STATEMENT OF COMMON GROUND BETWEEN NATIONAL HIGHWAYS AND DRAX POWER LIMITED

Drax Bioenergy with Carbon Capture and Storage

The Planning Act 2008 (as amended)

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Applicant: Drax Power Limited

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CONFIDENTIAL

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EXECUTIVE SUMMARY

A Statement of Common Ground (SoCG) is a written statement produced during the application process for a Development Consent Order (DCO). It is prepared jointly by the applicant and another party, to assist the Examining Authority in examining the DCO Application by providing an understanding of the status of discussions or negotiations between the applicant and the other party.

This SoCG has been prepared between National Highways (formerly Highways England) and Drax Power Limited (the 'Applicant') (jointly referred to as the Parties) to show where agreement has been reached to date in relation to the Applicant's application (the Application) for a DCO for their Bioenergy with Carbon Capture and Storage (BECCS) project (referred to as the Proposed Scheme). The SoCG represents an accurate and up to date reflection of matters discussed between the Parties. It is a document which will evolve during the pre-examination and examination stages, and conclude with a version which confirms the Parties' positions on relevant matters before the close of the examination.

National Highways is interested in the Proposed Scheme as the highway, traffic and street authority for England's motorways and certain major A-roads known as the strategic road network (SRN).

Throughout this document, points of agreement and disagreement between the Parties are clearly indicated.

1. INTRODUCTION AND PURPOSE

1.1. PURPOSE OF THE STATEMENT OF COMMON GROUND

1.1.1. A Statement of Common Ground (SoCG) is a written statement produced during the application process for a Development Consent Order (DCO) and is prepared jointly by the applicant and another party.

1.1.2. Paragraph 58 of the Department for Communities and Local Government's (DCLG, now Ministry of Housing, Communities and Local Government) guidance entitled 'Planning Act 2008: examination of applications for development consent' (26 March 2015) (DCLG, 2015) hereafter referred to as DCLG Guidance) describes a SoCG as follows:

> "*A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence*."

1.1.3. The aim of a SoCG is to assist the Examining Authority in examining the DCO by providing an understanding of the status of discussions or negotiations between the applicant and the other party. The effective use of SoCGs aids an efficient examination process.

1.1.4. A SoCG may be submitted to the Planning Inspectorate (PINS) prior to the start of or during an examination and is updated as necessary or as requested during the examination.

1.2. DESCRIPTION OF PROPOSED SCHEME

1.2.1. A full description of the Proposed Scheme description is included in Chapter 2 (Site and Project Description) of the ES submitted with the DCO Application (PINS document reference APP-038).

1.3. THIS STATEMENT OF COMMON GROUND WITH NATIONAL HIGHWAYS

1.3.1. This SoCG has been prepared between National Highways and the Applicant (jointly referred to as the Parties) in relation to the DCO Application.

1.3.2. It addresses topics of interest to National Highways. National Highways is interested in the Proposed Scheme as the highway, traffic and street authority for England's motorways and certain major A-roads known as the strategic road network (SRN).

1.3.3. Section 3 summarises the topics of relevance to this SoCG and Section 4 then details whether matters are agreed, not agreed or under discussion between the Parties.

1.3.4. In respect of environmental topics covered in the Environmental Statement submitted with the Application but not referred to in this SoCG, National Highways has no comments to make.

1.3.5. The SoCG is a document which will evolve during the pre-application and examination stages, and conclude with a version which confirms the Parties' positions on relevant matters before the close of the Examination.

1.3.6. This SoCG has been prepared in accordance with the DCLG Guidance.

2. RECORD OF ENGAGEMENT UNDERTAKEN TO DATE

2.1. RECORD OF ENGAGEMENT

2.1.1. The tables below set out a summary of the key meetings and correspondence between the Parties in relation to the Proposed Scheme.

