



PLANNING STATEMENT

ADDENDUM

Drax Bioenergy with Carbon Capture and Storage

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

Document Reference Number: 5.2.1

Applicant: Drax Power Limited

PINS Reference: EN010120



REVISION: 01

DATE: FEBRUARY 2023

DOCUMENT OWNER: WSP UK LIMITED

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PUBLIC

TABLE OF CONTENTS

1. PLANNING STATEMENT ADDENDUM	2
1.1. Introduction	2
1.2. National Policy Statement.....	2
1.3. Selby Local Plan	3
1.4. North Yorkshire Minerals and Waste Joint Plan.....	5
1.5. East Riding of Yorkshire Development plan.....	6
1.6. National Planning Policy Framework.....	7
APPENDICES	9
Appendix A - Assessment of Relevant East Riding of Yorkshire Council Local Planning Policy	10

TABLES

Table A.1 - Planning Policy Assessment – East Riding of Yorkshire Council	11
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1. PLANNING STATEMENT ADDENDUM

1.1. INTRODUCTION

- 1.1.1. This Planning Statement Addendum details changes to planning policy of relevance to the Application, which have occurred following the compilation of the application documents. This should be read alongside the originally submitted Planning Statement (APP-032), and the policy assessment contained within the National Policy Statement Compliance Tracker (NPS Compliance Tracker) (REP-031).

1.2. NATIONAL POLICY STATEMENT

- 1.2.1. The National Policy Statement Compliance Tracker (NPS Compliance Tracker) (REP-031) assesses the Proposed Scheme against the relevant policies of NPSs EN-1 and EN-3. The assessment did not take consideration of land within the Order Limits which is designated Open Space under Policy C3 of the East Riding Local Plan Strategy Document (2016).

- 1.2.2. Paragraph 5.10.14 of Part 5.10 of EN-1 states:

“The IPC should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the IPC determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.”

- 1.2.3. The designated Open Space land within the Order Limits comprises Bridge Close Allotments. Note the land is protected by Open Space Policy and listed as an allotment, however the area affected by Work No.8 does not impinge on any allotment plots. As such we are treating it as 'open space' land. ERYC agree that this appears to be a statutory allotment that is no longer in practical use. This is further discussed in Appendix A in relation to Policy C3. This land will not be subject to development. It is included within the Order Limits as it is subject to temporary possession powers sought by the Applicant in relation to the DCO Application. The only activities taking place on the designated land will be the re-stringing of an electrical overhead cable between two National Powergrid poles (one of which is located within the designated Open Space land and one which is not).
- 1.2.4. Based on the undertakings to take place within the Open Space, and that no construction works are proposed in this area, there will be no 'loss of facility' as per paragraph 5.10.14 above, and the Applicant therefore concludes that the policy is not relevant to the Proposed Scheme. It is agreed with ERYC that there is no loss of open space.

1.3. SELBY LOCAL PLAN

The Adopted Development Plan

- 1.3.1. The consideration of the proposal against the relevant planning policies in the Selby development plan are set out in the Planning Statement (APP-032).
- 1.3.2. The listed policies are consistent with Selby District Council and North Yorkshire County Council's Local Impact Report (REP-039), and this position is agreed in the latest 8.1.3 Statement of Common Ground between Selby District Council, North Yorkshire County Council and Drax Power Limited (REP-018).
- 1.3.3. The Applicant notes that Policy CS6 of the Selby District Local Plan (2005) is listed in the Local Impact Report. This is listed in the Applicant's Planning Statement, albeit is not included in Appendix 3 Table B.3 - Planning Policy Assessment – Local Planning Policy. For completeness, as part of the Examination, the Applicant is in negotiation with the relevant stakeholders regarding requirements and obligations which are directly related to the Proposed Scheme, in order to ensure that measures are incorporated to mitigate or minimise the consequences of the development. As such, the Applicant considers the proposal is compliant with Policy CS6.

The Emerging Development Plan

- 1.3.4. Selby District Council (SDC) published the Publication Local Plan for consultation between 26 August 2022 and 28 October 2022. Until it is formally adopted, the development plan for Selby constitutes the saved policies from the Selby District Local Plan (2005), policies from the Selby District Core Strategy Local Plan (2013) and policies from the North Yorkshire Minerals and Waste Joint Plan (2022). The Local Development Scheme (2022) states that the target submission date of the draft Local Plan is February 2023, with adoption anticipated in March 2024 i.e. it will not become adopted planning policy during the course of the Examination.
- 1.3.5. The Publication Local Plan is still subject to change prior to its formal adoption, and therefore the Applicant considers its draft policies should be afforded limited weight in the assessment of the Application. This position accords with the position of the LPA, as set out in Selby District Council and North Yorkshire County Council's Local Impact Report (REP-039).
- 1.3.6. As the document constitutes a draft iteration of part of the secondary planning policy framework, the Applicant does not consider it necessary to undertake a detailed planning policy assessment of the Proposed Scheme against the draft policies. However, the document does set out the Council's intended changes in planning policy direction and may therefore constitute an important and relevant consideration in the Examining Authority's (ExA) consideration of the Application (even if of limited weight). As such, the Applicant has undertaken a high-level analysis of the document in relation to the Proposed Scheme, which is provided below.
- 1.3.7. The "Vision for the District" outlines the authority's ambitions for Selby District over the plan period (i.e. up to 2040). This "Vision for the District" explicitly refers to the

use of carbon capture technologies over the plan period and recognises its benefit to employment opportunities:

“There will have been a significant shift in employment sectors as a result of the District’s role as a key driver in the reduction of carbon emissions through carbon capture technologies and the skills in the local workforce from mining and energy production will be built upon to support the success and expansion of clean industries and jobs in the low-carbon and renewable energy sectors”.

- 1.3.8. The Proposed Scheme comprises carbon capture technologies and will facilitate jobs in the low-carbon and renewable energy sectors. It is therefore very important, if not essential, to achieving this vision. With carbon capture technologies supported at the national policy level, the Applicant considers that this element of the draft vision is unlikely to change, and therefore the contribution of the Proposed Scheme to delivering upon this draft vision can be afforded some weight.
- 1.3.9. Whilst the Drax Power Station is not subject to any proposed allocations on the draft Policies Map, it is listed as an ‘Existing employment site’ under Policy EM2. In such locations, proposals for the expansion, intensification or redevelopment for employment uses will be supported where it does not harm the amenity of the surrounding area. As per the planning policy assessment in the submitted Planning Statement (APP-032) and in the NPS Compliance Tracker (REP-031), the Application does not harm the amenity of the surrounding area, and therefore in accordance with draft Policy EM2, the Proposed Scheme, which would constitute the partial redevelopment of part of the Power Station in order to capture carbon, should be supported.
- 1.3.10. The Publication Local Plan offers support to Drax Power Station’s operations and carbon capture technology. Paragraph 3.23 confirms that *“Drax Power Station is identified as a growth driver having recently been converted to sustainable biomass instead of coal”* and notes Drax Power Ltd is piloting negative emissions technology BECCS (which is also referenced at paragraphs 3.54 and 4.51). Paragraph 3.14 notes that *“solutions to realise reductions in carbon emissions from this facility will help achieve the aspirations for Zero Carbon Humber”*.
- 1.3.11. Draft Policy SG10 supports proposals for low carbon and renewable energy storage and generation, which is consistent with the existing development plan and national planning policy. The draft policy includes a number of planning considerations which have been considered in the Planning Statement (APP-032) and NPS Compliance Tracker (REP-031), and the Application would comply with this draft planning policy.
- 1.3.12. In summary, there are no draft allocations or policies which would change the planning policy conclusions in respect of the Proposed Scheme. Indeed the Publication Local Plan contains more explicit support for carbon capture technologies than the existing Local Plan, recognising their benefits in terms of employment and climate change. Whilst the document is still subject to change, the Applicant considers that, on the basis this local planning policy support aligns with the national

support for carbon capture technologies, this local support is an important and relevant consideration to the ExA's decision.

