



CONSULTATION REPORT

Drax Bioenergy with Carbon Capture and Storage

The Planning Act 2008 –Section 37(3)(c)

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 – Regulation 5(2)(q)

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EXECUTIVE SUMMARY

DRAX CONSULTATION PROCESS

This report has been prepared by WSP and Grayling Engage on behalf of Drax Power Limited ('the Applicant') to support its application for development consent for Bioenergy with Carbon Capture and Storage ('BECCS') at the Drax power station near Selby, North Yorkshire ('Proposed Scheme').

The Proposed Scheme is a Nationally Significant Infrastructure Project ('NSIP') under the Planning Act 2008 ('the PA2008'), meaning a Development Consent Order ('DCO') is required to construct, operate and decommission the Proposed Scheme. The Proposed Scheme requires an Environmental Impact Assessment ('EIA') under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Drax is committed to ensuring that statutory consultees, those with an interest in the site, residents, local interest groups, businesses, local authorities, and visitors have had a number of opportunities to understand the Proposed Scheme and to comment on those proposals. This has been achieved through a two-phase consultation process and engagement activities during the development of the design. Drax has had regard to all the consultation responses received in developing the Proposed Scheme during the pre-application period.

The Proposed Scheme was subject to non-statutory and statutory consultation periods. The non-statutory consultation was between 1 March to 28 March 2021 and the statutory consultation was held from 1 November to 12 December 2021.

Due to COVID-19 restrictions at the time of the non-statutory consultation, the approach was fully digital through a dedicated consultation website and online sessions. However, as restrictions eased, a hybrid approach was taken for the statutory consultation. This hybrid approach included a dedicated website and online sessions combined with in-person events and non-digital opportunities to view and comment on the Proposed Scheme.

The scope of the first consultation was to introduce the Proposed Scheme to stakeholders and communities. During the second consultation detailed information was provided on the Proposed Scheme ahead of submission of the application for development consent. This included information on what the Proposed Scheme involves, the importance of BECCS technology in meeting net zero goals, the DCO process, types of technologies used, construction and environmental components of the Proposed Scheme, environmental impacts and mitigation options, skills and employment opportunities and safety of BECCS operations. Figure 1 provides an overview of the key milestones and their timescales.



Figure 1: Timeframe of the Proposed Scheme and Engagement Activities

NON-STATUTORY CONSULTATION AND ENGAGEMENT

The non-statutory consultation was advertised by several methods including a flyer that was delivered to 6,801 surrounding properties, print advertising in the local newspapers Selby Times and Goole Times ahead of the consultation and via social media. A letter was also sent to 129 organisations, including local elected members, informing them of the consultation.

The overview of the non-statutory consultation in figures is:

Overall visitors to the consultation website: 966

Total responses to the consultation: 36

✓ Support: 10

✗ Oppose: 2

○ Neutral: 24

Whilst all feedback received during this consultation was incorporated into this report, it was notable that across the course of the consultation there was considerable

engagement with the website, but only 3.7% of consultees who visited the site responded to the consultation with feedback or questions.

From the consultation feedback, only two responses received said that they did not support the Proposed Scheme. There were ten responses in favour of the Proposed Scheme, including letters from Selby District Council, City of York Council and York and North Yorkshire Local Enterprise Partnership. Seven responses were made via the online feedback form, 'strongly supporting' the Proposed Scheme.

On the whole, the responses were generally supportive or neutral towards the principle of BECCS and Drax's ambition to become carbon negative. However, there were concerns raised over the reliability of the Proposed Scheme to ensure carbon dioxide will not escape from storage and the impact of the eventual construction works. A common theme was an interest in the BECCS technology, how it fits into the wider Zero Carbon Humber project and the sustainability of biomass.

STATUTORY CONSULTATION

The second phase of consultation complied with the statutory requirements of the PA2008, including sections 42, 47 and 48. In accordance with section 42 of the PA2008, Drax consulted with prescribed bodies, local authorities, those with an interest in the Site and those potentially affected by the construction and operation of the Proposed Scheme. In accordance with section 47 of the PA2008, Drax also consulted people living in the vicinity of the Proposed Scheme, which was undertaken in accordance with a Statement of Community Consultation ('SoCC'), which had been drafted and finalised in consultation with the local authorities. Drax also publicised the Proposed Scheme in accordance with section 48 of the PA2008.

Drax compiled an extensive database of consultees including those prescribed by the PA2008, the Infrastructure Planning (Applications: Prescribed Forms and Procedures) 2009 (the APFP Regulations) (Ref. 1.3) and EIA Regulations 2017. Drax also identified and consulted with non-statutory consultees who were identified by Drax as potentially having an interest in the Proposed Scheme.

Consultees included:

- Local authorities and prescribed bodies;
- Landowners and others with an interest in the Site;
- Those living in the vicinity of the Site;
- Local elected members;
- Local community groups;
- Hard to reach groups; and
- Other organisations with local or technical interests in the Proposed Scheme.

The SoCC was developed in consultation with the applicable local authorities and set out how Drax intended to engage with people living in the vicinity of the Site and detailed the methods by which they could comment on the Proposed Scheme during

the statutory consultation, in accordance with section 47 of the PA2008. A copy of the final SoCC can be found in Appendix C3.

The consultation materials provided information on the indicative layout of the Proposed Scheme and access arrangements. These documents were available to view at five deposit locations, three in-person public consultation events and on the BECCS at Drax consultation website.

Briefings and meetings were held with elected members. The Drax website for the Proposed Scheme was regularly updated and publicity was arranged to raise interest in the consultation through formal notices, media, posters, flyers, promotional pop-up events, advertising and social media.

The communication methods were carefully considered to ensure a wide range of consultees were made aware of the consultation and could access the relevant information. The consultation material was carefully produced to be clear and accessible to the range of different consultees. Consultees were also provided with several different ways to provide their feedback.

The activities generated 79 responses from section 47 consultees and 21 responses received from section 42(1)(a) and section 42(1)(b) statutory consultees. Regard has been had to these responses as required by section 49 of the PA2008, with any resultant changes to the Proposed Scheme or additional mitigation measures highlighted.

Key issues raised during the consultation by consultees included:

- Engineering and facility operations;
- Air quality impacts;
- Water environment impacts;
- Ecology;
- Landscape and visual impact;
- Materials and waste;
- Archaeology and cultural heritage;
- Noise and vibrations;
- Traffic impacts;
- Ground conditions; and
- Population and health security.

Tables summarising all relevant responses received during the statutory consultation period are included in Chapter 7, including the ways in which the Applicant has taken account of the relevant responses in finalising the Proposed Scheme for the DCO Application.

EIA RELATED CONSULTATION

As an EIA development, Drax, as the Applicant, submitted a request for a Scoping Opinion to the Secretary of State (SoS) for Business, Energy and Industrial Strategy in January 2021 (EN010120-000017), to seek an opinion on the scope and level of detail of the information to be included in the Environmental Statement ('ES'), to be submitted with the DCO Application. The SoS adopted the Scoping Opinion on 26 February 2021, following consultation with prescribed bodies (EN010120-000009-DBCC).

For the statutory consultation, a Preliminary Environmental Information Report ('PEIR') was prepared which presented environmental information to enable members of the public (including local communities), local authorities, statutory bodies and people whose land or interests would potentially be affected to understand the likely significant environmental effects of the Proposed Scheme, and an indication of the mitigation measures required to address any significant adverse impacts.

All comments received from consultees relating to the environmental impacts and mitigation have been considered, see Chapter 9 of this report for further details. Full details of the consultation and environmental assessments undertaken are detailed in Chapter 1 (Introduction) of the ES (document reference 6.1.1), Chapter 4 (EIA Methodology) of the ES (document reference 6.1.4) and topic chapters 5 – 18.

POST DCO SUBMISSION

Drax will continue its commitment to engagement after the DCO submission and this will include the agreement of Statements of Common Ground ('SoCG') with stakeholders where appropriate. In particular, engagement will continue with persons with interests in the Site throughout the examination and, if necessary, beyond, in order to acquire land by agreement as far as possible. In addition, engagement will continue to take place with key consultees through detailed design and with the wider community to keep them informed and engaged with the Proposed Scheme. SoCGs have been initiated pre-application. These will be updated during the pre-examination and examination stage to reflect on-going engagement with the aim of submitting completed SoCGs to the Examination.

