

**The Planning Inspectorate**

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Dear Sirs

**Drax Bio-Energy and Carbon Capture Storage  
Deadline 5**

**Comments on the Applicant's updated draft Development Consent Order (Rev 6 – document reference REP4-019 and REP4-022)**

1. The Council welcome amendments to requirements 20 and 21 – now agreed.
2. The Council welcome inclusion of references in requirements to consultation with the Highway Authority – now agreed.
3. The Council welcome amendments to Schedule 11 Procedure for Discharge of Requirements – now agreed.
4. The Council welcome changes to the explanatory note – now agreed.

**Comments on any other responses received by Deadline 4**

**1. Applicant's Summary of Oral Case at Issue Specific Hearing 3 (ISH3) - Rev 1 (document reference REP4-026) – in relation to Noise and Vibration**

**Paragraph 7.1 - Measurement location LT4 and Receptor R14**

It was questioned whether or not LT4 monitoring location data was representative of receptor R14. LT4 monitoring location data is used to set the background noise level at R14, a distance of roughly 1.5km apart. Taking into account the low background noise level reported (28dB L<sub>A90,15min</sub>), similar distances to Drax Power Station which is likely a dominant contributor to the existing noise climate (~1km), and rural context at both locations, there are no objections to adopting LT4 monitoring location data to set the R14 background noise level.

**Paragraph 7.2 - Adverse residual operational noise impacts & contextual considerations**

A noise difference between the rating level ( $L_{Ar,Tr}$ ) and background noise level ( $L_{A90,15min}$ ) is +6dB at receptor R6 and +7dB at receptor R14, which is an indication of adverse impacts depending on context.

Whilst a context case is provided by the applicant, it is contested that good acoustic design should form part of this in terms of equipment choice and orientation. The Councils Environmental Health Officer met with Esteban Olmos (Noise, Associate Director, WSP) on 23 March 2023 and would summarise as follows:

- Operational noise assumptions are provided (Appendix 7.2) and the indicative plant equipment layout shows plant orientation (Figure 2.2). It was confirmed that good acoustic design was embedded into the indicative layout. However, there is uncertainty that the Council had no input into the options appraisal that took place in the early stages of design, therefore, we are unable to comment on this. It is suggested in a post hearing note that revisiting the indicative layout has the potential to cause onerous design implications (para 7.12).
- There are some elements to the assessment methodology that favour the context case and worthy of emphasis:
  - Background noise levels at R6 and R14 are likely to be higher than those selected for the assessment. This is a consequence of the adopted assessment methodology which differs to that suggested within the standard and provides a much more conservative conclusion (Appendix 7.4 Baseline Noise Statistical Analysis – Plate 1.21: LT4 Night-time Histogram vs. BS4142:2014+A1:2019 Section 8 [Figure 4]).
  - Operational noise assumptions include an assumption that all noise sources will be operational 100% of the time.

The aforementioned depicts a deflated background noise level against an inflated rating level, thus potential for exaggerating the actual noise impacts.

As such, it is necessary to balance the onerous design implications of revisiting the indicative layout with the adverse night-time noise impacts at receptors R6 and R14, in the context of what is a conservative assessment of existing background noise levels and a worst-case scenario with all plant operating 100% of the time.

#### Paragraph 7.14 - Construction Working Hours

Resolved – reassured by Figure 2.3: Construction Laydown Plan.

#### Paragraph 7.17 - Siting of construction compounds

Resolved – reassured by Figure 2.3: Construction Laydown Plan.

### **2. Environmental Statement - Volume 3 - Appendix 18.1: Long List of Other Developments - Rev 3 (document reference REP4-005 and REP4-015)**

This reflects previous discussions and is agreed.

### **3. Environmental Statement - Volume 3 - Appendix 18.2: Short List of Other Developments - Rev 4 (document reference REP4-004 and REP4-025)**

This reflects previous discussions and is agreed.

Yours faithfully

**Michael Reynolds**  
**Senior Policy Officer (Infrastructure)**  
**North Yorkshire Council**