From: Richards, David

Sent: 28 September 2022 09:29

To: DraxBECCS < DraxBECCS@planninginspectorate.gov.uk>

Subject: Drax Power Station Bioenergy with Carbon Capture and Storage Extension Development Consent

(our ref: 22/01017/CON)

Dear Mr Doyle,

Thank you for your letter dated 30 August requesting any observations from Doncaster Council on the acceptance of the Drax Power Station Bioenergy with Carbon Capture and Storage Extension DCO Application.

Although the application site lies outside the administrative boundary, DMBC would appreciate being made an interested party for the purpose of submitting further representations once detailed feedback can be provided.

The following preliminary observations can be made:

Ecological Impacts

The Ecological Impact Assessment and Scoping Report (WSP January 2021) was considered to cover all of the information required to move this application to EIA stage. DMBC Ecology Officers at this stage outlined further information which could be provided:

- o The loss of arable land (to the proposed environmental mitigation area) and the protection of the Best and Most Versatile (BMV) soils.
- o Is it expected that stored fuel pellets will create leachate and if so how will this be managed?
- o If the use of fossil fuels is to be ceased and replaced wholly by biofuel and carbon capture will this result in the cessation of flue gas desulphurisation?
- o And if this is the case will this mean no more rail transportation of limestone from the Peak District through: Derbyshire, South Yorkshire, and North Yorkshire?

A further response from DMBC Ecologists after reviewing the submission details will be forwarded upon receipt.

Air Quality Impacts

The assessment proposal described in Section 7 follows recognised guidance and procedures to identify the likely impacts on air quality from the proposed development. The study area is currently defined as 15km; this is acceptable as long as this is the extent of the predicted significant impacts.

Section 7.4.3 describes that the maximum impacts are likely to be at distances over 10km from the development site. It is likely that receptors in Doncaster are potentially subject to increased emissions from the development, therefore an appropriate number of suitable receptors within the Borough should be identified to reflect this. This may include receptors within Air Quality Management Areas (AQMAs) or areas close to the objective such as Thorne and these can be identified through the Annual Status Reports or by discussion with the local Air Quality Team.

Section 17 discusses the approach to cumulative effects. In terms of air quality, please note that there are other large emitters proposed which are likely to have an impact on both human receptors and ecological receptors in the Doncaster area. DMBC are currently aware of the Keady Power Station Complex and an Energy from Waste installation in Kirk Sandall, Doncaster (pending consideration ref: 20/01774/TIPA). These should be considered as cumulative impacts cannot be ruled out at this stage.

A further response from the DMBC AQ Officer after reviewing the submission details will be forwarded upon receipt.

Transportation

Based on the location of the proposals and its proximity to Doncaster, the impacts are expected to be negligible.

Heritage Impact

The EIA Scoping Report identifies a study area of 10km radius from the application site. This is a sufficient zone of influence to cover potential impacts on the setting of heritage assets and includes part of DMBC area along our northern boundary. Within this study area there is a Scheduled Monument and a small number of listed buildings (farmhouses) which can be identified through Historic England's list of heritage assets. It is unlikely that their settings will be affected but the methodology to be employed as described in 11.7 of the scoping report is sufficient. There are no conservation areas or identified undesignated heritage assets within the study area that would require further consideration not identified here.

Environmental Health

No objections have been raised to the information provided within the sections relating to Environmental Health and nuisance.

Contamination

No objections have been raised to the level of information provided within the sections relating to land contamination and stability.

Kind regards

Dave Richards

Acting Planning Development Manager

Doncaster Metropolitan Borough Council

Directorate of Economy and Environment Civic Office, Waterdale, Doncaster, DN1 3BU

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