draft DCO (Examination Library ref AS-012) prevents any part of the Proposed Scheme, save for the permitted preliminary works (as defined in Article 2 of the draft DCO), from being commenced until a Construction Worker Travel Plan has been submitted to and approved by the relevant planning authority. This plan must be substantially in accordance with the outline Construction Worker Travel Plan.

The Applicant also submitted as part of the Application an outline Construction Traffic Management Plan (Examination Library ref APP-091), which sets out the framework for addressing the transport issues associated with the movement of construction traffic to service the Proposed Scheme, including site access, routing, signage, notifications, heavy goods vehicles (HGV) and abnormal indivisible loads. Requirement 17 in Schedule 2 of the draft DCO (Examination Library ref AS-012) prevents any part of the Proposed Scheme, save for the permitted preliminary works (as defined in Article 2 of the draft DCO), from being commenced until a Construction Traffic Management Plan has been submitted to and approved by the relevant planning authority. This plan must be substantially in accordance with the outline Construction Traffic Management Plan.

The Applicant has been in discussions with Highways England, NYCC and Selby District Council ("SDC") over the measures contained in the outline Construction Worker Travel Plan as well as the outline Construction Traffic Management Plan and revised versions will be submitted for Deadline 2.

## **Socio-economics**

### **Summary of representation:**

- The construction phase will create opportunities to train and employ local people.
- The local and national economic effect of securing the Drax Power station site at Selby is welcomed.

### **Response to representation:**

The Applicant welcomes the positive comments from NYCC. Socio-economics are fully assessed within Chapter 14 of the ES (Socio-Economics, Examination library ref. APP-072).

The Applicant is in discussions with NYCC and SDC in relation to the terms of the section 106 agreement which will secure local training and employment benefits.

## **Waste**

### **Summary of representation:**

- No significant local issues of concern.

### **Response to representation:**

The Applicant welcomes the positive comments from NYCC.

## **Biodiversity**

### **Summary of representation:**

- Satisfied that the Application provides a sufficient assessment of the impact on habitats in the area.
- A full landscape and biodiversity strategy will be needed to consider linkages and connectivity of habitats.

#### Response to representation:

The Applicant welcomes the positive comments from NYCC. The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) is currently being revised and is being discussed with NYCC. The revised document will be submitted for Deadline 2.

### Archaeology

#### Summary of representation:

- The mitigation proposed in the ES chapter is an appropriate response to the potential significance of any remains.

#### Response to representation:

The Applicant welcomes the positive comments from NYCC.

## 2.2 Selby District Council (RR-315)

### General

#### Summary of representation:

- It is likely that future representations will be made jointly with North Yorkshire County Council.
- Subject to an acceptable draft DCO, Selby District Council ("SDC") will support the granting of a Development Consent Order for the proposed Drax Repower project.
- The Proposed Scheme is in accordance with the spirit of the need for new nationally significant electricity infrastructure projects contained in the Overarching National Policy Statement for Energy (EN-1).

#### Response to representation:

The Applicant welcomes the positive comments from SDC. The Applicant is in discussions with SDC and NYCC in relation to the terms of the draft DCO.

### Landscape

#### Summary of representation:

- SDC is keen to ensure that the visual effects of the Proposed Development described by the Applicant as significant in the near landscape are mitigated as far as possible where serious impacts are identified.
- The Councils will comment upon the broad parameters for the new structures and the nature of materials and colour treatments to be used.
- Submissions will be made regarding the nature and content of any necessary planning obligation and the opportunities to secure off-site landscape mitigation.

#### Response to representation:

As background, the Landscape and Visual Impact Assessment ("LVIA") contained in Chapter 10 of the Environmental Statement (Examination Library ref APP-078) assesses the current baseline in accordance with EIA Regulations 2017. Consideration of the

cumulative effects which may arise as a consequence of the demolition or redevelopment of Ferrybridge and Eggborough power stations was set out within the Cumulative Assessment, Chapter 17 (Examination Library ref APP-085) paragraphs 17.5.4, 17.7.33 to 17.7.49 and Appendix 17.3 LVIA Cumulative Effects (Examination Library ref APP-130).

The visual effects of the Proposed Scheme are mitigated as far as reasonably practicable as referred to within the Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135). Extensive off-site mitigation was deemed unfeasible since it would result in the loss of Best and Most Versatile (BMV) agricultural land (Grade 1 and 2), and as a result the benefits of providing further mitigation would be disproportionately low (the significance of effect would not change) compared to the disbenefits involved and is therefore not considered to be appropriate. Accordingly, the Applicant considers that it has taken the necessary measures to minimise the effects of the Proposed Scheme on landscape and visual amenity as far as reasonably practicable as required by paragraph 2.6.8 of National Policy Statement EN-2.

The consideration of alternatives and the explanation of choices in relation to layout, structures and technologies which have influenced or provided parameters for the design of the Proposed Scheme are set out in Chapter 4 of the Environmental Statement (Examination Library ref APP-072). The LVIA has recommended the colour treatment which should be considered in the final design and, as reported in the LVIA Chapter (paragraph 10.4.17), *"The proposed colours have drawn on the original colour palette used in the original Drax design."* Details of the colour, materials and surface finishes would be approved by SDC prior to construction pursuant to draft DCO requirement 7 in Schedule 2 (Examination Library ref AS-012).

The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) summarises the work required to mitigate the landscape and biodiversity effects as far as reasonably practicable. As referred to in paragraph 1.1.27 of that strategy, further details for each compensation area will be provided in the detailed Landscape and Biodiversity Strategy and accompanying plans. The approval of the detailed strategy and implementation of the mitigation measures set out therein are secured by requirement 8 in Schedule 2 to the draft DCO (Examination Library ref AS-012).

The Outline Landscape and Biodiversity Strategy is currently being revised and is being discussed with SDC. The revised document will be submitted for Deadline 2.

## Highways

### Summary of representation:

- Submissions will be made on the nature and content of the Construction Management Traffic Plan and the Travel Plan.

### Response to representation:

An outline Construction Worker Travel Plan (Examination Library ref APP-090) forms part of the Application. Requirement 18 in Schedule 2 of the draft DCO (Examination Library ref AS-012) prevents any part of the Proposed Scheme, save for the permitted preliminary works (as defined in Article 2 of the draft DCO), from being commenced until a Construction Worker Travel Plan has been submitted to and approved by the relevant planning authority. This plan must be substantially in accordance with the outline Construction Worker Travel Plan.

The Applicant also submitted as part of the Application an outline Construction Traffic Management Plan (Examination Library ref APP-091), which sets out the framework for addressing the transport issues associated with the movement of construction traffic to service the Proposed Scheme, including site access, routing, signage, notifications, heavy goods vehicles (HGV) and abnormal indivisible loads. Requirement 17 in Schedule 2 of the draft DCO (Examination Library ref AS-012) prevents any part of the Proposed Scheme, save for the permitted preliminary works (as defined in Article 2 of the draft DCO), from being commenced until a Construction Traffic Management Plan has been submitted to and approved by the relevant planning authority. This plan must be substantially in accordance with the outline Construction Traffic Management Plan.

The Applicant has been in discussions with Highways England, NYCC and SDC over the measures contained in the outline Construction Worker Travel Plan as well as the outline Construction Traffic Management Plan and revised versions will be submitted for Deadline 2.

## Heritage

### Summary of representation:

- Submissions will be made on the nature of effects upon the setting of scheduled ancient monuments at Drax Augustinian Priory and Scurff Hall.

### Response to representation:

Work Number 9A of the Proposed Scheme (being a temporary construction laydown area including car parking, pedestrian bridge, site and welfare offices and workshops, security infrastructure, drainage and waste management and services) would be located to the east of Drax Augustinian Priory (Development Parcel A in Figure 1-3 of Chapter 1 of the Environmental Statement (Examination Library ref APP-069)). Work Number 9A would cause temporary minor harm to the setting of the Drax Augustinian Priory during construction.

There would also be a permanent adverse impact of minor significance on the setting of Drax Augustinian Priory resulting from the impact of new built forms in the landscape (Units X and Y, Work Numbers 1A and 2A).

In response to a request from Historic England, the Applicant has agreed to provide enhancement mitigation for Drax Augustinian Priory, which, whilst it would not offset the effect on that asset, would enhance people's experience of the Priory in the context of the reported minor negative impacts. The mitigation would comprise the provision of interpretative panels which would be placed at a suitable location on the Public Right of Way adjacent to the Priory or, in the event that the necessary consents and approvals cannot be obtained for the interpretative panels, would be located at the Drax Visitor Centre. The Applicant is in discussions with SDC and NYCC in order to secure such mitigation via a development consent obligation in a legal agreement pursuant to section 106 of the Town and Country Planning Act 1990.

There will also be a temporary adverse impact of minor significance on the setting of Scurff Hall resulting from the construction of the Gas Pipeline (Work No. 7) and the traffic associated with the construction of the Above Ground Installation (Work No.4).

These impacts and mitigation have been agreed with Historic England, and recorded in a Statement of Common Ground (submitted at Deadline 1, Applicants reference 8.1.1)

As set out in the Planning Statement (Examination Library ref. APP-062), the effects identified on Drax Augustinian Priory and Scurff Hall are considered to be acceptable in planning policy terms because the minor harm is less than substantial harm and is considered to be outweighed by the benefits of the Proposed Scheme.

## **Biodiversity**

### **Summary of representation:**

- Submissions will be made on the impacts upon designated sites, natural habitats and species; the nature of biodiversity offsetting proposals and mitigation; monitoring and long-term management.

### **Response to representation:**

The Biodiversity Chapter of the Environmental Statement (Examination Library ref APP-077) submitted with the Application has considered potential impacts and effects upon designated sites; natural habitats and protected species; biodiversity offsetting and mitigation; and the potential requirements for monitoring and long-term management of biodiversity mitigation measures. The Applicant has engaged with NYCC Ecology Service during the preparation of the Application and continues to do so. The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) is currently being revised and is being discussed with both SDC and NYCC. The revised document will be submitted for Deadline 2.

## **Draft DCO**

### **Summary of representation:**

- Submissions will be made on the nature and content of the draft DCO, including relationship to the approved site reconfiguration works in respect of the contractors' compound (Work No 15).

### **Response to representation:**

Engagement with SDC and NYCC on the draft DCO, including the relationship with the site reconfiguration works, is ongoing. As discussed with SDC and raised at the Preliminary Meeting held on 4 October 2018, the Applicant proposes to remove the Site Reconfiguration Works from the Application for the Proposed Scheme, given those works have been separately consented by SDC under the Town and Country Planning Act 1990 and have been implemented (planning permission 2018/0154/FULM granted on 24 May 2018). A revised draft DCO to reflect that proposed amendment will be submitted at Deadline 2 (alongside the application for this non-material amendment). It should be noted that Stage 1 (construction of Unit X, the Gas Pipeline, the GRF, AGI and battery storage facility for Unit X) was assessed on the basis that the Site Reconfiguration Works had been carried out, and so removing those works from the Application makes no difference to the assessment of Stages 1, 2, 3 and 4 (that is, the construction of the Proposed Scheme, its operation, maintenance and decommissioning).



## 2.3 Durham County Council (RR-163)

### General

#### Summary of representation:

- No comments or objections to make in relation to the proposals.

#### Response to representation:

The Applicant notes that there is no objection to the Proposed Scheme.

## 3 OTHER STATUTORY CONSULTEES

### 3.1 The Coal Authority (RR-151)

#### Asset protection

##### Summary of representation:

- There are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability that would need to be considered as part of this proposal. Accordingly, the Coal Authority has no comments or observations to make on this consultation.

##### Response to representation:

The Planning Statement (Examination Library ref APP-062) assesses the impact of any registered coal locations. No site of significant importance has been found and the Applicant welcomes the response from the Coal Authority confirming that it has no comments or observations to make on the Proposed Scheme.

### 3.2 Forestry Commission (RR-152)

#### General

##### Summary of representation:

- Summary of the Forestry Commission's responsibilities.
- Appendices which describe relevant government policy in relation to ancient woodlands, and environment considerations in energy and infrastructure policies.

##### Response to representation:

The Applicant notes the comments and has provided a response to the specific government policies mentioned in the sections below.

#### Biodiversity

##### Summary of representation:

- Recommendation that landscape and habitat reinstatements are in accordance with the UK Forestry Standard.
- Noting the importance of woodland management in making rural and urban landscapes more resilient to the effects of climate change and contribution to wider climate change adaptation.
- Recommendation of the Forestry Commission template management plan to ensure long term viability of created habitat and existing woodland.
- Recommendations to use the Ecological Site Classification Decision Support System (ESC-DSS) - Forest Research to determine resilient species choice for the proposed tree planting palette.
- Trees are important elements of green infrastructure, a key resource that can significantly contribute to climate change adaptation.

##### Response to representation:

The Applicant can confirm that the principles of The UK Forestry Standard would be given due regard during the development of the detailed Landscape and Biodiversity

Strategy(ies) as referred to in Appendix 6 of the Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135). The detailed strategy(ies) would be produced pursuant to draft DCO Requirement 8 'Provision of Landscape and Biodiversity Mitigation' in Schedule 2 of the draft DCO, should a DCO for the Proposed Scheme be granted.

The Applicant can confirm that the principles of the '*Forestry Commission template management plan: Create a woodland management plan*' will be given due regard in the revised Outline Landscape and Biodiversity Strategy which will be submitted for Deadline 2 and therefore regard will be had to those principles during the development of the detailed Landscape and Biodiversity Strategy(ies). The detailed strategy(ies) would be produced pursuant to draft DCO Requirement 8 'Provision of Landscape and Biodiversity Mitigation' in Schedule 2 of the draft DCO, should a DCO for the Proposed Scheme be granted.

It should be noted that the commitments in the Outline Landscape and Biodiversity Strategy respond to the local landscape and ecological setting, and whilst there would be creation of a number of small blocks of woodland/tree planting, the proposals are for a mosaic of habitats to be created, not just woodland. Detailed habitat creation and management proposals that include climate change adaptation measures will therefore need to be integrated across a range of habitats, not just woodland. It is therefore likely that not all elements of the Forestry Commission template management plan will be relevant to the planting and habitat creation associated with the Proposed Scheme.

The use of the '*Ecological Site Classification Decision Support System (ESC-DSS) - Forest Research*' would be considered during the development of the detailed Landscape and Biodiversity Strategy(ies). The strategy(ies) would be produced pursuant to draft DCO Requirement 8 'Provision of Landscape and Biodiversity Mitigation' in Schedule 2 of the draft DCO, should a DCO for the Proposed Scheme be granted.

Tree planting has been proposed as part of the habitat creation and enhancement proposals set out in the Outline Landscape and Biodiversity Strategy (Examination Library REF: APP-135). There will be no reduction in the area of ancient woodland (indeed, no loss or deterioration of ancient woodland is predicted to arise as a result of the Proposed Scheme), with the landscaping proposals expected to deliver a net increase in the extent of native woodland during implementation of the Proposed Scheme.

## **Landscape**

### **Summary of representation:**

- Encourage the design of the associated infrastructure (green space, woodlands, public footpaths and cycleways) to build on existing network of green infrastructure linking settlements around the Drax power station to the adjacent countryside, to aid the promotion for local residents to access the countryside.

### **Response to representation:**

The design of green space, woodlands and public access routes has been constrained by the Existing Drax Power Station Complex boundary and the need to preserve Best and Most Versatile agricultural land (Grade 1 and 2).

The Proposed Scheme includes measures to maintain and minimise disruption to public rights of way and access to the countryside, including minimising land take for the

construction laydown and car park which avoids closure of the public right of way and, in the event that the land needs to be prepared for carbon capture infrastructure at some point in the future, the provision for the diversion of the public right of way to the north of the Carbon Capture Readiness Reserve Space.

In terms of addressing significant landscape and visual effects, the effects are mitigated as far as reasonably practicable (in accordance with National Policy Statement EN-1 and paragraph 2.6.8 of National Policy Statement EN-2). The benefits of providing further mitigation would be disproportionately low (the significance of effect would not change) compared to the disbenefits (primarily land take of Best and Most Versatile agricultural land) associated with such further mitigation. Accordingly, the Applicant considers that it has taken the necessary measures to minimise the effects of the Proposed Scheme on landscape and visual amenity as far as reasonably practicable as required by paragraph 2.6.8 of National Policy Statement EN-2.

## Government policy

### Summary of representation:

- A summary of Government policy on woodland Natural Environment and Rural Communities Act 2006 ("NERC Act") (regard to the purpose of conserving biodiversity).
- National Planning Policy Framework (noting that development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons).
- National Planning Practice Guidance – Natural Environment Guidance, regarding development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS).
- Ancient woodland is an irreplaceable habitat, and in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland.
- Keepers of Time – A Statement of Policy for England's Ancient and Native Woodland - existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland.
- Importance of conserving and restoring ancient woodland.
- Standing Advice for Ancient Woodland and Veteran Trees - Standing advice to help planners assess the impact of the proposed development on the ancient woodland.
- Appropriate mitigation measures are an integral part of the proposed development.
- Regarding trees subject to a Tree Preservation Order, or hedgerows subject to the Hedgerows Regulations 1997, the Applicant should consider whether it would be feasible to use horizontal direct drilling under the ancient woodland or thrust bore under the protected tree or hedgerow.

### Response to representation:

Section 40 and Section 41 NERC Act species have been considered in the Environmental Statement (Chapter 9 Biodiversity, Examination Library Ref APP-077).

No loss or deterioration of ancient woodland is predicted to arise as a result of the Proposed Scheme. No ancient woodland has been identified within 2km of the Proposed Scheme on the basis of the Natural England Ancient Woodland Inventory (as downloaded from the Multi-Agency Geographic Information for the Countryside (MAGIC) web portal

(magic.gov.uk) (date accessed 12/09/2018). No veteran trees have been recorded within the footprint of the Proposed Scheme. Measures to avoid, minimise and mitigate impacts on other hedgerows not protected by the Hedgerow Regulations 1997 are also included in the Outline Construction Environmental Management Plan (Examination Library ref APP-133).

## Planning

### Summary of representation:

- Summary of National Policy Statement for Energy (EN-1).