Table 2.1 – Schedule of Meetings and Correspondence during the Pre-application Stage

Date	Form of Contact	Summary
22 February 2021	Email From WSP[1] to National Highways.	NYCC, National Highways, and ERoY provided comments on the proposed transport assessment parameters set out in a Transport Scoping Note, which had been provided to them by the Applicant. The approach was generally accepted by the highway authorities, but further discussions are required to reach final agreement ahead of the completion of the ES. The Transport Scoping Note issued covered all transport related parameters including baseline conditions, predicted trip generation, trip distribution, assessment scenarios, proposed growth factors, and other general items ahead of a scheduled meeting with consultees.
02 March 2021	Online Meeting North Yorkshire County Council (NYCC) Highways; East Riding of Yorkshire (ERoY); National Highways; Drax; WSP Transport.	Inception call to introduce Drax BECCS to highway authorities, scheme overview, transport scoping note content, Abnormal Indivisible Loads strategy, and approach to future engagement.
25 March 2021	Online Meeting NYCC (Highways);	Call with highway authorities to discuss approach to AIL routes.

[1] WSP acting on behalf of the Applicant

	ERoY; National Highways; Drax; WSP Transport.	National Highways to liaise with the DfT and seek confirmation and Approval in Principle for the Port of Goole 'Road Option' (as per the agreed approach for AIL movements associated with Drax Repower).
25 March 2021	Email From WSP to National Highways.	Request from WSP for contacts to liaise with the DfT and seek confirmation and Approval in Principle for the Port of Goole 'Road Option' (as per Drax Repower).
20 April 2021	Email From National Highways to WSP.	Confirmation received from National Highways that National Highways are happy with the proposed approach (in relation to the movement of AIL).
04 May 2021	Email From National Highways to WSP.	National Highways response to WSP Drax BECCS Transport Scoping Note v2.0 received.
25 June 2021	Email From National Highways to WSP.	National Highways shared M62 J36 Classified Turning Count and Queue data for review by the BECCS project team.
01 November 2021	Email From WSP to National Highways.	Issue of the Section 42 Notice, Section 48 Notice and PEIR.
22 December 2021	Email From WSP to National Highways.	Applicant email to National Highways noting Statutory Consultation period has ended. National Highways confirmed receipt of the information and would review and provide comment.
26 January 2022	Technical Memorandum From JSJV[2] to WSP.	National Highways provided a response to the PEIR (WSP, 2021) received in form of a Technical Memorandum, as prepared by JSJV on behalf of National Highways.

[2] JSJV acting on behalf of National Highways.

Table 2.2 – Schedule of Meetings and Correspondence during the Pre-Examination and Examination Stages

Date	Form of Contact	Summary
25 August 2022	Online Meeting National Highways; JSJV; Drax; WSP Highways.	Discussed the impact of the Proposed Scheme on the M62 Junction 36.
26 August 2022	Email WSP to National Highways.	Following the Online Meeting on 25 August 2022, WSP provided the Junctions 10 Model of the M62 Junction 36, traffic counts provided to WSP by National Highways and an excel copy of the traffic flow diagrams.
02 September 2022	Technical Memorandum From JSJV (on behalf of National Highways) to WSP.	National Highways provided a response to the ES (WSP, 2022) received in the form of a National Highways Letter and accompanying Technical Memorandum, as prepared by JSJV on behalf of National Highways.
28 September 2022	Email From JSJV to WSP.	JSJV reviewed and provided comments on the Junctions10 model WSP provided to JSJV following the Online Meeting on the 25 August 2022.
28 October – 3 November 2022	Emails Between WSP and JSJV.	Agreement of Revision 01 of the Statement of Common Ground.

3. SUMMARY OF TOPICS COVERED BY THIS STATEMENT OF COMMON GROUND AND RELEVANT DOCUMENTS

3.1. TOPICS COVERED IN THIS STATEMENT OF COMMON GROUND

3.1.1. The following topics discussed between the Parties are covered by this SoCG:

- Planning Policy; and
- Traffic and Transport, including Cumulative Effects.

3.2. RELEVANT DOCUMENTS FOR THIS STATEMENT OF COMMON GROUND

3.2.1. Table 3.1 provides a list of documents of particular relevance to this SoCG. This list will be updated to keep a record of the most recent version of the relevant document.

