

**Date:** 22 February 2023  
**Our ref:** 419443  
**Your ref:** EN010120



## **Summary of Natural England's Written Representations (Version 1.1, dated 22 February 2023) in respect of Drax Bioenergy with Carbon Capture and Storage Project**

Natural England's advice is that, in relation to identified nature conservation issues within its remit, there is no fundamental reason of principle why the project should not be permitted. However, Natural England considers that the applicant has provided insufficient evidence and is not yet satisfied that the following issues have been resolved:

- **Internationally and nationally designated sites**
  - Impacts from potential loss of functionally linked land (Construction phase) ('amber').
  - Impacts of acid deposition from aerial emissions (Operation phase) ('amber').
  - Impacts of nitrogen deposition from aerial emissions (Operation phase) ('amber').
  - Impacts of ammonia from aerial emissions (Operation phase) ('amber').
  - Proposed mitigation for aerial emissions (Operation phase) ('amber').
- **Protected species**
  - Further information is required to determine that the project will not adversely affect badgers ('amber').
- **Biodiversity net gain (BNG)**
  - Additional information is required to demonstrate that a 10% biodiversity net gain will be achieved ('amber').
  - The river BNG units do not achieve net gain in either of the scenarios presented ('amber').
  - The Habitat Provision Area within the order limits should be included as on-site in the Biodiversity Net Gain Assessment, and therefore subject to 10% net gain ('amber').

We welcome the further information provided by the Applicant since submission of our Relevant Representations (AS-011) (Version 1.2, dated 23 September 2022) and consider that the following issues have now been resolved, subject to the completion of agreed revisions to the Habitats Regulations Assessment (HRA) for internationally designated sites issues, and subject always to the appropriate requirements being adequately secured for all relevant issues:

- **Internationally and nationally designated sites**
  - Impacts from traffic emissions to air (Construction phase) ('green').
  - Clarification on scenarios used to assess the impacts from aerial emissions (Operation phase) ('green').
- **Protected species**
  - Further information has been provided to determine that the project will not adversely affect bat species ('green').
- **Biodiversity net gain (BNG)**
  - Clarity has been provided regarding impacts to habitats identified as habitats of principal importance (HPI) ('green').
- **Soils and best and most versatile agricultural land**
  - The Agricultural Land Classification (ALC) Grade will be calculated for all agricultural land subject to development or disturbance ('green').
  - Additional information has been provided regarding the Environmental Statement Chapter 11 Ground Conditions – EIA Methodology ('green').
  - Additional information will be provided regarding sustainable soil management in the Soil Handling Management Plan ('green').

Please refer to Natural England's Written Representations (Version 1.1, dated 22 February 2023) for detailed advice and response to the Examining Authority's (ExA's) first written questions.