1. SCHEME OVERVIEW

1.1. PURPOSE OF REPORT

1.1.1. Drax Power Limited (the ‘Applicant’) has made an application for development consent to enable the development of Bioenergy with Carbon Capture and Storage (‘BECCS’) at Drax Power Station in North Yorkshire. BECCS is a technology that has been developed to remove carbon dioxide (CO₂) from the atmosphere. The Applicant is proposing to install BECCS technology on up to two of its existing biomass power generating units at Drax Power Station, helping to permanently remove more CO₂ from the atmosphere than is produced across its operations, making Drax Group carbon negative. This Proposed Scheme is known as BECCS at Drax and is also referred to in this document as ‘the Proposed Scheme’.

1.1.2. As the Proposed Scheme constitutes a Nationally Significant Infrastructure Project (‘NSIP’), the Applicant must make an application under the Planning Act 2008 (as amended) (‘PA2008’) for a Development Consent Order (‘DCO’) to construct and operate the Proposed Scheme. The Application will be submitted to the Secretary of State for Business, Energy and Industrial Strategy (‘SoS’), who will appoint an examining authority to examine the Application and make a recommendation to the SoS, who will then make a decision on whether or not to grant development consent.

1.1.3. This Consultation Report has been prepared pursuant to section 37(3)(c) and section 37(7) of the PA2008, which requires a DCO application to be accompanied by a Consultation Report. The purpose of this Consultation Report is to provide a summary of the consultation undertaken by Drax, details of responses to the consultation, and the account taken of such responses, in accordance with section 37(7) of the PA2008. As such this report presents:

- a.** A summary of non-statutory consultation undertaken
- b.** An account of the statutory consultation in relation to the proposed DCO; Application, the publicity and activities undertaken in line with the PA2008
- c.** A summary of the responses received; and
- d.** A summary of how these responses have been had regard to in development of the DCO Application (from the proposed application that was consulted upon to the final form of this DCO Application), as required by section 49(2) of the PA2008.

1.1. THE APPLICANT AND BACKGROUND TO THE PROPOSED SCHEME

1.1.1. Drax Power Ltd (a subsidiary of Drax Group plc), is a UK energy business committed to enabling a zero carbon, lower cost energy future through its portfolio of dispatchable, renewable energy generation assets. Drax Power Ltd owns Drax Power Station.

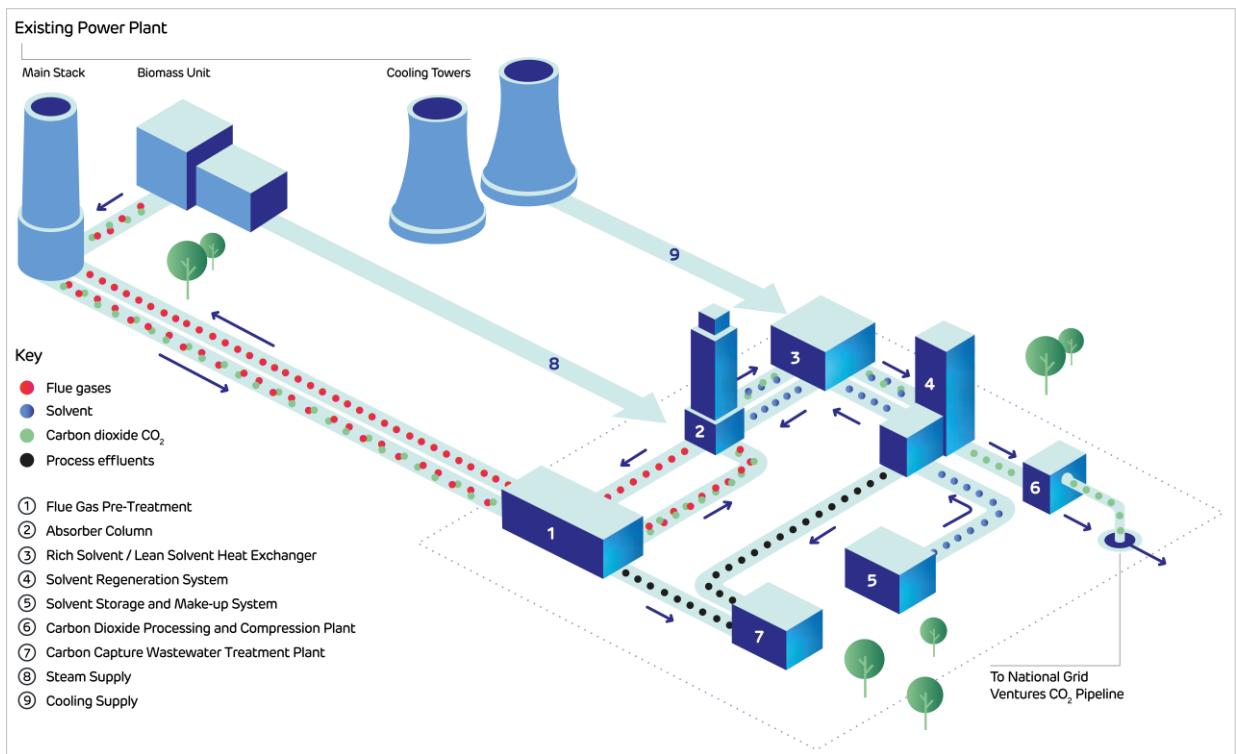
1.1.2. Drax Power Station was officially opened in 1975 with three coal-fired generation units and a total generating capacity of just under 2,000 MW. In 1986 it doubled in size

to make it the largest coal-fired power station in the UK. Since 1988, Drax has invested in a series of initiatives to reduce its impact on the environment (for example retrofitting flue gas desulphurisation equipment to its coal units) and in 2012 Drax embarked on a major programme of investment to transform its power generation operations away from coal. It currently has four biomass generating units, capable of using different biomass fuels to generate renewable electricity.

1.2. INTRODUCTION TO THE SCHEME

- 1.2.1. The Proposed Scheme is another step in Drax's commitment to moving Drax Power Station towards a low carbon facility and guaranteeing the future of the Power Station as a major component of the UK's electricity generation as well as a vital economic asset for Yorkshire and Humber.
- 1.2.2. In developing the Proposed Scheme, the Applicant is promoting their vision for a carbon negative company by 2030 based on three core pillars which this Proposed Scheme will deliver through;
 - a. Helping the UK reach net zero;
 - b. Supporting economic growth and create and protect green jobs and skills; and
 - c. Positioning the UK as a global leader in developing innovative carbon capture technologies.
- 1.2.3. BECCS would generate renewable electricity whilst capturing and permanently storing CO₂, delivering negative emissions. Drax's biomass units already use biomass stored from sustainably managed forests to generate electricity. With BECCS at Drax, the CO₂ that is emitted as part of this energy generation from biomass will be captured using carbon capture technology. That CO₂ will then be safely stored offshore under the seabed.
- 1.2.4. The process diagram for the Proposed Scheme is shown in Plate 1.1.

Plate 1.1 - Process Block Flow Diagram for BECCS



- 1 - A flue gas pre-treatment section will remove pollutants from the gas which is emitted from the biomass unit as part of the energy generation process before the CO₂ is extracted
- 2 - An absorber column will then extract the CO₂ from the flue gas using an amine solvent
- 3 – Solvent heat exchanged will then cool the amine solvent so that it can be re-used
- 4- A solvent regeneration system will then separate the CO₂ from the amine solvent when it is re-heated
- 5 – Solvent storage and make-up system ensure that the amine solvent remains in a good condition and continues to be available for the process
- 6 – CO₂ is then transferred to the compression and processing plant before the CO₂ is processed for transport by pipeline for storage in safe underground deposits
- 7 – A carbon capture wastewater treatment plant where wastewater effluents are recovered from the process, treated and re-used.
- 8 - For each Carbon Capture Plant, steam would be extracted from the associated biomass unit and supplied on an elevated steam (and other services) pipe bridge.
- 9 - Cooling requirements would be provided using the existing northern cooling towers at the Drax Power Station Site.

1.2.5. The Proposed Scheme would involve the installation of post-combustion carbon capture technology to capture CO₂ from up to two existing 660 megawatts electrical ('MWe') biomass power generating units at the Drax Power Station (Unit 1 and Unit 2). The installation of this technology constitutes an extension to the biomass Units 1 and 2 and is referred to as post-combustion carbon capture as the CO₂ is captured from the flue gas produced during the combustion of biomass in Units 1 and 2. The Proposed Scheme is designed to remove approximately 95% of the CO₂ from the flue gas from these two units.

1.2.6. The CO₂ captured will undergo processing and compression before being transported via a proposed new pipeline for storage under the southern North Sea. Transport and storage infrastructure will be consented through separate applications submitted by other parties (not the Applicant).

