

Date: 06 July 2023
Our ref: 439821
Your ref: EN010120



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BY EMAIL ONLY

Dear Sir/Madam,

NSIP Reference Name / Code: EN010120

Title: Natural England's updated comments in respect of Drax Bioenergy with Carbon Capture and Storage Project, promoted by Drax Power Limited (Deadline 9)

Examining authority's submission deadline 06 July 2023

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

For any further advice on this consultation please contact the case officer Alice Megaw at ██████████@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours faithfully

Alice Megaw

Yorkshire and Northern Lincolnshire Area Team

Natural England’s response to the Examining Authority’s (ExA’s) Questions under EPR Rule 17 (R17QB): Thursday 22 June 2023.

Table 2b: Natural England response to Examiner’s Questions under EPR Rule 17 (R17QB): Thursday 22 June 2023			
ExA question ref	Question addressed to	Question	Answer
R17QB.3	EA/NE/NYC	<p><i>In its response to R17QA.21 [REP8-029] the Applicant explains it is now seeking that it has seven years within which to commence the authorised development and exercise its compulsory acquisition powers.</i></p> <p><i>Given that a seven-year commencement date is different to the Applicant’s previous position that there would be a two-year delay to the anticipated timescales originally given in Table 2.1 of the ES [APP-038], would there be any implications to baselines, survey work undertaken and/ or conclusions drawn as a result of this extended commencement period?</i></p>	<p>Natural England considers that the proposed seven-year commencement period would introduce additional uncertainty into the reliability of the environmental assessment conclusions. In particular, we highlight that the in-combination assessment for impacts on designated sites will be made with less confidence as a result of the proposed extended commencement period. However, as detailed in our response to Examiner’s Questions under EPR Rule 17 (R17QA) (dated 13 June 2023), any future applications coming into the planning/ permitting system will have to make their own assessment with Drax BECCS as an in-combination/ cumulative project.</p> <p>Our advice on potential changes to the air quality assessment, ecological survey results and Biodiversity Net Gain (BNG) as a result of the extended commencement period broadly remains as detailed in our response to Examiner’s Questions under EPR Rule 17 (R17QA) (dated 13 June 2023) regarding the potential implications of the previously proposed two-year delay, although it should be noted that the baseline ecological surveys will be increasingly out of date.</p> <p>Overall, Natural England broadly agrees with the applicant’s assessment of potential impacts on baseline, survey work, worst case construction programme and</p>

			outcomes of the Environmental Impact Assessment (EIA) in their response to R17QB.2 in this case.
R17QB.9	Applicant/E A/NE/ NYC	<i>Please provide comment on the Applicant's suggested requirement as set out in the Applicant's response to R17AQ.21 [REP8-029] which would, amongst other things, prevent the authorised development commencing until development consent for the pipeline, the licence for the storage and the EP for Work No.1 was in place.</i>	Natural England has no comments to make on the Applicant's suggested requirement as set out in the Applicant's response to R17AQ.21 [REP8-029].