Table 3.1 – List of Relevant Application Documents for this SOCG

Document Reference	Document Name
APP-038	6.1.2 Environmental Statement - Volume 1 - Chapter 2: Site and Project Description
APP-041	6.1.5 Environmental Statement - Volume 1 - Chapter 5: Traffic and Transport
APP-062	6.2.5.1 Environmental Statement - Volume 2 - Figure 5.1: Study Area (Traffic and Transport)
APP-063	6.2.5.2 Environmental Statement - Volume 2 - Figure 5.2: Public Rights of Way
APP-064	6.2.5.3 Environmental Statement - Volume 2 - Figure 5.3: National Cycle Routes
APP-065	6.2.5.4 Environmental Statement - Volume 2 - Figure 5.4: Traffic Survey Data Locations
APP-066	6.2.5.5 Environmental Statement - Volume 2 - Figure 5.5: HDV Routing
APP-067	6.2.5.6 Environmental Statement - Volume 2 - Figure 5.6: Abnormal Indivisible Load Routing
APP-120	6.3.5.2 Environmental Statement - Volume 3 - Appendix 5.2: Framework Construction Worker Travel Plan

Document Reference	Document Name
APP-121	6.3.5.3 Environmental Statement - Volume 3 - Appendix 5.3: Traffic Flow Diagrams
APP-122	6.3.5.4 Environmental Statement - Volume 3 - Appendix 5.4: Personal Injury Collision Data
APP-123	Limited 6.3.5.5 Environmental Statement - Volume 3 - Appendix 5.5: Schedule Planner
APP-124	6.3.5.6 Environmental Statement - Volume 3 - Appendix 5.6: Junction Modelling Outputs
OD-009	6.3.5.1 Environmental Statement Volume 3 - Appendix 5.1: Construction Traffic Management Plan - Rev 2 - Accepted at the discretion of the Examining Authority

4. CURRENT POSITION

4.1. PLANNING POLICY

Table 4.1 – Planning Policy

Ref.	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
4.1.1	Legislation, Key Planning Policy, and Key Guidance Documents	Chapter 5 (Traffic and Transport) (document reference APP-041) sets out the legislation and key planning policy and key guidance documents that have been taken into account.	National Highways agree with the legislation, key planning policy and key guidance documents included within the ES. Key policies for National Highways are: • The National Highways document 'The Strategic Road Network: Planning for the future' (2015); and • The DfT Circular 02/2013.	Agreed