1.2.7. Core items of the existing infrastructure at the Drax Power Station would be utilised by installing and integrating the Carbon Capture Plant onto existing infrastructure including existing power generating units (Units 1 and 2) for extraction of steam, re-using the cooling water systems, Main Stack and electrical connections.

1.3. PROPOSED SCHEME BOUNDARY

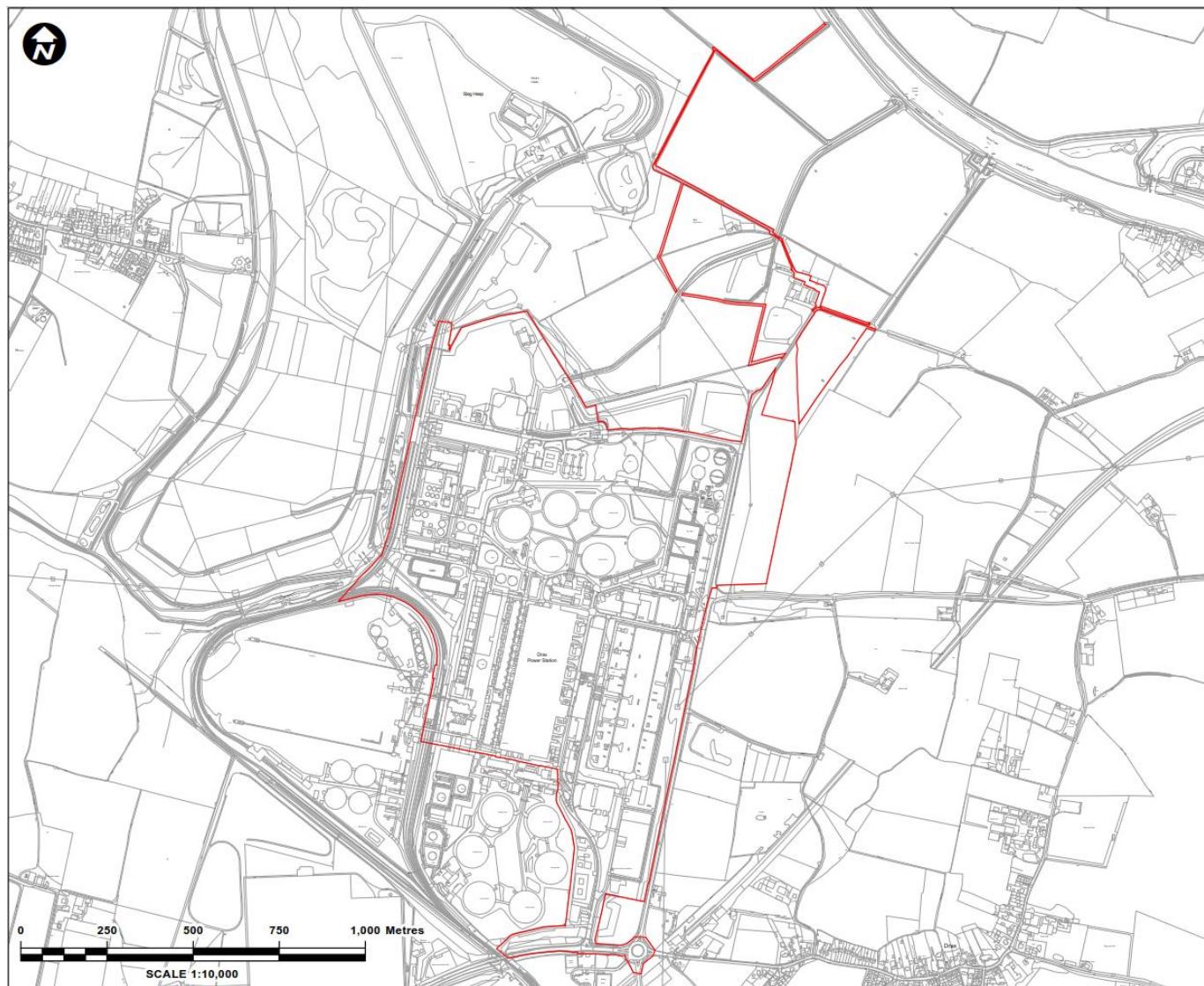
1.3.1. The Draft Order Limits for the Proposed Scheme are shown in Plate 1.2.

1.3.2. As well as the BECCS technology components described in section 1.3, which would be installed within the existing Drax Power Station Site, the Site includes:

- a.** Construction laydown areas consisting of both the East Construction Laydown Area and the Drax Power Station Site Construction Laydown Areas. The East Construction Laydown Area would be used for laydown of plant, equipment and materials, light fabrication, storage of topsoil from the area and as an overflow car park during construction. The Drax Power Station Site Construction Laydown Areas would be used for construction worker car parking, the Contractor Village, laydown, fabrication and local construction.
- b.** Land within the Order Limits has been identified to the north and north east of the Drax Power Station Site, on existing agricultural land, for environmental mitigation and compensation (Habitat Provision Area). No new infrastructure is proposed on this land. The details of the environmental mitigation and compensation to be provided within the Habitat Provision Area have been developed alongside the assessments of landscape and visual and biodiversity impacts, including a Biodiversity Net Gain assessment and as such proposed mitigation including the creation and enhancement of habitats is set out in the DCO Application and accompanying ES.
- c.** Minor vegetation and street furniture management are required to construct the Proposed Scheme within the Order Limits in relation to the transportation of construction materials via the road network. These works would take place along the A645 along the southern boundary of the Order Limits.

1.3.3. Schedule 1 of the draft DCO (document reference 3.1) identifies all works within the Proposed Scheme. The draft DCO is submitted as part of the DCO Application.

Plate 1.2 - Drax BECCS Draft Order Limits



1.4. OVERVIEW AND NARRATIVE OF THE PRE-APPLICATION STAGE FOR THE APPLICATION

1.4.1. The consultation for the Proposed Scheme was undertaken in two phases, with an initial non-statutory consultation phase, followed by a statutory consultation phase. The non-statutory consultation phase held from 1 March to 28 March 2021 aimed to raise awareness of the Proposed Scheme and highlight any early issues for consideration in its development. The statutory consultation took place from 1 November 2021 and ended at 11:59pm on 12 December 2021.

The following information shown in Table 1.1 summarises the consultation activities undertaken by the Applicant at both stages of consultation.

Table 1.1 - Summary of consultation activities

Date	Stage	Activity	Consultees
15 January 2021	EIA Scoping.	Notification to the SoS that the Applicant proposes to provide an environmental statement in respect of the Proposed Scheme, see cover letter included with the Scoping Report (Proposed Scheme reference EN010120). The Applicant requested a written EIA Scoping Opinion under Regulation 10 of the EIA Regulations 2017 from PINS on 15/01/2021	Required by Regulation 8(1)(b) of the EIA Regulations 2017 (Ref. 1.2).
Ongoing	EIA Consultation / engagement.	Meetings and / or email engagement and consultation. Further details can be found in Chapter 9 of this report and within the individual ES chapters (Volume 1). Development of Statements of Common Ground as appropriate.	Key stakeholders such as the Environment Agency, Selby District Council, North Yorkshire County Council (NYCC), East Riding of Yorkshire Council and Historic England.
26 February 2021	Scoping Opinion.	A Scoping Opinion was adopted by the SoS setting out consultation with prescribed consultation bodies under Regulation 10(6) of the EIA Regulations 2017. The SoS notified the Applicant under Regulation 11(1)(b) of the EIA Regulations the list of consultation bodies notified by PINS of the Proposed Scheme under Regulation 11(1)(a) and informed them of their duty under Regulation 11(3) to enter into consultation with the Applicant. PINS did not identify any persons under Regulation 11(1)(c) who may be affected by the development.	Consultation bodies as defined in Regulation 3 of the EIA Regulations 2017, being bodies prescribed under section 42(1)(a) of PA2008 and each authority that is within section 43 of the PA2008.
1 March to 28 March 2021	Non-statutory consultation, details can be found in Chapter 4 of this report.	The consultation was advertised by several methods including <ul style="list-style-type: none">~ A flyer that was delivered to the consultation zone~ Letter with brochure to key stakeholders~ Section 47 and section 48 notices and print advertising~ Digital exhibition with live chat function.	Prescribed bodies, local authorities, land interests, local community.
Informal SoCC issued on 30 April 2021, formal SoCC issued on 5 August 2021 for review.	Section 47 – SoCC preparation, details can be found in Chapter 5.	Statutory consultation with the local authorities on the SoCC (Section 47(2) PA2008), see Chapter 5 for further information.	Selby District Council and NYCC for statutory consultation and to East Riding of Yorkshire Council (as some of the highway powers sought in the DCO may be exercised within this administrative area).
October 2021	Section 47 – Statement of Community Consultation (SoCC) notification and publication, details can be found in Chapter 5.	Publishing the SoCC and making it available for inspection by the public, and publishing notices notifying how the SoCC could be inspected, in accordance with section 47(6) of PA2008. See Appendix H1 for the published SoCC notice. Section 47 advertising, further information can be found in Appendix H1 (in relation to the section 47 notice) on 14 October 2021 and 21 October 2021.	Local community.
29 October 2021	Section 46, details can be found in Chapter 6.	Notification to SoS of consultation, including provision of statutory consultation materials (Section 46) see Appendix B1 and B2 (which also includes a letter (by email) from PINS acknowledging receipt of information).	Secretary of State.
Monday 1 November 2021 to 12 December 2021.	Statutory consultation Sections 42 and 47 of the PA2008, details can be found in Chapters 5 and 6.	Notification of consultation (Section 42) see Appendix E1 (section 42 letter). Section 47 consultation: <ul style="list-style-type: none">~ Public exhibitions and stakeholder meetings,~ Information and statutory consultation materials at deposit locations (Appendix G).	Prescribed bodies and persons under section 42. Non-statutory consultees, local authorities, land interests, local community