### Response to representation:

The Proposed Scheme is considered to be in compliance with National Policy Statement EN-1 (and the other relevant NPSs EN-2, EN-4 and EN-5). The 'planning balance' considered in the Planning Statement (Examination Library ref. APP-062) concludes that the benefits of the Proposed Scheme, including the timely delivery of new low carbon electricity generating capacity that would contribute to the security, diversity and resilience of UK energy supplies and support the increased deployment of renewable energy, would substantially outweigh the limited harm that would result from the Proposed Scheme. The Proposed Scheme is considered to meet the tests in section 104 of the PA 2008.

## Sustainable development

### Summary of representation:

- Summary of policies related to clean growth.
- Summary of policies related to natural capital and the need to accelerate the rate of tree planting.
- The value of natural capital is routinely understated.
- Importance of increased tree planting by creating new forests, and incentivising extra planting on private and the least productive agricultural land, where appropriate.
- Industrial Strategy White Paper and references to clean growth.

### Response to representation:

In line with the Government's policies on clean growth, the Proposed Scheme will contribute to the Government's goal of moving to a lower carbon economy and will help to ensure the electricity system is smart and flexible to respond to changes in demand.

Electricity generation from natural gas has been proposed by the Applicant as it is able to respond quickly to changes in demand on the electricity network or fluctuations in supply of renewables. Gas is more efficient and results in lower CO<sub>2</sub> emissions per MW of electricity generated than other fossil fuels, such as coal and oil and, as such, the Proposed Scheme would result in much lower carbon dioxide emissions per unit of electricity than the existing coal-fired units. Indeed, the gas turbines proposed are higher efficiency than gas turbines currently operating in the UK. This would support the Government's commitment to decarbonisation of the energy sector.

This is confirmed by paragraphs 3.6.1 and 3.6.2 of National Policy Statement EN-1 which provide that:

*"3.6.1 Fossil fuel power stations play a vital role in providing reliable electricity supplies: they can be operated flexibly in response to changes in supply and demand, and provide diversity in our energy mix. They will continue to play an important role in our energy mix as the UK makes the transition to a low carbon economy, and Government policy is that they must be constructed, and operate, in line with increasingly demanding climate change goals.*

*3.6.2 Fossil fuel generating stations contribute to security of energy supply by using fuel from a variety of suppliers and operating flexibly. Gas will continue to play an important role in the electricity sector – providing vital flexibility to support an increasing amount of low-carbon generation and to maintain security of supply..."*

In addition, the proposed battery storage facilities of up to 200 MW will support the gas generating units in providing fast and flexible electricity export and other ancillary services to the National Transmission System, providing a short-term response to fluctuations in demand and supply by renewables sources, reducing the need for fossil-fuel generating stations to respond.

The Applicant acknowledges the value of natural capital and has sought to avoid impacts on the natural environment, including woodland, through the design of the Proposed Scheme. For example, the Gas Pipeline route avoids woodland and protected trees and hedgerows.

The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) and Biodiversity Net Gain Report (Examination Library ref APP-116) set out the proposed tree planting to mitigate landscape and biodiversity effects of the Proposed Scheme. Further revised versions of these documents are to be submitted at Deadline 2. Extensive off-site planting was deemed unfeasible since it would result in the loss of Best and Most Versatile (BMV) agricultural land (Grade 1 and 2), and as a result the benefits of providing further mitigation would be disproportionately low compared to the disbenefits involved and is therefore not considered to be appropriate. Accordingly, the Applicant considers that it has taken the necessary measures to minimise the effects of the Proposed Scheme on landscape and visual amenity as far as reasonably practicable as required by paragraph 2.6.8 of National Policy Statement EN-2.

The Outline Landscape and Biodiversity Strategy states that the proposal has sought to protect existing trees and woodland outside of the Site; see paragraph 1.5.7 which states *"External off site planting remains intact, and woodland forming part of Weddle's original design will remain undisturbed as a consequence of the Proposed Scheme"*. Further new planting including woodland will be introduced as part of the implementation of the Strategy.

### 3.3 Natural England (RR-212)

#### General

##### Summary of representation:

- Natural England has no objection to the Proposed Development.
- The proposal is not likely to have a significant impact on any nationally or internationally designated nature conservation sites or nationally designated landscapes.

- Sufficient mitigation measures have been put in place to avoid significant impacts on protected species.
- Natural England will develop the points raised as part of this relevant representation further as appropriate during the examination process.
- Natural England has worked successfully with the Applicant and there are no substantive outstanding matters.
- Natural England welcomes the biodiversity enhancements as set out in the Outline Landscape and Biodiversity Strategy which will have a positive effect on the natural environment by creating and enhancing habitats of biodiversity value on the site. Natural England advises that the Outline Landscape and Biodiversity Strategy should be secured by a suitably worded requirement.
- Natural England is satisfied that the potential impacts of the Proposed Development on nationally and internationally designated nature conservation sites, nationally designated landscapes and protected species have been adequately addressed.
- Natural England advises that, if approved, the project must be subject to all necessary and appropriate requirements which ensure that unacceptable environmental impacts either do not occur or are sufficiently mitigated.

#### Response to representation:

The Applicant welcomes the positive statements from Natural England. The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) is secured by requirement 8 of Schedule 2 of the draft DCO. The requirement prevents any part of the numbered works comprising stage 1 (being numbered works 1, 3A, 4A, 5, 6, 7, 8A, 9, 11, 12A, 13 and 14, which is Unit X, the battery storage facility and electrical connection associated with Unit X, the GRF, AGI, Gas Pipeline, construction laydown areas, and other associated development) from commencing until, for that numbered work, a written strategy, which is substantially in accordance with the Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) and Chapter 9 of the Environmental Statement (Examination ref APP-077) has been submitted to and approved by SDC. It is noted that the Outline Landscape and Biodiversity Strategy is currently being revised and is being discussed with both SDC and NYCC. The revised document will be submitted for Deadline 2.

A Statement of Common Ground (Applicant's document ref. 8.1.2) has been agreed with and signed by Natural England and was submitted into the Examination for Deadline 1. This Statement of Common Ground addresses:

- a) The need for the Proposed Scheme
- b) The principle of development of the Proposed Scheme
- c) Alternatives
- d) Design Scope and Flexibility
- e) Air quality (as pertains to biodiversity)
- f) Noise and vibration (as pertains to biodiversity)
- g) Biodiversity
- h) Protected Species Licensing

- i) Landscape and Visual matters
- j) Habitats Regulations Assessment ("HRA").

The Applicant and Natural England have agreed that, with the proposed avoidance, mitigation and compensation measures in place and which are secured via the draft DCO (Examination Library ref AS-012), there will be no likely significant effects on biodiversity as a result of the Proposed Scheme. Further, with the implementation of avoidance and mitigation measures included as part of the Proposed Scheme, there would be no adverse effects on the integrity of any European Site resulting from air quality impacts.

### **Protected species**

#### **Summary of representation:**

- o Summary of European nationally protected species that may be affected – Great Crested Newts, Badgers, Water Vole, Bats, Reptiles, Nesting Birds.
- o All protected species issues can be addressed by the proposed draft DCO requirement 16.

#### **Response to representation:**

The Applicant has worked closely with Natural England during the development of the Application, including in relation to the assessment of potential effects on protected species.

The Applicant agrees with Natural England that badger, water vole, bats, reptiles and nesting birds are species/species groups that may be affected.

The Applicant would like to clarify and reconfirm that no evidence of great crested newts has been recorded at the Site including a 250m buffer during surveys carried out in spring 2018 by the Applicant. No evidence of great crested newts was recorded during previous surveys carried out in support of the previously proposed White Rose Carbon Capture and Storage Project. Great crested newts are therefore considered to be absent from the Site and are not expected to be affected by the Proposed Scheme (see paragraphs 9.6.51 to 9.6.53 of the Environmental Statement Biodiversity Chapter, Examination Library Ref: APP-077). This has been agreed in the Statement of Common Ground with Natural England.

Regarding requirement 16 in the draft DCO, this requirement secures the Construction Environmental Management Plan ("CEMP"), an outline of which has been submitted with the Application (Examination Library ref APP-133). The Outline CEMP requires that measures for the protection of local habitats and protected species during the construction works will be included within the CEMP and provides general measures to protect against damage and disturbance during construction or demolition activities. The Outline CEMP provides a precautionary approach to eliminate the risk of harm on protected species and to reduce disturbance to populations and assemblages of protected species, including the habitats that they inhabit. This precautionary approach would be achieved through biodiversity sensitive methodologies that make use of avoidance mechanisms and good practice.

### **European Sites**

#### **Summary of representation**



- The applicant has submitted a thorough Environmental Statement which we are satisfied demonstrates beyond reasonable scientific doubt that there would be no significant effect on the integrity of any European site.

**Response to representation:**

The Applicant welcomes this conclusion from Natural England.

### **3.4 Public Health England (RR-228)**

#### **General**

**Summary of representation:**

- Public Health England is pleased to see that the comments it provided following the Section 42 process have been addressed. On this occasion, Public Health England has no additional comments to provide at this stage.

**Response to representation:**

The Applicant welcomes this conclusion from Public Health England.

### **3.5 Historic England (RR-236)**

#### **General**

**Summary of representation:**

- Historic England has been engaged in pre-application discussions with the Applicant.
- A Statement of Common Ground is being prepared which will summarise these discussions.

**Response to representation:**

A Statement of Common Ground with Historic England, submitted for Deadline 1 (Applicant's document ref. 8.1.1), sets out the agreements between the Applicant and Historic England. In summary, this addresses:

- Consultation with Historic England
- Scope of the assessment
- Assessment methodology
- Results of the assessment
- DCO Requirements

The Statement of Common Ground records agreement between the Applicant and Historic England that there will be impacts of minor significance on Heritage Assets; in the context of the National Planning Policy Framework (2018), effects of minor significance equate to less than substantial harm. Therefore, the effects of the Proposed Scheme will result in less than substantial harm on designated heritage assets. It is agreed that there would be a temporary, direct, short-term adverse effect of minor significance to the setting of Drax Augustinian Priory and Scurff Hall during construction and a permanent, direct long-term adverse effect of minor significance during operation on the setting of the Drax Augustinian Priory. Enhancement mitigation for Drax Augustinian Priory would comprise the provision of interpretative panels secured through a section 106 agreement being discussed with NYCC and SDC.

## 3.6 Environment Agency (RR-292)

### General

#### Summary of representation:

- Summary of Environment Agency ("EA") responsibilities.

#### Response to representation:

The Applicant notes the EA's responsibilities.

### Environmental permits

#### Summary of representation:

- An environment permit would be required before operations commenced.
- The EA has received the Applicant's permit variation application and is in the process of carrying out a full technical assessment of this proposal, including an appropriate assessment under the Conservation and Habitat Regulations 2010.
- In determining the permit application, the EA will consider management; operating activities and techniques; combined heat and power; carbon capture and sequestration; emissions to air and discharges to water, land and groundwater along with odour, noise and vibration; information.
- An assessment of BAT (Best Available Technique) will be included in the determination phase of the environmental permit application.
- When assessing the permit application, the EA will set conditions to ensure the emissions and discharges are at a level that will not significantly affect people and the environment. If the Applicant does not demonstrate an ability to comply with such conditions, the permit variation will be refused.
- The EA is satisfied that the Applicant has precluded heat or steam production by following the guidance within CHP Ready Guidance got Combustion an Energy from Waste Power Plants. Should a permit be issued to the Applicant, it will stipulate that the operator must undertake a periodic Combined Heat and Power ("CHP") review.
- Although the Applicant has stated that 'sufficient space will be allocated for future retrofit' we highlight that a site layout plan, indicating available space which could be made available for CHP, has not been provided with the Application.
- The selection of heat loads has not been agreed with the EA. This needs further assessment via a revised statement on CHP.
- The EA requires further information required regarding the space allocated to the Carbon Capture Plan ("CCP") before the EA can conclude whether "there are no foreseeable barriers" to carbon capture with regards to technical feasibility

#### Response to representation:

An Environmental Permit Application (Application reference: EPR/VP3530LS/V015) was received by the EA on the 24 May 2018. The application was Duly Made on the 18 July 2018. Subsequent to this communication, there have been no further requests for information. The Environmental Permit Application is for a variation to the Applicant's existing permit. The Applicant notes the EA's comments on determining the Environmental Permit Application in accordance with BAT.

The Application and Environmental Permit application both include the required documentation regarding the potential for CHP. A CHP Statement was submitted with the

Application (Examination Library ref APP-066). The EA's confirmation that any permit variation, should it be granted by the EA, will include a permit condition to review CHP readiness is noted, and as a result the Applicant considers it is not necessary to duplicate this by way of a requirement to the DCO. As a result, the revised draft DCO to be submitted at Deadline 2 will remove the CHP requirement (currently requirement 21) included in the current version of the draft DCO (Examination Library ref AS-012).

The space required for a CHP Scheme depends on a several factors, with the main one being steam / water parameters of the user. As any potential user's parameters are unknown, the Applicant has assumed a worst case in terms of required plant footprint, which would be provision of heat load for district heating.

The required footprint would be based on the following:

- Retrofit of the Proposed Scheme to allow installation of a steam extraction line off the cold reheat line. It has been confirmed that design of the cold reheat line will enable future retrofit to install a steam extraction line.
- Plot area on the Existing Drax Power Station Complex to locate equipment required for a district heating scheme. Equipment will include steam-to-LTHW (low temperature hot water) plate heat exchangers, back up boilers, thermal storage vessel, expansion vessels, district heating pumps and electrical auxiliaries building. Based on real project data, the Applicant has assumed a plot of 2000 m<sup>2</sup> (conservative estimate) would be required to locate this plant.

The Applicant confirms there is sufficient space on the Existing Drax Power Station Complex to locate this 2000m<sup>2</sup> plot. The exact location of this plot will be driven by the location of any future heat load user and the exit point for the water / steam pipes. As this location is not known, it was decided to not include a site layout plan within the CHP Assessment. It is, however, proposed to update the CHP Assessment to include the additional detail on plot size and list potential areas within the Existing Drax Power Station Complex that the CHP Scheme can be located. The revised CHP Assessment will be submitted to the Examination once it has been discussed and agreed with the EA.

The EA's response regarding Carbon Capture space allocation is noted and revisions to the Carbon Capture Readiness Statement (Examination Library ref APP-067) submitted with the Application have been made to address the issues raised. The revised statement is being discussed with the EA and it is anticipated it will be submitted to the Examination at Deadline 2.

## **Flood risk**

### **Summary of representation:**

- Confirmation that any work or structures, in, under, over or within 16m of the top of the bank of the tidal River Aire (Main River) will require an Environmental Permit and that an Environmental Permit will also be required for any temporary structures or stockpiles of materials within the floodplain.
- The Applicant should also acknowledge Flood Risk Activity Permits in their 'Other consents and licences' document (Examination Library ref APP-068).
- The EA is satisfied with the contents of the Flood Risk Assessment ("FRA") and the mitigation measures proposed within. The EA noted that the DCO does not contain any requirements that ensure that the proposals are carried out as per the FRA – the

EA suggests a requirement be included regarding the provision of flood risk mitigation.

#### Response to representation:

The Applicant would note that: Flood evacuation from construction areas both outside and within the Existing Drax Power Station Complex is addressed in section 5.3.1 of the FRA (Examination Library ref AS-014).

Recommended finished floor levels are addressed in sections 5.3.3 & 5.3.11 of the FRA.

Construction of the flood relief channel is addressed in sections 5.3.5 & 5.3.12 of the FRA.

Storage of materials is addressed in section 8.2.2 of the FRA.

Reinstatement of existing ground levels is addressed in section 8.2.3 of the FRA.

A requirement will be added to the draft DCO to ensure the works are to be carried out in accordance with the submitted FRA. The revised draft DCO submitted at Deadline 2 will reflect this.

The Applicant will also update the Other Consents and Licences document (Examination Library ref APP-068) to refer to Flood Risk Activity Permits and submit at Deadline 2.

### Surface water / groundwater

#### Summary of representation:

- A permit pursuant to the Environmental Permitting Regulations 2016 may be required if there are any discharges to surface water arising from dewatering activities as part of the construction phase.
- The 'Other Consents and Licences' document (Examination Library ref APP-068) should be updated to reflect any permitting requirements in relation to discharges to surface water or groundwater.
- Provision of contact details that the Applicant will require regarding a new surface water abstraction licence for temporary works during construction.
- The EA welcomes the inclusion of the requirement regarding surface water drainage.

#### Response to representation:

Chapter 12 of the Environmental Statement, Water Resources (Examination Library ref APP-080) describes the consent requirements for discharges to surface water and groundwater, and for temporary pumping of groundwater. All required consent applications will be made at the appropriate times and through ongoing engagement with the EA. The Applicant will also update the Other Consents and Licences document (Examination Library ref APP-068) to refer to any permitting requirements in relation to discharges to surface water or groundwater and submit at Deadline 2.

There are no proposals in the DCO for new permanent abstractions. The Applicant proposes that the requirement for an abstraction licence for the temporary pumping of groundwater in excavations be disapplied in the draft DCO, and will be discussing this with the EA.

The direction and contact details provided are noted and appreciated.

## Waste

### Summary of representation:

- Should demolition waste require treatment prior to being reused as part of the construction phase, a relevant exemption or environmental permit would be required.
- A specific requirement should be included to secure submission of the Site Waste Management Plan.

### Response to representation:

A Site Waste Management Plan ("SWMP") will be produced as part of the Construction Environmental Management Plan ("CEMP"). The proposed structure of the SWMP is included in the Outline CEMP. Requirement 16 of the draft DCO (Examination Library ref AS-012) secures the approval and implementation of the CEMP, and therefore the SWMP. A further requirement is therefore not considered necessary.

## Contaminated Land and Ground Conditions

### Summary of representation:

- The current wording in the draft DCO regarding contaminated land and ground conditions is considered insufficient. Suggestion that requirements are included that are based on the standard Environment Agency planning condition wording.

### Response to representation:

The Applicant proposes to revise the DCO requirements with regards to land contamination and protection of controlled waters in line with the EA's comments. The Applicant is currently in discussion with the EA to confirm appropriate wording for the requirements requested. The revised draft DCO submitted at Deadline 2 will reflect the revised requirement.

## Construction Environmental Management Plan

### Summary of representation:

- The EA supports the inclusion of a requirement for submission of a construction environmental management plan (CEMP)
- The CEMP should cover as a minimum appropriate bunding for potentially hazardous liquids, consideration of production of silty water, stockpiling soil and aggregates, and relevant emergency contacts for on-site in the event of emergency / spill / pollution.