4.2. TRAFFIC AND TRANSPORT

Table 4.2 – Traffic and Transport

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
4.2.1	Baseline (Study Area)	The study area is set out in Section 5.6 of Chapter 5 (Traffic and Transport) (document reference APP-041) and shown on Figure 5.1 (Study Area (Traffic and Transport) (document reference APP-062).	National Highways agree with the Traffic and Transport Study Area included in the ES. It is agreed that the study area to be considered should include: • M62 Junction 36 Dumbbell Roundabout (Ref: Junction 4a / 4b); • M62 eastbound mainline from Junction 36 (Ref: Link 6); and • M62 westbound mainline from Junction 36 (Ref: Link 9).	Agreed
4.2.2	Baseline (Traffic Flows)	At the pre-application stage, the Applicant proposed to use March 2018 baseline traffic flows across the study area. However, National Highways provided October 2018 traffic flows for the M62 Junction 36.	National Highways agree with this approach and consider the October 2018 surveys to be robust because traffic flows have reduced from 2018 to 2022. National Highways also note that the daily traffic profile has not	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		The Applicant reviewed the October 2018 data provided by National Highways which confirmed that flows are higher than the March 2018 flows surveyed at Junction 36. As such, the October 2018 data was used in the ES. The baseline traffic flows are set out in Section 5.7 of Chapter 5 (Traffic and Transport) (document reference APP-041).	materially changed from 2018 to 2022.	
4.2.3	Baseline (Personal Injury Collision Data)	The Applicant undertook a Highway Safety Analysis (presented in Section 5.7 of Chapter 5 (Traffic and Transport) (document reference APP-041) using data obtained from North Yorkshire County Council and East Riding of Yorkshire Council for the most recent five-year period available at the time of the request (01/01/2017 to 31/01/2021).	National Highways recommend that the Applicant present a collision data analysis for the period 2015-2019 to ensure that a full 5-year period, unaffected by the covid-19 pandemic, has been reviewed. National Highways also request that the study area be extended to cover M62 Junction 36 and the M62 mainline east and west of the junction. JSJV would also note that where a collision resulted in fatal or serious	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
			injury and/or where a cluster of collisions are recorded, the causation factors should be considered to confirm or otherwise any pre-existing trends.	
4.2.4	Baseline (TEMPro Factors)	Traffic growth predictions for the assessment years considered within in Section 5.7 of Chapter 5 (Traffic and Transport) (document reference APP-041) were taken from the Trip End Model Program (TEMPro) v7.2c.	National Highways consider the proposed background growth factors to be acceptable. The proposed factors are not materially different to those derived by JSJV and we support the use of the alternative assumptions function.	Agreed
4.2.5	Methodology (Sensitive Receptors)	A low sensitivity was assigned on the basis of the type of user groups who may use Link 6 and 9, and the type of land uses the link passes through. This is in line with IEMA guidance and LA104 that identify groups, locations and areas which may be sensitive to changes in traffic conditions. Based on this methodology the M62 mainline (links 6 and 9) were assigned a low sensitivity.	National Highways suggests that M62 eastbound and westbound mainlines may be potentially impacted by the construction impacts of the scheme and as such, further justification should be provided to explain the proposed sensitivity for the M62 mainline.	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
4.2.6	Methodology (Construction Phase – Option 2)	The Applicant has assessed Option 2 as the worst case for traffic and transport within Chapter 5 (Traffic and Transport) (document reference APP-041).	On the basis that the duration of the construction peak is significantly greater for Option 2, JSJV previously agreed that Option 2 is more likely to represent a worse-case scenario in terms of traffic and transport. However, JSJV also noted that Option 1 results in greater traffic generation than Option 2 over the Christmas period of 2025. Furthermore, Option 1 creates a second peak construction period in 2028 (June – August), whereas Option 2 only has one construction peak period (albeit, spread out across a longer time period). JSJV would reiterate that further analysis is required to assess the SRN peak periods (and, potentially, the corresponding shoulder peak periods).	Under discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
4.2.7	Methodology (Operational Workforce)	The Applicant requires a total workforce of 50 full time staff for the operational phase of the Proposed Scheme. The assessment of the operational phase has been limited to reviewing the change in traffic flows on the links and junctions within the study area.	Based on previous agreements at the pre-application stage and details contained with the ES, National Highways agree that the trip generation associated with the operational phase of the Proposed Scheme is unlikely to have a significant impact on the operation of the SRN during the AM & PM peak hour periods. National Highways agree that the trip generation associated within the operational phase of development is unlikely to generate a significant impact on the operation of the SRN during the AM & PM peak hour periods. Whilst National Highways agree, they state that the Applicant has provided insufficient evidence to justify the stated number of workers. However, given that 50 staff are forecast to generate 24 two-way trips at M62 Junction 36, if the number of staff were to be doubled to 100 then the impact at	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
			M62 junction 36 would be in the order of 48 two-way trips. On this basis, and considering the previous agreements at the pre-application stage, JSJV would agree that the trip generation associated with the operational phase of development is unlikely to generate a significant impact on the operation of the SRN during the AM & PM peak hour periods.	
4.2.8	Methodology (Decommissioning Phase)	The Applicant considers that the decommissioning phase will be no worse than those during the construction phase. A Decommissioning Traffic Management Plan (DTMP) for the works will also be submitted, approved and implemented at the appropriate time and be consulted upon with National Highways, secured by DCO Requirement.	National Highways support this approach subject to a DCO Requirement being included which secures a DTMP.	Agreed
