

Date: 08 February 2019  
Our ref: 271403  
Your ref: EN010091



The Planning Inspectorate  
National Infrastructure Directorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN  
[DraxRe-power@pins.gsi.gov.uk](mailto:DraxRe-power@pins.gsi.gov.uk)

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Sir/Madam

**NSIP Reference Name / Code: EN010091 Drax Repowering**

Thank you for your consultation on the above.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Please refer to the table below containing Natural England's responses to the relevant question.

Ref	Question	Natural England Response
BHR 2.4	<p>The ExA acknowledges the additions made to the Outline LBS [REP2-026] in respect of otter and fish mitigation following the ExA's questioning (BHR 1.19 [PD-006]). However, additions made to the updated Outline CEMP [REP4-005] in respect of otters and fish species appear to be minimal and do not contain the same certainty as those included in the HRA Report [REP3-017] and Outline LBS [REP2-026]. For example, paragraph 3.4.6 defers to the HRA Report and states that the measures "<i>should be incorporated in the final CEMP for submission</i>" and that "<i>Such measures include pre-construction surveys ideally before site clearance is carried out, the avoidance of any obstructions to established otter paths, minimising light spill and the use of exclusion zones if necessary.</i>" [emphasis added].</p> <ol style="list-style-type: none"><li>i. Check and correct differences between the Outline CEMP, the Outline LBS and the HRA in this matter.</li><li>ii. Comment on the revisions to the Outline CEMP and whether the revision will support the statements made in the Applicant's HRA Report and Outline LBS.</li></ol>	<p>Natural England is satisfied with the approach to otter and fish mitigation across the Outline CEMP, Outline LBS and HRA and is broadly satisfied with the revisions made to the Outline CEMP in this regard. Our only minor comment is to be clear with regards to paragraph 3.4.6 that pre-construction surveys must be carried out before site clearance is undertaken unless there are sound ecological reasons why they are not necessary. We therefore recommend removing the word "ideally" from the last sentence of the paragraph.</p>

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter please contact Merlin Ash on 02080 266382. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Merlin Ash  
Yorkshire and Northern Lincolnshire Team  
Natural England