Date	Stage	Activity	Consultees
Monday 1 November 2021 to 12 December 2021	Statutory Consultation Regulations 11(1)(b) and 13 of the EIA Regulations 2017 Section 48. PA2008, details can be found in Chapter 6.	Letter notifying of consultation and sending a copy of the section 48 notice. See Appendix E1 which is the letter sent to consultation bodies and persons notified under regulation 11(1)(b), which included the section 48 notice.	The 'consultation bodies' and to any person notified to the Applicant by the SoS in accordance with regulation 11(1)(b) of the EIA Regulations 2017.
Monday 1 November 2021 to 12 December 2021	Statutory Consultation Section 48 PA2008 Regulation 4 The Infrastructure Planning (Applications: Prescribed Forms and Procedures) 2009 (APFP Regulations) (Ref.1.3), details can be found in Chapter 6.	Section 48 Notice publication, evidence can be found in Appendix H1 and F8 for evidence of section 48 notices placed in the vicinity of the Proposed Scheme.	All consultees including statutory bodies, local authorities, land interests, local community

2. REPORT STRUCTURE

2.1. STRUCTURE OF THE CONSULTATION REPORT

2.1.1. This report has been structured in line with the guidance contained in PINS Advice Note 14 'Compiling the consultation report' (April 2012, version 2) and describes the consultation process that Drax has followed in terms of both the non-statutory and statutory stages of consultation and publicity as required, in the case of statutory consultation and publicity.

2.1.2. To avoid duplication in the DCO Application, where documents submitted as part of the Application are referred to in this Consultation Report, the relevant document reference number is provided rather than included in appendices in the Consultation Report.

2.1.3. Table 2.1 shows the structure of the Consultation Report.

Table 2.1 - Structure of the Consultation Report

Chapters	Chapter title
	Executive Summary
Chapter 1	Scheme Overview
Chapter 2	Report Structure
Chapter 3	Legislative Context and Compliance
Chapter 4	Non-Statutory Consultation
Chapter 5	Preparation for Statutory Consultation
Chapter 6	Overview of Statutory Consultation
Chapter 7	Responses to Statutory Consultation
Chapter 8	Additional Consultation
Chapter 9	Environmental Impact Assessment
Chapter 10	Conclusions
Appendices	Appendix A: Event Invitation Letters and Correspondence Appendix B: The Infrastructure Planning (EIA Regulations) 2017 Regulation 8 letter to the Inspectorate and acknowledgement (s46)

Chapters	Chapter title
	<p>Appendix C: Statement of Community Consultation and supporting information</p> <p>Appendix D: List of Prescribed Consultees and Land Interests identified and consulted during statutory consultation</p> <p>Appendix E: Section 42 Notification & Statutory Responses</p> <p>Appendix F: Additional land consultees identified during and post statutory consultation and letters. Site notice map and photos for the unknown Land interests and section 48 notice on site.</p> <p>Appendix G: Section 47 Consultation Material</p> <p>Appendix H: Section 47 and section 48 notices and newspaper published notices.</p> <p>Appendix I: Preliminary Environmental Information Report – Non technical Summary</p> <p>Appendix J: Non-Statutory Consultation Report and supporting materials</p> <p>Appendix K: Land Referencing Methodology</p> <p>Appendix L: Undelivered correspondence</p> <p>Appendix M: Additional consultation</p>

3. LEGISLATIVE CONTEXT AND COMPLIANCE

3.1. LEGISLATIVE REQUIREMENTS FOR PRE-APPLICATION CONSULTATION AND PUBLICITY

3.1.1. Prior to submitting an application for a DCO, the PA2008 requires an applicant to carry out consultation to engage with local communities, local authorities, prescribed consultees and those who would be directly affected by the proposals. In addition, an applicant must comply with the requirements set out in the APFP Regulations and the EIA Regulations 2017.

3.1.2. Table 2.1 signposts the relevant chapters of the report in relation to the sections of the PA2008 and the requirements contained in the APFP Regulations and the EIA Regulations 2017.

3.2. RELEVANT GUIDANCE

3.2.1. The Applicant has also taken into account the relevant guidance and advice notes in particular:

- a. Planning Act 2008: Guidance on the pre-application process (March 2015), Department for Communities and Local Government's ('DCLG') (Ref. 1.4);
- b. Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land (September 2013) ('DCLG') (Ref. 1.5);
- c. The Planning Inspectorate's Advice Note Three (August 2017, version 7): EIA Notification and Consultation (Ref. 1.6);
- d. The Planning Inspectorate's Advice Note Six (February 2016, version 7): Preparation and submission of application documents (Ref. 1.7); and
- e. The Planning Inspectorate's Advice Note Fourteen (April 2012, version 2): Compiling the consultation report (Ref. 1.8).

3.2.2. In accordance with Advice Note Fourteen, a summary of the consultation undertaken in accordance with the EIA Regulations 2017 is included in the ES (document reference 6.1) but the approach the Applicant has taken to responding to those comments is set out in this report where appropriate. However, the focus of this report is consultation undertaken in accordance with sections 42, 46, 47 and 48 of the PA2008 and the requirements under the APFP Regulations.

3.2.3. The Consultation Report and collection and handling of data is compliant with the General Data Protection Regulation ('GDPR') which came into force from the 25 May 2018 (Ref. 2.2).

3.3. COMPLIANCE WITH THE PLANNING ACT 2008

3.3.0. **Error! Reference source not found.** sets out how the Applicant has complied with the statutory requirements of the Act.

Table 3.1 - How the Applicant has Complied with the Statutory Requirements of the Act

