

Comments on REP4-028 Drax Power Limited Deadline 4 Submission - 8.10.3 Applicant's Responses to Issues Raised at Deadline 3 - Rev 1

REP4-028 4.3 (P1 – P2) AQ 1.7 of REP2-060 *The Applicant responded to our question thus: The monitoring undertaken by local authorities is publicly available within their Air Quality Annual Status Reports that are published on an annual basis. For example: for Selby, the reports are published on Selby District Council's Local Air Quality Management website 1 for years from 2012 to 2022. Pollutant concentrations are monitored at 36 locations within the district. For East Riding of Yorkshire, the reports are published on East Riding of Yorkshire's Air quality monitoring website 2 for years from 2012 to 2022. Pollutant concentrations are monitored at over 90 locations within the district.*

Due to the council changes the link provided by Drax no longer links to the relevant page however we were able to find Selby District Council's 2022 Air Quality Annual Status Report (ASR) on the new site to which the link redirects.

It is our understanding that all of the air pollution monitoring conducted by Selby District Council is traffic based and therefore not aimed at monitoring emissions from Drax and other industrial sites in the area. Appendix D of the report, maps, makes it clear all monitoring was in traffic related locations. Selby Council acknowledges in its own response that it does not have any data relating to Drax (REP2-095).

We would assert therefore that the Local Authority pollution monitoring does not cover Drax's emissions and certainly the existing air quality monitoring that there is that does not measure the new pollutants that are produced by the PCC amine process. So there is no established baseline for those compounds.

Commenting on REP4-041 Natural England Deadline 4 Submission - Update to Written Representation

We would like to ask the Natural England the following questions in relation to REP4-041

Table 1a: Natural England's detailed advice
Natural England key issue reference no 20

1. What level of cumulative uncertainty did Natural England assume when assessing whether nitrogen deposition and acid deposition at Thorne Moor fall within the bounds of natural variation?

Table 1a: Natural England's detailed advice
Natural England key issue reference no 19 and 20

2. Why does Natural England consider significant increased long-term nitrogen and acid deposition, even if within the bounds of natural variation, to be acceptable when critical loads are exceeded (Lower Derwent Valley SAC, Lower Derwent Valley Ramsar, Thorne Moor SAC)? By definition, further significant long-term increases can be expected to cause further significant long-term ecological harm. Please could Natural England elaborate and explain its reasoning further.