1.4. NORTH YORKSHIRE MINERALS AND WASTE JOINT PLAN

- 1.4.1. The consideration of the proposal against the relevant planning policies in the North Yorkshire Minerals and Waste Joint Plan (2022) are set out in the Planning Statement (APP-032).
- 1.4.2. The listed policies are also set out in the Selby District Council and North Yorkshire County Council's Local Impact Report (REP-039), and this position is agreed in the latest 8.1.3 Statement of Common Ground between Selby District Council, North Yorkshire County Council and Drax Power Limited (REP-018).
- 1.4.3. The Applicant notes that the Local Impact Report references three additional policies above and beyond that agreed list. The Applicant's position in respect of these policies is detailed below:
- i. Policy M11: Supply of alternatives to land-won primary aggregates – This policy is referenced in 6.1.13 Environmental Statement - Volume 1 - Chapter 13: Materials and Waste (APP-049), as it encourages the management of construction, demolition and excavation (CDE) waste, with an emphasis on reuse and recycling in accordance with the Waste Hierarchy. This is relevant context to the proposed approach to waste in the Application. However the policy requirements for Policy M11 concern proposals which would facilitate the supply and use of secondary, recycled and marine aggregate, and therefore the Application does not need to be assessed against this policy.
 - ii. Policy W01: Moving waste up the waste hierarchy – This policy is referenced in 6.1.13 Environmental Statement - Volume 1 - Chapter 13: Materials and Waste (APP-049). The policy outlines aims to move waste up the Waste Hierarchy through waste minimisation; increased recovery of waste; provision of waste treatment to help divert waste from landfill. As detailed in Chapter 13 of the Environmental Statement, the Applicant's current commitment is to divert 95% of waste from landfill), and the Proposed Scheme will seek to divert waste from landfill through implementation action in the highest tiers of the Waste Hierarchy. The Proposed Scheme therefore complies with Policy W01.
 - iii. Policy W05: Meeting waste management capacity requirements – This policy is referenced in 6.1.13 Environmental Statement - Volume 1 - Chapter 13: Materials and Waste (APP-049). The policy aims to meet waste management capacity requirements for CDE waste, through increased recycling capacity and infrastructure and reclamation of landfill. This is relevant context to the proposed approach to waste in the Application as discussed in relation to Policy W01. However the policy requirements for Policy W05 concern proposals for recycling and landfill facilities, and therefore the Application does not need to be assessed against this policy.

1.5. EAST RIDING OF YORKSHIRE DEVELOPMENT PLAN

The Adopted Development Plan

- 1.5.1. The East Riding Local Plan comprises the Strategy Document (adopted April 2016), which sets out strategic policies to guide decisions on planning applications, the Allocations Document (adopted July 2016), which allocates sites for development, and the Bridlington Town Centre Area Action Plan (AAP, adopted 2013). Neither the Allocations Document, nor the AAP are of relevance to this application.
- 1.5.2. As a result of the Proposed Change 2, the East Riding of Yorkshire Council (ERYC) is now a host authority of the Application, whereas it was previously a 'neighbouring authority'. ERYC is the host authority to Work nos. 8A and 8B of the DCO (AS-076), as shown on the Works Plan (AS-073), which includes:
- Diversion of existing electrical 11kV overhead lines (Work no. 8A); and
 - Diversion of existing telecommunications overhead lines (Work no. 8B).
- 1.5.3. As such, **Appendix A** includes a planning policy assessment of the relevant components of the Proposed Scheme within the authority of the East Riding of Yorkshire against the relevant policies of the development plan i.e. the policies in the Strategy Document, which are relevant to the proposed works relating to the overhead lines (OHL1 and OHL2) which oversail the A645 and the A614 respectively, as well as the telecommunications line which crosses the A614 twice (TCL1), which are located within the Order Limits (as extended through the Change Request).
- 1.5.4. In summary, the Applicant considers that the relevant components of the Proposed Scheme within the authority of the East Riding of Yorkshire comply with the development plan. In the context of the development plan, there are no material considerations which indicate the Application should not be approved without delay.
- 1.5.5. The Local Plan recognises at paragraph 7.53 that "*Carbon Capture and Storage has significant potential to reduce carbon dioxide emissions and keep fossil fuels (coal and gas) in the UK's electricity supply mix*". Whilst the Carbon Capture and Storage (CCS) elements of the proposed scheme are located within SDC authority, the works within ERYC will facilitate the construction of the CCS infrastructure, and this policy support is an important and relevant consideration in its consideration.

The Emerging Development Plan

- 1.5.6. ERYC is preparing an update to the Local Plan and has consulted on the Proposed Submission Local Plan Update, which closed on 5 December 2022. The Local Plan Update comprises the Draft Strategy Document Update, the Draft Allocations Document Update 2020 – 2039, and the Draft Local Plan Policies Map Update.
- 1.5.7. The Local Development Scheme (2022) states that the target submission date of the draft Local Plan Update is June 2023, with adoption anticipated in June 2024 i.e. it will not become adopted planning policy during the course of the Examination.
- 1.5.8. The Local Plan Update is subject to change prior to its formal adoption, and therefore the Applicant considers its draft policies should be afforded limited weight in the

assessment of the Application. As the documents constitutes a draft iteration of part of the secondary planning policy framework, the Applicant does not consider it necessary to undertake a detailed planning policy assessment of the Proposed Scheme against the draft policies. However, the documents do set out the Council's intended changes in planning policy direction and may therefore constitute an important and relevant consideration in the ExA's consideration of the Application, even if of limited weight. As such, the Applicant has undertaken a high-level analysis of the documents in relation to the Proposed Scheme, which is provided below.

- 1.5.9. The Draft Strategy Document Update includes explicit support for carbon capture technologies. Policy S2 (addressing climate change) has been amended to incorporate an approach to support methods of carbon capture. As noted above, the works within ERYC will facilitate the construction of the CCS infrastructure, and this draft policy support is a material consideration in its consideration.
- 1.5.10. The Draft document also states that part of the 'Community Plan and Vision for the Local Plan' is for the East Riding to be a place where *"The built and natural environment is protected through sustainable development and economic growth."* The works proposed within the East Riding will enable the construction of the Proposed Scheme, which represents sustainable development as detailed within the Planning Statement (APP-032), and will have result in a number of benefits, including economic growth, as evidenced in Chapter 16 (Population, Health and Socio-Economics) of the ES (APP-052).
- 1.5.11. The Draft Local Plan Policies Map Update and the Draft Allocations Document Update 2020 – 2039 do not include proposed changes relevant to the Proposed Scheme.
- 1.5.12. In summary, there are no draft allocations or policies which would change the planning policy conclusions in respect of the Proposed Scheme.

1.6. NATIONAL PLANNING POLICY FRAMEWORK

- 1.6.1. The Department for Levelling Up, Housing, and Communities is consulting on proposed updates to the National Planning Policy Framework (NPPF) from 22 December 2022 to 2 March 2023. The update is due in Spring 2023.
- 1.6.2. Much of the NPPF is proposed to remain unchanged, with proposed updates largely relating to housing delivery and local plan progression in particular.
- 1.6.3. Of some relevance to the Application is the proposed change to Chapter 14 "Meeting the challenge of climate change, flooding and coastal change". This chapter is proposed to be updated to state that:

"When determining planning applications for renewable and low carbon development, local planning authorities should... approve an application for the repowering and life-extension of existing renewables sites, where its impacts are or can be made acceptable. The impacts of repowered and life-extended sites

should be considered for the purposes of this policy from the baseline existing on the site”.

