



The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our ref: RA/2023/146038/01
Your ref: EN010120
Date: 6 July 2023

Dear Sir/Madam

DRAX POWER STATION BIOENERGY WITH CARBON CAPTURE AND STORAGE EXTENSION DEVELOPMENT CONSENT ORDER: RESPONSE TO EXAMINER'S REQUEST FOR FURTHER INFORMATION RULE 17

We have reviewed the Examining Authority's questions (R17QB), received 22 June 2023 and wish to offer the following responses set out below.

GENERAL AND CROSS-TOPIC QUESTIONS

R17QB.3

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. 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?

We do not consider there are any implications on survey work or conclusions, as a result of a seven-year delay, that have not already been addressed. Our reasons for this are the same as those stated for a possible two year delay in our response to R17QA [REP8-035] and are set out below:

- In relation to Ecology, the Environmental Statement, Chapter 8, Section 8.7.2 states that "The survey data obtained for these projects have been reviewed as per CIEEM's advice note on the lifespan of ecological reports and surveys (CIEEM, 2019)." As CIEEM's advice note on the lifespan of ecological reports and surveys should be followed we would expect to see the validity of the existing data being assessed again before the construction phase starts to check if any significant changes have occurred in the interim via an updated Preliminary Ecological Appraisal. The need for this survey update should be included within the proposed/updated timescales.

- Prior to the commencement of the project, there is a requirement (as outlined in the S106) for the BNG assessment to be updated in line with the detailed design of the project – and any updated surveys would be undertaken at this point where required. So we do not consider the proposed 2 year delay should cause issues for the BNG provided.
- The outline landscape and biodiversity strategy highlights that a series of ecological surveys and assessment would be required prior to construction taking place and that this would include walkovers to re-confirm the ecological baseline to ensure construction phase mitigation remains appropriate.
- For flood risk the applicant has assessed a longer lifetime of the development in terms of its mitigation. The agreed revised wording for Requirement 11 ensures that further mitigation will be considered at year 20 of operation.

DEVELOPMENT CONSENT ORDER

R17QB.9 b)

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.

We have considered the Applicant's response to R17AQ.21 [REP8-029] and the proposed requirement. We have no comments to make.

We trust this answers your questions sufficiently.

Yours faithfully

Mrs Frances Edwards

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