



CONSULTATION REPORT

Appendix A Event invitation letters and correspondence

Drax Bioenergy with Carbon Capture and Storage

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

Document Reference Number: 5.1.1

Applicant: Drax Power Limited

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PUBLIC

A1 - Stakeholder letter to elected members and
SDC and NYCC Executive Members Planning Committee



Drax Power Station
Selby
North Yorkshire
YO8 8PH

X September 2021

Dear X,

BECCS at Drax statutory public consultation – Invitation to a briefing

As you may be aware, Drax Power Limited ("Drax") is proposing to develop Bioenergy with Carbon Capture and Storage (BECCS) within its existing plant in North Yorkshire. Further to my letter I sent you in March, I am writing to you as we are now moving forward with the statutory public consultation ahead of submitting an application for a Development Consent Order (DCO).

The public consultation will be held over a 6-week period from Monday 1st November to Sunday 12th December. It will consist of online and in-person events to ensure accessibility for all groups and for the local community to review and comment on the proposed scheme. Our dedicated consultation website - www.BECCS-Drax.com - will provide information about our consultation events, the project, how BECCS technology can help in meeting net-zero goals, the DCO process, project impacts, FAQs, and a feedback form for your views.

As a local elected member your views are important to us and will help to inform our proposals. Please provide any comments and responses to the consultation on the dedicated feedback form on the website by 11:59pm on 12th December 2021. Alternatively, you can provide feedback by sending an email to info@beccs-drax.com or by mail using the following address: FREEPOST CARBON CAPTURE BY DRAX.

Prior to the start of the consultation period, we would like to invite you to a briefing with the project team so you can ask any questions you might have about the proposals. We're engaging with your local authority planning officers to arrange suitable times and dates for both an in-person and online briefing.



We would also be grateful if you could share the details of the consultation throughout your networks – with your residents and community groups. We want to ensure that all communities and individuals have equal opportunity to learn about the proposed scheme and provide their views.

Please also contact us if you would like a hard copy of the consultation materials, or if you require these in different formats such as braille or large print. You can get in touch with the Drax team on the details below.

We look forward to hearing your views on our proposals and we hope to meet you at one of the briefings.

Yours sincerely

Jim Doyle

Development Manager

Email: info@BECCS-Drax.com

Phone: 01757 618381

A2 - Stakeholder letter to Elected Members for the site tour



Drax Power Station
Selby
North Yorkshire
YO8 8PH

X September 2021

Dear X,

BECCS at Drax statutory public consultation – Invitation to a site tour and briefing

As you may be aware, Drax Power Limited ("Drax") is proposing to develop Bioenergy with Carbon Capture and Storage (BECCS) within its existing plant in North Yorkshire. Further to my letter I sent you in March, I am writing to you as we are now moving forward with the statutory public consultation ahead of submitting an application for a Development Consent Order (DCO).

The public consultation will be held over a 6-week period from Monday 1st November to Sunday 12th December. It will consist of online and in-person events to ensure accessibility for all groups and for the local community to review and comment on the proposed scheme. Our dedicated consultation website - www.BECCS-Drax.com - will provide information about our consultation events, the project, how BECCS technology can help in meeting net-zero goals, the DCO process, project impacts, FAQs, and a feedback form for your views.

Ahead of the public consultation, we would like to invite you to Drax Power Station for a site tour, which will include a briefing on Drax and the BECCS project, followed by a combined site tour of Drax's operations and the BECCS project area. This visit will provide you with the opportunity to see the site first-hand to appreciate the national significance of the project, and to ask any questions you might have before the public consultation process begins.

The site tours will take place on Monday 25th October 2021 at 10:00am and Wednesday 27th October 2021 at 6:00pm. The tours will take between 2 to 3 hours. Please let us know which tour you would like to attend by contacting us on the email or telephone number at the bottom of this letter.



You may also be invited to briefings that we're arranging via the planning team at your local authority. We are currently in touch with your planning officers, and it is likely that you will be included in briefings, so please feel free to join them if you wish.

If you cannot attend either briefing, then we are more than happy to arrange an individual briefing, via video call, for yourself. Please let us know if this would be of interest.