Statutory requirement	Response and Activity undertaken	Date undertaken
Section 42: Duty to consult		
Did the Applicant consult the applicable persons set out in s42 of the Act about the proposed application?		
Section 42(1)(a) persons prescribed?	Yes. The consultees were written to at the commencement of the statutory consultation with consultation documentation. See section 6.2 and Appendix E1.	1 November 2021 – issue of consultation documentation.
Section 42(1) (aa) the Marine Management Organisation?	Yes. The consultees were written to at the commencement of the statutory consultation with consultation documentation. See section 6.2 and Appendix E1.	1 November 2021 – issue of consultation documentation.
Section 42(1)(b) each local authority within s43?	Yes. The consultees were written to at the commencement of the statutory consultation with consultation documentation. See section 6.3 and Appendix E1.	1 November 2021 – issue of consultation documentation.
Section 42(1)(c) the Greater London Authority (if in Greater London area)?	Not applicable.	Not applicable.
Section 42(1)(d) each person in one or more of s44 categories?	Yes. All identified Persons with an interest in Land (PILs) were consulted at the commencement of the Statutory Consultation. See section 6.5 and Appendix F1. The Book of Reference is provided at Document 4.3 of the submission, which provides a list of PILs.	1 November 2021 – issue of consultation documentation.
Section 45: Timetable for s42 consultation		
Did the Applicant notify s42 consultees of the deadline for receipt of consultation responses; and if so, was the deadline notified by the Applicant 28 days or more starting with the day after receipt of the consultation documents?	Yes. In the letter sent to consultees it was stated that the consultation started on the 1 November 2021 and that the consultation deadline was the 12 December 2021, six weeks after the consultation started. See section 6.9 and Appendix E1.	
Section 47: Duty to consult local community		
Did the Applicant prepare a Statement of Community Consultation (SoCC) on how it intended to consult people living in the vicinity of the land?	Yes. A SoCC was published as part of the consultation documentation, see Chapter 5 and Appendix C3.	1 November 2021.
Were 'B' and (where relevant) 'C' authorities consulted about the content of the SoCC; and if so, was the deadline for receipt of responses 28 days beginning with the day after the day that 'B' and (where applicable) 'C' authorities received the consultation documents?	Yes. Selby District Council (Category B) and NYCC (Category C) were provided with a draft copy of the SoCC and were formally invited to comment. East Riding of Yorkshire Council was consulted as a non-prescribed host authority. See Chapter 5 and Appendix C.	Initial discussions took place to inform drafting of the SoCC, commencing on 30 April 2021. Formal consultation on the SoCC took place from the 5 August 2021 to 2 September 2021. This meets the statutory requirement for 28 days of consultation on the SoCC.
Has the Applicant had regard to any responses received when preparing the SoCC?	Yes. NYCC on behalf of both NYCC and Selby District Council confirmed they were supportive of the approach outlined in the SoCC. There were some minor comments to be addressed but overall, they understood that all statutory requirements would be met to engage members of the community. Details of how regard to responses received are contained in Chapter 5 and Appendix C2.	Informal consultation took place, commencing on 30 April 2021. Formal consultation on the SoCC took place from the 5 August 2021 to 2 September 2021. This meets the statutory requirement for 28 days of consultation on the SoCC.
Has the SoCC been made available for inspection in a way that is reasonably convenient for people living in	Yes. The section 47 notice was placed in the following five local papers;	14 October 2021

Statutory requirement	Response and Activity undertaken	Date undertaken
the vicinity of the land; and has a notice been published in a newspaper circulating in the vicinity of the land which states where and when the SoCC can be inspected?	<ul style="list-style-type: none"> ~ Selby Times; ~ Goole Times; ~ Epworth Times ~ Yorkshire Post. ~ Pontefract and Castleford Express. 	21 October 2021
Does the SoCC set out whether the development is EIA development; and does it set out how the Applicant intends to publicise and consult on the Preliminary Environmental Information?	Yes. Section 2.4 of the SoCC confirms the development is EIA development and the consultation material includes the Preliminary Environmental Information.	
Has the Applicant carried out the consultation in accordance with the SoCC?	Yes. The Applicant has undertaken the consultation in line with the SoCC as set out in Table 5.3. in Chapter 5.	
Section 48: Duty to publicise the proposed application		
Did the Applicant publicise the proposed application in the prescribed manner set out in Regulation 4(2) of the APFP Regulations?	Yes. A copy of the section 48 notice is in Appendix H1 and details of where placed on location in Appendix F8.	
<ul style="list-style-type: none"> ~ For at least two successive weeks in one or more local newspapers circulating in the vicinity in which the Proposed Development would be situated; ~ Once in a national newspaper; ~ Once in the London Gazette and, if land in Scotland is affected, the Edinburgh Gazette; and ~ Where the proposed application relates to offshore development – <ul style="list-style-type: none"> ▪ Once in Lloyds List; and ▪ Once in an appropriate fishing trade journal. 	The Yorkshire Post The Guardian The London Gazette Not applicable.	21 October and 28 October 2021. 23 October 2021. 21 October 2021.
Did the s48 notice include the required information set out in Regulation 4(3) of APFP Regulations?		
~ The name and address of the Applicant;	Yes. The section 48 notice included the following 'Notice is hereby given that Drax Power Limited of Drax Power Station, Drax, Selby Y08 8PH'.	
~ A statement that the Applicant intends to make an application for development consent to the Secretary of State;	The section 48 notice included the following; 'Notice is hereby given that Drax Power Limited of Drax Power Station, Drax, Selby Y08 8PH (the "Applicant") proposes to make an application (the "Application") under section 37 of the Planning Act 2008 to the Secretary of State for Business, Energy and Industrial Strategy for a Development Consent Order ("DCO") to authorise the installation and operation of post combustion carbon capture technology to capture carbon dioxide from up to two existing 660 MWe biomass power generating units at the Drax Power Station (Unit 1 and Unit 2)'.	
~ A statement as to whether the application is EIA development;	The section 48 notice included the following; 'The Applicant has notified the Secretary of State in writing under Regulation 8(1)(b) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') that it proposes to provide an Environmental Statement ("ES") in respect of the	

Statutory requirement	Response and Activity undertaken	Date undertaken
	Proposed Scheme. The Proposed Scheme is therefore 'EIA development' for the purposes of the EIA Regulations and an ES will form part of the Application for the Proposed Scheme'.	
~ A summary of the main proposals, specifying the location or route of the Proposed Development	The section 48 notice included a description of the scheme and the principal elements.	
~ A statement that the documents, plans and maps showing the nature and location of the Proposed Development are available for inspection free of charge at the places (including at least one address in the vicinity of the Proposed Development) and times set out in the notice;	The Notice included the following statements 'Documents and other information including a consultation brochure and plans showing the nature and location of the Proposed Scheme (together "the consultation documents") are available to view and comment on from 1 November to 12 December 2021 on the Proposed Scheme website: [REDACTED] within the Consultation Documents page. They will also be available for inspection free of charge at the following locations and times' (Table of locations and times in Section 8 of the section 48 notice).	
~ The latest date on which those documents, plans and maps will be available for inspection;	The section 48 notice included the following; consultation documents are available to view and comment on from 1 November to 12 December 2021.	
~ Whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge;	The section 48 notice included the following; Copies of the consultation brochure and non-technical summary of the PEIR will be provided free of charge. Due to the size of the PEIR as a detailed technical document, a charge of £210 will incur for the printing and delivery of the PEIR upon request.	
~ Details of how to respond to the publicity; and	Details of the how to submit an online feedback form (website); respond via email or freepost were included in the section 48 notice.	
~ A deadline for receipt of those responses by the Applicant, being not less than 28 days following the date when the notice is last published.	The section 48 notice included the following; All responses and representations must be received by the Applicant, Drax Power Ltd, no later than 23:59 on 12 December 2021 .	
Are there any observations in respect of the s48 notice provided above?	No.	
Has a copy of the s48 notice been sent to the EIA consultation bodies and to any person notified to the Applicant in accordance with the EIA Regulations?	Yes. Enclosures including the section 48 notice were referenced within the letter sent to prescribed consultees, relevant local authorities and land interests. See Appendix E1 for consultation notification letters.	
S49: Duty to take account of responses to consultation and publicity		
Has the Applicant had regard to any relevant responses to the s42, s47 and s48 consultation?	This Consultation Report details how account has been taken of the previous consultations. Chapter 4 details how Drax has taken into account of non-statutory consultation/ engagement stages and Chapters 6 and 7 detail how Drax has taken account of responses received during the statutory consultation.	Non-Statutory - between 1 March and 28 March 2021. Statutory – 1 November 2021 to 12 December 2021.
Guidance about pre-application procedure		
To what extent has the Applicant had regard to statutory guidance 'Planning Act 2008: Guidance on the pre-application process'?	Drax considers it has complied fully with the guidance as detailed in this Consultation Report. This can be seen in section 3.4.	

3.4. COMPLIANCE WITH THE DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT GUIDANCE ON THE PRE-APPLICATION PROCESS

3.4.1. Table 3.2 sets out how the Applicant has complied with the guidance set out by the Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities) in March 2015 about the pre-application process for the Act.