- 1.6.4. Whilst the Proposed Scheme does not seek to repower or extend the life of the existing biomass operation, this proposed revision to the policy does highlight the national policy support for continuing to utilise existing sources of renewable energy. The Proposed Scheme will ensure the continuation of an existing source of renewable power whilst reducing the carbon emissions associated with the process, thereby directly responding to the challenge of climate change.
- 1.6.5. The Applicant considers that the Proposed Scheme accords with the main principles of the existing NPPF and the proposed updated NPPF, and that significant weight should be placed on the need to support economic growth and productivity; the value of using suitable brownfield land; and responding to the challenge of climate change through the use of renewable and low carbon development.

APPENDICES

APPENDIX A - ASSESSMENT OF RELEVANT EAST RIDING OF YORKSHIRE COUNCIL LOCAL PLANNING POLICY

APPENDIX A - ASSESSMENT OF RELEVANT EAST RIDING OF YORKSHIRE COUNCIL LOCAL PLANNING POLICY

Table A.1 - Planning Policy Assessment – East Riding of Yorkshire Council

Policy	Policy Text	Assessment
East Riding Local Plan 2012 - 2029		
Policy S1: Presumption in favour of sustainable development (Strategic Policy)	<p>Development Proposals</p> <p>A. When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the East Riding of Yorkshire.</p> <p>B. The Local Plan should be read as a whole. Planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise - taking into account whether:</p> <ol style="list-style-type: none"> 1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or 2. Specific policies in that Framework indicate that development should be restricted. <p>*Note points C and D relate to Neighbourhood Planning and are not relevant to the Application.</p>	<p>The proposed works within the East Riding of Yorkshire Council (ERYC) authority accord with the policies in the Local Plan and should be approved without delay. No material considerations indicate otherwise, and there are no adverse impacts of granting permission which would significantly and demonstrably outweigh the benefits i.e. facilitating the development of the BECCS at Drax project.</p> <p>Based on the above, the Applicant considers the Proposed Scheme represents sustainable development, and is therefore in compliance with Policy S1.</p>
Policy S2: Addressing climate change (Strategic Policy)	<p>The Local Plan and development decisions will support a reduction in greenhouse gas emissions and adaptation to the expected impacts of climate change.</p>	<p>Whilst the Carbon Capture and Storage (CCS) elements of the proposed scheme are located within SDC authority, the works within ERYC will facilitate the construction of the CCS infrastructure. Therefore the proposed works within ERYC will indirectly support a reduction in greenhouse gas emissions in accordance with Policy S2 on the basis of the following:</p> <p>The Proposed Scheme has been designed to remove approximately 95% of the carbon dioxide from the flue gas emitted from two of the four energy generation from biomass units, becoming the first negative emissions power plant in the UK. Therefore, the Proposed Scheme would reduce greenhouse gas emissions. The Proposed Scheme constitutes the adaptation of the existing Drax Power Station to the impacts of climate change.</p> <p>Additionally, Chapter 14 (Climate Resilience) of the ES (APP-050) reports the outcome of the assessment of likely significant environmental effects in relation to the vulnerability of the Proposed Scheme to climate change hazards. It also outlines potential adaptation measures (for consideration in the planning and design, to be adopted) that will make the Proposed Scheme more resilient to climate change.</p> <p>Chapter 14 (Climate Resilience) of the ES (APP-050) demonstrates that the Applicant has considered the impact of climate change in the design of the proposed new energy infrastructure, and that through this consideration, potential effects are demonstrated to be sufficiently mitigated through various adaptive measures.</p>

Policy	Policy Text	Assessment
		<p>Chapter 14 also considers how the Proposed Scheme will be resilient to the impacts of climate change (i.e. flooding, drought, rising temperatures and the effects of rising sea levels). This is assessed in detail within the NPS Compliance Tracker (REP-031).</p> <p>Chapter 14 concludes that there will be no adverse effects arising from climate change on the operational phase of the Proposed Scheme.</p> <p>The above demonstrates that the Proposed Scheme will reduce greenhouse gas emissions through adaptations to existing infrastructure at the Drax Power Station, and that various adaptive measures within the design of the Proposed Scheme are included to suitably mitigate any potential adverse impacts of climate change during the operational phase of the Proposed Scheme.</p> <p>The Applicant therefore considers that the Proposed Scheme accords with Policy S2.</p>
<p>Policy S4: Supporting development in Villages and the Countryside (Strategic Policy)</p>	<p>A. Outside of the settlements listed in Policy S3, development will be supported to help maintain the vibrancy of Villages (listed in Appendix B) and the Countryside where it:</p> <ol style="list-style-type: none"> 1. Is of an appropriate scale to its location taking into account the need to support sustainable patterns of development; 2. Encourages the re-use of previously developed land where appropriate; and 3. Does not involve a significant loss of best and most versatile agricultural land. <p>Development in Villages and the Countryside should also accord with the specific provisions of parts B or C of this policy.</p> <p>Villages</p> <p>B. Within the development limits of Villages, as set out on the Policies Map, the following forms of development will be supported where it does not detract from the character and appearance of the village:</p> <ol style="list-style-type: none"> 1. New housing, usually comprising a single dwelling; 2. Affordable housing for local people; 3. New and/or enhanced local services and facilities; and 4. Economic development. <p>Countryside</p> <p>C. Outside of a development limit land will be regarded as the Countryside and the following forms of development supported, where proposals respect the intrinsic character of their surroundings:</p> <ol style="list-style-type: none"> 1. Conversion of buildings for economic development (including work-live units), tourism or community uses. Conversions for new housing will be supported where the preservation of the building would enhance the immediate setting and where it: 	<p>The works required in East Riding are to facilitate the delivery of Abnormal Indivisible Loads (AILs) to the Site to enable construction of the Proposed Scheme. The works are therefore required to support sustainable patterns of development, in accordance with part A.1 of Policy S4.</p> <p>The works within East Riding are shown on the Works Plan (AS-073) and include the following:</p> <ul style="list-style-type: none"> • Work no. 8A (diversion of existing electrical 11kV overhead lines); and • Work no. 8B (diversion of existing telecommunications overhead lines). <p>As detailed in the Draft Development Consent Order (DCO) (AS-076), Work nos. 8A and 8B include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Civil works including excavation, trenching, horizontal directional drilling works or auger boring; • Vegetation removal and landscape and habitat reinstatement measures; • Works to facilitate construction access including temporary road modifications and temporary removal or reinstatement of structures, features and landscaping; and • Temporary construction laydown area. <p>Land within the Order Limits which accommodates the works proposed comprises both brownfield and greenfield land, however the works will facilitate the construction of the CCS plant at the Drax Power Station which will re-use previously developed land, in accordance with part A.2 of Policy S4.</p> <p>Moreover, whilst some works are proposed on greenfield land, the works are temporary, and following completion of the construction works the land will be subject to vegetation and habitat reinstatement measures.</p> <p>Appendix 11.2 of the ES (Soil Resource and Agricultural Land Classification Survey) (Applicant reference 6.3.11.2 Rev 2), which is submitted at Deadline 2 of the Application, identifies land within the Order Limits required to facilitate Work nos. 8A and 8B to include Agricultural Land Classification (ALC) Grade 2 best and most versatile agricultural land (BMV). However, the works will not result in the loss of BMV. Works are short term and temporary (estimated at 10 days of work per line), with the land proposed to remain in agricultural use with no loss of BMV.</p>