As a local elected member your views are important to us and will help to inform our proposals. Please provide any comments and responses to the consultation on the dedicated feedback form on the website by 11:59pm on 12th December 2021. Alternatively, you can provide feedback by sending an email to info@beccs-drax.com or by mail using the following address: FREEPOST CARBON CAPTURE BY DRAX.

We would be grateful if you could share the details of the consultation throughout your networks – with your residents and community groups. We want to ensure that all communities and individuals have equal opportunity to learn about the proposed scheme and provide their views.

We look forward to hearing your views on our proposals and we hope to meet you at the site visit.

Yours sincerely

Jim Doyle

Development Manager

Email: info@BECCS-Drax.com

Phone: 01757 618381

A3 - Stakeholder letter to Hard to Reach Groups and Community Groups offering a briefing



Drax Power Station
Selby
North Yorkshire
YO8 8PH

X October 2021

Dear X,

BECCS at Drax statutory public consultation

Drax Power Limited (“Drax”) is proposing to develop Bioenergy with Carbon Capture and Storage (BECCS) within its existing plant in North Yorkshire.

BECCS is a technology that has been successfully trialled and developed to remove carbon dioxide (CO₂) from the atmosphere. We are proposing to install carbon capture technology on up to two of our existing biomass power generating units at Drax Power Station, helping us remove more CO₂ from the atmosphere than is produced across our operations, making the company carbon negative. The project is known as "BECCS at Drax".

As BECCS at Drax is classified as a Nationally Significant Infrastructure Project under the Planning Act 2008, its construction and operation requires planning permission known as a Development Consent Order (DCO). As part of this process, we will be holding a statutory public consultation to gather feedback on our proposals before we submit our DCO application.

The public consultation will be held over a 6-week period from Monday 1st November to Sunday 12th December. It will consist of online and in-person events to ensure accessibility for all groups and for the local community to review and comment on the proposed scheme. Our dedicated consultation website - www.BECCS-Drax.com - will provide information about the consultation events, the project, how BECCS technology can help in meeting net-zero goals, the DCO process, project impacts, FAQs, and a feedback form for your views.

The community’s views are important to us, and we want to hear from you. **Please provide any comments on the dedicated feedback form on the website by 11:59pm on 12th December 2021. Alternatively, you can provide feedback by sending an email to**



info@beccs-drax.com or by mail using the following address: FREEPOST CARBON CAPTURE BY DRAX.

Please also contact us if you would like a hard copy of the consultation materials, or if you require these in different formats such as braille, large print or in another language. You can get in touch with the Drax team on the details below.

We would also like to invite you to an online briefing with the project team, during the consultation, so that you can ask any questions you might have about the proposals. If you would like us to arrange a briefing with you, at any time during the consultation, please let us know.

We would be grateful if you could share the details of the consultation throughout your networks. We want to ensure that all communities and individuals have equal opportunity to learn about the proposed scheme and provide their views.

We look forward to hearing your views on our proposals and we hope to meet at a briefing session.

Yours sincerely

Jim Doyle

Development Manager

Email: info@BECCS-Drax.com

Phone: 01757 618381

A4 - Stakeholder letter to Elected Members and Environmental Interest Groups offering a briefing



Drax Power Station
Selby
North Yorkshire
YO8 8PH

X September 2021

Dear X,

BECCS at Drax statutory consultation – Invitation to a briefing

As you may be aware, Drax Power Limited ("Drax") is proposing to develop Bioenergy with Carbon Capture and Storage (BECCS) within its existing plant in North Yorkshire. Further to my letter I sent you in March, I am writing to you as we are now moving forward with the statutory public consultation ahead of submitting an application for a Development Consent Order (DCO).

The public consultation will be held over a 6-week period from Monday 1st November to Sunday 12th December. It will consist of online and in-person events to ensure accessibility for all groups and for the local community to review and comment on the proposed scheme. Our dedicated consultation website, www.BECCS-Drax.com - will provide information about our consultation events, the project, how BECCS technology can help in meeting net-zero goals, the DCO process, project impacts, FAQs, and a feedback form for your views.