4.2.9	Methodology (Assessment Scenarios)	The Applicant has set out the Assessment Scenarios in Section 5.5	National Highways are in agreement with the Assessment Scenarios assessed. Further	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		of Chapter 5 (Traffic and Transport) (document reference APP-041).	discussions are required regarding the worst case traffic flows and this is discussed under item 4.2.16. • Existing: 2018 Baseline • Year of submission: 2022 • Peak construction year (under discussion – covered later in this table)	
4.2.10	Assessment (Trip Generation – Workers)	Section 5.9 of Chapter 5 (Traffic and Transport) (document reference APP-041) states that during the peak month of construction, the vehicle trip generation is proposed to be 858 two-way trips in August 2026, based on 1000 workers, 400 vehicle trips at 2 per vehicle and 29 minibuses at 7 per vehicle.	National Highways consider the proposed vehicle trip generation to be acceptable. This is agreed but noting the need to assess the worst-case.	Agreed
4.2.11	Assessment (Trip Generation – HDV)	Section 5.9 of Chapter 5 (Traffic and Transport) (document reference APP-041) proposes that the volume of HDVs on the network during the peak month of construction (in 2026) is to be a maximum of 270 two-way daily	National Highways consider the level of HGV trip generation to be in line with that contained in the proposed schedule planner and is, therefore, considered to be robust.	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		HDV movements (135 in and 135 out). The Applicant has set out the Assessment Scenarios in Section 5.5 of Chapter 5 (Traffic and Transport) (document reference APP-041) proposes that HDV deliveries are to be spread evenly over the 12-hour working day from 07:00 – 19:00.	National Highways consider the proposed HDV profile to be acceptable. This is agreed but noting the need to assess the worst-case.	
4.2.12	Assessment (Trip Distribution)	The Applicant has set out the trip distribution within Section 5.9 of Chapter 5 (Traffic and Transport) (document reference APP-041) which is consistent with previous assessments undertaken for Drax Power Station. The trip distribution was based on a gravity model weighted on population and distance that the informed the traffic analysis for the Drax Repower DCO.	Through EIA scoping for the development, National Highways agreed that the gravity model could be used to distribute workers associated with the Proposed Scheme. Consequently, the proposed construction worker trip distribution is acceptable. National Highways also note that they support the assumption that 100% of the HDV trip generation will use M62 Junction 36 as this represents a worst-case scenario.	Agreed
4.2.13	Assessment (Trip Assignment)	Appendix 5.3: Traffic Flow Diagrams (document reference APP-121) highlights that through the M62	National Highways states that further analysis is required to assess the SRN peak periods	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		Junction 36, based on the assumptions set out in the ES, a total of 112 PCUs are predicted to travel through the junction in the AM peak (LDV and HDV) and a total of 162 PCUs in the PM peak.	(and, potentially, the corresponding shoulder peak periods). Details of the specific requirements to be included in subsequent analysis will be determined through agreements made in the SoCG.	
4.2.14	Assessment (Modal Split)	Section 5.9 of Chapter 5 (Traffic and Transport) (document reference APP-041) states that the Applicant anticipates that 80% of the workforce would be based locally and travel from home and 20% of the workforce would be transient and travel from local accommodation. It has been assumed in the ES that workers travelling from home will travel by private car as a driver or passenger, with an average vehicle occupancy of two workers per vehicle, with the remaining 20% travelling by minibus, with an average occupancy of seven workers per vehicle.	National Highways supports the proposed assumptions for construction trip generation. This is agreed, subject to a review of the proposed Construction Worker Travel Plan [CWTP].	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
4.2.15	Assessment (Passenger Car Unit (PCU))	The Applicant has incorporated the following PCU values into all assessments: • Car – 1.0 • LGV – 1.0 • Rigid – 1.5 • Articulated – 2.3 • PSV – 2.0 • MCL – 0.4 • PLC – 0.2	National Highways suggest that the following PCU equivalent values should be used, based on guidance within TAG UNIT M3.1 Highway Assignment Modelling (May 2020): • LGVs on all road types – 1.0 • HGVs on motorways and all-purpose dual carriageways – 2.5 • HGVs on other road types – 2.0.	Under Discussion
4.2.16	Assessment (Peak Periods)	The Applicant used the peak hour periods 07:15 – 08:15 and 16:30 – 17:30 in all peak hour assessments undertaken, which are presented in Section 5.9 of Chapter 5 (Traffic and Transport) (document reference APP-041). These peak periods were selected as they had the highest hourly PCU total in the AM peak and PM peak periods.	National Highways suggest that the network peak periods for the M62 Junction 36 is from 07:30 - 08:30 and 16:45 - 17:45. On this basis, National Highways request clarification to confirm whether the worst-case peak for M62 Junction 36 has been assessed. National Highways state that if the worst-case peak has not been	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
			assessed, then further analysis will be required. National Highways note that there may be a requirement to assess the shoulder peak periods of the worst-case peak periods. National Highways suggest that the worst-case morning and evening weekday peak should be derived by considering the maximum combined base traffic flows and development traffic flows.	
4.2.17	Assessment (Cumulative)	The Applicant has set out the approach to committed developments in Section 5.7 of Chapter 5 (Traffic and Transport) (document reference APP-041).	National Highways consider the approach to committed developments to be acceptable.	Agreed
4.2.18	Assessment (Environmental Impacts)	The environmental effects considered within Chapter 5 (Traffic and Transport) (document reference APP-041) are: • Severance • Pedestrian Amenity	National Highways withhold comment on the effect on intimidation and fear until the impact of the Proposed Scheme at the SRN has been agreed upon.	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		• Fear and Intimidation • Highway Safety; and • Driver Delay.		