Policy	Policy Text	Assessment
	<ul style="list-style-type: none"> i. would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of a heritage asset; ii. would re-use a redundant or disused building without significant alteration or significant extension. <ul style="list-style-type: none"> 2. Replacement dwellings; 3. New dwellings of exceptional quality or of truly outstanding innovative design; 4. Affordable housing for local people; 5. Agricultural, forestry or other rural-based occupational dwellings subject to demonstrating an essential need. Such dwellings will be subject to an agricultural occupancy condition; 6. Employment uses in accordance with Policy EC1; 7. Agricultural, horticultural and forestry uses; 8. New and enhanced infrastructure; 9. Energy development and associated infrastructure; 10. Development to support existing military defence operations; and 11. Sports, equine, recreation, community facilities and tourism development. 	<p>A Soil Handling Management Plan will be produced which would detail clear guidance on the methods of recovering, storing and reinstating the soils whilst minimising a loss in quality and function during construction. The Soil Handling Management Plan is secured via Requirement 14 of the DCO (AS-076).</p> <p>Open Cut Construction activities may result in the potential for adverse impacts on soils, however these works along with new access roads and compounds required for construction would be temporary and the area would be reinstated once works are completed in line with the Soil Handling Management Plan.</p> <p>Where Trenchless Construction methods are used, impacts to agricultural soils would be reduced. Therefore it is not anticipated that there would be any new or significant effects on agricultural soils or soil function as a result of Work nos. 8A and 8B, in line with part A.3 of Policy S4.</p> <p>Part C.9 of Policy S4 supports energy development and associated infrastructure where it respects the intrinsic character of their surroundings. The Proposed Change Application Report (PCAR) (AS-045) confirms that the land affected by Work nos. 8A and 8B would be reinstated to the pre-existing condition. Sections of the overhead lines (OHLs) which would be undergrounded would have a negligible beneficial landscape and visual effect, following construction. Any replacement OHL poles would assimilate with the existing OHL infrastructure.</p> <p>To facilitate the undergrounding of the OHLs, there may be a requirement to remove some vegetation, but this would be reinstated. Again, this will result in a negligible effect and the Proposed Scheme is therefore demonstrated to be respectful to the intrinsic character of the surrounding area.</p> <p>Based on the above, the Applicant considers that Work nos. 8A and 8b of the Proposed Scheme comply with Policy S4.</p>
<p>Policy S8: Connecting people and places (Strategic Policy)</p>	<ul style="list-style-type: none"> A. New development should ensure that people and places are well connected. B. The overall role and function of the Strategic Transport Network, as shown in Figure 7, will be protected and/or enhanced, having regard to the investment priorities, policies, and proposals of the Local Transport Plan and other related strategies. C. Transport schemes that improve the overall capacity and coverage of the transport network will be supported. Where appropriate land will be safeguarded for these schemes in the Allocations Document, Bridlington Town Centre Area Action Plan, or a Neighbourhood Development Plan. D. The role and function of the East-West Multi-Modal Transport Corridor, which serves the transport needs of Key Employment Sites, will be protected and/or enhanced, where appropriate, to enable the efficient and integrated movement of freight by, and between, different transport modes. E. Roadside facilities essential to support the safety and welfare of motorists will be supported, where they are of an appropriate scale and meet an identified need. 	<p>The works proposed to OHLs as encompassed in Work nos. 8A and 8B of the DCO (AS-076), as shown on the Works Plan (AS-073), will enhance the role and function of the Strategic Transport Network and of the East-West Multi-Modal Transport Corridor. The undergrounding of OHLs will improve the existing function of these transport assets as it will improve height restrictions currently in place along these routes (on land within the Order Limits).</p> <p>Any adverse impact on these routes will be temporary, during the construction phase of the Proposed Scheme only, and therefore would not permanently impact the overall role and function of the Strategic Transport network or the East-West Multi-Modal Transport Corridor. In particular, the PCAR confirms that the short length and duration and small number of traffic movements associated with the proposed undergrounding of the OHLs means the significance of effects (such as pedestrian amenity and highway safety during the construction phase) would not be significant.</p> <p>Based on the above, the Applicant considers that Work nos. 8A and 8b of the Proposed Scheme comply with Policy S8.</p>

Policy	Policy Text	Assessment
	<p>F. Existing and future port operations at Goole within the Operational Port Area, as shown on the Policies Map, will be safeguarded from development which would conflict with this use.</p> <p>G. Existing wharf and rail facilities on the Aire and Calder Canal, River Ouse, Humber Estuary, and elsewhere will be safeguarded to maintain a choice of sustainable transport modes.</p> <p>H. Existing and disused public transport, cycling and footpath networks and facilities, including Public Rights of Way, will be enhanced and/or protected, particularly within and linking to the Major Haltemprice Settlements, Principal Towns, and Towns.</p> <p>I. Proposals which facilitate integration between different modes of travel, especially walking, cycling and public transport, will be encouraged.</p> <p>J. Initiatives that improve accessibility in rural areas will be supported, through working with the Local Transport Plan and other strategies and programmes, including the community transport sector.</p>	
<p>Policy EC4: Enhancing sustainable transport (Strategic Policy)</p>	<p>A. In order to increase overall accessibility, minimise congestion and improve safety, new development will be supported where it is accessible, or can be made accessible, by sustainable modes of transport and addresses its likely transport impact. Development proposals should:</p> <ol style="list-style-type: none"> 1. Produce and agree a transport assessment and travel plan, where a significant transport impact is likely; 2. Support and encourage sustainable travel options which may include public transport, electric and ultra low emission vehicles, car sharing, cycling and walking; particularly in the Major Haltemprice Settlements, Principal Towns, and Towns; and 3. Bring forward other necessary transport infrastructure to accommodate expected movement to and from the development. <p>B. Developments generating significant freight movement located along the East-West Multi-Modal Transport Corridor should capitalise on the opportunities for transferring and transporting freight by means other than road.</p> <p>C. The number of parking spaces for all new development should reflect:</p> <ol style="list-style-type: none"> 1. The level of public transport accessibility; 2. The expected car usage on the site; and 3. The most efficient use of space available and promotion of good design. 	<p>Freight movement along the East-West Multi-Modal Transport Corridor will be required to facilitate the delivery of materials to the Drax Power Station Site during the construction phase of the Proposed Scheme.</p> <p>As detailed in the NPS Compliance Tracker (REP-031), the Applicant considered alternate methods of transportation but concluded these were not viable.</p> <p>Water-borne transport (utilising the River Ouse and the existing Drax Jetty) was considered as a sustainable transport mode for AILs and other materials in the iterative design process. This was discussed during statutory consultation with the relevant stakeholders. The Applicant used the DfT policy guidance “Water Preferred Policy Guidelines for the movement of abnormal indivisible loads” when preparing the Application. Chapter 5 (Traffic and Transport) of the ES (APP-041) considers this guidance and confirms that transport of AIL was discussed during pre-application discussions with National Highways, North Yorkshire County Council and ERYC. This is described in further detail in Section 3.6 of Chapter 3 (Consideration of Alternatives) of the ES (APP-039). The outcome of the consultation was Agreement in Principle to transporting AIL by using the ‘Road Option’ and approval of the proposed strategy was confirmed 20 April 2021. It was agreed that the substantial infrastructure works, and construction required, and the associated impact, including financial considerations of the jetty option, outweighed the benefit. As such, this method of transportation was not progressed.</p> <p>The effects of the Proposed Scheme on highway matters are assessed in Chapter 5 (Traffic and Transport) of the ES (APP-041) and the PCAR (AS-045), and conclude that the Proposed Scheme will not result in significant adverse effects in terms of traffic and transport, subject to the implementation of mitigation measures which are secured via requirements in the DCO (AS-079). Based on the above, the Applicant considers the Proposed Scheme has sought to achieve the aims of part B of Policy EC4, but has sufficiently demonstrated that the use of East-West Multi-Modal Transport Corridor is justified. The Applicant therefore considers the Proposed Scheme complies with Policy EC4.</p>
<p>Policy EC5: Supporting the</p>	<p>A. Proposals for the development of the energy sector, excluding wind energy but including the other types of development listed in Table 7, will be supported</p>	<p>The proposed works within ERYC do not constitute development of the energy sector, albeit Work nos. 8A and 8B do facilitate such works within Selby authority. The Applicant considers</p>