As a local stakeholder your views are important to us and will help to inform our proposals. **Please provide any comments or response to the consultation on the dedicated feedback form on the website by 11:59pm on 12th December 2021.** Alternatively, you can provide feedback by sending an email to info@beccs-drax.com or by mail using the following address: FREEPOST CARBON CAPTURE BY DRAX.

We would also like to invite you to a briefing, via video call, with the project team so you can ask any questions you might have about the proposals. If you would like us to arrange a briefing, before or during the consultation, please let us know.

Please also contact us if you would like a hard copy of the consultation materials, or if you require these in different formats such as braille or large print. You can get in touch with the Drax team on the details below.



We would be grateful if you could share the details of the consultation throughout your networks – with your residents and community groups. We want to ensure that all communities and individuals have equal opportunity to learn about the proposed scheme and provide their views.

We look forward to hearing your views on our proposals and we hope to meet at a briefing session.

Yours sincerely

Jim Doyle

Development Manager

Email: info@BECCS-Drax.com

Phone: 01757 618381

A5 - Correspondence with Biofuelwatch in non-statutory and statutory consultation

Appendix A - Biofuelwatch Correspondence with Drax

Non-statutory consultation

Monday 29 March - following the closure of first phase of the public consultation, environmental organisation Biofuelwatch stated that it 'strongly disagrees' with the concept of BECCS and submitted a list of the environmental questions (see below), sent from themselves and three other environmental groups. Although this was submitted after the consultation closed, the project team considered the submission ahead of the statutory consultation to ensure that they would be able to meaningfully respond to any questions or queries in the next phase of consultation.

Monday 29 March 2021 - from Biofuelwatch to BECCS at Drax Consultation Team

Dear Sir/Madam,

I am writing on behalf of the Cut Carbon Not Forests coalition, which includes Natural Resources Defense Council, Southern Environmental Law Center, Dogwood Alliance and Biofuelwatch.

As you know, we strongly disagree with the claim that CCS linked to energy from forest biomass would permanently remove CO₂ from the atmosphere, i.e. result in negative emissions. A recent letter from 87 scientists and economists states: *"Forest bioenergy is adding increasingly large amounts of carbon dioxide to the atmosphere and reducing the capacity of forests to absorb atmospheric carbon dioxide, making it more difficult to reach net zero carbon as the stated goal for limiting global temperature. Adding carbon capture and storage (CCS) technology to a bioenergy plant does not resolve this issue. Bioenergy with Carbon Capture and Storage (BECCS) has not been demonstrated at scale, and based upon existing CCS for coal, it would remove relatively little of the life cycle emissions and add substantially to the cost of electric power generation."*

We understand that the current consultation is seeking input prior to Drax Plc. submitting a formal Scoping Application to the Planning Inspectorate. In this context, we would like to take the opportunity to list the different questions which we believe must be addressed in detail in an Environmental Impact Assessment for this project:

1. Net energy efficiency of Drax's generating station when operated with carbon capture: How much energy will be required for capturing and compressing carbon dioxide and, once this is accounted for, how much of the energy contained in the wood pellets burned will be converted into electricity supplied to the grid? We believe that the answer to this question should be backed up with evidence from carbon capture trials involving combustion of wood pellets;
2. Information about how the inevitable reduction in the plant's net energy efficiency resulting from carbon capture would be compensated: would it result in a reduction of the amount of electricity delivered to National Grid, or would it result in an increase in the amount of wood pellets burned and, if so, by what amount?
3. Detailed assessments of potential air quality impacts as well as public health impacts;
4. Detailed assessment of any potential impacts on water quality;
5. Information as to whether Drax's proposal is contingent upon the approval, construction and availability of a CO₂ pipeline proposed by the Zero Carbon Humber Partnership, so that CO₂ can be stored underneath the North Sea. If Drax proposes CCS for the biomass units even in the absence of an operational carbon storage project offshore, then how would the CO₂ captured be stored or used?

Many thanks.