### Response to representation:

The outline CEMP (Examination Library ref APP-133) already states the following "*storage and bunded areas will be constructed of impervious floors and walls with the capacity for the contents of the storage tank and an additional 10% safety margin*". This is considered to satisfy the EA's request for appropriate bunding (of at least 110% of the container sizes) for potentially hazardous liquids.

In relation to production of silty water, stockpiling soil and aggregates and relevant emergency contacts, amendments will be made to the Outline CEMP to reflect these comments and ongoing discussions with the EA. An updated Outline CEMP will be

submitted for Deadline 2. Requirement 16 of the draft DCO (Examination Library ref AS-012) secures the approval and implementation of the CEMP.

### **Stack design parameters**

#### **Summary of representation:**

- The dimensions for certain structures on site will be dependent on the results of the technical assessment submitted with the environmental permit application.

#### **Response to representation:**

A stack sensitivity assessment (Examination Library ref APP-098) was completed as part of the air quality technical assessment. This concluded that a minimum stack height of 120 m provides adequate dispersion to reduce the impacts of the operation of the Units to negligible or slight adverse levels. The methodology and assumptions used were agreed with the EA. The Applicant is content that the stack sensitivity assessment is robust.

## **3.7 National Grid (RR-308)**

### **Asset protection**

#### **Summary of representation:**

- Confirmation of the National Grid Electricity Transmission plc ("NGET") and National Grid Gas plc ("NGG") assets which have been identified as being within or within close proximity to the proposed Order limits.

#### **Response to representation:**

The assets listed have been noted and these are all considered in the design studies done to date. Protective provisions for inclusion in the draft DCO are currently being discussed with NGET and NGG and will cover the assets listed below. It should also be noted that Drax already has various interface agreements in place with NGET, given the location of NGET's substation within the Existing Drax Power Station Complex.

We note the specific actions to date for each asset:

#### SUBSTATION(S)

##### **DRAX4 (400kV) Substation**

The Applicant is in conversation with NGET about the Substation and how the Proposed Development will interact with it. All necessary precautions and restrictions required by NGET will be considered in the design of project assets. All works required to the Substation are including in the Application.

##### **CAMBLESFORTH 66kV S/S**

The Proposed Scheme will not affect this facility.

#### OVER HEAD LINE

4VJ (400kV) overhead line route, Towers 01, 01A, 02, 02A

The Applicant is aware that there will be works in close proximity to Towers 01, 01A, 02, 02A and the associated overhead power lines. The Applicant will consider all necessary constructions constraints from NGET alongside HSE guidance note GS6 associated to working and installing assets next to the NGET assets.

4VH (400kV) overhead line route, Tower 01

The Proposed Scheme will not affect this tower or associated overhead line route.

4VC (400kV) overhead line route, Towers 340, 341

The Applicant is aware that there will be works in close proximity to 340 tower, 341 tower and the associated overhead power lines. The Applicant will consider all necessary construction constraints from NGET alongside HSE guidance note GS6 associated with working and installing assets next to the NGET assets.

### UNDERGROUND CABLE

66kV cables between DRAX1 Substation and CAMBLESFORTH 66kV

The Applicant is aware that there will be works in close proximity to the 66kV cables between DRAX1 Substation and CAMBLESFORTH 66kV. Prior to any construction work, the relevant project representatives will be in discussion with NGET to ensure all NGET constructions constraints are considered.

400kV cables in the vicinity of the DRAX4 Substation

The Applicant is aware that there will be works in close proximity to the 400kV cables in the vicinity of the DRAX4 Substation. Prior to any construction work, the relevant project representatives will be in discussion with NGET to ensure all NGET constructions constraints are considered.

### GAS PIPELINE

Feeder 29 - ASSELBY TO PANNAL high pressure gas

The Applicant is in contact with NGG regarding this asset given Feeder 29 is the pipeline into which the Gas Pipeline will connect.

### DRAX above ground installation

The Applicant is working in proximity to this facility (approx. 100m) but should not directly interact with it. It is likely the Proposed Scheme may affect vehicle access along Rusholme Lane with construction traffic, the specifics of which will be coordinated with NGG (and other stakeholders) to ensure this issue is not detrimental to NGG duties as a regulated asset owner and operator.

## 4 PARISH COUNCILS

### 4.1 Newland Parish Council (RR-239)

#### Highways

##### Summary of representation:

- No objection to the Proposed Scheme.
- The Council has concerns in relation to the management of the construction traffic going to and from the proposed site of the Above Ground Installations ("AGI") on Rusholme Lane.
- Suggestion that there is a designated route to the AGI using New Road, Carr Lane, past Read School, Church Dike Lane, and Rusholme Lane for all vehicles until such time as the proposed route of the pipeline is sufficiently developed and able to carry the traffic to and from the proposed AGI site.
- Under no circumstances should the pipes be taken to the site using Church Dike Lane and Rusholme Lane.

##### Response to representation:

The Applicant welcomes the Parish Council's no objection to the Proposed Scheme.

The Applicant submitted as part of the Application an outline Construction Traffic Management Plan (CTMP) (Examination Library ref APP-091). The outline CTMP sets out the framework for addressing the transport issues associated with the movement of construction traffic to service the Proposed Scheme, including site access, routing, signage, notifications, heavy goods vehicles (HGV) and abnormal indivisible loads. Requirement 17 in Schedule 2 of the draft DCO (Examination Library ref AS-012) prevents any part of the Proposed Scheme, save for the permitted preliminary works (as defined in Article 2 of the draft DCO), from being commenced until a Construction Traffic Management Plan has been submitted to and approved by the relevant planning authority. This plan must be substantially in accordance with the outline Construction Traffic Management Plan.

The Applicant has been in discussions with Highways England, NYCC and SDC over the measures contained in the outline Construction Traffic Management Plan and a revised version will be submitted for Deadline 2.

The revised outline CTMP will consider the routes identified by Newlands Parish Council to access the AGI site and include measures to ensure that only vehicles capable of comfortably traversing the length of Rusholme Lane being allowed to do so. The analysis will involve undertaking a swept path analysis of the route prior to deliveries to the AGI with on-site check measurements. Any vehicles that are identified as unable to travel along Rusholme Lane will be required to use the proposed route of the pipeline, with access from Main Road. This issue is currently under discussion with Newland Parish Council.



## 5 NON-STATUTORY ORGANISATIONS

### 5.1 Introduction

5.1.1 As a majority of the non-statutory organisations covered similar issues (as either expressed by bespoke responses or utilising a pro-forma template text understood to be provided by Biofuelwatch), this section has been grouped by the themes raised as part of the relevant representations, including a summary of each RR within those themes.

### 5.2 Climate change

Summary of representations:

Table 5-1: Summary of RRs – non-statutory organisations – climate change

PINS Ref	Organisation	Summary of representation
RR-184	Fuel Poverty Action	<ul style="list-style-type: none"> <li>○ Oppose the Drax Repower proposals</li> <li>○ “Negative climate impacts” cost lives, and also have major financial costs, for heating, cooling, food, and health care. We cannot afford this development.</li> <li>○ These negative impacts set up vicious circles exacerbating climate change including through the need for air conditioning.</li> </ul>
RR-002	Biofuelwatch	<ul style="list-style-type: none"> <li>○ Object to the Drax Repower proposals as they are deemed incompatible with a transition to a lower carbon future and is not a sustainable development, as defined in the National Planning Policy Framework</li> <li>○ Example of the recently rejected planning permission for an open-cast coal mine at Druridge Bay</li> <li>○ Proposal is incompatible with a transition to low-carbon economy and the proposed scheme will represent a net increase in greenhouse gas emissions</li> <li>○ There is a need to phase out fossil fuel emissions to meet UK obligations under the Paris Climate Agreement</li> </ul>
RR-185	Harrogate District Friends of the Earth	<ul style="list-style-type: none"> <li>○ Object to the Drax Repower proposals as they are deemed incompatible with a transition to a lower carbon future and is not a sustainable development, as defined in the National Planning Policy Framework</li> </ul>
RR-143	Food & Water Europe	
RR-225	Frack Free Exmoor Quantocks and Sedgemoor	
RR-226	Global Justice Now	

PINS Ref	Organisation	Summary of representation
RR-245	Elmet & Rothwell Green Party	<ul style="list-style-type: none"> <li>○ Example of the recently rejected planning permission for an open-cast coal mine at Druridge Bay</li> <li>○ Proposal is incompatible with a transition to low-carbon economy and the proposed scheme will represent a net increase in greenhouse gas emissions</li> <li>○ There is a need to phase out fossil fuel emissions to meet UK obligations under the Paris Climate Agreement</li> <li>○ The smokestack CO<sub>2</sub> emissions from new gas units will contribute to higher long-term UK CO<sub>2</sub> emissions.</li> </ul>
RR-273	ClientEarth	<ul style="list-style-type: none"> <li>○ Object to the proposed project as it is not consistent with National Policy Statements (NPSs) EN-1 and EN-2.</li> </ul>
RR-293	Friends of the Earth Selby	<p>The proposal</p> <ul style="list-style-type: none"> <li>○ expands a power station that is already the biggest CO<sub>2</sub> emitter (and of other pollutants) in the UK.</li> <li>○ breaches the Climate Change Act 2008</li> <li>○ contributes to breaching the Paris Agreement</li> </ul>
RR-317	South Lakes Action on Climate Change Towards Transition (SLACCtt)	<ul style="list-style-type: none"> <li>○ Object to the proposals as they are incompatible with decarbonisation and the UK's commitment to meeting the 2015 Paris Climate temperature goals</li> <li>○ The proposal is also incompatible with the UN definition of 'sustainable development' used in the 2018 Revised NPPF</li> <li>○ If the government updates its policies to comply with the Paris temperature goals, the proposal would be legally non-compliant</li> <li>○ The proposals would delay transition to a low-carbon future</li> <li>○ There is no credible guarantee of early addition of CCS</li> </ul>
RR-320	Yorkshire Wildlife Trust	<ul style="list-style-type: none"> <li>○ The development is incompatible with The Climate Change Act 2008.</li> <li>○ The Trust is disappointed in the proposed approach to mitigate the</li> </ul>

PINS Ref	Organisation	Summary of representation
		impacts of the development on CO <sub>2</sub> emissions and climate change.

[Response to representation:](#)

**Climate Change and the Energy National Policy Statements**

Section 104(3) of the PA 2008 states that the Secretary of State ("SoS") must decide the Application in accordance with any relevant national policy statement ("NPS"). The Proposed Scheme is classed as an energy Nationally Significant Infrastructure Project ("NSIP") and as such must be assessed against the government's suite of Energy NPSs. Of relevance to gas fired generating stations are the Overarching National Policy Statement EN-1 and the National Policy Statement for Fossil Fuel Electricity Generating Infrastructure EN-2. National Policy Statements for Gas Supply Infrastructure EN-4 and National Policy Statement for Electricity Networks EN-5 are also relevant for the Proposed Scheme.

The purpose of the Energy NPSs is to transpose into planning policy the Government's commitment on climate change and the drive towards a low carbon economy. To date, the main driver of the country's carbon reduction has been the power generation sector, but all industry sectors have roles to play in decarbonisation. The electrification of non-power sectors is an important part of overall carbon emission reductions, as recognised by NPS EN-1, paragraph 2.2.1 *"We are committed to meeting our legally binding target to cut greenhouse gas emissions by at least 80%, compared to 1990 levels. Analysis done on possible 2050 pathways shows that moving to a secure low carbon energy system is challenging, but achievable. It requires major investment in new technologies to renovate our buildings, the electrification of much of our heating, industry and transport, prioritisation of sustainable bioenergy and cleaner power generation."*

It is clear that the country's pathway to a successful 2050 carbon budget must involve wider transitions outside of the power generation sector. As paragraph 2.2.1 of EN-1 states, decarbonisation of transport, industry, agriculture and the home are key areas that must reduce non-power sector emissions. However, it is only logical that to enable this wider transition, the power generation sector must increase in capacity whilst also looking for ways to reduce in carbon intensity.

Paragraph 3.3.14 of EN-1 states that *"[Government] expect[s] the demand for electricity is likely to increase, as significant sectors of energy demand (such as industry, heating and transport) switch from being powered by fossil fuels to using electricity. As a result of this electrification of demand, total electricity consumption...could double by 2050."*

Whilst the country's total **energy demand** will likely reduce by 2050, **electricity demand** is expected to grow. NPS EN-1 recognises this, and the policy contained in NPS EN-1 therefore seeks to address it.

In addition, NPS EN-1 recognises that decarbonisation is just one aspect of the country's energy policy – low carbon generation brings with it other challenges. Energy policy also needs to ensure that security of supply is maintained and that electricity is affordable. So,

NPS EN-1 is not only a policy that aims to reduce carbon emissions from the power generation sector, but to ensure security of supply and affordability:

*"...energy is vital to economic prosperity and social well-being and so it is important to ensure that the UK has secure and affordable energy." (EN-1, paragraph 2.1.2)*

*"...the Government believes that the NPSs set out planning policies which both respect the principles of sustainable development and are capable of facilitating, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and increasingly low carbon supplies of energy." (EN-1, paragraph 2.2.19)*

*"The Government needs to ensure that sufficient electricity generating capacity is available to meet maximum peak demand, with a safety margin or spare capacity to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events." (EN-1, paragraph 3.3.2)*

*"The larger the difference between available capacity and demand...the more resilient the system will be in dealing with unexpected events, and consequently the lower the risk of a supply interruption." (EN-1, paragraph 3.3.3);*

*"[A] diverse mix of all types of power generation...helps to ensure security of supply." (EN-1, paragraph 3.3.4)*

In summary, the policy contained in the Energy NPSs therefore seeks to (1) reduce carbon emissions in the power generation sector whilst balancing that need with (2) ensuring security of supply in an era when electricity demand is growing and (3) ensuring that electricity is affordable.

The policy in the Energy NPSs was the subject of consultation and assessment before being adopted as national planning policy to achieve those three aims. In particular, as part of the Appraisal of Sustainability ("AoS"), alternative policies were considered as required by the Strategic Environmental Assessment ("SEA") Directive. Paragraphs 1.7.5, 1.7.8 and 1.7.9 of NPS EN-1 provide a useful overview to that process. Those paragraphs state:-

*"1.7.5 As required by the SEA Directive, Part 3 of the AoS of EN-1 also includes an assessment of reasonable alternatives to the policies set out in EN-1 at a strategic level. In particular, this involved a generic assessment of alternatives which placed more emphasis on three key drivers of policy which are highly relevant to the planning context: securing low cost energy (Alternative A1); reducing greenhouse gas emissions (Alternative A3); and reducing other environmental impacts of energy infrastructure development (Alternative A4). There are many different possible changes which could be made to the individual planning policies set out in EN-1 to EN-5, and very large numbers of possible combinations of those different possible policies. However, any change which was consistent with the overall aims of the energy policies that the consenting of new infrastructure in accordance with the energy NPSs is intended to help achieve, would be motivated by the desire to do more in one or more of the areas represented by Alternatives A1, A3 or A4.*

...

*1.7.8 Alternative A3, placing more emphasis on a reduction in CO2 emissions would, by definition, be beneficial from a climate change point of view. There is also the possibility that it may compare favourably with EN-1 from a human health and well-being and economic perspective.*

*1.7.9 However it is not clear that it would be possible to give practical effect to such an alternative through the planning system in the next ten years or so without risking negative impacts on security of supply. Equally the planning policies in the energy NPSs as drafted do not put any unjustified barriers in the way of the development of low carbon energy infrastructure (or the networks infrastructure needed to support it). Accordingly, Alternative A3 has not been preferred to EN-1 at this stage, but Government is actively considering other ways in which to encourage industry to accelerate progress towards a low carbon economy, particularly through the Electricity Market Reform project (see Section 2.2 of this NPS)."*

Further, paragraph 5.2.2 of NPS EN-1 provides that the Examining Authority and Secretary of State do "not, therefore need to assess individual applications in terms of carbon emissions against carbon budgets".

It follows from the above that:

1. the Energy NPSs implement the government's commitment on climate change, and the policies in the NPS are not an issue for the examination of the Proposed Scheme. This was further made clear by the Examining Authority at the Preliminary Hearing and at the Open Floor Hearing both held on 4 October 2018; and
2. as the Proposed Scheme falls within the remit of the Energy NPSs, it is not incompatible with a transition to a low-carbon economy, UK climate obligations under the Paris Agreement, nor the Climate Change Act 2008. It must be remembered that the policy contained in NPS EN-1 is designed to cover the three pillars of government energy policy - decarbonisation, security of supply and affordability. The Proposed Scheme falls within NPS EN-1 and, therefore, the "need" for the Proposed Scheme in the context of these three pillars is not up for debate. It also follows that sections 104(4), 104(5) and 104(6) of the PA 2008 are not engaged. It only remains, therefore, in accordance with section 104(7), for the Examining Authority and the Secretary of State to determine, following the Examination, as to whether the Proposed Scheme's effects outweigh its benefits, which, as the Applicant has demonstrated in its application, they do not.

We would also note that the recent Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Business, Energy and Industrial Strategy for the Eggborough Combined Cycle Gas Turbine Power Station (which was endorsed by the Secretary of State who granted approval for this scheme on 20 September 2018) confirms that the need for new gas power generation is established through the Energy NPSs.

### **Carbon Capture**

For the Applicant's response regarding carbon capture and storage, please refer to Section 6.11 Carbon capture and Combined Heat and Power.

### **Cost of Climate Change**

Fuel Poverty Action have raised issues relating to the costs of climate change. However, these issues relate to global emissions and UK Government policy on emissions and climate change. Government policy is not a matter for the Examination.

### **Existing CO<sub>2</sub> Emissions and net increase in greenhouse gas emissions**

The existing Drax Power Station is the largest generating station in the UK and has reduced its CO<sub>2</sub> emissions through conversion of coal units to biomass. Emissions of CO<sub>2</sub> are, therefore, not disproportionate to the amount of energy produced and current generation methods at Drax (biomass and coal). Whilst total emissions are predicted to increase with the Proposed Scheme, this is a result of the increased generation capacity to produce energy to meet national demand. The Proposed Scheme's high efficiency gas turbines will further reduce the emissions intensity per unit of power generated, providing a significant benefit to climate, as described in the ES Chapter 15 – Climate (Examination Library ref APP-083).