Policy	Policy Text	Assessment
energy sector (Strategic Policy)	<p>where any significant adverse impacts are addressed satisfactorily and the residual harm is outweighed by the wider benefits of the proposal. Developments and their associated infrastructure should be acceptable in terms of:</p> <ol style="list-style-type: none"> 1. The cumulative impact of the proposal with other existing and proposed energy sector developments; 2. The character and sensitivity of landscapes to accommodate energy development, with particular consideration to the identified Important Landscape Areas, as shown on Figure 11; 3. The effects of development on: <ol style="list-style-type: none"> i. local amenity, including noise, air and water quality, traffic, vibration, dust and visual impact; ii. biodiversity, geodiversity and nature, particularly in relation to designations, displacement, disturbance and collision and the impact of emissions/contamination; iii. the historic environment, including individual and groups of heritage assets above and below ground; iv. telecommunications and other networks; including the need for additional cabling to connect to the National Grid, electromagnetic production and interference, and aeronautical impacts such as on radar systems; v. transport, including the opportunity to use waterways and rail for transportation of materials and fuel, and the capacity of the road network to accommodate development; vi. increasing the risk of flooding; and vii. the land, including land stability, contamination and soil resources. <p>B. Where appropriate, proposals should include provision for decommissioning at the end of their operational life. Where decommissioning is necessary, the site should be restored, with minimal adverse impact on amenity, landscape and biodiversity, and opportunities taken for enhancement of these features.</p> <p>C. Suitable areas for wind energy development will be identified through a review of the Local Plan and/or preparation of Neighbourhood Development Plans. Prior to the completion of the review proposals involving wind energy development will be determined in accordance with national planning policy and practice guidance.</p>	<p>Policy EC5 applies insofar as it could be considered to be the “associated infrastructure” linked to the development, and therefore assesses compliance of the Proposed Scheme with parts A.1, A.2 and A.3 of Policy EC5 below.</p> <p>Appendix 18.2 (Short List of Other Developments) of the ES (Applicant reference 6.3.18.2 Rev 3) identifies existing and proposed energy developments within 5km of the Order Limits land within East Riding (i.e. land within the Order Limits to accommodate Work nos. 8A and 8B). The cumulative impact of the Proposed Scheme with the other existing and proposed energy sector developments identified in Appendix 18.2 is considered within Chapter 18 (Cumulative Effects) of the ES (Applicant reference 6.1.18 Rev 2).</p> <p>Chapter 18 and Appendix 18.2 of the ES confirm that the Proposed Scheme (with regard to Work nos. 8A and 8B only) alongside other energy sector developments within 5km of the Order Limits land in East Riding will not result in any significant adverse effects during the construction and operational phases, nor during deconstruction. The Applicant therefore considers the ES suitably demonstrates that the Proposed Scheme is in accordance with part A1 of Policy EC5.</p> <p>The evidence provided in the assessment of Policy S4 above, assessment provided in the NPS Compliance Tracker (REP-032) and Landscape and Visual Amenity text within the PCAR (AS-045), demonstrate that the Work nos. 8A and 8B of the Proposed Scheme will not result in any significant adverse effects on the landscape character of the surrounding area, in line with part A.2 of Policy EC5.</p> <p>Criteria i. – viii of part A.3 of Policy EC5 have been assessed in terms of effects resulting from the Proposed Scheme, in particular with regard to the effects of Work nos. 8A and 8B, within the PCAR (AS-045). The assessments reported in the PCAR states that Work nos. 8A and 8B will not result in any significant environmental impacts. The Applicant therefore considers that the effects of the Proposed Scheme on matters included in criteria i. – viii, in respect of Work nos. 8A and 8B, are therefore acceptable, in line with part A.3 of Policy EC5.</p> <p>Points B and C of the policy are not relevant to the proposed works within ERYC.</p> <p>Based on the above, the Applicant considers the Proposed Scheme accords with the requirements of Policy EC5.</p>
Policy EC6: Protecting mineral resources (Strategic Policy)	<ol style="list-style-type: none"> A. Mineral Safeguarding Areas for sand and gravel, crushed rock, limestone, industrial chalk, clay, and silica sand are identified on the Policies Map. B. Within or adjacent to Mineral Safeguarding Areas, non-mineral development, which would adversely affect the viability of exploiting the underlying or adjacent deposit in the future, will only be supported where it can be demonstrated that the: <ol style="list-style-type: none"> 1. Underlying or adjacent mineral is of limited economic value; 	<p>Part of the Order Limits within East Riding is located within a Mineral Safeguarding Area. The Proposed Scheme represents ‘non-mineral development’, however with regard to part B of Policy EC6, the Applicant does not consider that the Proposed Scheme (of relevance Work nos. 8A and 8B) would adversely affect the viability of exploiting the underlying or adjacent deposit in the future.</p> <p>The Work nos. 8A and 8B constitute minor, temporary works, and ultimately the undergrounding of a limited number of OHLs in will not disable mineral development from coming forward in this location in future, if required.</p>

Policy	Policy Text	Assessment
	<ol style="list-style-type: none"> 2. Need for the development outweighs the need to safeguard the mineral deposit; 3. Non-mineral development can take place without preventing the mineral resource from being extracted in the future; 4. Non-mineral development is temporary in nature; or 5. Underlying or adjacent mineral deposit can be extracted prior to the non-mineral development proceeding, or prior extraction of the deposit is not possible 	<p>Based on the above, the Applicant considers the Proposed Scheme is in compliance with the requirements of Policy EC6 a in respect of Work nos. 8A and 8B.</p>
<p>Policy ENV1: Integrating high quality design (Strategic Policy)</p>	<p>A. All development proposals will:</p> <ol style="list-style-type: none"> 1. Contribute to safeguarding and respecting the diverse character and appearance of the area through their design, layout, construction and use; and 2. Seek to reduce carbon emissions and make prudent and efficient use of natural resources, particularly land, energy and water. <p>B. Development will be supported where it achieves a high quality of design that optimises the potential of the site and contributes to a sense of place. This will be accomplished by:</p> <ol style="list-style-type: none"> 1. Having regard to the specific characteristics of the site's wider context and the character of the surrounding area; 2. Incorporating an appropriate mix of uses on the site; 3. Having an appropriate scale, density, massing, height and material; 4. Having regard to the amenity of existing or proposed properties; 5. Having an adaptable layout for sites and/or buildings that takes into account the needs of future users; 6. Having regard to healthy lifestyles; 7. Incorporating energy efficient design and arrangements to manage waste; 8. Incorporating hard and/or soft landscaping, alongside boundary treatment of an appropriate scale and size, to enhance the setting of buildings, public space and views; 9. Promoting equality of safe access, movement and use; 10. Having regard to features that minimise crime and the perception of crime; 11. Considering the use of public art, where the sense of place and public access or view would justify it; 12. Ensuring infrastructure, including green infrastructure and flood mitigation, are well integrated into the development; 13. Incorporating, where possible, nature conservation and biodiversity enhancement into the development; 14. Paying attention to the use of local materials, architectural styles and features that have a strong association with the area's landscape, geology and built form, with particular attention to heritage assets; and 15. Safeguarding the views and setting of outstanding built and natural features and skylines within and adjoining the East Riding, including those features identified in Policies A1-A6. 	<p>As demonstrated in the assessment of Policy S4 above, the Work nos. 8A and 8B of the Proposed Scheme will not adversely affect the character and appearance of Order Limits land within East Riding, in line with part A.1 of Policy ENV1. Any works which would have a significant visual impact are temporary, and land will be reinstated once the construction phase is complete. Design wise, the Works have been designed to account for surrounding land uses and have incorporated suitable landscaping and biodiversity measures.</p> <p>The Proposed Scheme will reduce carbon emissions from the Existing Drax Power Station Site and the Carbon Capture Plant will be constructed on previously developed land. The proposed works within East Riding (Work nos. 8A and 8B) will facilitate the Carbon Capture infrastructure and therefore aligns with part A.2 of Policy ENV1.</p> <p>The PCAR (AS-045) demonstrates that regard has been had to the relevant criteria in part B 1 – 15 of Policy EN6. This is also considered in the NPS assessment included in the NPS Compliance Tracker (REP-031). Ultimately the proposals within East Riding (Work nos. 8A and 8B) are very minor in scale and will result in a non-material change in terms of landscape and visual effects. Any new and replacement infrastructure is incorporated within the existing character of the area and land used to facilitate the construction will be reinstated.</p> <p>The Proposed Scheme is therefore considered by the Applicant to accord with Policy ENV1.</p>