Yours sincerely,

Statutory Consultation

Thursday 18 November - Biofuelwatch participated and raised detailed questions. Their questions are listed below:

- How much CO₂ has been captured and how much has been stored as part of the joint trial with MHI and over what period?
- What percentage of CO₂ from a biomass unit do you expect to capture in future?
- Has it been established through the trial how much of a biomass unit's electricity will be required to capture a set proportion of CO₂? Are there trial results from which to deduce the energy penalty?

We were unable to answer these questions on the live chat, but we followed up with answers via email within 24 hours.

Friday 19 November - from BECCS at Drax Project Team following the live chat session
Many thanks for participating in the Drax live chat session yesterday. Please find answers to your questions below:

1. How much CO₂ has been captured and how much has been stored as part of the joint trial with MHI and over what period?

The carbon capture pilot captures around 250 kg/h of CO₂. The purpose of the trial was to provide data on the capture of CO₂ from biomass flue gas that will help to validate the full-scale design of the capture system.

The CO₂ was released into the flue gas stream after capture, as there is not yet any CO₂ transportation & storage infrastructure in place for permanent sequestration.

1. What percentage of CO₂ from a biomass unit do you expect to capture in future?

The plant will be designed to capture up to 95% of the CO₂ in the flue gas

1. Has it been established through the trial how much of a biomass unit's electricity will be required to capture a set proportion of CO₂? Are there trial results from which to deduce the energy penalty?

This was not within the scope of the trial, however, it has been an important consideration in the selection of the vendor and energy efficiency is an essential part of the project design. Specific values are commercially confidential at this point, but this aspect will be considered in the relevant chapter of the Environmental Statement.

Please do not hesitate to get back to us, if you have any follow up questions on this.

Best wishes,

BECCS at Drax Consultation Team

Monday 22 November - Biofuelwatch responded to BECCS at Drax Consultation Team with questions as below:

- How much CO₂ has been captured in total over the course of the trial?
- How long have you been conducting the trial?
- How many hours have you been able to capture 250Kg/hour without interruption?

Separately, Biofuelwatch emailed the consultation team and requested for the Environmental Information Report (EIR) to address impacts of all amine degradation products on public health and air quality. Additionally, they felt that the first three questions in the survey weren't appropriate to the consultation.

Drax provided answers to all questions and explained that there were no legal guidelines for setting out the survey. As such, we provided closed and open questions on the Proposed Scheme. Drax will explore the impact of amine degradation in the EIR. Please all correspondence of this below:

Tuesday 23 November - BECCS at BECCS at Drax Consultation Team

Thank you again for your email.

In response to your questions, the trial unit has been running since mid-2020, during which time it has been regularly taken in and out of operation. The aim of the trial was to not prove operational reliability, as a pilot plant is not representative of a large-scale process in that regard. Instead, the trial has been successful in its aim of providing data on the interaction of the carbon capture solvent with Drax flue gas.

Do let us know if you have any further questions on this.

Best wishes,

BECCS at Drax consultation team

Thursday 25 November - Biofuelwatch to BECCS at Drax Consultation Team

Dear Sir/Madam,

We are writing with regard to your planning application Drax Bioenergy with Carbon Capture and Storage Project:

[Beccs Consultation Drax \[REDACTED\]](#)

[Drax Bioenergy with Carbon Capture and Storage Project | National Infrastructure Planning \(planninginspectorate.gov.uk\)](#)

We would like to share our concerns with respect to the invitation to the public to share their views, as can be found here: [Give your view – Beccs Consultation Drax \[REDACTED\]](#).

We are concerned that the first 3 of these questions are not appropriate to a planning consultation; they read more like an opinion survey on policy. These first 3 don't appear material to the planning application at all, only number 4 invites meaningful input.

We therefore ask that the consultation be re-opened asking open questions on the merits of the planning proposal and preliminary environmental statement.

We will in the meantime submit our own comments via email answering question 4.

Many thanks in anticipation of your response,

Biofuelwatch

Thursday 2 December - BECCS at Drax Consultation Team to Biofuelwatch

Thank you for your email regarding the BECCS at Drax statutory consultation and for submitting an online feedback form.

The consultation invites a meaningful response from consultees and provides the opportunity for that response to be submitted either via the questionnaire or in free form via email or post.