### **Druridge Bay Decision**

A number of Interested Parties raised the issue of the recent Druridge Bay decision, in which the SoS found that greenhouse gas emissions from the proposed open cast coal mine would adversely impact upon measures to limit climate change. A key distinction between the Druridge Bay decision and the Proposed Scheme is that it was considered under the Town and Country Planning Act 1990, taking into account the National Planning Policy Framework (NPPF). The Inspector's Report for the Druridge Bay scheme notes the NPPF "*states that permission should not be given for the extraction of coal unless the proposal is environmentally acceptable, or can be made so by planning conditions or obligations; or if not, it provides national, local or community benefits which clearly outweigh the likely impacts to justify the grant of planning permission.*" This contrasts with the National Policy Statement for Energy (EN-1) (applicable in relation to the Proposed Scheme, but not for development under the Town and Country Planning Act 1990), which requires a "*presumption in favour of granting consent to applications for energy NSIPs.*"

The need for the Proposed Scheme is already established by the Energy NPSs, and the Applicant has demonstrated how the benefits associated with the Proposed Scheme outweigh its adverse effects.

The Inspector's Report for the Druridge Bay scheme notes that "*Coal cannot be phased out unless and until there is another, cost effective way of generating this power at the times when it is needed. The energy mix has to provide sufficient and cost effective capacity across the whole year. In terms of replacing coal-fired generation this is particularly an issue during the winter months when demand is high and some of the other sources, such as renewables, generate much less electricity.*"

This is also recognised in the Government response to unabated coal closure consultation (Implementing the end of unabated coal by 2025 – Government response to unabated coal closure consultation, BEIS, 2018), which states that the SoS should "*retain provisions to [allow the continued use of unabated coal after 2025] in emergency situations, as a last resort, where there might be a shortfall in electricity generation, or risk of one*". This situation would be made more likely in the event that supply is not provided through the

Capacity Market. BEIS (2018) notes that the Capacity Market is “*designed to encourage the investment needed to bring forward new generation to replace retiring stations and provide back-up for more intermittent and inflexible generation sources.*” Cost effective generation meeting these requirements on a suitable scale is effectively limited to gas and nuclear. Given the aim of phasing out unabated coal by 2025 and the time required to bring forward and construct new nuclear capacity, gas power generation will be needed.

The Proposed Scheme would support the Government’s objectives to improve the security, availability and affordability of energy through diversification. Specifically, it will provide reliable and flexible power generation that is needed to support the phasing out of coal power generation and increasing the amount of energy from renewable and low carbon technologies.

### **National Planning Policy Framework and sustainable development**

Paragraph 3 of the National Planning Policy (NPPF) makes it clear that the document does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision-making framework set out in the PA 2008 and relevant NPSs, as well as any other matters that are considered both important and relevant. However, paragraph 3 goes on to confirm that matters that can be considered to be both important and relevant to NSIPs may include the NPPF and the policies within it.

The NPPF defines sustainable development as having three dimensions: an economic role, a social role and an environmental role. The Proposed Scheme would support the achievement of sustainable development by improving the security, diversity and resilience of the UK electricity supplies generally, and supporting the UK’s transition to low carbon electricity generation. It would generate employment opportunities in North Yorkshire during construction and would, therefore, contribute positively to socio-economic wellbeing of people in North Yorkshire and beyond. Whilst there would be a reduction in jobs during the operational phase, this is expected to be a natural reduction through retirement, and, where possible, redeployment. As a whole, the Proposed Scheme is also considered to significantly contribute to the social and economic wellbeing of the UK more generally through improved security of supply and resilience which in turn, would continue to support the wellbeing of people and businesses in the UK.

Paragraph 2.2.19 of NPS EN-1 confirms that new energy infrastructure are compatible with sustainable development principles: “...*the Government believes that the NPSs set out planning policies which both respect the principles of sustainable development and are capable of facilitating, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and increasingly low carbon supplies of energy.*” Furthermore, paragraph 2.1.2 of NPS EN-1 makes it clear that “*energy is vital to economic prosperity and social well-being and so it is important to ensure that the UK has secure and affordable energy.*”

With the Proposed Scheme being located on a brownfield site that is already utilised for power generation, as well as re-using existing infrastructure that has not come to the end of its operational life, the Proposed Scheme fully accords with the principles of sustainable development contained within NPS EN-1 and indeed the NPPF.

## 5.3 Source of gas

### Summary of representations:

Table 5-2: Summary of RRs – non-statutory organisations – source of gas

PINS Ref	Organisation	Summary of representation
RR-184	Fuel Poverty Action	<ul style="list-style-type: none"> <li>The UK public rejects fracking</li> <li>Expanding any gas-fired generation is incompatible with climate commitments, and fracking, which Drax would rely on, is worse, because of methane emissions.</li> </ul>
RR-002	Biofuelwatch	<ul style="list-style-type: none"> <li>Unconventional gas production is a controversial and unpopular process</li> <li>Greater reliance on gas would require either increased Russian imports or dependence on unconventional gas, especially hydraulic fracturing (fracking) and horizontal drilling.</li> </ul>
RR-185	Harrogate District Friends of the Earth	
RR-143	<b>Food &amp; Water Europe</b>	
RR-225	<b>Frack Free Exmoor Quantocks and Sedgemoor</b>	
RR-226	<b>Global Justice Now</b>	
RR-245	<b>Elmet &amp; Rothwell Green Party</b>	
		<ul style="list-style-type: none"> <li></li> </ul>
RR-320	Yorkshire Wildlife Trust	<ul style="list-style-type: none"> <li>The Trust would like confirmation that the Applicant has considered whether the development will lead to increased use of unconventional gas such as shale gas in the Yorkshire region.</li> </ul>

### Response to representation:

The Proposed Scheme is not dependent on gas produced by any specific source of gas, including hydraulic fracturing (fracking). The Proposed Scheme will obtain natural gas directly from the National Grid. Where National Grid sources its gas is National Grid's responsibility and the Applicant will have no control over the origin of the gas. UK Government's decisions on planning policy and potential projects to deliver gas (such as fracking) will be subject to appropriate consideration and environmental and sustainability assessments, and that consideration is outside the scope of the Examination of this Application.

The assessment of Green House Gas emissions reported in the ES Chapter 15 – Climate (Examination Library ref APP-083) for the Proposed Scheme includes well to tank (WTT) emissions as described in 2017 Government GHG Conversion Factors for Company Reporting - Methodology Paper for Emission Factors - Final Report (BEIS, 2017). WTT emissions account for the extraction, transport, storage, processing and distribution of the natural gas to be used by the Proposed Scheme.



## 5.4 Use and need for gas capacity

### Summary of representations:

Table 5-3: Summary of RRs – non-statutory organisations – use of gas

PINS Ref	Organisation	Summary of representation
RR-184	Fuel Poverty Action	<ul style="list-style-type: none"> <li>The UK cannot accept the argument that increasing use of gas is a transition to a low carbon future.</li> </ul>
RR-002	Biofuelwatch	<ul style="list-style-type: none"> <li>Unconventional gas production is associated with far more leakage of methane than conventional gas production. Research shows that gas plants can become a bigger source of greenhouse gas emissions than coal ones if just 3% of the gas leaks into the atmosphere.</li> <li>Drax's plan to replace coal with another fossil fuel cannot help us to decarbonise and will hamper rather than help the U.K.'s transition to low carbon energy.</li> </ul>
RR-185	Harrogate District Friends of the Earth	<ul style="list-style-type: none"> <li>Unconventional gas production is associated with far more leakage of methane than conventional gas production. Research shows that gas plants can become a bigger source of greenhouse gas emissions than coal ones if just 3% of the gas leaks into the atmosphere.</li> <li>Drax's plan to replace coal with another fossil fuel will hamper rather than help the UK's transition to low carbon energy.</li> </ul>
RR-143	<b>Food &amp; Water Europe</b>	
RR-225	<b>Frack Free Exmoor Quantocks and Sedgemoor</b>	
RR-226	<b>Global Justice Now</b>	
RR-245	<b>Elmet &amp; Rothwell Green Party</b>	
RR-293	Friends of the Earth Selby	<p>The proposal:</p> <ul style="list-style-type: none"> <li>will cause more damage than good</li> <li>is not future proof and uses old carbon based fuels</li> <li>is wasting our time (Friends of the Earth), the planning inspectorate's, the secretary of state's and other agencies, as well as the public's time in continuing to pursue old fashioned outdated and dangerous proposals to make money</li> <li>does not take into consideration public good or opinion</li> </ul>
RR-317	South Lakes Action on Climate Change	<ul style="list-style-type: none"> <li>Concern over fugitive methane release from the well or infrastructure</li> </ul>

PINS Ref	Organisation	○ Summary of representation
	Towards Transition (SLACctt)	○ Gas is unlikely to act as a cost-effective 'bridge' to a decarbonised UK energy system

### Response to representation:

The Overarching NPS for Energy EN-1, confirms the urgent need that exists in the UK for new electricity nationally significant infrastructure projects, including new fossil-fuel generating stations. The Proposed Scheme will help meet this need. The NPSs emphasise the need for an energy mix in the UK to maintain flexibility in supply. See also our response at Section 5.2 above.

Electricity generation from natural gas has been proposed by the Applicant as it is able to respond quickly to changes in demand on the electricity network or fluctuations in supply of renewables. Gas is more efficient and results in lower CO<sub>2</sub> emissions per MW of electricity generated than other fossil fuels, such as coal and oil and, as such, the Proposed Scheme would result in much lower carbon dioxide emissions per unit of electricity than the existing coal-fired units. This would support the Government's commitment to decarbonisation of the energy sector.

This is confirmed by paragraphs 3.6.1 and 3.6.2 of NPS EN-1 which provide that:

*"3.6.1 Fossil fuel power stations play a vital role in providing reliable electricity supplies: they can be operated flexibly in response to changes in supply and demand, and provide diversity in our energy mix. They will continue to play an important role in our energy mix as the UK makes the transition to a low carbon economy, and Government policy is that they must be constructed, and operate, in line with increasingly demanding climate change goals.*

*3.6.2 Fossil fuel generating stations contribute to security of energy supply by using fuel from a variety of suppliers and operating flexibly. Gas will continue to play an important role in the electricity sector – providing vital flexibility to support an increasing amount of low-carbon generation and to maintain security of supply..."*

Drax Power Station has been providing electricity in the UK since 1975, comprising originally of six coal-fired units. Since then, four units have been converted to biomass. The Applicant has been a pioneer in moving the UK towards a decarbonised future, and the repowering of up to two units with natural gas would be a further step in that direction.

The Government's UK Low Carbon Transition Plan White Paper (2009) also acknowledges the vital role that gas generated power plays in providing reliable electricity supplies, maintaining the diversity in the UK's energy mix and adapting to changing demand. Gas is a reliable and clean energy source compared to other fossil fuels and is an important contributor to moving the UK to a low carbon economy, as anticipated by EN-1. Gas is also a flexible source of power that can back up intermittent renewables and underpin the security of supply and price stability within the energy market. The Government's Impact Assessment for implementing the end of unabated coal by 2025 (BEIS, 2018) makes it clear that additional fossil fuel plants, and gas plants in particular, will be required under scenarios where existing coal plants are closed.

No evidence has been submitted in relevant representations to substantiate claims that unconventional gas production in the UK will be associated with more leakage of methane than conventional gas production. In any event, the Proposed Scheme is not dependent on gas produced by any specific source of gas, including hydraulic fracturing (fracking). The Proposed Scheme will obtain natural gas directly from the National Grid.

Regarding fugitive losses of methane, the Applicant notes that the study quoted in the relevant representations relates to loss of methane from natural gas power plants. The study found that loss rates from the natural gas power plants studied was in the range 0.09–0.34%, well below the 3% figure quoted in the relevant representations. It concluded, therefore, that the “climate benefit of using natural gas for electricity generation is not compromised given the magnitude of losses at the point of use” at natural gas power plants. Methane is a minor contributor to the greenhouse gas impact of the Proposed Scheme, which has been assessed using established data and methods and reported in the ES Chapter 15 – Climate (Examination Library ref APP-083). The Applicant has responded to the issue of the source of gas in Section 5.3.

Friends of the Earth Selby claim that the Proposed Development does not take into account public opinion. The Applicant would like to draw attention to the Consultation Report (Examination Library ref APP-026), which sets out the results of the statutory and non-statutory consultation undertaken with local communities, local authorities, prescribed consultees and those who would be directly affected by the Proposed Development, and the regard the Applicant has had to the responses to that consultation, in line with the requirements of the Planning Act 2008. The Consultation Report includes the response to the Section 47 feedback form, which asked respondents whether they supported, opposed or were neutral regarding the proposals. Of the 183 consultees who responded to this question, 89% of the respondents noted support for the Proposed Scheme, 6% were neutral, and 4% opposed it.

The Applicant was asked by the Examining Authority at the Open Floor Hearing on 4 October 2018 what the Energy NPSs say in terms of the need for gas generation of the scale and capacity proposed by the Proposed Scheme. Paragraphs 3.1.1 - 3.1.3 of NPS EN-1 make clear that targets or limits on types of energy infrastructure are not a matter for planning policy. Those paragraphs provide:

*" 3.1.1 The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions.*

*3.1.2 It is for industry to propose new energy infrastructure projects within the strategic framework set by Government. The Government does not consider it appropriate for planning policy to set targets for or limits on different technologies.*

*3.1.3 The [Secretary of State] should therefore assess all 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 in this Part. "*

We also refer to the response provided in section 5.2 above, which highlights that the policy contained in the Energy NPSs seeks to (1) reduce carbon emissions in the power generation sector whilst balancing that need with (2) ensuring security of supply in an era

when electricity demand is growing and (3) ensuring that electricity is affordable. The Proposed Development satisfies these three pillars. In addition, with the Proposed Scheme being located on a brownfield site that is already utilised for power generation, as well as re-using existing infrastructure that has not come to the end of its operational life, the Proposed Scheme fully accords with the principles of sustainable development contained within NPS EN-1 and indeed the NPPF.

## 5.5 Renewables

### Summary of representations:

Table 5-4: Summary of RRs – non-statutory organisations – renewables

PINS Ref	Organisation	Summary of representation
RR-184	Fuel Poverty Action	<ul style="list-style-type: none"> <li>The UK public embraces renewable energy</li> <li>In sharp contrast to fracking, 85% of the UK public support renewable energy. For keeping homes warm, insulation and other energy saving measures are often the most effective, and cost-effective choice. The investment required to repower Drax could instead insulate homes.</li> </ul>
RR-002	Biofuelwatch	<ul style="list-style-type: none"> <li>Rather than paying for an unnecessary gas development which is bad for the climate, we should invest in genuinely renewable wind, wave and solar energy which can help us to meet our climate targets.</li> </ul>
RR-185	Harrogate District Friends of the Earth	
RR-143	<b>Food &amp; Water Europe</b>	
RR-225	<b>Frack Free Exmoor Quantocks and Sedgemoor</b>	
RR-226	<b>Global Justice Now</b>	
RR-245	<b>Elmet &amp; Rothwell Green Party</b>	

### Response to representation:

Drax is committed to enabling a low-carbon future by moving away from coal and towards renewable and cleaner fuels. Drax currently has four of the six units at the Existing Drax Power Station Complex running on sustainable biomass pellets and predominantly a sustainable biomass generator. Drax has also announced that it is to pilot the first bioenergy carbon capture storage ("BECCS") project of its kind in Europe, which, if successful, could make the renewable electricity produced at its North Yorkshire power station carbon negative.

The Applicant has been a pioneer in moving the UK towards a decarbonised future, and the repowering of up to two units with natural gas would be a further step in that direction. The Proposed Scheme will play an important role in supporting a flexible, reliable and affordable energy system that can support intermittent, low-carbon wind and solar power generation.

The Energy NPSs support and encourage industry bringing forward many new low carbon developments, as evidenced by paragraph 3.3.5 of NPS EN-1 (set out below). The NPSs also make clear the role of fossil fuel generating stations in this respect (see for example paragraphs 3.6.1 and 3.6.2 of NPS EN-1 as set out above in response to the previous theme). In addition, and in line with paragraph 3.3.5, the Proposed Scheme satisfies NPS EN-2 criteria on CCS which will further support the transition to a low carbon economy.

*"3.3.5 The UK is choosing to largely decarbonise its power sector by adopting low carbon sources quickly. There are likely to be advantages to the UK of maintaining a diverse range of energy sources so that we are not overly reliant on any one technology (avoiding dependency on a particular fuel or technology type). This is why Government would like industry to bring forward many new low carbon developments (renewables, nuclear and fossil fuel generation with CCS) within the next 10 to 15 years to meet the twin challenge of energy security and climate change as we move towards 2050."*

As a result, the Proposed Scheme does not discourage renewables, but instead works alongside and supports the transition to an economy more reliant upon renewable forms of energy. As the power sector continues to decarbonise, it is crucial to retain and replace dispatchable thermal generation alongside the continued deployment of low carbon technologies, to ensure the stability and security of energy supply.

The response provided in section 5.2 above is also relevant.

## 5.6 Water transport

### Summary of representations:

Table 5-5: Summary of RRs – non-statutory organisations – water transport

PINS Ref	Organisation	Summary of representation
RR-235	Canal & River Trust	<ul style="list-style-type: none"> <li>○ The River Ouse is defined as a priority freight route by the Trust and we are therefore also keen to promote the use of the waterway for the sustainable transportation of freight</li> <li>○ Noted that the use of the river to transport materials to and from site has been discounted</li> <li>○ Request that appropriate consideration is given to the justification provided in this section, to ensure that the use of waterborne freight can be effectively ruled out as a viable option</li> </ul>
RR-288	Commercial Boat Operators Association	<ul style="list-style-type: none"> <li>○ Wish to ensure that the government's water preferred policy for the movement of the largest and heaviest abnormal loads is adhered to</li> </ul>

### Response to representation:

The use of the Drax jetty was considered at the initial design stage for the import of construction materials up to 200 tonnes. However, it was ultimately ruled out for the Proposed Scheme as it was judged to be not practical from an engineering perspective, environmentally desirable or economic. The current jetty would need to be demolished and rebuilt to manage the largest loads. In addition, it would be highly likely that adverse environmental effects would result from the need for at least one mobile crane landside of the jetty, associated security lighting, fencing, storage and welfare facilities, laydown areas and dredging to make the jetty suitable for use, as well as impacts on protected species such as otters. If brought into use general construction materials, the jetty would provide limited benefit as a result of the limited draught restricting the vessels that could be used and tidal restrictions on the hours of use. A summary of these considerations is provided in the ES Chapter 4 – Consideration of Alternatives (Examination Library ref APP-072). Accordingly, the very limited benefit would be considerably outweighed by the environmental cost of bringing the jetty back into use and made fit for purpose for the Proposed Scheme. Subsequently, it has also been found that the road between the Drax jetty and the Power Station Site would need to be widened and rebuilt as it would not accommodate the vehicle required to transport the heaviest abnormal loads.