Policy	Policy Text	Assessment
	<p>C. Innovative design incorporating new materials and technologies will be supported where the local context and sub areas, with their diverse landscapes, geologies, historical background and built form, have been fully considered as part of the design process.</p> <p>D. Where possible, the design of development that maximises the use of decentralised and renewable or very low carbon technologies will be supported. This includes expecting that:</p> <ol style="list-style-type: none"> 1. Chosen technology(ies) will be operationally suitable for the development, visually acceptable and not unduly harm amenity; and 2. Larger developments will consider how to contribute/share technologies to meet part of their energy needs, and/or increase the sustainability of existing or new development nearby, and be capable of being adapted over time to further upgrade energy efficiency and allow alternative occupancy and/or use. 	
<p>Policy ENV2: Promoting a high quality landscape (Strategic Policy)</p>	<p>A. Development proposals should be sensitively integrated into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting and, where possible, seek to make the most of the opportunities to protect and enhance landscape characteristics and features. To achieve this, development should:</p> <ol style="list-style-type: none"> 1. Protect the character and individual identity of settlements by maintaining their physical separation, including through the maintenance of the Key Open Areas identified in Policies A1-A6, where there is a risk of settlement coalescence. 2. Protect and enhance important open spaces within settlements which contribute to their character. 3. Ensure important hedgerows and trees are retained unless their removal can be justified in the wider public interest. Where important hedgerows and trees are lost replacements will usually be required. 4. Maintain or enhance the character and management of woodland where appropriate. 5. Retain, not detract from, and enhance wetland and water feature characteristics. 6. Protect and enhance views across valued landscape features, including flood meadows, chalk grassland, lowland heath, mudflats and salt marsh, sand dunes and chalk cliffs. 7. Protect and enhance the undeveloped coast. <p>B. Proposals should protect and enhance existing landscape character as described in the East Riding Landscape Character Assessment, in particular, within the following Important Landscape Areas as shown on the Policies Map:</p>	<p>The submitted PCAR (AS-045) notes that, although the proposed works within East Riding (Work nos. 8A and 8B) represent a physical change to the existing situation, in terms of landscape and visual effects, the proposals result in a non-material change and effects that are determined to be not significant. The land affected would be reinstated to the pre-existing condition. The sections of the OHLs which are to be undergrounded would result in a negligible beneficial effect following construction, as there would be a reduction in OHLs and therefore a beneficial effect on visual amenity. The replacement poles would also result in a negligible effect given they will provide a like-for-like replacement of an existing structure.</p> <p>As such, the Proposed Scheme in respect of Work nos. 8A and 8B will be sensitively integrated into the existing landscape, and will protect the existing character of the surrounding area in accordance with Policy ENV2.</p> <p>To facilitate the undergrounding of the cables there may be a requirement to remove some vegetation, but this would be reinstated once the works are complete, in accordance with criterion A.3.</p> <p>Based on the above, and supporting assessments submitted with the Application, the Proposed Scheme in respect of Work nos. 8A and 8B has sought to protect and respect the landscape character of the surrounding area, and the Applicant therefore considers the Proposed Scheme complies with the requirements of Policy ENV2.</p>

Policy	Policy Text	Assessment
	<ol style="list-style-type: none"> 1. The Yorkshire Wolds, with special attention to ensuring developments are of an appropriately high quality and will not adversely affect the historic and special character, appearance or natural conservation value. 2. The Heritage Coast designations at Flamborough and Spurn Head. 3. The Lower Derwent Valley, which includes the River Derwent Corridor and Pocklington Canal. 4. The Thorne, Crowle and Goole Moors. 	
<p>Policy ENV3: Valuing our heritage (Strategic Policy)</p>	<p>A. Where possible, heritage assets should be used to reinforce local distinctiveness, create a sense of place, and assist in the delivery of the economic well-being of the area. This can be achieved by putting assets, particularly those at risk, to an appropriate, viable and sustainable use.</p> <p>B. The significance, views, setting, character, appearance and context of heritage assets, both designated and non-designated, should be conserved, especially the key features that contribute to the East Riding's distinctive historic character including:</p> <ol style="list-style-type: none"> 1. Those elements that contribute to the special interest of Conservation Areas, including the landscape setting, open spaces, key views and vistas, and important unlisted buildings identified as contributing to the significance of each Conservation Area in its appraisal; 2. Listed Buildings and their settings; 3. Historic Parks and Gardens and key views in and out of these landscapes; 4. The dominance of the church towers and spires as one of the defining features of the landscape, such as those of Holderness and the Wolds; 5. Heritage assets associated with the East Yorkshire coast and the foreshore of the Humber Estuary; 6. The historic, archaeological and landscape interest of the Registered Battlefield at Stamford Bridge; 7. The historic cores of medieval settlements, and, where they survive, former medieval open field systems with ridge and furrow cultivation patterns; 8. The nationally important archaeology of the Yorkshire Wolds; and 9. Those parts of the nationally important wetlands where waterlogged archaeological deposits survive. <p>C. Development that is likely to cause harm to the significance of a heritage asset will only be granted permission where the public benefits of the proposal outweigh the potential harm. Proposals which would preserve or better reveal the significance of the asset should be treated favourably.</p>	<p>As detailed in the PCAR (AS-045), a review of online data shows that there are no designated heritage assets within the Order Limits land located within East Riding and within a 500m study area. The proposed construction compounds have potential for hitherto unknown buried archaeological remains to be located, although this is relatively low. As Trenchless Construction methods are minimally intrusive and the potential for archaeological remains is low, it is not anticipated that there would be any significant effects on archaeological remains.</p> <p>It is not anticipated that Open Cut Construction across highways would have significant effect on unknown buried archaeological remains due to previous truncation / removal during the construction of the road. Any Open Cut Construction outside the highway area is considered to be relatively localised and therefore no significant effects on archaeological remains are anticipated.</p> <p>No further mitigation is therefore recommended, however this would be agreed with the Local Planning Authority before construction commences as part of the discharge of Requirement 13 of the DCO (AS-076) for these works.</p> <p>As such, it is envisaged the Proposed Scheme will not result in harm to the significance of any heritage assets, and the Applicant therefore considers the Proposed Scheme accords with Policy ENV3.</p>