4.2.19	Assessment (Junction Capacity Assessments)	Section 5.9 of Chapter 5 (Traffic and Transport) (document reference APP-041) sets out the junction capacity assessments undertaken.	National Highways agree with the general conclusions drawn in the ES in relation to the capacity assessments undertaken, e.g. Junction 4 would operate over capacity under the 2026 Do Minimum and 2026 Do Something scenarios. National Highways states that further analysis is required to assess the SRN peak periods (and, potentially, the corresponding shoulder peak periods). Details of the specific requirements to be included in subsequent analysis are under discussion. On the basis of the above, JSJV would withhold comment on the proposed assessment until all assessment inputs have been	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
			agreed upon (peak periods and Do Minimum mitigation) and until the proposed Junction10 model has been reviewed and approved.	
4.2.20	Assessment (M62 Junction 36 Junction 10 Model)	The traffic impact of the Proposed Scheme onto the M62 Junction 36 was modelled using Junctions10. At a meeting between the Applicant and National Highways on the 25/08/22, the Applicant provided the Junctions10 model to JSJV for review.	National Highways (through their consultants JSJV) have reviewed the Junctions10 model and have provided comments. The geometry is in general accurate, however, there is an error on the westbound link road between the two roundabouts, where the conflict angle (PHI) has been excluded. This should be corrected. The option to model blocking back between the roundabouts has not been used. We acknowledge that there are, potentially, reasons for this, associated with U-turning vehicles and use of the capacity intercept option, but we would also note that the risk of blocking back between the junctions in the future scenarios appears high, in particular the westbound link	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
			between the junctions blocking back to the eastern junction. Consequently, we request that a sensitivity test is undertaken where U-turning vehicles and the capacity adjustment are removed, and queues limited to 28 vehicles for westbound, and 44 vehicles for eastbound, are input in the queue limited options, within the 'linked arm' option of the 'traffic demand' menu. This sensitivity test should then be run to comment on the impact of blocking back, in particular on the eastern roundabout of the dumbbell arrangement.	
4.2.21	Mitigation (M62 Junction 36 Improvement)	During a meeting between National Highways and the Applicant on the 25/08/2022, the Applicant requested details of the proposed improvement scheme to the M62 Junction 36.	National Highways provided the following details: The scheme was derived as part of the East Riding of Yorkshire Local Plan which was adopted in April 2016. The scheme is currently under review, with modelling being carried out to	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
			understand whether the mitigation is still required; • The East Riding Infrastructure Study (2014) was the driver for the mitigation and includes a description and very basic plans within Appendix G of Appendix E; and • Contributions have started to be collected by ERYC but remain well short of the cost of the scheme. Therefore, although committed within the ERYC Local Plan there are no timescales for delivery. On the basis of the above, National Highways request that the ES assesses with and without the scheme in place (in the Do Minimum and DoSomething scenarios).	
4.2.22	Mitigation (Design, Mitigation and	The following Tertiary Mitigation Measures have been identified to	National Highways agree with the use of Tertiary Mitigation Measures as proposed.	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
	Enhancement Measures)	safeguard the environment and will be considered within the EIA: • Construction Traffic Management Plan (CTMP) (document reference OD-009) • Construction Worker Travel Plan (CWTP) (document reference APP-120)	However, should significant impacts remain, then consideration may need to be given to capacity enhancements to mitigate for development traffic increases. This is agreed, noting the following two sections of this table.	
4.2.24	Mitigation (CTMP – Additional Detail)	The Applicant submitted a CTMP (document reference OD-009) as part of the DCO application that is secured by DCO Requirement. The Applicant will discuss the recommendations and update the CTMP at the first Examination deadline in accordance with the outcome of the discussions.	National Highways requires that the CTMP be secured by DCO requirement and recommend that the CTMP is updated to include the matters set out in its Relevant Representation.	Under Discussion
4.2.25	Mitigation (CWTP – Measures)	The Applicant has set out mitigation measures within the CWTP (document reference APP-120). The Applicant will discuss the proposed travel plan measures and update the CWTP at the first	National Highways support the proposed travel plan measures. However, it suggests that a firm financial commitment should be made to specific incentives, rather than a description of potential example incentives.	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		Examination deadline to reflect the outcome of the on-going discussions.		
4.2.26	Mitigation (CWTP – Monitoring)	Section 6.10 of the CWTP (document reference APP-120) states that: "National Highways have requested the monitoring of construction worker traffic. The TPC and senior management will agree the arrangements for the monitoring of construction worker traffic with National Highways and review the data at the proposed TPSG to understand and agree if additional measures are required to support the management of the construction phase traffic impacts". It is considered that this is the appropriate stage for such monitoring to be agreed, rather than through the SoCG.	National Highways supports this and would suggest that an agreement on monitoring of construction worker traffic could be included in the Statement of Common Ground.	Under Discussion
4.2.27	Mitigation (CWTP – Car Parking)	Construction workers will park within the existing 500 carparking spaces available within the Drax Power Station Site.	National Highways would suggest that if the construction site will have a capped number of parking spaces available to construction workers of no more than 450	Under Discussion

