



# COVER LETTER (8)

## Drax Bioenergy with Carbon Capture and Storage

The Planning Act 2008, National Infrastructure Planning Advice Note Sixteen: 'How to request a change which may be material ('AN16')', and the Infrastructure Planning (Compulsory Acquisition) Regulations 2010

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Applicant: Drax Power Limited

PINS Reference: EN010120



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DOCUMENT OWNER: WSP UK Limited

AUTHOR: I Pennington

APPROVER: C Fountain

PUBLIC

Drax Power Station  
Selby  
North Yorkshire  
YO8 8HP

George Harrold  
Case Manager  
National Infrastructure Planning  
The Planning Inspectorate  
Major Applications and Plans Directorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

05 December 2022

Dear Mr Harrold,

**PINS Reference: EN010120**

**Document Reference: 8.2.7 Cover Letter (8) – Submission of Proposed Changes Application**

**The Planning Act 2008, National Infrastructure Planning Advice Note Sixteen: ‘How to request a change which may be material (‘AN16’), and the Infrastructure Planning (Compulsory Acquisition) Regulations 2010**

**Drax Power Station Bioenergy with Carbon Capture and Storage**

1. We write on behalf of Drax Power Limited (‘the Applicant’) to provide the Proposed Changes Application, with reference to the above and following the receipt of the Examining Authority’s (‘ExA’) responses, dated 23 September 2022 and 10 October 2022 (‘the ExA’s letters’), to the Applicant’s Change Request letter and follow-up correspondence dated 12 September 2022 and 30 September 2022. The Proposed Changes Application responds fully to the points made in the ExA’s letters and is intended to contain sufficient information to enable the ExA to consider two proposed minor changes to the application for development consent for the Drax Bioenergy with Carbon Capture and Storage (‘BECCS’) (‘the Proposed Scheme’) project (‘the Application’) or to prepare further questions, if necessary.
2. Proposed Change 01 (PC-01): The Application submitted to the Planning Inspectorate committed to providing floodplain compensation as part of the Proposed Scheme but did not confirm where this was to be located. Since the Application was submitted, the Applicant has been able to investigate solutions to the floodplain compensation and has continued to engage with Interested Parties such as the Environment Agency to confirm a suitable solution. This solution comprises land within the Applicant’s ownership, but not previously included within the Order Limits. Further details of PC-01 are set out under Sections 2 and 5 of the submitted Proposed Changes Application Report (PCAR) (Doc. Ref. 8.5.1).

3. Proposed Change 02 (PC-02): Relocation of existing overhead lines in respect of two electrical lines and two telecommunications lines which cross the access route to the Site at A614 (Rawcliffe Road) and the A645 to allow for the delivery of Abnormal Indivisible Loads (AILs) to the Site. Further details of PC-02 are set out under Sections 2 and 6 of the PCAR (Doc. Ref. 8.5.1). This Proposed Change involves land that is outside of the current Order Limits, is not in the ownership of the Applicant and over which it is proposed to compulsorily acquire rights ('the CA Additional Land'). As such, the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 ('the CA Regulations') are invoked.
4. Consequently, some of the documents submitted alongside the Proposed Changes Application also constitute documents required under Regulation 5 of the CA Regulations. Where this is the case, this is noted below.
5. Accordingly, we submit the following documents for consideration as part of the Proposed Changes Application:

<b>Proposed Changes Application Document Reference</b>	<b>PINS Document Reference (Most up to date submitted version)</b>	<b>Document Details</b>	<b>Date</b>
<b>8.2.7</b>	N/A	Cover Letter (8) Submission of Proposed Changes Application (This letter)	December 2022
<b>8.5.1</b>	N/A	Proposed Changes Application Report	December 2022
<b>8.5.2.1</b>	N/A	Figure 1 to PCAR – Floodplain Compensation Area (FCA) Constraints Plan	December 2022
<b>8.5.2.2</b>	N/A	Figure 2 to PCAR – Overhead Line (OHL) Constraints Plan	December 2022
<b>8.5.2.3</b>	N/A	Figure 3 to PCAR – FCA Landscape and Biodiversity Plan	December 2022
<b>8.5.2.4</b>	N/A	Figure 4 to PCAR – OHL Landscape and Biodiversity Plan	December 2022
<b>8.5.3.1</b>	N/A	Appendix 1 to PCAR – FCA Trial Pitting Interpretative Technical Note	December 2022

