



# **COVER LETTER (19)**

## **Drax Bioenergy with Carbon Capture and Storage**

**The Planning Act 2008, The Infrastructure Planning (Examination Procedure) Rules 2010**

**Document Reference Number: 8.2.18**

**Applicant: Drax Power Limited**

**PINS Reference: EN010120**



**REVISION: 01**

**DATE: 28 March 2023**

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**AUTHOR: I Pennington**

**APPROVER: C Fountain**

**PUBLIC**

Drax Power Station  
Selby  
North Yorkshire  
YO8 8HP

+44(0)1757 618381  
[REDACTED]

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

28 March 2023

Dear Mr Harrold,

**PINS Reference: EN010120**

**Document Reference: 8.2.18 Cover Letter (19) – Submission of Documents Requested for Deadline 4 of the Examination**

**Drax Power Station Bioenergy with Carbon Capture and Storage (BECCS)**

1. We write on behalf of Drax Power Limited ('the Applicant') to provide the documents requested by the Examining Authority ('ExA') for Deadline 4 of the Examination.
2. This is in accordance with the request set out in the Rule 6 letter dated 13 December 2022 and as updated and confirmed in the Rule 8 letter dated 24 January 2023 and the further letter dated 27 February 2023.
3. Accordingly, the following documents are enclosed with this submission:

<b>Application Document Reference</b>	<b>PINS Document Reference (Most up to date submitted version)</b>	<b>Document Details</b>	<b>Date</b>
<b>1.3</b>	REP3-001	Application Guide (Clean)	28 March 2023
<b>1.3</b>	REP3-002	Application Guide (Tracked)	28 March 2023

<b>Application Document Reference</b>	<b>PINS Document Reference (Most up to date submitted version)</b>	<b>Document Details</b>	<b>Date</b>
<b>1.4</b>	REP3-003	Application Document Tracker (Clean)	28 March 2023
<b>1.4</b>	REP3-004	Application Document Tracker (Tracked)	28 March 2023
<b>3.1</b>	REP2-007	Draft Development Consent Order (Clean)	28 March 2023
<b>3.1</b>	REP2-008	Draft Development Consent Order (Tracked)	28 March 2023
<b>3.1.2</b>	REP2-009	Schedule of Changes to the Draft Development Consent Order	28 March 2023
<b>3.2</b>	REP2-010	Explanatory Memorandum (Clean)	28 March 2023
<b>3.2</b>	REP2-011	Explanatory Memorandum (Tracked)	28 March 2023
<b>4.1.1</b>	REP3-005	Schedule of Negotiations and Powers Sought (Clean)	28 March 2023
<b>4.1.1</b>	REP3-006	Schedule of Negotiations and Powers Sought (Tracked)	28 March 2023
<b>4.2</b>	AS-082	Funding Statement (Clean)	28 March 2023
<b>4.2</b>	AS-083	Funding Statement (Tracked)	28 March 2023
<b>4.3</b>	REP2-016	Book of Reference (Clean)	28 March 2023
<b>4.3</b>	REP2-017	Book of Reference (Tracked)	28 March 2023
<b>4.3.3</b>	REP2-018	Schedule of Changes to the Book of Reference	28 March 2023
<b>6.1.18</b>	REP2-022	Environmental Statement – Volume 1 – Chapter 18: Cumulative Effects (Clean)	28 March 2023
<b>6.1.18</b>	REP2-023	Environmental Statement – Volume 1 – Chapter 18: Cumulative Effects (Tracked)	28 March 2023
<b>6.2.18.1</b>	REP2-027	Environmental Statement – Volume 2 – Figure 18.1 – Short List of ‘Other Developments’ Considered within the Cumulative Impacts Assessment	28 March 2023
<b>6.3.18.1</b>	REP2-045	Environmental Statement – Volume 3 – Appendix 18.1 – Long List of Other Developments (Clean)	28 March 2023
<b>6.3.18.1</b>	REP2-046	Environmental Statement – Volume 3 – Appendix 18.1 – Long List of Other Developments (Tracked)	28 March 2023
<b>6.3.18.2</b>	REP2-047	Environmental Statement – Volume 3 – Appendix 18.2 – Short List of Other Developments (Clean)	28 March 2023