Accordingly, Drax has considered that the more appropriate solution is to use an alternative inland facility on the River Ouse at the Port of Goole, approximately 7 miles from the Drax Power Station, for the delivery of abnormal indivisible loads (AILs) for the Proposed Scheme. Drax is currently in discussions with Highways England over a Statement of Common Ground to agree this approach.

## 5.7 Water abstraction

### Summary of representations:

Table 5-6: Summary of RRs – non-statutory organisations – water abstraction

PINS Ref	Organisation	Summary of representation
RR-235	Canal & River Trust	<ul style="list-style-type: none"> <li>It is noted that the proposals will utilise the existing abstraction and discharge system and would not result in any change to the abstraction or discharge from existing.</li> <li>In the event that any alteration to these arrangements is required, the Trust would wish to be consulted further to ensure that the impact to navigational safety can be fully assessed.</li> </ul>

### Response to representation:

The Applicant confirms that no changes are required to its existing operational abstraction and discharging systems relating to the River Ouse as a result of the Proposed Scheme.

## 5.8 Environmental impacts

### Summary of representations:

Table 5-7: Summary of RRs – non-statutory organisations – water abstraction

PINS Ref	Organisation	Summary of representation
RR-273	ClientEarth	<ul style="list-style-type: none"> <li>The adverse impacts of the project – including the significant adverse environmental impacts – would outweigh the project’s benefits.</li> </ul>

### Response to representation:

The environmental impacts of the Proposed Scheme have been fully assessed and reported in the Environmental Statement and summarised in the Non-Technical Summary (Examination Library ref APP-131).

Significant adverse environmental effects prior to mitigation were identified on landscape and visual amenity, traffic and transport, climate change (with respect to overall greenhouse gas emissions) and water resources. Significant beneficial impacts were identified on the local and regional economy, and with respect to climate change in relation to the greenhouse gas emissions intensity per unit of electricity output from the Proposed Scheme.

The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) addresses the key landscape and visual effects as far as reasonably practicable given the constraints associated with the Existing Drax Power Station Complex boundary and extent of Best and Most Versatile agricultural land (BMV) (Grade 1 and 2). The benefits of providing further mitigation would be disproportionately low compared to the disbenefits (land take of agricultural land) associated with further mitigation.

With respect to climate change, as noted above there would be a significant positive effect as a result of the decrease in greenhouse gas emissions per unit of electricity generated by the Proposed Scheme. With respect to the overall increase in greenhouse gas emissions, the National Policy Statement for Fossil Fuel Electricity Generating Infrastructure (EN-2) acknowledges that “CO<sub>2</sub> emissions are a significant adverse impact of fossil fuel generating Stations” and notes that “the policies set out in Section 2.2 of EN-1 will apply, including the EU ETS.” The Applicant’s response in relation to the need for gas generation to provide stability and affordability and to assist with the transition to a low carbon economy (as set out at section 5.2 above) is also relevant in this respect. Impacts on traffic and water will be short-term and mitigated through measures outlined in the Outline Construction Traffic Management Plan (APP-091), Outline Construction Workers Travel Plan (APP-090) and Outline Construction Environmental Management Plan (Examination Library ref APP-133).

The ‘planning balance’ considered in the Planning Statement (Examination Library ref. APP-062) concludes that the benefits of the Proposed Scheme, including the timely

delivery of new low carbon electricity generating capacity that would contribute to the security, diversity and resilience of UK energy supplies and support the increased deployment of renewable energy, would substantially outweigh the limited harm that would result from the Proposed Scheme. Furthermore, the Proposed Scheme supports the three pillars of the Government's energy policy, being decarbonisation, security of supply and affordability (given the re-use of existing infrastructure that is already in existence and has an operational life remaining).

## 5.9 Biodiversity

### Summary of representations:

Table 5-8: Summary of RRs – non-statutory organisations – biodiversity

PINS Ref	Organisation	Summary of representation
RR-320	Yorkshire Wildlife Trust	<ul style="list-style-type: none"> <li>○ The Trust would like to see in the final plans how the created habitats contribute to coherent ecological networks.</li> <li>○ The methodologies stated within the BNG strategy is sound, however further information is required to fully assess the implications of the proposals and the likely achievable net gain</li> <li>○ There may be potential for habitats condition to be improved to high rather than maintaining at moderate condition.</li> <li>○ Due to the size and scale of this development, best practise would be a target of 20% biodiversity gain</li> </ul>

### Response to representation:

The Applicant is currently in discussions with Yorkshire Wildlife Trust regarding a Statement of Common Ground covering the areas of concern to the Trust. This Statement of Common Ground will be provided to the Examination as soon as practicable.

The Applicant confirms that the updated Outline Landscape and Biodiversity Strategy to be submitted for Deadline 2 will include greater emphasis on how the proposed measures will contribute to establishing coherent ecological networks.

As a result of updating the Outline Landscape and Biodiversity Strategy, the Biodiversity Net Gain Report (Examination Library ref APP-116) is also being updated. Both updated documents will be submitted for Deadline 2.

It is important to be realistic in calculating biodiversity net gain about what will be delivered by proposed habitat restoration, creation and enhancement. Should the condition of habitats improve above the level predicted in the Biodiversity Net Gain Report that would of course be welcome. Given the complexities associated with habitat creation, the Applicant considers that the updated Biodiversity Net Gain Report to be submitted at Deadline 2 sets out a realistic assessment of the biodiversity units that would be delivered. The Applicant also notes that proposed target of of 20% biodiversity net gain is not



standard practice. The level of gain delivered is broadly in line with the new BREEAM ecological assessment method, which states that delivery of 105% - 110% of biodiversity units compared to those lost is net gain, with 110% providing significant net gain. The outcome of the biodiversity net gain calculations will be detailed within the report submitted at Deadline 2.

By reusing a significant amount of existing infrastructure and locating the Proposed Scheme on the Existing Drax Power Station Complex, the Proposed Scheme has a relatively minor land take of semi-natural habitats in the context of many Nationally Significant Infrastructure Projects. Much of the land take is also temporary and agricultural land.

## 5.10 Landscape

### Summary of representations:

Table 5-9: Summary of RRs – non-statutory organisations – landscape

PINS Ref	Organisation	Summary of representation
RR-320	Yorkshire Wildlife Trust	<ul style="list-style-type: none"> <li>○ The Trust is concerned about the very extensive list of landscape impacts.</li> <li>○ The Trust would be happy to be involved with discussions on possible landscape mitigation with other partners.</li> </ul>

### Response to representation:

It is accepted in the Landscape and Visual Impact Assessment (Examination Library ref APP-078) that there are significant adverse landscape and visual effects as a result of the Proposed Scheme. Government policy, as set out in the Energy NPSs, acknowledges that negative effects on landscape / visual amenity are likely as a result of the development of new energy infrastructure, at the scale and speed required to meet the current and future need. NPS EN-1 further acknowledges that "*the impacts on landscape/visual amenity in particular will sometimes be hard to mitigate*" (paragraph 1.7.2).

The location of the Proposed Scheme is appropriate and has been driven by objectives relating to utilising existing brownfield land forming part of the Existing Drax Power Station Complex and its associated infrastructure, which is already developed for energy generation. The reutilisation of existing brownfield land represents an efficient land use with fewer environmental impacts during construction and operation than a new power station on previously undeveloped land, or on land that does not have an existing electricity generating use. The reutilisation of as much existing infrastructure as possible (such as the existing cooling systems, cooling towers and steam turbines at Drax Power Station) avoids such infrastructure potentially becoming redundant despite remaining within its operating life and being capable of contributing to more efficient energy production and a lower carbon footprint (given it is already constructed).

The consideration of alternatives and the explanation of choices in relation to layout, structures and technologies which have influenced or provided parameters for the design of the Proposed Scheme are set out in Chapter 4 of the ES (Examination Library ref APP-072). The draft DCO contains a requirement to mitigate the landscape and visual effects

of the Proposed Scheme by securing the submission and approval by SDC of appropriate details and materials for Units X and Y. Requirement 7 of the draft DCO (Examination Library ref AS-012) requires the submission and approval of details of the external appearance of Unit X and Y, in particular the colour, materials and surface finishes of all new permanent buildings and structures, prior to commencement of development. The proposed colours outlined in the LVIA have drawn on the original colour palette used in the original Drax Power Station design. Whilst design has been factored in to the iterative development of the Proposed Scheme, there is a need for this to be balanced by the engineering requirements of the Proposed Scheme and its objectives.

The Outline Landscape and Biodiversity Strategy (Examination Library ref APP-135) addresses the key landscape and visual effects as far as reasonably practicable given the constraints associated with the Existing Drax Power Station Complex boundary and extent of Best and Most Versatile agricultural land (BMV) (Grade 1 and 2). The benefits of providing further mitigation would be disproportionately low compared to the disbenefits (land take of agricultural land) associated with further mitigation. The mitigation provided in the Outline Landscape and Biodiversity Strategy is therefore considered to be appropriate and proportionate. On the basis that the location is appropriate for the Project it is considered that mitigation has been introduced to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable. Whilst the visual effects of the Proposed Scheme are acknowledged, they should be given limited weight in accordance with EN2 – paragraph 2.6.10 which states “if having regard to the considerations in respect of other impacts set out in EN-1 and this NPS, the [Secretary of State] is satisfied that the location is appropriate for the project, and that it has been designed sensitively (given the various siting, operational and other relevant constraints) to minimise harm to landscape and visual amenity, the visibility of a fossil fuel generating station should be given limited weight.” Furthermore, it should be noted that NPS EN-1 paragraph 5.9.15 states that “the SoS should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project”.

## 5.11 Health

### Summary of representations:

Table 5-10: Summary of RRs – non-statutory organisations – health

PINS Ref	Organisation	Summary of representation
RR-293	Friends of the Earth Selby	<ul style="list-style-type: none"> <li>○ The power station is causing and will continue to cause unprecedented damage to health within the Selby District community and further afield</li> <li>○ The proposal blocks light within the community and has a profound effect on the lives of people and wildlife</li> <li>○ The proposal breaches the Human Rights Act 1998, right to life.</li> </ul>

### Response to representation:

Human health was assessed in the Environmental Statement (Examination Library ref APP-069) in the following chapters with a consideration of the cumulative effects in Chapter 17:

- Chapter 6 (Air Quality)
- Chapter 7 (Noise and Vibration)
- Chapter 11 (Ground Conditions)
- Chapter 12 (Water Resources, Quality and Hydrology)
- Chapter 16 (Major Accidents and Natural Disasters)

No significant effects on human health were identified as part of this assessment. Mitigation has been included as part of the Proposed Scheme to prevent negative effects on human health. This includes adherence to a Construction Environmental Management Plan, the implementation of which will be secured by a requirement to the DCO.

It is unclear which elements of the Proposed Scheme are alleged to block light within the community. By reusing existing infrastructure and locating the majority of the Proposed Scheme on the Existing Drax Power Station Complex, the design has minimised the need for new structures close to residential locations. The Proposed Scheme is not expected to result in any impacts relating to light on nearby communities.

We also note that no concerns have been raised in relation to health by Public Health England in its relevant representation.

## 5.12 Engagement and consultation

### Summary of representations:

Table 5-11: Summary of RRs – non-statutory organisations – engagement

PINS Ref	Organisation	Summary of representation
RR-293	Friends of the Earth Selby	<ul style="list-style-type: none"> <li>○ The proposal was poorly communicated to the public</li> <li>○ The proposal is deceptive in its approach to represent the environmental facts to the public / stealth approach to expanding the power station</li> <li>○ The proposal has not provided key information in its Environmental Statement to allow the public to fully understand environmental impact</li> </ul>

### Response to representation:

The proposals for the Proposed Scheme have been communicated in a transparent and clear manner, setting out all likely significant environmental effects, and the Applicant has undertaken meaningful consultation in order to obtain and have regard to views from statutory consultees and the public.

Various engagement and consultation exercise were held prior to the application submission to communicate the proposals to the public, to provide an opportunity for the public to comment, and to enable the Applicant to have regard to those comments. This

included a non-statutory engagement exercise undertaken in November 2017 for stakeholders and the public to learn about the proposals and provide initial feedback.

A statutory pre-application consultation was then held between January and February 2018 which included five consultation events for the public to attend and ask questions. The Applicant consulted with Selby District Council and North Yorkshire County Council ahead of this consultation to agree how it would be carried out and to ensure that it was carried out in an appropriate, accessible and fair manner. Both councils have since confirmed to the Secretary of State that the consultation was undertaken in an adequate manner.

Consultation materials were produced for the statutory consultation, and the consultation (including how and where the materials could be viewed) was widely promoted to enable communities and the wider public to provide comments. All materials were factual, and the proposals have been communicated in a clear and transparent manner, including the likely environmental effects. The statutory consultation materials included a preliminary environmental information report, to provide information about the likely environmental effects of the proposed scheme, and a non-technical summary of this information was also provided as well as a consultation leaflet and project overview report, in order to ensure the information was as accessible as possible to the public.

Further details on the non-statutory and statutory consultations can be found in the Consultation Report (Examination Library ref APP-026).

As part of its Application, the Applicant has provided an Environmental Statement which provides factual information on the potential environmental impacts of the Proposed Scheme. This is available for the public to review on the PINS website. The ES was provided in accordance with the EIA Regulations 2017, and by accepting the Applicant's application, the SoS has determined that the ES was of a satisfactory standard and complied with the statutory requirements.

A summary of environmental impacts is provided in the Non-Technical Summary of the Environmental Statement (Examination Library ref APP-131). Full details of the environmental impacts and effects are reported in the Environmental Statement (Examination Library ref APP-069).

## 5.13 Cost

### Summary of representations:

Table 5-12: Summary of RRs – non-statutory organisations – cost

PINS Ref	Organisation	Summary of representation
RR-293	Friends of the Earth Selby	<ul style="list-style-type: none"> <li>○ The proposals are costly and badly thought through. It is a loss making scheme.</li> <li>○ The company proposing the project fails to make a profit.</li> <li>○ It is a high cost project with no returns for the government.</li> </ul>

PINS Ref	Organisation	Summary of representation
RR-317	South Lakes Action on Climate Change Towards Transition (SLACCTt)	<ul style="list-style-type: none"> <li>The Drax proposal is uneconomic</li> </ul>

#### Response to representation:

No evidence has been submitted by Friends of the Earth or South Lakes Action on Climate Change to substantiate their claims that the Proposed Development is uneconomic. Drax has a long and successful history in the power generation sector and, as a result, would only embark on the Proposed Scheme if it considered it was right in terms of the direction of the Government's energy policy and from a financial point of view for the shareholders of Drax. As referred to in this document, it is Drax's contention that the Proposed Scheme supports the three pillars of the Government's energy policy, being decarbonisation, security of supply and affordability (given the re-use of existing infrastructure that is already in existence and has an operational life remaining).

## 5.14 Security

#### Summary of representations:

Table 5-13: Summary of RRs – non-statutory organisations – security

PINS Ref	Organisation	Summary of representation
RR-293	Friends of the Earth Selby	<ul style="list-style-type: none"> <li>The proposal is a risk to UK security and puts the country in the hands of unreliable sources for fuel.</li> </ul>

#### Response to representation:

The Planning Statement (APP-062) concludes that the benefits of the Proposed Scheme, including the timely delivery of new low carbon electricity generating capacity, would contribute to the security, diversity and resilience of UK energy supplies. Indeed, the Government has made it clear in the Energy NPSs that fossil fuel generating stations are an important part of the country's energy mix to ensure security of supply -

*"...energy is vital to economic prosperity and social well-being and so it is important to ensure that the UK has secure and affordable energy." (EN-1, paragraph 2.1.2)*

*"...the Government believes that the NPSs set out planning policies which both respect the principles of sustainable development and are capable of facilitating, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and increasingly low carbon supplies of energy." (EN-1, paragraph 2.2.19)*

*"The Government needs to ensure that sufficient electricity generating capacity is available to meet maximum peak demand, with a safety margin or spare capacity to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events."* (EN-1, paragraph 3.3.2)

*"The larger the difference between available capacity and demand...the more resilient the system will be in dealing with unexpected events, and consequently the lower the risk of a supply interruption."* (EN-1, paragraph 3.3.3);

*"[A] diverse mix of all types of power generation...helps to ensure security of supply."* (EN-1, paragraph 3.3.4)

The Proposed Scheme is not dependent on gas produced by any specific source of gas. The Proposed Scheme will obtain natural gas directly from the National Grid. Where National Grid sources its gas is National Grid's responsibility and the Applicant will have no control over the origin of the gas. UK Government's decisions on planning policy and potential projects to deliver a reliable supply of gas will be subject to appropriate consideration and environmental and sustainability assessments, and that consideration is outside the scope of the Examination of this Application.

The ES has considered the Proposed Scheme's vulnerability to major accidents and disasters, as reported in ES Chapter 16 – Major Accidents and Disasters (Examination Library ref APP-084). No risks to UK security have been identified.

## 5.15 The Applicant

### Summary of representations:

Table 5-14: Summary of RRs – non-statutory organisations – the Applicant

PINS Ref	Organisation	Summary of representation
RR-293	Friends of the Earth Selby	<p>The proposal</p> <ul style="list-style-type: none"> <li>○ the company's current projects are failing (as discussed in the recent Channel 4 Despatches programme)</li> <li>○ the proposal fails to understand why 112,000 people objected to previous attempts at expansion in 2015</li> <li>○ is an attempt at desensitising government and public, through repeated application attempts</li> </ul>

### Response to representation:

Other projects and applications are not relevant to the consideration of the Proposed Scheme by the SoS; it is a matter for the Applicant and outside the scope of the application and examination.