<b>Proposed Changes Application Document Reference</b>	<b>PINS Document Reference (Most up to date submitted version)</b>	<b>Document Details</b>	<b>Date</b>
<b>8.5.3.2</b>	N/A	Appendix 2 to PCAR – OHL Preliminary Risk Assessment to account for the Proposed Changes (Part 1). This document is submitted in two Parts due to its size.	December 2022
<b>8.5.3.3</b>	N/A	Appendix 3 to PCAR – OHL Preliminary Risk Assessment to account for the Proposed Changes (Part 2). This document is submitted in two Parts due to its size.	December 2022
<b>8.5.3.4</b>	N/A	Appendix 4 to PCAR – Ecology Survey Technical Note.	December 2022
<b>8.5.3.5</b>	APP-160	Appendix 5 to PCAR – Flood Risk Assessment, Proposed Changes Extracts.	December 2022
<b>8.5.3.6</b>	N/A	Appendix 6 to PCAR – Consultation materials prepared and distributed to support the Proposed Changes Application process.	December 2022
<b>8.5.3.7</b>	N/A	Appendix 7 to PCAR – Consultees consulted as part of the Proposed Changes Application consultation.	December 2022
<b>8.5.3.8</b>	N/A	Appendix 8 to PCAR – Consultation responses received during the consultation period and the Applicant’s response.	December 2022



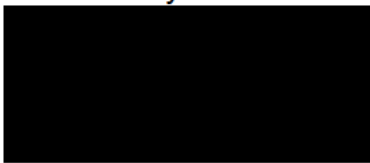
Proposed Changes Application Document Reference	PINS Document Reference (Most up to date submitted version)	Document Details	Date
8.5.3.9	APP-009	<p>Appendix 9 to PCAR - Land Plans, Proposed Changes Extracts.</p> <p>This shows updates relevant to both PC-01 and PC-02.</p> <p>For the CA Additional Land elements of PC-02, this update also constitutes the Applicant's compliance with Regulation 5(b)(i) of the CA Regulations.</p>	December 2022
8.5.3.10	OD-005	Appendix 10 to PCAR- Works Plans, Proposed Changes Extracts to account for the Proposed Changes.	December 2022
8.5.3.11	APP-011	Appendix 11 to PCAR - Access and Rights of Way Plans, Proposed Changes Extracts to account for the Proposed Changes.	December 2022
8.5.3.12	AS-025	Appendix 12 to PCAR - Draft Development Consent Order (DCO): Track Changes to articles 10, 11 and 13 and Schedules 1, 5, 7, 8 and 10 – the parts of the DCO affected by the Proposed Changes.	December 2022
8.5.3.13	OD-007	Appendix 13 to PCAR - Explanatory Memorandum (Tracked) Proposed Changes Extracts of relevant sections of the EM affected by the Proposed Changes	December 2022

Proposed Changes Application Document Reference	PINS Document Reference (Most up to date submitted version)	Document Details	Date
8.5.3.14	N/A	<p>Appendix 14 to PCAR - Statement of Reasons Addendum</p> <p>This is submitted pursuant to Regulation 5(b)(ii) of the CA Regulations in respect of the CA Additional Land.</p>	December 2022
8.5.3.15	N/A	<p>Appendix 15 to PCAR - Funding Statement Addendum.</p> <p>This is submitted pursuant to Regulation 5(b)(ii) of the CA Regulations in respect of the CA Additional Land.</p>	December 2022
8.5.3.16	AS-003	<p>Appendix 16 to PCAR - Book of Reference: Track Changes version.</p> <p>This is submitted pursuant to Regulation 5(a) of the CA Regulations but incorporates changes reflecting to both Proposed Changes.</p>	December 2022
8.5.3.17	AS-003	<p>Appendix 17 to PCAR - Book of Reference: Clean version.</p> <p>This is submitted pursuant to Regulation 5(a) of the CA Regulations but incorporates changes reflecting to both Proposed Changes. The changes relating to PC-01 are shown in blue text and for PC-02 are shown in green text (for the CA Additional Land) and green text for other land</p>	December 2022

Proposed Changes Application Document Reference	PINS Document Reference (Most up to date submitted version)	Document Details	Date
		proposed to be added to the Order limits.	

6. We enclose with this letter the above documents via WeTransfer, as agreed with PINS via email on 23 November 2022.
7. We trust the information submitted with this Proposed Changes Application in response to the ExA's letters is helpful and will assist in the decision to accept the two proposed minor changes into the Application.
8. Please do not hesitate to contact me should you have any queries regarding this response. We look forward to receiving acknowledgement of the receipt of this response.

Yours sincerely



Jim Doyle  
 Planning and Consents Manager