Policy	Policy Text	Assessment
	<p>D. Where development affecting archaeological sites is acceptable in principle, the Council will seek to ensure mitigation of damage through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development.</p>	
<p>Policy ENV4: Conserving and enhancing biodiversity and geodiversity (Strategic Policy)</p>	<p>A. Proposals that are likely to have a significant effect on an International Site will be considered in the context of the statutory protection which is afforded to the site.</p> <p>B. Proposals that are likely to have an adverse effect on a National Site (alone or in combination) will not normally be permitted, except where the benefits of development in that location clearly outweigh both the impact on the site and any broader impacts on the wider network of National Sites.</p> <p>C. Development resulting in loss or significant harm to a Local Site, or habitats or species supported by Local Sites, whether directly or indirectly, will only be supported if it can be demonstrated there is a need for the development in that location and the benefit of the development outweighs the loss or harm.</p> <p>D. Where loss or harm to a National or Local designated site, as set out in Table 9, cannot be prevented or adequately mitigated, as a last resort, compensation for the loss/harm must be agreed. Development will be refused if loss or significant harm cannot be prevented, adequately mitigated against or compensated for.</p> <p>E. Proposals should further the aims of the East Riding of Yorkshire Biodiversity Action Plan (ERYBAP), designated Nature Improvement Areas (NIAs) and other landscape scale biodiversity initiatives. To optimise opportunities to enhance biodiversity, proposals should seek to achieve a net gain in biodiversity where possible and will be supported where they:</p> <ol style="list-style-type: none"> 1. Conserve, restore, enhance or recreate biodiversity and geological interests including the Priority Habitats and Species (identified in the ERYBAP) and Local Sites (identified in the Local Sites in the East Riding of Yorkshire). 2. Safeguard, enhance, create and connect habitat networks in order to: <ol style="list-style-type: none"> i. protect, strengthen and reduce fragmentation of habitats; ii. create a coherent ecological network that is resilient to current and future pressures; iii. conserve and increase populations of species; and iv. promote and enhance green infrastructure. 	<p>The areas comprising the OHL Order Limits (i.e. areas Work nos. 8A and 8B) are not in proximity to any statutory or non-statutory designated sites, nor are there evident impact pathways connecting the areas where construction works would take place with such protected sites, that are predicted to give rise to likely significant effects.</p> <p>Given the small-scale nature of the works and that they are primarily confined to grassland, agricultural land and urban features, they would lead to a short-term loss of habitat which would be negative, although not significant. All semi-natural habitats modified as part of the proposed works within East Riding would be reinstated to their original condition following construction. These measures will be included within a final Landscape and Biodiversity Strategy, which is secured as a requirement to the DCO (AS-076).</p> <p>The Proposed Scheme would therefore conserve biodiversity in accordance with the overarching principle of Policy ENV4.</p> <p>The Applicant therefore considers the Proposed Scheme complies with Policy ENV4.</p>
<p>Policy ENV6: Managing environmental</p>	<p>A. Environmental hazards, such as flood risk, coastal change, groundwater pollution and other forms of pollution, will be managed to ensure that development does not result in unacceptable consequences to its users, the wider community, and the environment.</p>	<p>The works within East Riding (Work nos. 8A and 8B) are small-scale in nature and will not result in any environmental hazards, such as flood risk, coastal change, groundwater pollution and other forms of pollution, in accordance with Policy ENV6. This is confirmed in the PCAR (AS-045), and in the relevant chapters of the ES.</p>

Policy	Policy Text	Assessment
<p>hazards (Strategic Policy)</p>	<p>Flood risk</p> <p>B. The risk of flooding to development will be managed by applying a Sequential Test to ensure that development is steered towards areas of lowest risk, as far as possible. The Sequential Test will, in the first instance, be undertaken on the basis of the East Riding of Yorkshire Strategic Flood Risk Assessment (SFRA) and the Environment Agency's Flood Map, within appropriate search areas. Where development cannot be steered away from Flood Zone 3, the sub-delineation of Zone 3a, detailed within the relevant SFRA, will be used to apply the Sequential Test, with preference given to reasonably available sites that are in the lower risk/hazard zones. Where necessary, development must also satisfy the Exception Test.</p> <p>C. If, following application of the Sequential Test, it has not been possible to successfully steer development to Flood Zone 1 or a sequentially preferable site, a Sequential Approach will be taken to site layout and design, aiming to steer the most vulnerable uses towards the lowest risk parts of the site and upper floors.</p> <p>D. Flood risk will be proactively managed by:</p> <ol style="list-style-type: none"> 1. Ensuring that new developments: <ol style="list-style-type: none"> i. limit surface water run-off to existing run-off rates on greenfield sites, and on previously developed land reduce existing run-off rates by a minimum of 30%, or to greenfield run-off rate; ii. do not increase flood risk within or beyond the site; iii. incorporate Sustainable Drainage Systems (SuDS) into major development proposals and proposals at risk of flooding, unless demonstrated to be inappropriate; iv. do not culvert or otherwise build over watercourses, unless supported by the Risk Management Authority; v. have a safe access/egress route from/to Flood Zone 1 or establish that it will be safe to seek refuge at a place of safety within a development; vi. incorporate high levels of flood resistant and resilient design if located in a flood risk area; vii. are adequately set-back from all watercourses including culverted stretches; and viii. adhere to other relevant SFRA recommendations. 2. Supporting proposals for sustainable flood risk management, including the creation of new and/or improved flood defences, water storage areas and other schemes, provided they would not cause unacceptable adverse environmental, social, or economic impacts. 	<p>In terms of contamination, measures to manage environmental risks should unexpected contamination be encountered during the works would be managed effectively through local measures set out in the CEMP, which is secured as a requirement to the DCO.</p> <p>As detailed in the submitted PCAR (AS-045), it is not anticipated that there would be any new or different significant effects during construction in respect of groundwater impacts as a result of the proposed works within East Riding (Work nos. 8A and 8B).</p> <p>The Applicant therefore considers the Proposed Scheme, in respect of Work nos. 8A and 8B, accords with the relevant parts of Policy ENV6.</p>

Policy	Policy Text	Assessment
	<p>3. Supporting the removal of existing culverting and returning these sections to open watercourse.</p> <p>4. Designating areas of Flood Zone 3b (Functional Floodplain) and safeguarding land for current and future flood risk management, on the Policies Map.</p> <p>Coastal change</p> <p>*Note, this section of the policy is not relevant to the proposal.</p> <p>Groundwater pollution</p> <p>H. The risk of groundwater pollution will be managed by:</p> <ol style="list-style-type: none"> 1. Avoiding development that will increase the risk of pollution in Source Protection Zones (SPZ) and where this is not possible, ensuring that appropriate mitigation measures are employed; 2. Supporting developments which will decrease the risk of pollution in SPZs by cleaning up contaminated land and incorporating pollution-prevention measures; 3. Preventing inappropriate uses/activities in SPZ1 and SPZ2, unless adequate safeguards against possible contamination can be agreed; 4. Preventing non-mains drainage that would involve sewage, trade effluent or other contaminated discharges, as far as possible; and 5. Ensuring re-development of previously developed sites does not contaminate under-lying aquifers. 	
<p>Policy C1: Providing infrastructure and facilities (Strategic Policy)</p>	<p>A. Proposals for new and/or improved infrastructure and facilities will be supported where they enhance the quality and range of services and facilities.</p> <p>B. New development will be supported where it is adequately serviced by infrastructure and facilities. Where necessary, the phasing of new development will be linked to the delivery of new or improved infrastructure and facilities.</p> <p>C. Subject to economic viability, developer contributions will be sought from new development to:</p> <ol style="list-style-type: none"> 1. Meet the need for new and/or improved infrastructure and facilities; and 2. Mitigate its impact on the wider environment and the community. 	<p>The proposals within East Riding (Work nos. 8A and 8B) constitute improved infrastructure and should be supported on the basis they facilitate the AIL deliveries to construct the Drax at BECCS project. As such, this will improve height restrictions currently in place along these routes (on land within the Order Limits). The Applicant therefore considers the Proposed Scheme (Work nos. 8A and 8B) to accord with Policy C1.</p>
<p>Policy C3: Providing public open space for leisure and recreation (Strategic Policy)</p>	<p>A. Proposals should maintain and/or enhance the quantity, quality and accessibility of open space and address any shortfalls in provision, when measured against the standards set out in Table 12.</p> <p>B. Development that increases demand for open space will be required to address this demand in line with Part A of this Policy. Where practicable, open space should</p>	<p>Part of the land included in the Order Limits within East Riding (Work nos. 8A and 8B) is allocated Open Space on the adopted Policies Map. The designated Open Space land within the Order Limits comprises Bridge Close Allotments. However, whilst the land protected by the Open Space policy is listed as 'allotments', the area affected by Work No.8 does not impinge on any allotment plots. Indeed, from Google satellite view or from what can be site on site visit, there does not appear to be any allotment present in the location of the allocation, and certainly not where the Proposed Scheme works are to be carried out. Furthermore, ERoY have</p>