## 5.16 Aviation and defence interests

### Summary of representations:

*Table 5-15: Summary of RRs – non-statutory organisations – aviation and defence interests*

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-187</b>	NATS LTD	<ul style="list-style-type: none"><li>○ No anticipated impacts from the proposals</li></ul>

### Response to representation:

The Applicant welcomes the conclusion by NATS. No civil and military aviation and defence interests that would be affected by the Proposed Scheme have been identified. Neither NATS, nor the Ministry of Defence, Civil Aviation Authority or any local airfields have raised any concerns during the public consultation, as set out in the Consultation Report (Examination Library ref APP-026).

## 6 MEMBERS OF THE PUBLIC / BUSINESSES

6.1.1 As a majority of the relevant representations submitted by members of the public / businesses covered similar issues (as either expressed by bespoke responses or utilising a pro-forma template text understood to be provided by Biofuelwatch), this section has been grouped by the themes raised in the relevant representations.

### 6.2 Biodiversity

Summary of representations:

Table 6-1: Summary of RRs – members of the public/business – biodiversity

PINS Ref	Organisation	Summary of representation
RR-003	Ben Tarr	<ul style="list-style-type: none"> <li>No one has the right to make fun of, or hurt, or abuse, or exploit, or murder, any other animal, for any reason. Humans are animals, and no more special than any other creature.</li> </ul>

Response to representation:

Drax does not condone human or animal abuse. The Proposed Scheme does not involve any such treatment.

### 6.3 Climate change

Summary of representations:

Table 6-2: Summary of RRs – members of the public/business – climate change

PINS Ref	Organisation	Summary of representation
<b>Template objection letter. See Table 6-12 for the list of Interested Parties who submitted this RR</b>		<ul style="list-style-type: none"> <li>Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework, since it is not compatible with a transition to a low-carbon future.</li> <li>Reference to the rejected planning permission for an open-cast coal mine at Druridge Bay.</li> <li>The proposals represent an increase in greenhouse gas emissions.</li> <li>In order to meet the Paris Climate Agreement, it is vital for the UK to phase out fossil fuel emissions.</li> <li>The smokestack CO2 emissions from new gas units will contribute to higher long-term UK CO2 emissions.</li> <li>Drax's Repower plan to burn large quantities of gas will hamper rather than</li> </ul>
RR-011	David Somervell	
RR-001	Sally Clark	
RR-009	David Geall	
RR-010	David Hope	
RR-018	Jackie Oversby	
RR-038	Robert Bater	
RR-060	Elizabeth Potts	
RR-070	Mike Baker	
RR-096	Susan Francis	



<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-107</b>	Veronica Clark	help the U.K.'s transition to low carbon energy. Replacing coal with another fossil fuel cannot help us to decarbonise.
<b>RR-117</b>	Martina Weitsch	
<b>RR-131</b>	Sue Rule	
<b>RR-137</b>	Faith Kenrick	
<b>RR-142</b>	Alice	
<b>RR-155</b>	Frances Sleaf	
<b>RR-194</b>	Michael Andrews	
<b>RR-199</b>	Claudia Riccomini	
<b>RR-210</b>	Dr Nicola Hall	
<b>RR-215</b>	Deborah Loe	
<b>RR-217</b>	Adrian Fielding	
<b>RR-223</b>	Ceri Pryke-Hendy	
<b>RR-242</b>	Richard & Jan Stephens	
<b>RR-272</b>	Angela Forbes	
<b>RR-275</b>	Ewa Barker	
<b>RR-314</b>	Roger Manser	
<b>RR-179</b>	Christine Way	
<b>RR-211</b>	Joseph Nicholas	
<b>RR-278</b>	Laurentia Johns	
<b>RR-004</b>	Breathe Clean Air Group	<ul style="list-style-type: none"> <li>○ The project is not a sustainable development as defined in the National Planning Policy framework, since it is not compatible with a transition to a low carbon future.</li> <li>○ The Drax proposal will extend the burning of fossil fuel. The Government needs to be reducing the burning of carbon-based fossil fuels.</li> </ul>
<b>RR-006</b>	Charles Nelson	<ul style="list-style-type: none"> <li>○ Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework,</li> </ul>
<b>RR-150</b>	Philomena Grimley	

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-179</b>	Christine Way	<p>since it is not compatible with a transition to a low-carbon future.</p> <ul style="list-style-type: none"> <li>○ The proposals represent an increase in greenhouse gas emissions.</li> <li>○ In order to meet the Paris Climate Agreement, it is vital for the UK to phase out our fossil fuel emissions.</li> </ul>
<b>RR-211</b>	Joseph Nicholas	
<b>RR-227</b>	Martin King	
<b>RR-261</b>	Jo Pycroft	
<b>RR-278</b>	Laurentia Johns	
<b>RR-012</b>	Deborah Sawday	<ul style="list-style-type: none"> <li>○ Objecting as fossil fuel emissions must be phased out to meet the Paris Climate Agreement</li> </ul>
<b>RR-032</b>	Mark Knowles	<ul style="list-style-type: none"> <li>○ Development and expansion of Drax is potentially locking the UK into a high carbon economy with poorer quality air than we should have.</li> <li>○ The proposals will hamper rather than help the UK's transition to low carbon energy.</li> </ul>
<b>RR-034</b>	Mary Robertson	<ul style="list-style-type: none"> <li>○ The proposals are incompatible with the Paris Climate Agreement.</li> </ul>
<b>RR-053</b>	David Callow	<ul style="list-style-type: none"> <li>○ Need to do more to reduce CO2 emissions. The change from coal to gas is an improvement it does not go anywhere near enough to meet the requirements to bring about a substantial reduction in emissions.</li> </ul>
<b>RR-055</b>	David SmartKnight	<ul style="list-style-type: none"> <li>○ Objection to the application as the proposal would go against the UK's National Planning Policy Framework for sustainable development, since it is entirely incompatible with a transition to a low-carbon future.</li> </ul>
<b>RR-159</b>	Jacqueline Walkden	
<b>RR-173</b>	Frances Bowen	
<b>RR-180</b>	Emily Scrivener	
<b>RR-257</b>	HELEN DRYDEN	
<b>RR-271</b>	Alison Shutt	
<b>RR-305</b>	Michael Fairless	
<b>RR-306</b>	Michael Swarbrick	
<b>RR-058</b>	Dr Jane Milton	

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-062</b>	Kristine Vaaler	<ul style="list-style-type: none"> <li>○ Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework, since it is not compatible with a transition to a low-carbon future.</li> <li>○ Reference to the rejected planning permission for an open-cast coal mine at Druridge Bay.</li> <li>○ Extending the use of fossil-fuel is inconsistent with Paris Climate Agreement.</li> </ul>
<b>RR-119</b>	Michael Mitchell	
<b>RR-066</b>	Margaret Anne Evans	<ul style="list-style-type: none"> <li>○ Examples provided of climate palaeontology as indicators of climate change</li> <li>○ Need an immediate reduction in gas, coal, and oil fired power and a massive expansion of renewable energy too allow greenhouse gas emissions to escape out to space</li> </ul>
<b>RR-074</b>	Nikki Jones	<ul style="list-style-type: none"> <li>○ The government should be taking the advice of the Committee on Climate Change</li> </ul>
<b>RR-076</b>	Richard Howarth	<ul style="list-style-type: none"> <li>○ Objection on the grounds of climate change</li> </ul>
<b>RR-079</b>	Steve Harris	<ul style="list-style-type: none"> <li>○ The proposal is incompatible with a transition to a low carbon economy and thus not a sustainable development.</li> </ul>
<b>RR-081</b>	Susan Chapman	<ul style="list-style-type: none"> <li>○ Not acting with the urgency required at speed and scale to solve the climate crisis;</li> <li>○ Climate change should be a political priority.</li> </ul>
<b>RR-086</b>	Dr Philippa Berry	<ul style="list-style-type: none"> <li>○ Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework, since it is not compatible with a transition to a low-carbon future.</li> <li>○ The proposals will prevent the UK from meeting its international commitments to tackle climate change.</li> </ul>

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-106</b>	Philip Greswell	<ul style="list-style-type: none"> <li>○ Not in the interest of the Governments in its ambition to reduce harmful emissions which affect global warming.</li> </ul>
<b>RR-113</b>	Dr. Guy Johnson	<ul style="list-style-type: none"> <li>○ Drax should not be given permission to continue burning very large quantities of fossil fuels at a time when it is essential that UK CO<sub>2</sub> emissions are reduced quickly to meet our international commitments under the Paris climate agreement.</li> </ul>
<b>RR-114</b>	Fred Mann	<ul style="list-style-type: none"> <li>○ Burning fossil fuels is the wrong way to go as it is one of the main drivers of climate change.</li> </ul>
<b>RR-128</b>	Jamie Osborn	<ul style="list-style-type: none"> <li>○ The open-cast coal mine at Druridge Bay was rejected planning permission earlier this year on grounds of climate change. That should equally apply to any future developments.</li> </ul>
<b>RR-133</b>	Tessa Cowley	<ul style="list-style-type: none"> <li>○ The proposal will affect the climate.</li> </ul>
<b>RR-176</b>	Mr Charles Marshall	<ul style="list-style-type: none"> <li>○ Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework, since it is not compatible with a transition to a low-carbon future.</li> <li>○ Reference to the rejected planning permission for an open-cast coal mine at Druridge Bay.</li> </ul>
<b>RR-192</b>	Gilian Cleeve	<ul style="list-style-type: none"> <li>○ Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework, since it is not compatible with a transition to a low-carbon future.</li> <li>○ The proposals represent an increase in greenhouse gas emissions.</li> <li>○ Drax's plan to burn large quantities of gas will hamper rather than help the U.K.'s transition to low carbon energy.</li> </ul>
<b>RR-198</b>	Christopher Keene	<ul style="list-style-type: none"> <li>○ Oppose the application on the grounds that it could lead to climate change, resulting in the death of billions of people.</li> </ul>

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-205</b>	Melanie Cartwright	<ul style="list-style-type: none"> <li>○ Object to the Drax proposal because we have signed up to Paris Accord and we should not be increasing our CO2 emissions.</li> </ul>
<b>RR-206</b>	Robin Gill	<ul style="list-style-type: none"> <li>○ Object to the proposals due to the UK's commitment to the 2015 Paris Climate Agreement requires us to reduce carbon emissions by 80% by 2050.</li> </ul>
<b>RR-209</b>	David Plunkett	<ul style="list-style-type: none"> <li>○ The proposals will not able us to meet climate change targets.</li> <li>○ Climate damage now will be irreversible.</li> </ul>
<b>RR-216</b>	Erik Williams	<ul style="list-style-type: none"> <li>○ Concern at the substituting of one fossil fuel for another as it will not help us fulfil our commitments under the Paris Climate Agreement.</li> <li>○ The government is obliged to take environmental consideration into account when considering developments such as the one proposed for Drax.</li> </ul>
<b>RR-232</b>	Kate Griffin	<ul style="list-style-type: none"> <li>○ Drax is already this country's biggest carbon dioxide emitter and there is no way it should be permitted to increase its carbon emissions.</li> <li>○ Replacing the coal-fired units with bigger units burning natural gas is in no way compatible with the UK government's supposed aim of "delivering a low carbon future".</li> </ul>
<b>RR-249</b>	Carol Hutchinson	<ul style="list-style-type: none"> <li>○ This will not allow us to fulfil our commitment to climate change or rid our environment of plastic pollution.</li> </ul>
<b>RR-254</b>	Cllr Douglas Johnson	<ul style="list-style-type: none"> <li>○ Endorse the observations of Biofuelwatch.</li> <li>○ The proposal is at odds with the NPPF by failing to be a sustainable development.</li> </ul>
<b>RR-263</b>	Lynne Peacock	<ul style="list-style-type: none"> <li>○ It is important that we stop burning fossil fuels now to meet our climate change targets as set out in the Paris agreement.</li> </ul>
<b>RR-279</b>	Mary Watson	<ul style="list-style-type: none"> <li>○ Object to the proposals in view of the pollution and environmental destruction it causes.</li> </ul>

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-284</b>	AJ Rushton	<ul style="list-style-type: none"> <li>○ Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework, since it is not compatible with a transition to a low-carbon future.</li> <li>○ The proposals will hamper rather than help the UK's transition to low carbon energy.</li> </ul>
<b>RR-295</b>	Janis Grant	<ul style="list-style-type: none"> <li>○ The UK has signed up to the essential Paris Climate Change targets. This proposal and its likely outcomes are incompatible with achieving these goals.</li> </ul>
<b>RR-298</b>	Julian May	<ul style="list-style-type: none"> <li>○ The proposals are inefficient, expensive, and contrary to the UK's aim to reduce emissions.</li> <li>○ The more it will be used, the more profits it will make, and the more at odds it will be with the UK's plans for decarbonisation.</li> </ul>
<b>RR-300</b>	Laura Ager	<ul style="list-style-type: none"> <li>○ Objecting because proposal is not a sustainable development as defined in the National Planning Policy Framework, since it is not compatible with a transition to a low-carbon future.</li> <li>○ Reference to the rejected planning permission for an open-cast coal mine at Druridge Bay.</li> <li>○ The proposals will hamper rather than help the UK's transition to low carbon energy.</li> </ul>
<b>RR-310</b>	oliver wistanley ramos	<ul style="list-style-type: none"> <li>○ Concern over emission levels within the UK.</li> </ul>

#### Response to representation:

The Applicant notes that the representations made generally follow the same template format which it understands was provided by Biofuelwatch. There are no new or different comments provided in these representations, and so the Applicant refers to its response on Climate Change set out at Section 5.2 above.

## 6.4 Source of gas

#### Summary of representations:

*Table 6-3: Summary of RRs – members of the public/business – source of gas*

PINS Ref	Organisation	Summary of representation
<b>Template objection letter. See Table 6-12 for the list of Interested Parties who submitted this RR</b>		<ul style="list-style-type: none"> <li>○ Concern that increased reliance on gas would require either increased Russian imports or reliance on unconventional gas, especially hydraulic fracturing (fracking) and horizontal drilling.</li> </ul>
RR-001	Sally Clark	
RR-009	David Geall	
RR-010	David Hope	
RR-018	Jackie Oversby	
RR-038	Robert Bater	
RR-060	Elizabeth Potts	
RR-070	Mike Baker	
RR-096	Susan Francis	
RR-107	Veronica Clark	
RR-117	Martina Weitsch	
RR-131	Sue Rule	
RR-137	Faith Kenrick	
RR-142	Alice	
RR-155	Frances Sleaf	
RR-179	Christine Way	
RR-194	Michael Andrews	
RR-199	Claudia Riccomini	
RR-210	Dr Nicola Hall	
RR-211	Joseph Nicholas	
RR-215	Deborah Loe	
RR-217	Adrian Fielding	
RR-223	Ceri Pryke-Hendy	
RR-242	Richard & Jan Stephens	
RR-261	Jo Pycroft	
RR-275	Ewa Barker	

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-278</b>	Laurentia Johns	
<b>RR-314</b>	Roger Manser	
<b>RR-011</b>	David Somervell	
<b>RR-278</b>	Laurentia Johns	
<b>RR-261</b>	Jo Pycroft	
<b>RR-004</b>	Breathe Clean Air Group	<ul style="list-style-type: none"> <li>○ Concern that Drax will be forced to use methane from fracking which will produce even more air pollution.</li> </ul>
<b>RR-089</b>	Graham Gill	<ul style="list-style-type: none"> <li>○ Gas production from the North Sea is in decline whilst natural gas from fracking is generally very carbon intensive.</li> </ul>
<b>RR-206</b>	Robin Gill	
<b>RR-147</b>	Rosamund Howe	<ul style="list-style-type: none"> <li>○ The proposal also appears extremely short-sighted, raising the fear that fracking may be envisaged as offering a different source of fuel with incalculable environmental risks.</li> </ul>
<b>RR-149</b>	Peter Baker	<ul style="list-style-type: none"> <li>○ Building a new gas-fired power station will support demand for fracking.</li> </ul>
<b>RR-182</b>	Carole Shorney	
<b>RR-216</b>	Erik Williams	<ul style="list-style-type: none"> <li>○ Supplies from the North Sea are, or shortly will be, in decline. And Russia cannot be regarded as a reliable long-term source. Fracking is not a safe means of extracting gas as far as the environment and global-warming are concerned.</li> </ul>
<b>RR-249</b>	Carol Hutchinson	<ul style="list-style-type: none"> <li>○ Due to Drax financial failures last year, fracking firms will use the opportunity to grab the resource for their polluting industry.</li> </ul>
<b>RR-295</b>	Janis Grant	<ul style="list-style-type: none"> <li>○ Concerned regarding the implications for demand for gas and the likelihood that this would provide an incentive to fracking across Yorkshire.</li> </ul>
<b>RR-306</b>	Michael Swarbrick	<ul style="list-style-type: none"> <li>○ Concern that the proposal will be used to support the mining of gas by fracking which will be a disaster for our county.</li> </ul>



**Response to representation:**

The Applicant notes that the representations made generally follow the same template format which it understands was provided by Biofuelwatch. There are no new or different comments provided in these representations, and so the Applicant refers to its response on Source of Gas set out at Section 5.3 above.