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		However, provision for 300 overflow car parking spaces would be provided within the East Construction Laydown Area. The combined capacity of 800 carparking spaces across the two areas will not be required throughout the entire construction programme but is included to ensure operational resilience throughout the construction phase as the existing operational units will still require maintenance and dealing with outages.	spaces, then the proposed parking provision of 800 car parking spaces (500 standard spaces + 300 overflow spaces) should be revised. National Highways would suggest that the CWTP should provide specific commitments to how the proposal to provide favourable parking locations for those that travel to the Site with two or more passengers will be enforced and how many car parking spaces will be specifically allocated for only workers who car share.	
4.2.28	Mitigation (CWTP – Hours of Operation)	During the construction phases it is proposed that the standard working periods would be Monday to Friday, 07:00 to 19:00, with all personnel working within a nine-hour period. It is also proposed that start-up and shutdown activities would take place during the one-hour period either side of standard working hours. For the purposes of the assessment, it has been proposed that all	Subject to the impact at the SRN, there may be a requirement for National Highways to request that the arrival and departure movements for construction staff occur outside of the SRN peak periods. This could be requested through the consultation with National Highways on the CTMP and CWTP that is already required by the DCO.	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
		construction worker related trips would arrive between 06:00 and 10:00 and depart between 16:00 and 20:00 (Mondays to Fridays). On Saturdays, it is proposed that working hours would be 07:00 and 14:30.	This is an agreed approach, noting that subject to the impact at the SRN, there may be a requirement for National Highways to request that the arrival and departure movements for construction staff occur outside of the SRN peak periods.	
4.2.29	Other (AIL Strategy)	AIL Strategy – The Applicants preferred option is by road from Port of Goole to Drax Power Station. An option to upgrade Drax jetty was considered but has now been ruled out.	National Highways is happy with the proposed approach. In April 2021, National Highways provided confirmation that both DfT and National Highways are in agreement with the proposed AIL approach in principle.	Agreed
4.2.30	Other (AIL Route – Highway Condition Survey)	The Applicant states that a highway condition survey will be carried out along the whole route ahead of the first AIL delivery, and after the final AIL. Any road maintenance issues or damage deemed to be attributable to the AIL will be rectified, and the road will be returned to its former condition.	National Highways support the approach to undertaking a highway condition survey. National Highways state that the surveys should be provided to National Highways, include a commitment to make good any defects and for the Applicant to work closely with National	Agreed

Ref	Description of Matter	Applicant – Current Position	National Highways – Current Position	Position
			Highways before undertaking any surveys. National Highways note that no works to the SRN should be undertaken prior to an agreement with National Highways.	

5. SIGNATURES

Table 5.1 – Signatures

Ref	National Highways	Drax Power Ltd (the Applicant)
Signature		
Printed Name		
Title		
On behalf of	National Highways	Drax Power Ltd
Date		