Table 3.2 - How Drax has Complied with the Guidance set out by the Department for Communities and Local Government on the Pre-Application Process

Guidance	Comment
The pre-application consultation process	
Para 17 – When circulating consultation documents, developers should be clear about their status, for example ensuring it is clear to the public if a document is purely for purposes of consultation.	The consultation materials produced for the statutory consultation consisted of a brochure, factsheets and feedback form, which clearly set out it was for the purpose of the consultation and date responses need to be received by. A copy of the statutory consultation brochure and associated feedback form can be found in Appendix G1, G2 and G5 of this Consultation Report.
Para 21 – Where an Applicant has not been able to follow this guidance, they should set out why this is the case, in the consultation report.	Drax has complied with the guidance in the undertaking of the statutory consultation.
Para 23 – In brief, during the pre-application stage applicants are required to: <ul style="list-style-type: none"> ~ Notify the Secretary of State of the proposed application; 	The Secretary of State was notified on 29 October 2021 and the cover letter is provided in Appendix B1.
<ul style="list-style-type: none"> ~ Identify whether the Proposed Scheme requires an environmental impact assessment; 	The Proposed Scheme falls under Schedule 1, paragraph 23 of the Infrastructure Planning (EIA) Regulations 2017 ('the EIA Regulations 2017') (HM Government, 2017) as 'Installations for the capture of carbon dioxide streams for the purposes of geological storage pursuant to Directive 2009/31/EC from installations referred to in this Schedule, or where the total yearly capture of carbon dioxide is 1.5 megatonnes or more'. The Proposed Scheme will have the capability of capturing 3.9 megatonnes of carbon dioxide per annum per biomass unit and is therefore classified as 'EIA development'. This information was also contained 1.4.1 of the PEIR.
<ul style="list-style-type: none"> ~ Where it does, confirm that they will be submitting an environmental statement along with the application, or that they will be seeking a screening opinion ahead of submitting the application; 	<p>A PEIR was published for the statutory consultation and noted our intention to submit an ES as part of the DCO Application (document reference 6.1). This information was also contained in paragraph 1.4.1. of the PEIR.</p> <p>A Regulation 8(1)(b) (of the EIA Regulations 2017) notification was submitted to the SoS along with the EIA Scoping Report in January 2021 and confirmed that the Applicant intends to submit a DCO Application in April 2022. The SoS adopted the Scoping Opinion on 26 February 2021. This information was also contained in paragraph 1.4.3. of the PEIR.</p>
<ul style="list-style-type: none"> ~ Produce a Statement of Community Consultation, in consultation with the relevant local authority or authorities, which describes how the applicant proposes to consult the local community about their Proposed Scheme and then carry out consultation in accordance with that Statement; 	The SoCC was provided to the host local authorities Selby District Council and NYCC for informal review on 30 April 2021. The formal period of consultation on the SoCC started on the 5 August and lasted 28 days. The consultation was compliant with the SoCC.
<ul style="list-style-type: none"> ~ Make the Statement of Community Consultation available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land where the development is proposed, as required by section 47 of the Planning Act and Regulations; 	The SoCC was made available at deposit point locations detailed in the SoCC in Appendix C3.
<ul style="list-style-type: none"> ~ Identify and consult statutory consultees as required by section 42 of the Planning Act and Regulations; 	Section 42 consultees were identified and consulted. Identification of section 42(1)(d) statutory consultees as defined under s44 of the PA2008 was undertaken following the diligent inquiry process set out in Section 6.5. The Applicant wrote formally to all consultees identified under section 42 of the PA2008 to notify them of the consultation. See Appendix E1.
<ul style="list-style-type: none"> ~ Publicise the proposed application in accordance with Regulations; 	Section 48 notice was published in a local paper (The Yorkshire Post) for two consecutive weeks, a national paper for one week and the London Gazette for one week. See Appendix H3 for details.
<ul style="list-style-type: none"> ~ Set a deadline for consultation responses of not less than 28 days from the day after receipt / last publication; 	Statutory consultation was held between 1 November to 12 December 2021 for a period of six weeks. Therefore, the consultation period was in excess of the statutory minimum.
<ul style="list-style-type: none"> ~ Have regard to relevant responses to publicity and consultation; 	Responses to statutory consultation are provided in Chapter 7, Tables 7.2, 7.3 and 7.5 provide comments received to statutory consultation and regard had to those comments.
<ul style="list-style-type: none"> ~ Prepare a consultation report and submit it to the Secretary of State. 	This Consultation Report (document reference 5.1) will be submitted for the application for development consent.

Guidance	Comment
Para 24 – The aim should be to ensure that consultation is appropriate to the scale and nature of the Proposed Scheme and where its impacts will be experienced.	Drax supported a range of communications channels, Proposed Scheme website, online and face to face events, stakeholder meetings as required and appropriate to support and promote the consultation.
Who should be consulted?	
Para 26 – The Planning Act requires certain bodies and groups of people to be consulted at the pre-application stage but allows for flexibility in the precise form that consultation may take depending on local circumstances and the needs of the Proposed Scheme itself.	Drax has engaged with all parties during the statutory consultation, as required by the Planning Act. In addition, Drax consulted the local community within the vicinity of the proposals, as set out under section 47 of the Act. Details of how Drax consulted in accordance with the relevant sections of the PA2008 are set out in Table 3.1
Para 29 – Applicants will often need detailed technical input from expert bodies to assist with identifying and mitigating the social, environmental, design and economic impacts of Proposed Schemes, and other important matters. Technical expert input will often be needed in advance of formal compliance with the pre-application requirements. Early engagement with these bodies can help avoid necessary delays and the costs of having to make changes at later stages of the process. It is equally important that statutory consultees respond to a request for technical input in a timely manner. Applicants are therefore advised to discuss and agree a timetable with consultees for the provision of such inputs.	Early engagement with expert bodies to seek their technical input has supported Drax in the development of the design of the proposals. Technical engagement has been particularly relevant to the scheme, the approach to mitigation and the EIA. This has involved such consultees such as the Environment Agency, Natural England and the host local authorities. Further information on engagement is provided in the relevant ES chapters.
Local authorities	
Para 37 – Prior to submitting their draft Statement of Community Consultation applicants may wish to seek to resolve any disagreements or clarifications about the public consultation design. An applicant is therefore likely to need to engage in discussions with local authorities over a longer period than the minimum requirements set out in the Act.	Drax entered informal consultation with the host authorities (Selby DC, NYCC) on the 8 December 2020 ahead of formal consultation that started on the 27 September 2021. Evidence of continued consultation with these authorities will be included in document reference 7.1.1 (Statement of Common Ground between Selby District Council, NYCC and Drax Power Limited). The first draft will be submitted prior to the examination as this is an evolving document.
Para 41 – Where a local authority raises an issue or concern on the Statement of Community Consultation which the applicant feels unable to address, the applicant is advised to explain in their consultation report their course of action to the Secretary of State when they submit their application.	The host local authorities (NYCC and Selby District Council) were consulted on the SoCC for 28 days beginning on 5 August 2021. Table 5.3 of this Consultation Report provides details on how Drax has had regard to the comments made by the local authorities in developing the SoCC. All matters raised on the SoCC were addressed. Drax also informally consulted East Riding of Yorkshire County Council as a neighbouring authority.
Persons with an Interest in Land (PILs)	
Para 50 – It is the applicant's responsibility to demonstrate at submission of the application that due diligence has been undertaken in identifying all land interests and applicants should make every reasonable effort to ensure that the Book of Reference (which records and categorises those land interests) is up to date at the time of submission.	Drax has ensured due diligence in line with the land referencing methodology, refer to Appendix K and has undertaken research in identifying all land interests. All known land interests have been consulted under section 42(1)(d) of the Planning Act and Drax has made all reasonable effort to ensure the Book of Reference (document reference 4.3) is up to date at the point of submission. Further details on how Drax has demonstrated due diligence is included in the Statement of Reasons (document reference 4.1)
Para 52 – Applicants should explain in the consultation report how they have dealt with any new interests in land emerging after conclusion of their statutory consultation having regard to their duties to consult and take account of any responses.	Where new land interests have been identified, Drax has issued letters and provided 28 days to comment on the Proposed Scheme. Details on the approach to additional consultees after consultation can be found in section 6.11.
Local communities	
Para 54 – In consulting on the proposals, an inclusive approach is needed to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Applicants should use a range of methods and techniques to ensure that they access all sections of the community in question. Local authorities will be able to provide advice on what works best in terms of consulting their local communities given their experience of carrying out consultations in their area.	A variety of techniques were used to ensure an inclusive approach to consultation on the proposals. These are as follows <ul style="list-style-type: none"> ~ Interactive Proposed Scheme website ~ Consultation events (online and face to face) ~ Consultation brochures and information in community locations/deposit points