**6.5 Use and need for gas capacity**

**Summary of representations:**

*Table 6-4: Summary of RRs – members of the public/businesses – use of gas*

PINS Ref	Organisation	Summary of representation
<b>Template objection letter. See Table 6-12 for the list of Interested Parties who submitted this RR</b>		<ul style="list-style-type: none"> <li>○ Research suggests that a gas plant can become a bigger source of greenhouse gas emissions than a coal one if just 3% of the gas leaks into the atmosphere.</li> </ul>
RR-011	David Somervell	
RR-018	Jackie Oversby	
RR-038	Robert Bater	
RR-060	Elizabeth Potts	
RR-070	Mike Baker	
RR-107	Veronica Clark	
RR-117	Martina Weitsch	
RR-137	Faith Kenrick	
RR-142	Alice	
RR-155	Frances Sleaf	
RR-179	Christine Way	
RR-194	Michael Andrews	
RR-199	Claudia Riccomini	
RR-210	Dr Nicola Hall	
RR-211	Joseph Nicholas	
RR-215	Deborah Loe	
RR-217	Adrian Fielding	
RR-223	Ceri Pryke-Hendy	
RR-242	Richard & Jan Stephens	

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-275</b>	Ewa Barker	
<b>RR-001</b>	Sally Clark	
<b>RR-009</b>	David Geall	
<b>RR-010</b>	David Hope	
<b>RR-096</b>	Susan Francis	
<b>RR-131</b>	Sue Rule	
<b>RR-278</b>	Laurentia Johns	
<b>RR-314</b>	Roger Manser	
<b>RR-004</b>	Breathe Clean Air Group	
<b>RR-022</b>	Julian Goodare	<ul style="list-style-type: none"> <li>○ Need to transition away from fossil fuels. We don't need more power stations burning fossil fuels and releasing greenhouse gases. We need sustainable power, and we need energy conservation.</li> </ul>
<b>RR-074</b>	Nikki Jones	<ul style="list-style-type: none"> <li>○ When fugitive methane emissions are included, that gas is no improvement on coal;</li> <li>○ We cannot build more fossil-fuelled power plants.</li> </ul>
<b>RR-089</b>	Graham Gill	<ul style="list-style-type: none"> <li>○ We need to shift away from all fossil fuels.</li> </ul>
<b>RR-114</b>	Fred Mann	<ul style="list-style-type: none"> <li>○ Other pollutants will also be released.</li> </ul>
<b>RR-128</b>	Jamie Osborn	<ul style="list-style-type: none"> <li>○ Object to introducing natural gas-burning units, replacing dirty fossil fuel with dirty fossil fuel.</li> </ul>
<b>RR-133</b>	Tessa Cowley	<ul style="list-style-type: none"> <li>○ There is no need to use fossil fuels. Other technologies mean we can now have clean energy.</li> </ul>
<b>RR-145</b>	Janet Chapman	<ul style="list-style-type: none"> <li>○ Gas is better than coal, but it is still not good. Drax is one of the companies that emit the most carbon dioxide to produce energy.</li> <li>○ Drax uses biofuels that in some case come from clear-felled forests.</li> </ul>

PINS Ref	Organisation	Summary of representation
		<ul style="list-style-type: none"> <li>○ Converting the power station will tie Drax into burning oil for decades to come.</li> </ul>
RR-147	Rosamund Howe	<ul style="list-style-type: none"> <li>○ Objection to the proposals as the objective should be to reduce our dependency on fossil fuels of any kind and to maximise the use of renewable forms of energy.</li> </ul>
RR-149	Peter Baker	<ul style="list-style-type: none"> <li>○ “Natural gas” is mainly composed of methane, which is an extremely powerful greenhouse gas.</li> <li>○ The proposals will lock us in to decades more of fossil fuel burning.</li> <li>○ Transitioning to burning gas instead of coal is a way of keeping Drax open and continuing to receive subsidies for burning biomass.</li> </ul>
RR-182	Carole Shorney	
RR-169	Robert Edwards	<ul style="list-style-type: none"> <li>○ We must stop using fossil fuels as a source of energy.</li> </ul>
RR-206	Robin Gill	<ul style="list-style-type: none"> <li>○ Object to the proposals as the current trend in power generation in the UK and elsewhere is moving away from traditional large centralised carbon-burning power stations.</li> </ul>
RR-209	David Plunkett	<ul style="list-style-type: none"> <li>○ We do not need to switch any current UK power stations to another fuel type.</li> <li>○ This is short term thinking to convert the polluting power plant into gas.</li> </ul>
RR-253	Chris White	<ul style="list-style-type: none"> <li>○ Concern that gas is considered a 'transition' fuel between other fossil fuels and renewable energy.</li> <li>○ We must each do our utmost to act now and reject carbon based or greenhouse gas producing methods.</li> </ul>
RR-295	Janis Grant	<ul style="list-style-type: none"> <li>○ Fracking is absolutely unnecessary - methane gas is a massive contributor to climate change and needs to be left in the ground.</li> </ul>

#### Response to representation:

The Applicant notes that the representations made generally follow the same template format which it understands was provided by Biofuelwatch. Other than the point regarding

other pollutants (RR-114) and the concern regarding burning oil (RR-145), the representations refer to the same comments as highlighted in Section 5.4 above, Use and need for gas capacity, and so the Applicant refers to its response on these matters at Section 5.4 above.

The Proposed Scheme is for gas-fired power generation and will not result in the burning of oil.

With regards to the point regarding other pollutants, in addition to carbon dioxide and water vapour, the combustion of natural gas results in the release of small amounts of other air pollutants. These include nitrogen oxides and carbon monoxide and, if abatement technology is fitted to reduce the NOx emissions, ammonia. These impacts are assessed in Chapter 6 of the ES, Air Quality (Examination Library ref APP-074). The combustion of natural gas is not associated with emissions of other local air pollutants such as particulate matter, sulphur dioxide, acid gases (hydrogen chloride / hydrogen sulphide), PaH or dioxins. The repowering of solid fuel fired combustion units with gas combustion units will reduce total emissions of these pollutants.

## 6.6 Renewables

### Summary of representations:

Table 6-5: Summary of RRs – members of the public/business – renewables

PINS Ref	Organisation	Summary of representation
<b>Template objection letter. See Table 6-12 for the list of Interested Parties who submitted this RR</b>		<ul style="list-style-type: none"> <li>○ We should instead invest in genuinely renewable wind, wave and solar energy which can help us to meet our climate targets, instead of unnecessary gas development which is bad for the climate.</li> </ul>
<b>RR-018</b>	Jackie Oversby	
<b>RR-038</b>	Robert Bater	
<b>RR-001</b>	Sally Clark	
<b>RR-009</b>	David Geall	
<b>RR-010</b>	David Hope	
<b>RR-060</b>	Elizabeth Potts	
<b>RR-070</b>	Mike Baker	
<b>RR-096</b>	Susan Francis	
<b>RR-107</b>	Veronica Clark	
<b>RR-117</b>	Martina Weitsch	
<b>RR-131</b>	Sue Rule	
<b>RR-137</b>	Faith Kenrick	
<b>RR-142</b>	Alice	

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
RR-155	Frances Sleep	
RR-176	Mr Charles Marshall	
RR-179	Christine Way	
RR-194	Michael Andrews	
RR-199	Claudia Riccomini	
RR-210	Dr Nicola Hall	
RR-211	Joseph Nicholas	
RR-215	Deborah Loe	
RR-217	Adrian Fielding	
RR-223	Ceri Pryke-Hendy	
RR-227	Martin King	
RR-242	Richard & Jan Stephens	
RR-261	Jo Pycroft	
RR-272	Angela Forbes	
RR-275	Ewa Barker	
RR-278	Laurentia Johns	
RR-284	AJ Rushton	
RR-300	Laura Ager	
RR-314	Roger Manser	
RR-011	David Somervell	
RR-007	Christopher Stephen Wakeley	<ul style="list-style-type: none"> <li>○ Suggest it would be better to replace these units with renewable energy such as wind or solar.</li> </ul>
RR-029	Lisa Stewart	<ul style="list-style-type: none"> <li>○ Use renewable energy sources instead of fossil fuels.</li> </ul>
RR-081	Susan Chapman	

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-032</b>	Mark Knowles	<ul style="list-style-type: none"> <li>We should invest in genuinely renewable sources instead of unnecessary gas development.</li> </ul>
<b>RR-128</b>	Jamie Osborn	<ul style="list-style-type: none"> <li>We should instead invest in genuinely renewable energy which can help us to meet our climate targets.</li> </ul>
<b>RR-305</b>	Michael Fairless	
<b>RR-006</b>	Charles Nelson	
<b>RR-149</b>	Peter Baker	<ul style="list-style-type: none"> <li>Neither coal, biomass nor gas should still be being burnt in our power stations. Energy we do use should come from genuinely renewable sources.</li> </ul>
<b>RR-182</b>	Carole Shorney	
<b>RR-192</b>	Gilian Cleeve	<ul style="list-style-type: none"> <li>We should instead invest in more efficient use of energy.</li> </ul>
<b>RR-205</b>	Melanie Cartwright	<ul style="list-style-type: none"> <li>We should be building more wind farms, onshore as well as off shore.</li> </ul>
<b>RR-209</b>	David Plunkett	<ul style="list-style-type: none"> <li>The UK and the world need to develop green energy.</li> </ul>
<b>RR-216</b>	Erik Williams	<ul style="list-style-type: none"> <li>Renewable fuels are a much safer source of energy than gas.</li> </ul>
<b>RR-257</b>	HELEN DRYDEN	<ul style="list-style-type: none"> <li>With greater investment and political backing, the UK can become a world leader in renewable technologies and infrastructure.</li> </ul>
<b>RR-271</b>	Alison Shutt	<ul style="list-style-type: none"> <li>We need to invest in renewable and low carbon onshore wind and solar power in order to meet the Paris Agreement.</li> <li>At Drax, near the River Ouse, and elsewhere in the country we need to be looking at creating more opportunities for Hydro power.</li> </ul>
<b>RR-279</b>	Mary Watson	<ul style="list-style-type: none"> <li>In favour of the increasing use of electricity produced from renewable resources and seeing the end of the extraction and burning of fossil fuels.</li> </ul>
<b>RR-296</b>	Jennie Dixon	<ul style="list-style-type: none"> <li>Object on the basis we need to be moving towards renewables and this move will lock us into more gas when we urgently need to move away from fossil fuels.</li> </ul>

PINS Ref	Organisation	Summary of representation
RR-306	Michael Swarbrick	<ul style="list-style-type: none"> <li>○ Need to harness power from the tides around our country.</li> <li>○ Every south facing roof in the country should have photo-voltaic cells fitted.</li> <li>○ The way ahead is not to continue to push burning fossil fuels to save us from severe climate change.</li> </ul>

#### Response to representation:

The Applicant notes that the representations made generally follow the same template format which it understands was provided by Biofuelwatch. There are no new or different comments provided in these representations, and so the Applicant refers to its response on renewables set out at Section 5.5 above.

## 6.7 Health

#### Summary of representations:

Table 6-6: Summary of RRs – members of the public/business – health

PINS Ref	Organisation	Summary of representation
RR-004	Breathe Clean Air Group	<ul style="list-style-type: none"> <li>○ The proposals will lead to air pollution with massive ill-health impacts</li> </ul>

#### Response to representation:

The Applicant notes that the representations made generally follow the same template format which it understands was provided by Biofuelwatch. There are no new or different comments provided in these representations, and so the Applicant refers to its response on health set out at Section 5.11 above.

## 6.8 Battery storage

#### Summary of representations:

Table 6-7: Summary of RRs – members of the public/business – battery storage

PINS Ref	Organisation	Summary of representation
RR-081	Susan Chapman	<ul style="list-style-type: none"> <li>○ Dangerous to continue using hydrocarbons, batteries are a game-changer in the use of renewable sources.</li> </ul>
RR-209	David Plunkett	<ul style="list-style-type: none"> <li>○ Battery storage capacity is needed. The UK could become a market leader in power storage, but not when companies just concentrate on their share price.</li> </ul>

#### Response to representation:

The Proposed Scheme includes up to two battery energy storage facilities, which will be amongst the largest in the world. Battery storage is promoted through the Government's Smart Systems and Flexibility Plan (UK Government, July 2017), which aims to reduce barriers to the adoption of smart technologies, including storage. These facilities will support the gas generating units in providing fast and flexible electricity export and other ancillary services to the National Transmission System. Battery storage technology will play an important role in providing a flexible and secure response to electricity supply and demand in a future with a greater intermittent supply through renewables. Specifically, the battery facilities will provide fast start up of the generating units to enable a rapid 'ramp rate' likely to be required on the system with greater penetration of intermittent renewables and potential for 'black start' capability to maintain security of grid supplies. By co-locating the storage and generation assets, the Proposed Scheme will make efficient use of existing grid infrastructure.

Along with the conversion of Drax coal units to biomass and decision to pilot the first bioenergy carbon capture storage (BECCS) project of its kind in Europe, the proposed battery storage and high efficiency gas power generation demonstrate the Applicant's commitment to provide innovative solutions to meet the Government's policy objectives of ensuring a secure, low-carbon energy supply.

## 6.9 Security

### Summary of representations:

Table 6-8: Summary of representations – members of the public/business – security

PINS Ref	Organisation	Summary of representation
RR-298	Julian May	<ul style="list-style-type: none"> <li>○ A go-ahead for this development would mean upscaling a power station that is already too big for its location, and would make the UK grid more vulnerable in climate change related extreme weather event as well as conflict situations and terrorism, because of sheer size and centralization of the grid.</li> <li>○ The proposals would demand an increase in the need of power stations around the UK being on hot standby at all times, which is dependent on the biggest power station that could potentially cut out.</li> <li>○ A development at this site should only be for the purpose of making use of existing (mainly grid) infrastructure.</li> </ul>

### Response to representation:

The Proposed Scheme will support the three pillars of government energy policy - decarbonisation, security of supply and affordability. NPS EN-1 states that "*some renewable sources (such as wind, solar and tidal) are intermittent and cannot be adjusted to meet demand. As a result, the more renewable generating capacity we have the more*



*generation capacity we will require overall, to provide back-up at times when the availability of intermittent renewable sources is low.”*

By providing fast, flexible response through the battery storage facility and ability to run in Open Cycle mode, the Proposed Scheme will reduce the need to have other (potentially older and less efficient) plant on hot standby.

The location of the Proposed Scheme makes use of the resilient local grid infrastructure, which has been upgraded by National Grid. Spare bays are located at the National Grid substation to accommodate future development of this type.

The ES has considered the Proposed Scheme’s vulnerability to major accidents and disasters, as reported in ES Chapter 16 – Major Accidents and Disasters (Examination Library ref APP-084) and Climate Risk and Vulnerability (ES Appendix 15.1 (Examination Library ref APP-123)). No risks to UK security have been identified.

## 6.10 Energy distribution

### Summary of representations:

*Table 6-9: Summary of RRs – members of the public/business – energy distribution*

<b>PINS Ref</b>	<b>Organisation</b>	<b>Summary of representation</b>
<b>RR-298</b>	Julian May	<ul style="list-style-type: none"> <li>The plans do not mention how the electricity is meant to be distributed from the point of view of grid infrastructure. Would it necessitate extensive building of new power lines considering the huge increase in power output?</li> </ul>

### Response to representation:

The Applicant has accepted an offer from National Grid for a connection of Unit X into its electrical substation that is located within the Existing Drax Power Station Complex. As part of this connection, the existing power lines that currently service Drax Power Station will be utilised and so the building of new power lines and pylons is not required. The same is expected to apply to the electrical connection of Unit Y. Given the increase in electricity generated, and also the fact that National Grid will be connecting other power stations to its Grid, such as the recently consented Eggborough CCGT plant, it may be necessary for some form of reinforcement works to the wider transmission network to be undertaken, such as upgrading of overhead lines with new conductors (re-stringing) or modification work to existing remote substations. If any such reinforcement work is required, National Grid would undertake that work either pursuant to its permitted development rights or obtain the necessary consents.

## 6.11 Carbon capture and Combined Heat and Power

### Summary of representations:

*Table 6-10: Summary of RRs – members of the public/business – carbon capture*

PINS Ref	Organisation	Summary of representation
RR-298	Julian May	<ul style="list-style-type: none"> <li>○ Considering that carbon capture and storage seems to be neither proven to be working nor deemed financially viable, is making it carbon capture ready meaningful?</li> <li>○ Will there be gigawatts of thermal energy wasted, that could at times be used for district heating?</li> <li>○ In any further development of our energy system we should seek to make business within the framework of technical and environmental needs rather than stretching this framework to accommodate the easiest route to business.</li> </ul>

#### Response to representation:

The CCS Directive requires an amendment to Directive 2001/80/EC on the limitation of emissions of certain pollutants from large combustion plants (commonly known as the Large Combustion Plant Directive (LCPD)). Consequently, EU Member States are required to ensure that operators of all combustion plants with an electrical power generating capacity of 300 MW or more (and for which the construction / operating licence was granted after the date of the CCS Directive) have assessed whether the following conditions are met in respect of each combustion plant:

- Suitable storage sites for CO<sub>2</sub> are available;
- Transport facilities are technically and economically feasible; and
- It is technically and economically feasible to retrofit the combustion plant for CO<sub>2</sub> capture.

The Applicant has submitted a Carbon Capture Readiness Statement (Examination Library ref APP-067) to demonstrate these points and, following discussions with the Environment Agency (EA), is preparing additional information to demonstrate that there are no foreseeable barriers to carbon capture with regards to technical feasibility.

As part of the Proposed Scheme, Drax would also safeguard land for future use for carbon capture equipment for when carbon capture become feasible in the future. The draft DCO submitted in support of the Application includes requirements to secure both the safeguarding of this land and regular monitoring and reporting on the feasibility of carbon capture in future. The Application is, therefore, in compliance with the current regulatory framework and also in compliance with paragraphs 2.3.4 and 2.3.5 of NPS EN-2.

Drax has also announced that it is to pilot the first bioenergy carbon capture storage (BECCS) project of its kind in Europe, which, if successful, could make the renewable electricity produced at its North Yorkshire power station carbon negative.

The Applicant has concluded that it would not currently be viable to produce heat or steam from the Proposed Scheme. The Applicant has reached this decision by undertaking a

scoping exercise to identify potential sites and an economic appraisal and taking account of the distributed nature of the loads, the distances to the identified opportunities, potential barriers and constraints to the installation of export pipework. This assessment is set out in the Combined Heat and Power Statement (Examination Library ref APP-066).

The EA is satisfied that the Applicant has precluded heat or steam production by following the guidance within CHP Ready Guidance for Combustion and Energy from Waste Power Plants' V1.0 February 2013. The EA has also confirmed that any environmental permit it issues for the operation of the Proposed Scheme will include a condition requiring the operator to undertake a periodic Combined Heat and Power review, in order to assess the feasibility of exporting heat in future. The Application is, therefore, in compliance with paragraphs 2.3.2 and 2.3.3 of NPS EN-2.

## 6.12 General opposition comments

### Summary of representations:

Table 6-11: Summary of RRs – members of the public/business – general opposition

PINS Ref	Organisation	Summary of representation
RR-105	John H. Brogden	<ul style="list-style-type: none"> <li>○ Objection to the proposals.</li> </ul>
RR-233	Timothy I Mullen	

### Response to representation:

The Applicant notes these objections.