If responding via the questionnaire, then questions 2, 3, and 4 all ask for respondents' independent views and the reasons for their views, with question 4 referencing as an example the environmental impacts.

Consultees are therefore able to focus and respond on any matters they so wish, through a range of different channels – including the online questionnaire – where they can provide their views on the merits of the planning proposal and preliminary environmental statement. This gives people ample opportunity to ensure their views can be expressed clearly and is entirely in line with expectations for a statutory consultation, where there is no prescribed form for the questions asked of consultees. We will therefore not be reopening the consultation which is due to close on 12 December.

We look forward to receiving your comments via email in relation to the project.

Best wishes,

BECCS at Drax Consultation Team

Friday 3 December - Biofuelwatch to BECCS at Drax Consultation Team

Thank you for your response. As we explained in our previous email, we do not feel the first three questions are appropriate to the consultation and hope the planning inspectorate will take our views into consideration.

We will however ensure we feed our own response in via email before the deadline,

Wednesday 8 December - Biofuelwatch to BECCS at Drax Consultation Team

Dear Sir/Madam,

We are writing in response to the statutory consultation about the Drax Bioenergy with Carbon Capture and Storage Project proposal. We feel there is some key information missing that we believe must be addressed in the Environmental Information Report:

- We believe that the Environmental Information Report must address impacts of all amine degradation products on public health as well as those on air quality.
- We note with concern that the information provided about amine degradation products relies on manufacturer information from Mitsubishi Heavy Industries (6.4.35 of the air quality section of the PEIR). We believe that real world data verifying MHI's findings should be provided, based on data from relevant trials, given that this particular amine solvent - KS-21 - is newly developed and may therefore have different properties from amine solvents used elsewhere.
- We can see no data about the expected conversion efficiency of the two biomass units once operating with carbon capture. We would ask for relevant data to be set out in the final Environmental Information Report.

Yours faithfully,

Biofuelwatch

Wednesday 15 December - BECCS at Drax Project Team to Biofuelwatch

Many thanks for your feedback on the statutory consultation.

The PEIR was generated to help stakeholders understand the current position of the proposed development. We will provide a full consideration of emissions to air as part of our assessments which will be published within the Environmental Statement and will assess impacts on public health and air quality.

As an integral part of the Environmental Statement, we will assess and model the solvent to comply with the requirements of the EIA regulations.

We are commencing the studies which will form part of the Environmental Statement. This will include the relevant information required for a DCO application.

We welcome your responses to our consultation we will address them in our assessments.

A6 - BECCS at Drax Statutory Consultation Email Correspondence

---- Oct 20, 2021 12:51 PM [REDACTED] wrote ----

Hello

Interesting to read your flyer, its in everyone's interests to be involved in the environment, we are all more environmentally friendly & savvy. Reading the flyer this sounds good, I'm all for reducing carbon dioxide. It needs to be sustainable, cost effective and efficient.

Good luck with your proposed development.

Regards

[REDACTED]

----- Original Message -----

Subject:Re: Bioenergy with carbon capture & storage

Date:2021-10-20 13:30

From:BECCS Drax Consultation <info@beccs-drax.com>

To [REDACTED]

Hi [REDACTED]

Thank you for your email and for the kind feedback. We would also appreciate your views and thoughts when our consultation opens on 1st Nov.

Best wishes,

BECCS at Drax Community Relations Team

Email: info@beccs-drax.com

Freephone: 01757 618 381

[REDACTED]

---- Oct 20, 2021 10:18 AM [REDACTED] wrote ----

Hello,

Thank you for the information flyer posted through my door. Please could I get an emailed copy of the consultation materials about the BECCS scheme?

Best wishes,
[REDACTED]

----- Original Message -----

Subject:Re: BECCS Scheme

Date:2021-11-09 16:46

From:BECCS Drax Consultation <info@beccs-drax.com>

To: [REDACTED]

Good afternoon [REDACTED]

You can find all the consultation materials – including a brochure, exhibition boards and a non-technical summary of our Preliminary Environmental Information Report (PEIR) – on our dedicated page on our website:- [REDACTED]

As many of the documents are rather large, this is easiest way for you to access them. However, if you have any problems accessing them, then please don't hesitate to let us know.