Guidance	Comment
	<ul style="list-style-type: none"> ~ Mailing to the consultation zone ~ Advertising in local newspaper alongside Notices placed in a National Paper and the London Gazette ~ Social media advertising
<p>Para 55 – Applicants must set out clearly what is being consulted on. They must be careful to make it clear to local communities what is settled and why, and what remains to be decided, so that expectations of local communities are properly managed. Applicants could prepare a short document specifically for local communities, summarising the proposal and outlining the matters on which the view of the local community is sought. This can describe core elements of the Proposed Scheme and explain what the potential benefits and impacts may be. Such documents should be written in clear, accessible, and non-technical language. Applicants should consider making it available in formats appropriate to the needs of people with disabilities if requested.</p>	<p>The consultation brochure and exhibition banners used on the website and the public consultation events set out the principal features of the proposals. The feedback form was designed to help consultees focus on the section areas they wish to focus on. The response form comprised of open questions to allow the consultee to use free form text.</p> <p>Copies of the consultation brochure, exhibition boards and feedback form can be found in Appendix G1, G2 and G5 of this Consultation Report.</p>
<p>Para 56 – Applicants are required to set out in their Statement of Community Consultation how they propose to consult those living in the vicinity of the land. They are encouraged to consider consulting beyond this where they think doing so may provide more information on the impacts of their proposals.</p>	<p>The SoCC (section 3.1) provides information on promotion of the consultation including details of the consultation zone and how this was defined (see section 3.6). See Appendix C3 for the SoCC.</p>
<p>Para 57 – The Statement of Community Consultation should act as a framework for the community consultation generally, for example, setting out where details and dates of any events will be published. The Statement of Community Consultation should be made available online, at any exhibitions or other events held by applicants. It should be placed at appropriate local deposit points (e.g., libraries, council offices) and sent to local community groups as appropriate.</p>	<p>The SoCC included dates and location details for the three public webinar events and three in-person face to face events.</p> <p>Although no longer required to provide a hard copy at deposit locations, the SoCC was available at view at the five deposit locations, detailed in Appendix C3 of this report.</p>
<p>Para 58 – Where possible, the first of the two required local newspaper advertisements (section 48 notices) should coincide approximately with the beginning of the consultation with communities.</p>	<p>Drax advertised the proposed application under section 48 of the Planning Act to coincide with the start of section 42 and section 47 consultations. Details of the published notices can be found in Table 5.2 and Table 6.2 of this report.</p> <p>Copies of the newspaper notices can be found in Appendix H2 and H3 of this report.</p>
When should consultation take place and how much is enough?	
<p>Para 68 – To realise the benefits of consultation on the Proposed Scheme, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. At the same time, consultees will need sufficient information on a Proposed Scheme to be able to recognise and understand the impacts.</p>	<p>The statutory consultation commenced well in advance of the proposed DCO application date, allowing time for consultees to meaningfully contribute to the design of the proposals.</p>
<p>Para 70 – To manage the tension between consulting early, but also having proposals that are firm enough to enable consultees to comment, applicants are encouraged to consider an iterative, phased consultation consisting of two (or more) stages, especially for large Proposed Schemes with long development periods.</p>	<p>Drax held non-statutory consultation between 1 March and 28 March 2021, the report is provided in Appendix J1.</p> <p>Statutory consultation was held 1 November to 12 December 2021.</p>
<p>Para 72 Applicants should therefore set consultation deadlines that are realistic and proportionate to the Proposed Scheme.</p>	<p>The statutory consultation ran for six weeks from 1 November to 12 December 2021. Allowing adequate time for consultees to respond to the statutory consultation.</p>
<p>Para 76 – In circumstances where a particular issue has arisen during the pre-application consultation, or where it is localised in nature, it may be appropriate to hold a non-statutory, targeted consultation. A developer's Statement of Community Consultation should be drafted so that it does not preclude this approach. A more bespoke approach can be adopted, which may allow developers to respond with more agility to the issue at hand. If adopting this approach, the emphasis should be on ensuring that relevant individuals and organisations are included.</p>	<p>The Applicant has undertaken additional targeted consultation, information as provided in Chapter 8 of this report</p>
The consultation report and responding to consultees	
<p>Para 80 – The consultation report should:</p>	<p>Chapter 1 provides the overview of the process for consultation including the timeline.</p>

Guidance	Comment
<ul style="list-style-type: none"> ~ Provide a general description of the consultation process undertaken, which can helpfully include a timeline; 	
<ul style="list-style-type: none"> ~ Set out specifically what the applicant has done in compliance with the requirements of the Planning Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Inspectorate; 	Chapter 3 provides details of compliance (sections 3.3, 3.4 and 3.5).
<ul style="list-style-type: none"> ~ Set out how the applicant has taken account of any response to consultation with local authorities on what should be in the applicant's Statement of Community Consultation; 	Table 5.1 sets out the regard Drax has had to comments on both informal and formal consultation for the SoCC.
<ul style="list-style-type: none"> ~ Set out a summary of relevant responses to consultation (but not a complete list of responses); 	Responses have been thematically presented within this report with Drax's response to those responses. See Chapter 7.
<ul style="list-style-type: none"> ~ Provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed; 	<p>Chapter 4 describes how the proposals developed following non-statutory consultation and how these were taken into consideration for statutory consultation. Further information is provided in the non-statutory report (Appendix J1).</p> <p>Chapter 7 sets out the responses received at statutory consultation, while Tables 7.2, 7.3, and 7.5 show how the applicant has had regard to the issues raised by consultees.</p>
<ul style="list-style-type: none"> ~ Provide an explanation as to why responses advising on major changes to a Proposed Scheme were not followed, including advice from statutory consultees on impacts; 	Chapter 7 sets out the responses received at statutory consultation, while Tables 7.2, 7.3 and 7.5 show how the applicant has had regard to the issues raised by consultees, including where suggestions have not been followed and a justification for this.
<ul style="list-style-type: none"> ~ Where the applicant has not followed the advice of the local authority or not complied with this guidance or any relevant Advice Note published by the Inspectorate, provide an explanation for the action taken or not taken; and 	Drax entered informal consultation with the host authorities (Selby DC, NYCC) on the 8 December 2020 ahead of formal consultation that started on the 27 September 2021. Evidence of continued consultation with these authorities will be included in document reference 7.1.1 (Statement of Common Ground between Selby DC, NYCC and Drax Power Limited). This will be submitted prior to the examination as this is an evolving document.
<ul style="list-style-type: none"> ~ Be expressed in terms sufficient to enable the Secretary of State to understand fully how the consultation process has been undertaken and significant effects addressed. However, it need not include full technical explanations of these matters. 	This Consultation Report details how consultations (non-statutory and statutory) and engagement have shaped the proposals pre-submission. Please see Chapter 4 and Chapter 6 for the consultation process and how matters raised have been addressed.
<p>Para 83 – The consultation report may not be the most appropriate format in which to respond to the points raised by various consultee groups and bodies. Applicants should therefore consider producing a summary note in plain English for the local community setting out headline findings and how they have been addressed, together with a link to the full consultation report for those interested. If helpful, this could be supplemented by events in the local area.</p>	A Consultation Report for the non-statutory consultation was produced (Appendix J1).
Environmental Impact Assessment	
<p>Para 91 – The applicable EIA regulations prescribe as follows:</p> <ul style="list-style-type: none"> ~ Regulation 10 requires that the applicant's Statement of Community Consultation must state whether the Proposed Scheme falls within the scope of the Directive, and, if it does, how the applicant intends to publicise and consult on the preliminary environmental information (see paragraphs 93 and 94) for requirements in relation to preliminary environmental information); and 	<p>The SoCC states:</p> <p>'The Proposed Scheme is an Environmental Impact Assessment (EIA) development as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations)'.</p> <p>See section 48 notice in Appendix H1.</p>
<ul style="list-style-type: none"> ~ Regulation 11 requires that publicity of proposals under section 48 of the Planning Act must also encompass the requirements of the Environmental Impact Assessment process and at the time of publishing the proposed application, applicants must notify all environmental consultation bodies. 	Drax has consulted environmental consultees as required by section 42(1)(a). This information can be seen in Chapter 4 (EIA methodology) of the ES (document reference 6.1.4).

Guidance	Comment
<p>Preliminary Environmental Information (PEI)</p> <p>Para 93 – For the pre-application consultation process, applicants are advised to include sufficient preliminary environmental information to enable consultees to develop an informed view of the Proposed Scheme. The information required may be different for different types and sizes of Proposed Scheme. It may also vary depending on the audience of a particular consultation. The preliminary environmental information is not expected to replicate or be a draft of the environmental statement. However, if the applicant considers this to be appropriate (and more cost-effective), it can be presented in this way. The key issue is that the information presented must provide clarity to all consultees. Applicants should be careful not to assume that non-specialist consultees would not be interested in any technical environmental information. It is therefore advisable to ensure access to such information is provided during all consultations.</p>	<p>A PEIR has been published for this consultation. See Appendix I for the non-technical summary of the PEIR while the full PEIR is available on the project website under the consultation documents tab.</p>

3.5. COMPLIANCE WITH PLANNING INSPECTORATE ADVICE NOTE FOURTEEN

3.5.1. Table 3.3 below sets out how the Applicant has complied with the guidance in the Planning Inspectorate's Advice Note Fourteen from February 2021 (version 3).