This table lists the Interested Parties who submitted the template objection letter, whose comments have been summarised in the above tables.

*Table 6-12: List of Interested Parties who submitted the template objection letter*

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-005	Carol Cooper
RR-008	Clare Pargeter
RR-013	Duncan Law
RR-014	Elsbeth Barraclough
RR-015	Esme North
RR-016	Gabby Taylor
RR-017	Grace Onions
RR-019	Jacqui Butterworth
RR-020	Jon Skoyles
RR-021	Jonathan Boyne
RR-023	Julie Wreford
RR-024	June Bostock
RR-025	Kristrn Kleps
RR-026	Laura Goody
RR-027	Linda Lever
RR-028	Line Ringgaard
RR-030	Low Carbon Trust
RR-031	Mark Hollinrake
RR-033	Martyn Rose
RR-035	Mrs Rosalind Collier
RR-036	Nicola Frances Gladys Packer
RR-037	Professor Patricia Howard
RR-039	Robert Helson
RR-040	Roland Pargeter
RR-041	Ruth Griffiths
RR-042	Shirley Swan
RR-043	Steve Manchee
RR-044	Steve Overton
RR-045	Susan Fairweather
RR-046	Thomas Collett
RR-047	Timothy Mullen
RR-048	Adrian Appley
RR-049	Barry Hodson
RR-050	Brenda McAuliffe
RR-051	Chantal Buslot
RR-052	Darren Burling
RR-054	David Foley
RR-056	Davy King
RR-057	Dr Geoffrey Mead
RR-059	Dr Peter Hirst
RR-061	Jessica Winkler
RR-063	L Warren

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-064	Lauren MacKenzie
RR-065	Lyn Brayshaw
RR-067	Margaret Morris
RR-068	May Erskine
RR-069	Michelle Hayward
RR-071	Mike Williams
RR-072	Ms Heather Marsden
RR-073	Ms Rosemary A Clarke
RR-075	Peter Westlake
RR-077	Roger Wortley
RR-078	Sally Burley
RR-080	Susan Buss
RR-082	Susie Laan
RR-083	Anthony Guy Simmons
RR-084	Carl-Luis Obrist
RR-085	D Prentis
RR-087	Elisabeth Bechmann
RR-088	Esther Juhl
RR-090	John Philpot
RR-091	Martin Alcock
RR-092	Neil Bye
RR-093	Paul Paice
RR-094	Peter Deane
RR-095	Robert Palgrave
RR-097	Teresa Belton
RR-098	Adam Quartermaine
RR-099	Alan Fleming
RR-100	Andrew Clements
RR-101	Chloe Tetley
RR-102	Conor Coulter
RR-103	David Woods
RR-104	Doreen Jaques
RR-108	Alexander Davey
RR-109	Andrew Finney
RR-110	Anne Archer
RR-111	David Callander
RR-112	David Matilla
RR-115	Jan Palmer
RR-116	Jane Wilding
RR-118	Melanie Underwood
RR-120	Pauline Moylan
RR-121	Roy Meddings
RR-122	Almuth Ernsting
RR-123	Calum Harvey-Scholes
RR-124	Charles Metcalfe
RR-125	Chris Hesketh

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-126	Christian Stuart Keegan
RR-127	Ian Brown
RR-129	Janice Long
RR-130	Mark Utting
RR-132	Sue Smith
RR-134	William Boggia
RR-135	Christopher Thornon
RR-136	Davina Blake
RR-138	Larry Lima
RR-139	Rich Felgate
RR-140	Richard Parkin
RR-141	Susan Foster-Collins
RR-144	Heather Grinter
RR-146	Rob Parsons
RR-148	David Allen
RR-153	Mrs Caroline Stevenson
RR-154	F D Simpson
RR-156	Simon Barton
RR-157	Rebecca Coulthard
RR-158	Greenpeace
RR-160	James Kavanagh
RR-161	Clare Matheson
RR-162	David Treadwell
RR-164	Julie Plumridge
RR-165	Mark Hollinrake (2)
RR-166	Matthew Burns
RR-167	Melissa McClements
RR-168	Natalie Payne
RR-170	Stuart Toll
RR-171	Zoe Whiteside
RR-172	David Lally
RR-174	Graham Oliver
RR-175	Lauren Tindle
RR-177	Peter Humble
RR-178	Simon Erskine
RR-181	Mark Brown
RR-183	Felix Haslam
RR-186	John Snowdon
RR-188	Peter Daw
RR-189	Janet Milton
RR-190	Alicia Forsberg
RR-191	Dr Shirleen Stibbe
RR-193	Graham Lingley
RR-195	Barry Dalglish
RR-196	Philippa Roddis
RR-197	Rebecca Wade

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-200	Dr Anna Johnson
RR-201	Greg Peakin
RR-202	Jamie Russell
RR-203	Katarina Kositzki
RR-204	Kevin Daws
RR-207	Stephen Vardigans
RR-208	Teresa Fitzsimmons
RR-213	Deirdre Henderson
RR-214	Nancy Inness
RR-218	Glyn Roberts
RR-219	Patricia Keogh
RR-220	Roshan Lal
RR-221	Caroline Snow
RR-222	Pascoe Sabido
RR-224	Christopher Connolly
RR-229	Steve Rolfe
RR-230	Eleanor Leach
RR-231	Felicia Ronnholm
RR-234	Adam Whitworth
RR-237	jenny trigg
RR-238	Mr. Sam Clements
RR-240	Tim Padmore
RR-241	John Baker
RR-243	zeynep Erdogan
RR-244	Catherine Cameron
RR-246	Stephen Shillitoe
RR-247	Will Dyson
RR-248	Angela Smith
RR-250	Catherine Harrington
RR-251	Catherine Smith
RR-252	Chris Redston
RR-255	Duncan Livermore
RR-256	Eileen Pearce
RR-258	Irene Flack
RR-259	Jane Lawson
RR-260	Janice Feldermann
RR-262	Joe Downie
RR-264	Margaret Manning
RR-265	Mrs Janet Baarda
RR-266	Paul Davison
RR-267	Rosemary Frances Jarrett
RR-268	Steve Black
RR-269	Tania Bustamante
RR-270	A Gordon
RR-274	David Herbert
RR-276	Ian Brown (2)

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-277	Joseph Swift
RR-280	Molly Crawford
RR-281	Mr Michael Barry Heath
RR-282	Rosie Sinfield
RR-283	Virginia Shaw
RR-285	alicia taylor
RR-286	Angus Lavery
RR-287	Beau Bulman
RR-289	Damian Swarbrick
RR-290	Dr Fleur Visser
RR-291	Elaine Hall
RR-294	Harry Carter
RR-297	Jenny Shepherd
RR-299	Julie Gritten
RR-301	Laura Price
RR-302	Lily worfolk
RR-303	Liz Cruse
RR-304	Liz Postlethwaite
RR-307	Nathan Roche
RR-311	Paul Martyn
RR-312	Peter Hardy
RR-313	Robert Price
RR-316	Skye Golding
RR-318	Stephanie Robinson
RR-319	Steve Jack



## Appendix A

### List of Relevant Representations

## RELEVANT REPRESENTATIONS – LOCAL AUTHORITIES

PINS Ref	Name / organisation
RR-163	Durham County Council
RR-309	North Yorkshire County Council
RR-315	Selby District Council

## RELEVANT REPRESENTATIONS – PARISH COUNCILS

PINS Ref	Name / organisation
RR-239	Newland Parish Council

## RELEVANT REPRESENTATIONS – OTHER STATUTORY CONSULTEE

PINS Ref	Name / organisation
RR-151	The Coal Authority
RR-152	Forestry Commission
RR-212	Natural England
RR-228	Public Health England
RR-236	Historic England
RR-292	Environment Agency
RR-308	National Grid

## RELEVANT REPRESENTATIONS – NON-STATUTORY ORGANISATION

PINS Ref	Name / organisation
RR-002	Biofuelwatch
RR-143	Food & Water Europe
RR-184	Fuel Poverty Action
RR-185	Harrogate District Friends of the Earth
RR-187	NATS LTD
RR-225	Frack Free Exmoor Quantocks and Sedgemoor
RR-226	Global Justice Now
RR-235	Canal & River Trust
RR-245	Elmet & Rothwell Green Party
RR-273	ClientEarth
RR-288	Commercial Boat Operators Association
RR-293	Friends of the Earth Selby
RR-317	South Lakes Action on Climate Change Towards Transition

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-320	Yorkshire Wildlife Trust

## RELEVANT REPRESENTATIONS – MEMBERS OF THE PUBLIC / BUSINESS

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-001	Sally Clark
RR-003	Ben Tarr
RR-004	Breathe Clean Air Group
RR-005	Carol Cooper
RR-006	Charles Nelson
RR-007	Christopher Stephen Wakeley
RR-008	Clare Pargeter
RR-009	David Geall
RR-010	David Hope
RR-011	David Somervell
RR-012	Deborah Sawday
RR-013	Duncan Law
RR-014	Elsbeth Barraclough
RR-015	Esme North
RR-016	Gabby Taylor
RR-017	Grace Onions
RR-018	Jackie Oversby
RR-019	Jacqui Butterworth
RR-020	Jon Skoyles
RR-021	Jonathan Boyne
RR-022	Julian Goodare
RR-023	Julie Wreford
RR-024	June Bostock
RR-025	Kristrn Kleps
RR-026	Laura Goody
RR-027	Linda Lever
RR-028	Line Ringgaard
RR-029	Lisa Stewart
RR-030	Low Carbon Trust
RR-031	Mark Hollinrake
RR-032	Mark knowles
RR-033	Martyn Rose
RR-034	Mary Robertson
RR-035	Mrs Rosalind Collier
RR-036	Nicola Frances Gladys Packer
RR-037	Professor Patricia Howard
RR-038	Robert Bater
RR-039	Robert Helson

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-040	Roland Pargeter
RR-041	Ruth Griffiths
RR-042	Shirley Swan
RR-043	Steve Manchee
RR-044	Steve Overton
RR-045	Susan Fairweather
RR-046	Thomas Collett
RR-047	Timothy Mullen
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RR-049	Barry Hodson
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RR-051	Chantal Buslot
RR-052	Darren Burling
RR-053	David Callow
RR-054	David Foley
RR-055	David SmartKnight
RR-056	Davy King
RR-057	Dr Geoffrey Mead
RR-058	Dr Jane Milton
RR-059	Dr Peter Hirst
RR-060	Elizabeth Potts
RR-061	Jessica Winkler
RR-062	Kristine Vaaler
RR-063	L Warren
RR-064	Lauren MacKenzie
RR-065	Lyn Brayshaw
RR-066	Margaret Anne Evans
RR-067	Margaret Morris
RR-068	May Erskine
RR-069	Michelle Hayward
RR-070	Mike Baker
RR-071	Mike Williams
RR-072	Ms Heather Marsden
RR-073	Ms Rosemary A Clarke
RR-074	Nikki Jones
RR-075	Peter Westlake
RR-076	Richard Howarth
RR-077	Roger Wortley
RR-078	Sally Burley
RR-079	Steve Harris
RR-080	Susan Buss
RR-081	Susan Chapman
RR-082	Susie Laan
RR-083	Anthony Guy Simmons
RR-084	Carl-Luis Obrist
RR-085	D Prentis

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-086	Dr Philippa Berry
RR-087	Elisabeth Bechmann
RR-088	Esther Juhl
RR-089	Graham Gill
RR-090	John Philpot
RR-091	Martin Alcock
RR-092	Neil Bye
RR-093	Paul Paice
RR-094	Peter Deane
RR-095	Robert Palgrave
RR-096	Susan Francis
RR-097	Teresa Belton
RR-098	Adam Quartermaine
RR-099	Alan Fleming
RR-100	Andrew Clements
RR-101	Chloe Tetley
RR-102	Conor Coulter
RR-103	David Woods
RR-104	Doreen Jaques
RR-105	John H. Brogden
RR-106	Philip Greswell
RR-107	Veronica Clark
RR-108	Alexander Davey
RR-109	Andrew Finney
RR-110	Anne Archer
RR-111	David Callander
RR-112	David Matilla
RR-113	Dr.Guy Johnson
RR-114	Fred Mann
RR-115	Jan Palmer
RR-116	Jane Wilding
RR-117	Martina Weitsch
RR-118	Melanie Underwood
RR-119	Michael Mitchell
RR-120	Pauline Moylan
RR-121	Roy Meddings
RR-122	Almuth Ernsting
RR-123	Calum Harvey-Scholes
RR-124	Charles Metcalfe
RR-125	Chris Hesketh
RR-126	Christian Stuart Keegan
RR-127	Ian Brown
RR-128	Jamie Osborn
RR-129	Janice Long
RR-130	Mark Utting
RR-131	Sue Rule

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-132	Sue Smith
RR-133	Tessa Cowley
RR-134	William Boggia
RR-135	Christopher Thornon
RR-136	Davina Blake
RR-137	Faith Kenrick
RR-138	Larry Lima
RR-139	Rich Felgate
RR-140	Richard Parkin
RR-141	Susan Foster-Collins
RR-142	Alice
RR-144	Heather Grinter
RR-145	Janet Chapman
RR-146	Rob Parsons
RR-147	Rosamund Howe
RR-148	David Allen
RR-149	Peter Baker
RR-150	Philomena Grimley
RR-153	Mrs Caroline Stevenson
RR-154	F D Simpson
RR-155	Frances Sleaf
RR-156	Simon Barton
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RR-166	Matthew Burns
RR-167	Melissa McClements
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RR-170	Stuart Toll
RR-171	Zoe Whiteside
RR-172	David Lally
RR-173	Frances Bowen
RR-174	Graham Oliver
RR-175	Lauren Tindle
RR-176	Mr Charles Marshall
RR-177	Peter Humble
RR-178	Simon Erskine
RR-179	Christine Way
RR-180	Emily Scrivener
RR-181	Mark Brown

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-182	Carole Shorney
RR-183	Felix Haslam
RR-186	John Snowdon
RR-188	Peter Daw
RR-189	Janet Milton
RR-190	Alicia Forsberg
RR-191	Dr Shirleen Stibbe
RR-192	Gilian Cleeve
RR-193	Graham Lingley
RR-194	Michael Andrews
RR-195	Barry Dalglish
RR-196	Philippa Roddis
RR-197	Rebecca Wade
RR-198	Christopher Keene
RR-199	Claudia Riccomini
RR-200	Dr Anna Johnson
RR-201	Greg Peakin
RR-202	Jamie Russell
RR-203	Katarina Kositzki
RR-204	Kevin Daws
RR-205	Melanie Cartwright
RR-206	Robin Gill
RR-207	Stephen Vardigans
RR-208	Teresa Fitzsimmons
RR-209	David Plunkett
RR-210	Dr Nicola Hall
RR-211	Joseph Nicholas
RR-213	Deirdre Henderson
RR-214	Nancy Inness
RR-215	Deborah Loe
RR-216	Erik Williams
RR-217	Adrian Fielding
RR-218	Glyn Roberts
RR-219	Patricia Keogh
RR-220	Roshan Lal
RR-221	Caroline Snow
RR-222	Pascoe Sabido
RR-223	Ceri Pryke-Hendy
RR-224	Christopher Connolly
RR-227	Martin King
RR-229	Steve Rolfe
RR-230	Eleanor Leach
RR-231	Felicia Ronnholm
RR-232	Kate Griffin
RR-233	Timothy I Mullen
RR-234	Adam Whitworth

<b>PINS Ref</b>	<b>Name / organisation</b>
RR-237	jenny trigg
RR-238	Mr. Sam Clements
RR-240	Tim Padmore
RR-241	John Baker
RR-242	Richard & Jan Stephens
RR-243	zeynep Erdogan
RR-244	Catherine Cameron
RR-246	Stephen Shillitoe
RR-247	Will Dyson
RR-248	Angela Smith
RR-249	Carol hutchinson
RR-250	Catherine Harrington
RR-251	Catherine Smith
RR-252	Chris Redston
RR-253	Chris White
RR-254	Cllr Douglas Johnson
RR-255	Duncan Livermore
RR-256	Eileen Pearce
RR-257	HELEN DRYDEN
RR-258	Irene Flack
RR-259	Jane Lawson
RR-260	Janice Feldermann
RR-261	Jo Pycroft
RR-262	Joe Downie
RR-263	Lynne Peacock
RR-264	Margaret Manning
RR-265	Mrs Janet Baarda
RR-266	Paul Davison
RR-267	Rosemary Frances Jarrett
RR-268	Steve Black
RR-269	Tania Bustamante
RR-270	A Gordon
RR-271	Alison Shutt
RR-272	Angela Forbes
RR-274	David Herbert
RR-275	Ewa Barker
RR-276	Ian Brown (2)
RR-277	Joseph Swift
RR-278	Laurentia Johns
RR-279	Mary Watson
RR-280	Molly Crawford
RR-281	Mr Michael Barry Heath
RR-282	Rosie Sinfield
RR-283	Virginia Shaw
RR-284	AJ Rushton
RR-285	alicia taylor



<b>PINS Ref</b>	<b>Name / organisation</b>
<b>RR-286</b>	Angus Lavery
<b>RR-287</b>	Beau Bulman
<b>RR-289</b>	Damian Swarbrick
<b>RR-290</b>	Dr Fleur Visser
<b>RR-291</b>	Elaine Hall
<b>RR-294</b>	Harry Carter
<b>RR-295</b>	Janis Grant
<b>RR-296</b>	Jennie Dixon
<b>RR-297</b>	Jenny Shepherd
<b>RR-298</b>	Julian May
<b>RR-299</b>	Julie Gritten
<b>RR-300</b>	Laura Ager
<b>RR-301</b>	Laura Price
<b>RR-302</b>	Lily worfolk
<b>RR-303</b>	Liz Cruse
<b>RR-304</b>	Liz Postlethwaite
<b>RR-305</b>	Michael Fairless
<b>RR-306</b>	Michael Swarbrick
<b>RR-307</b>	Nathan Roche
<b>RR-310</b>	oliver wistanley ramos
<b>RR-311</b>	Paul Martyn
<b>RR-312</b>	Peter Hardy
<b>RR-313</b>	Robert Price
<b>RR-314</b>	Roger Manser
<b>RR-316</b>	Skye Golding
<b>RR-318</b>	Stephanie Robinson
<b>RR-319</b>	Steve Jack