All the best,

Mary

Drax Consultation Team

----- Original Message -----

Subject:Drax public consultation - 23 Nov 2021

Date:2021-11-26 13:25

From:BECCS Drax Consultation <info@beccs-drax.com>

To: [REDACTED]

Dear sir,

Many thanks for attending the BECCS at Drax public consultation at Drax Sports and Social Club on the Tuesday 23 November.

We are writing in relation to your query about 'signing up for updates' via the project website - [REDACTED]

We can confirm that our project website does not have a 'sign up for updates' section. As such, can we ask whether this is the website that you raised your question about?

Many thanks,

BECCS at Drax consultation team

----- Nov 27, 2021 10:00 PM [REDACTED] wrote -----

Dear Drax/ Beccs,

I'm supportive of BECCS (who wouldn't be?) and interested in the proposed corridor route. Can you please send me a link to your interactive map?

Does the width of the route corridor denote all the land that may be suitable for a route? I.e. you plan to install a small pipeline somewhere in the width shown on your maps and the wider it is shown, the more options you have?

Do you plan to compulsorily purchase the land you will need or will you be asking owners, similar to windfarms and electricity wayleaves?

The section I am interested in is on A2 near Swinefleet warping drain. You say you think the route will be 500m north of Thorne and Hatfield. I would be very interested in more information about your route plans there.

Thankyou

[REDACTED]

Subject:Re: Interactive map/ A1
Date:2021-11-29 17:47
From:BECCS Drax Consultation <info@beccs-drax.com>
To: [REDACTED]

Hi [REDACTED]

Thank you for getting in touch.

As we are only responsible for the BECCS at Drax Development Consent Order (DCO) application, our partner National Grid Ventures is better placed to answer any questions on the proposed pipeline and route.

Please feel free to reach out to the Humber Low Carbon Pipelines project team at National Grid Ventures, who will be able to assist further.

Email: HumberLowCarbon@nationalgrid.com

Phone: 0800 860 6255

Freepost: FREEPOST HLCP NATIONAL GRID

Do let us know if you have any further questions on the consultation.

Best,

BECCS at Drax consultation team

Subject:Beccs at Drax public consultation follow up
Date:2021-12-10 11:36
From:BECCS Drax Consultation <info@beccs-drax.com>
To: [REDACTED]

Dear sir and madam,

Many thanks for attending our BECCS at Drax public consultation at Drax Sports and Social Club on Tuesday 23 November. As promised, please find a response to your question regarding wagon movements on our traffic construction route below.

We are still at an early stage of the planning process, but our preliminary construction information indicates that the construction works are anticipated to generate on average 48 two-way HGV trips per day (or 4 two-way HGV trips per hour). At its peak, we anticipate that the construction works could generate a maximum number of 240 two-way HGV trips per day (or 12 two-way HGV trips per hour).

However, this daily peak would not be a regular occurrence and would only take place during high intensity works such as when foundations and concrete pours take place, or when steel needs to be transported to site for installation.

HGVs will travel on fixed routes to and from Drax Power Station along the M62, A614 and A645. They will travel on the Strategic Road Network via the M62 west of J36 as this provides connectivity to the majority of the UK.

We are working closely with Local Planning Authorities (LPA) and Highway Authorities on environmental and traffic impacts and mitigation, and our traffic management plan will be agreed in advance with the LPA before any works commence.

Kind regards,

Drax Community Relations Team

----- Original Message -----

Subject:BECCS SCHEME

Date:2021-10-19 14:24

From: [REDACTED]

To:"info@beccs-drax.com" <info@beccs-drax.com>

Heres a question why bother if your not installing it on all bio mass generators. Ya might as well save ya money cos china aint bothered france dont care and i think where the only country thats not wired right cos our politicians only have half a brain between em. So i was you save ya money and dont bother and help bring down the cost of electricity. Wait ya won't bring down the cost cos thst means less money in your pocket. So personally i dont care what ya do nobody else in the world cares so why should we!!