Policy	Policy Text	Assessment
	<p>be provided on-site and link in well with other green infrastructure features as described in Policy ENV5.</p> <p>C. Proposed open space, including open space required to make up existing shortfalls in provision, will be identified in the Allocations Document or a Neighbourhood Development Plan.</p> <p>D. Existing and proposed open spaces are shown on the Policies Map. Proposals resulting in the loss of an existing open space, sports and recreational buildings and land, will only be supported where:</p> <ol style="list-style-type: none"> 1. Assessments of existing provision against local standards demonstrate the land is surplus to requirements for all of the functions that open space can perform; or 2. Replacement open space to an equivalent standard or better, in terms of quantity, quality and accessibility, is provided; or 3. The development is for alternative sports and recreation provision, for which there is a deficit; and 4. The loss of open space would not have an unacceptable detrimental impact on the amenity or character of the area. 	<p>confirmed that historic Google satellite imagery from before 2012 indicate that this land has not been used for allotments in that period. The land also appears to be fenced off from public access. ERYC agree that this appears to be a statutory allotment that is no longer in practical use</p> <p>As such the Applicant is treating the land within the Order limits as 'open space' land rather than as 'allotments', to strictly reflect that it is allocated as open space, but that there are no known allotments present and that it is unlikely to strictly form 'public open space' in statutory terms.</p> <p>For the avoidance of doubt, the plots of land within the area of designated Open Space are for Temporary Possession only, not compulsory acquisition of rights, and therefore section 132 of the Planning Act 2008 is not engaged. The Book of Reference (AS-084) has, however, been updated at Deadline 2 to account for this 'open space' plot (Applicant reference 4.3 Rev 04).</p> <p>The Proposed Scheme works would involve the re-stringing of an existing overhead line. As such, there would be no 'loss' of existing Open Space, and the temporary impact of activities required as a result of the Applicant's temporary possession of rights would not cause an unacceptable detrimental impact on amenity or character of the area. This position is agreed with ERYC.</p> <p>Based on the above, the Applicant considers the Proposed Scheme, in respect of Work nos. 8A and 8B, is in accordance with Policy C3.</p>
<p>Policy A4: Goole & Humberhead Levels sub area (Spatial Policy)</p>	<p>Plans, strategies and development decisions in the Goole & Humberhead Levels sub area should:</p> <p>A. Housing</p> <p>This section of the policy is not relevant to the Proposed Scheme.</p> <p>B. Economy</p> <ol style="list-style-type: none"> 1. Support appropriate expansion and diversification of the sub area's key economic sectors, particularly ports and logistics; manufacturing and engineering; finance and business services; and retail. 2. Make the most of the area as a prime location for economic development that takes advantage of its multi-modal transport infrastructure. 3. Support the development of Capitol Park as a Key Employment Site on the edge of Goole for manufacturing, storage and distribution uses. 4. Support the development of the Ozone Industrial Estate at Howden, and the Green Park Business Park at Newport, predominantly for manufacturing, storage and distribution uses. 5. Support the role that Gilberdyke Industrial Estate has in contributing to the rural economy. 6. Support initiatives aimed at linking employment opportunities with residential areas of Goole and the wider sub area. 	<p>The proposed works within East Riding (Work nos. 8A and 8B) will enhance connectivity within the Goole and Humberhead sub area, as they constitute transport infrastructure improvements by way of improving height restrictions currently in place along these routes (on land within the Order Limits). It will also support the economic benefits arising from the Proposed Scheme.</p> <p>The Applicant therefore considers that the Application accords with Policy A4.</p>

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	<p>7. Support the expansion of Goole Town Centre boundary to incorporate further town centre uses and development opportunities.</p> <p>8. Encourage value-added, port-related activities and maximise opportunities for intensification and expansion around the sub area's ports and wharves at Goole and Howdendyke.</p> <p>9. Support appropriately located developments aimed at promoting tourism in the sub area, including provision of hotels and the enhancement of Oakhill Country Park.</p> <p>C. Environment</p> <p>1. Support integrated approaches to habitat and species management, safeguarding and enhancing designated sites, including the Humber Estuary, Lower Derwent Valley, River Derwent, River Ouse and Thorne, Crowle and Goole Moors, green infrastructure corridors and the Humberhead Levels Nature Improvement Area, and avoid development that would have a detrimental impact, working in conjunction with neighbouring authorities where appropriate.</p> <p>2. Have regard to the character and quality of landmarks, such as the cranes, 'Salt and Pepper Pot' water towers and St. Johns Church in Goole, Howden Minister and Wressle Castle, and respect, and, where possible, enhance views of these features.</p> <p>3. Protect those elements which contribute to the setting and character of the sub area's heritage assets, particularly in Howden, and support initiatives to improve the quality of the public realm in Goole, including the revitalisation of the town centre, extensions to pedestrianised areas and further tree planting.</p> <p>4. Ensure the integrity of the Sherwood Sandstone aquifer, and the Pollington and Cowick Groundwater Source Protection Zones, is protected.</p> <p>5. Proactively manage the risk of flooding posed from the Humber Estuary and the Rivers Aire, Derwent, Don (Dutch River), Ouse, and Trent, as well as the risk of surface water flooding, having regard where appropriate to the relevant Strategic Flood Risk Assessment and flood risk management plans and strategies.</p> <p>6. Prevent coalescence by protecting the character and individual identity of settlements by maintaining Key Open Areas between Goole and Hook, and Snaith and Cowick.</p> <p>7. Manage improvements to the River Aire, River Ouse, Aire and Calder Navigation and Dutch River where it would create economic, environmental and recreational opportunities, and does not adversely affect conservation initiatives or the quality of the natural environment.</p> <p>D. Community and Infrastructure</p> <p>1. Enhance connectivity within the sub area and with the rest of the East Riding and other important centres, such as Hull, Doncaster and Leeds, by supporting transport infrastructure improvements, particularly:</p>	

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	<ul style="list-style-type: none"> i. improvements to walking, cycling and public transport facilities, including those set out within the Local Transport Plan individual settlement transport strategies and major cross country routes, such as the Transpennine Trail, the Public Right of Way network, and the National Cycle Network; ii. completion of Capitol Park Link Road from M62 Junction 36 to the A161, Goole; iii. M62 Junction 36 Interchange improvements; iv. the Old Goole River Berth at the Port of Goole; v. improved facilities and railway freight capacity at the port of Goole; and vi. structural repair work to the A645 Newland bridge. <p>2. Support the provision of additional infrastructure, including:</p> <ul style="list-style-type: none"> i. primary health care capacity, including GPs and dentists across the sub area; ii. drainage and flood alleviation schemes, particularly for Goole, Gilberdyke, and Eastrington; iii. additional secondary school pupil capacity at Goole High School; and iv. additional primary school pupil capacity for existing schools in Goole and Howden, alongside the provision of a new primary school in Goole. 	