<b>Application Document Reference</b>	<b>PINS Document Reference (Most up to date submitted version)</b>	<b>Document Details</b>	<b>Date</b>
<b>6.3.18.2</b>	REP2-048	Environmental Statement – Volume 3 – Appendix 18.2 – Short List of Other Developments (Tracked)	28 March 2023
<b>6.3.18.4</b>	REP2-049	Environmental Statement – Volume 3 – Appendix 18.4 – Justification of Scoping In / Out of Stages 3 and 4 of the Assessment (Clean)	28 March 2023
<b>6.3.18.4</b>	REP2-050	Environmental Statement – Volume 3 – Appendix 18.4 – Justification of Scoping In / Out of Stages 3 and 4 of the Assessment (Tracked)	28 March 2023
<b>6.3.18.5</b>	REP2-051	Environmental Statement – Volume 3 – Appendix 18.5 – Cumulative Assessment Matrix (Clean)	28 March 2023
<b>6.3.18.5</b>	REP2-052	Environmental Statement – Volume 3 – Appendix 18.5 – Cumulative Assessment Matrix (Tracked)	28 March 2023
<b>8.1.7</b>	REP-021	Statement of Common Ground (SoCG) between National Highways and Drax Power Limited	28 March 2023
<b>8.4</b>	REP3-015	Statement of Commonality	28 March 2023
<b>8.6.4</b>	N/A (new document)	Applicant's Summary of Oral Case at Issue Specific Hearing 3 (ISH3)	28 March 2023
<b>8.6.5</b>	N/A (new document)	Applicant's Summary of Oral Case at Compulsory Acquisition Hearing 1 (CA1)	28 March 2023
<b>8.6.6</b>	N/A (new document)	Applicant's Summary of Oral Case at Issue Specific Hearing 4 (ISH4)	28 March 2023
<b>8.10.2</b>	REP3-020	Applicant's Comments on Submissions at Deadline 2 (Updated)	28 March 2023
<b>8.10.3</b>	N/A (new document)	Applicant's Comments on Submissions at Deadline 3	28 March 2023
<b>8.13</b>	N/A (new document)	Applicant's Response to Compulsory Acquisition Relevant Representations	28 March 2023

In considering this documentation, please note the following:

4. The Application Document Tracker and Application Guide have been updated to reflect the latest status and list of documents submitted as part of the Examination process.



5. The Draft Development Consent Order has been updated following updates to the Section 106 Agreement at Deadline 3 and to reflect discussions at ISH4.
6. The Explanatory Memorandum has been updated for Deadline 4, following discussions at ISH4 and to ensure alignment with updates to the Draft DCO, including Article 6.
7. The Schedule of Negotiations and Powers Sought document has been updated to reflect the latest status of discussions with affected parties.
8. The Funding Statement has been updated to include the audited 2022 accounts for Drax Group plc, as requested by the ExA during the CAH1 Hearing on 23 March 2023.
9. The Book of Reference (4.3) has been updated to reflect the following:
  - additional plots where Yorkshire Water have confirmed an interest in respect of water assets;
  - the addition of a new tenant occupier of land (Mr Roustoby);
  - the removal of a former tenant occupier of some land (Mr Cowling);
  - the removal of British Gas Limited to reflect the confirmation that this party does not have an interest in the land; and
  - a qualifier of an interest in land in respect of East Riding of Yorkshire Council.
10. The Schedule of Changes to the Book of Reference (document reference 4.3.3) details these changes.
11. Chapter 18 Cumulative Effects and the associated Appendices have been updated to reflect additional developments put forward by Selby District Council and North Yorkshire County Council during consultation. In relation to the cumulative developments identified in the updated cumulative assessment, ID103 and ID106 have not yet been assessed in the HRA Report (REP2-101). The next iteration of the HRA Report will include an assessment of in-combination effects associated with these developments.
12. This submission includes an updated SoCG with National Highways as discussed at ISH2 and ISH4, and the Statement of Commonality has been updated to reflect this.
13. Document 8.6.4 provides a summary of the Applicant's Oral Case presented at ISH3, and includes Appendix 1 providing further information on monitoring emissions in the Drax Environmental Permit, and Appendix 2 providing further information on noise guidance as discussed at ISH3.
14. Document 8.6.5 provides a summary of the Applicant's Oral Case presented at CAH1 and includes Appendix 1 providing further information regarding the planning permission for an employment development on land south of Rawcliffe Road, adjacent to the Glews Garage site including a plan indicating the areas of overlap between the permitted development and the proposed area of works for OHL2 as submitted in the Proposed Changes Application in December 2022. As discussed at CAH1, this overlap will be removed (save for a small strip of tarmac adjacent to the highway which is not proposed to be developed upon) by the Applicant's prospective Changes Application. Please note that the drawing in Appendix 1 uses georeferencing to overlay the Proposed Site Plan drawing for the approved employment development on land south of Rawcliffe Road, so may not be 100% accurate and should be used for indicative purposes only.
15. Document 8.6.6 provides a summary of the Applicant's Oral Case presented at ISH4.
16. An updated version of the Applicant's Comments on Submissions at Deadline 2 is submitted at this time to reflect the Applicant's response to Biofuelwatch's Written Representation in relation to Air

Quality and Biodiversity. As explained in Cover Letter (16) (8.2.15) issued at Deadline 3 (10 March 2023), the extent of technical detail set out in that Written Representation and the number of third-party sources it refers to has meant that the Applicant required additional time to develop responses to these points. The additional responses are shown in red text in the updated document. For the avoidance of doubt, no other changes to this document have been made.

17. The Applicant's comments on other parties' submissions at Deadline 3 is provided in Document 8.10.3 and its comments on the Relevant Representations submitted under the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 is also submitted in Document 8.13.
18. Enclosed with this letter are the above documents via the file upload facility on the project application website<sup>1</sup>, as agreed with the Inspectorate via the Rule 6 letter on 13 December 2022.
19. We trust the above and enclosed are helpful. However, please do not hesitate to contact the undersigned should you have any queries regarding these documents.

Yours sincerely



Jim Doyle  
Planning and Consents Manager

 [@drax.com](mailto:[redacted]@drax.com)

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<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/yorkshire-and-the-humber/drax-bioenergy-with-carbon-capture-and-storage-project>