Table 3.3 – How Drax has Complied with the Guidance set out in Planning Inspectorate Advice Note Fourteen

Guidance	Comment
3.6 - The report should include a list of all persons and bodies that were consulted, and when they were consulted.	A full list of prescribed consultees is provided at Appendix D1.
3.8 - The list of the prescribed organisations should follow the order they are presented in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations). Any variations between the Applicant's list of prescribed consultees and the list of organisations set out in Schedule 1 of the APFP Regulations should be robustly justified.	Appendix D1 to this report provides a list of prescribed consultees at section 42 consultation in the order they are set out in the APFP Regulations, as well as justification if consultees were not contacted. Chapter 7 of this report summarises responses received from prescribed consultees in the same order as listed in the APFP regulations and the regard it has given these responses.
3.9 - Where relevant, the list of prescribed consultees should also include the Marine Management Organisation – s42(1) (aa) and the Greater London Authority – s42(1)(c).	The proposed development is not within the boundary of the GLA and as such this organisation was not included as a prescribed consultee for this application. The MMO were consulted on an earlier design, and again at Statutory Consultation, although no response was received at either stage.
3.10 - A short description of how s43 of the PA2008 has been applied in order to identify the relevant local authorities should be included. This could be supported by a map showing the site and identifying the boundaries of the relevant local authorities.	Table 6.2 identifies how section 43 of the Act has been applied to identify the relevant local authorities for the Proposed Scheme and Plate 6.1 identifies the relevant authority boundaries. A location map was included in the consultation brochure (see Appendix G2).
3.11 - The Applicant must demonstrate that diligent enquiry was undertaken to identify persons under s44 of the PA2008 and to ensure that an up-to-date Book of Reference is submitted. In that context, it is useful to set out the methodology for identifying persons in Category 3 (those who may make a relevant claim).	Land Referencing Methodology is provided in Appendix K.
3.12 - The Consultation Report should explain how many persons with an interest in land were consulted, under which category and when. It is not necessary to list the names of all individuals identified in the Book of Reference.	Section 6.10 details the how the land interests were consulted during statutory consultation.
<p>3.13 - If additional persons with an interest in land were added and consulted following changes to the Proposed Scheme boundary during the Pre-application stage, it is useful to describe:</p> <ul style="list-style-type: none"> ~ How many additional persons with an interest in land were consulted; ~ When they were consulted; ~ How they were consulted; and ~ What information they were consulted with. 	Appendix F and M to this report provides a list of persons identified following changes to the Proposed Scheme and consulted at section 42 consultation. Details of how additional parties identified through changes to the Proposed Scheme were consulted, information provided in chapter 6.11.
<p>3.14 - The Secretary of State needs to be satisfied that the Applicant has complied with the Statement of Community Consultation (SoCC) preparation process. Evidence should be submitted as part of the Consultation Report which shows:</p> <ul style="list-style-type: none"> ~ Which local authorities were consulted about the content of the draft SoCC; ~ What the local authorities' comments were; ~ Confirmation that the local authorities were given 28 days to provide their comments; and ~ A description about how the Applicant had regard to the local authorities' comments. 	<p>The SoCC was issued informally to Selby DC, NYCC and East Riding of Yorkshire County Council by email on 30 April 2021 with a deadline for responses of 20 May 2021.</p> <p>The SoCC was issued for formal consultation on 5 August 2021 for 28 days and a response was received on 2 September 2021 from NYCC on behalf of both NYCC and Selby DC confirming support for the approach outlined in the SoCC, with some minor comments to address as set out in Table 5.1 with an explanation of how the comments have been addressed.</p> <p>The updated SoCC was issued to Selby DC and NYCC by email on 27 September 2021. East Riding of Yorkshire Council was consulted as a non-prescribed host authority due to its close proximity to the Site and also due to highways powers sought in relation to the construction of the Proposed Scheme.</p> <p>No further suggestions were received, so the SoCC was not further revised in response to comments from the local authorities. See Appendix C3 for the final published SoCC.</p> <p>Drax has complied with the SoCC as demonstrated in Table 5.3 and further detail is provided in Chapter 5.</p>
3.15 - Following the coming into force of The Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020 (the 2020 Regulations) Applicants no longer	The SoCC was available for inspection at the following locations during the period from Monday 1 November to Sunday 12 December 2021;

Guidance	Comment
<p>need to place paper copies of the SoCC on deposit at locations in the vicinity of the Proposed Development. Instead, Applicants should make the SoCC available for inspection online. Evidence that this has been done should be provided in the Consultation Report, for example, a screen shot of the relevant webpage showing the published SoCC (including the full website address and relevant telephone number for enquiries as required by the 2020 Regulations) and confirmation that the public could access the webpage free of charge.</p>	<ul style="list-style-type: none"> ~ Selby Library (52 Micklegate, Selby YO8 4EQ) ~ Snaith Library (27 Market Pl, Snaith, Goole DN14 9HE) ~ Goole Library (Carlisle Street, Goole DN14 5DS) ~ East Riding of Yorkshire Council (Beverley Customer Service Centre, 7 Cross St, Beverley HU17 6TB) ~ Drax Sports Club (Main Rd, Drax, Selby YO8 8PJ) <p>The SoCC was also available online on the consultation documents page of the website. See Appendix C4 for a screenshot of the webpage. Online access was available at the libraries only.</p>
<p>3.16 - Copies of the published SoCC notice as it appeared in the local press should be provided along with confirmation of which local newspapers it was published in and when. If a scan of a notice is not clear, then it can be supplemented with a document containing the text of the notice. Where it was not possible to place the SoCC notice in a printed newspaper, then a screen shot of the notice as it was published in an online local newspaper publication should be provided (including the full website address and relevant telephone number for enquiries as required by the 2020 Regulations), ensuring the date of publication is visible.</p>	<p>Appendix H2 contains evidence of the section 47 Notice, which was published in the following printed local newspapers; The Selby Times, The Goole Times, The Castleford & Pontefract Express, and The Yorkshire Post.</p>
<p>3.17 - Where more than one SoCC was prepared for a Proposed Scheme, e.g., where a SoCC was subject to one or more updates, the updated SoCC or SoCC's should be included together with a narrative about why the preceding SoCC was reviewed and updated.</p>	<p>One SoCC was prepared for this application, see Appendix C3.</p>
<p>3.18 - Where there are any inconsistencies between the SoCC, and the consultation carried out this should be clearly explained and justified e.g., where additional consultation took place that was not included in the SoCC or SoCC's.</p>	<p>The Applicant complied with the SoCC for statutory consultation as demonstrated in Table 5.3. Targeted consultation undertaken as described in Chapter 8 was not subject to the same requirements of the SoCC.</p>
<p>3.19 - A scanned copy of the s48 notice as it appeared in the local and national newspapers and journals, clearly showing the publication's name and date of publication, should be included in the report. If the scan is of poor quality this should be supplemented with a copy of the text. A description of where the notice was published, and confirmation of the time period given for responses should be included in the report.</p>	<p>Appendix H3 contains evidence of the section 48 notice published twice in the printed local newspaper; The Yorkshire Post (21 and 28 October 2021) National paper – The Guardian (23 October 2021) London Gazette (21 October 2021)</p>
<p>3.20 - Where it was not possible to place the notice in printed newspapers, then screen shots of the notice as it was published in online newspaper publications should be provided (including the full website address and relevant telephone number for enquiries as required by the 2020 Regulations), ensuring the date of publication is visible.</p>	<p>Appendix H3 contains evidence of the section 48 notice published on 21 and 28 October 2021 in the printed local newspaper; The Yorkshire Post.</p>
<p>3.21 - Applicants should provide confirmation that the s48 notice was sent to the Environmental Impact Assessment (EIA) consultation bodies at the same time as the notice was published. See Regulation 13 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).</p>	<p>See Appendix E1 for copy of the letter as sent to the consultation bodies on the 1 November 2021. The letter included a copy of the section 48 notice. The section 48 notice was published on Drax Consultation website pages on 1 November 2021.</p>
<p>3.22 Applicants may have been engaged in non-statutory consultation; e.g., early consultation with statutory bodies may have been undertaken when identifying options and in advance of statutory consultation under the provisions of the PA2008. Applicants may also have been engaged in non-statutory consultation that takes place after the statutory consultation following changes made to the project.</p>	<p>Chapter 4 provides details of the non-statutory consultation.</p>

3.6. CONSULTATION ZONE

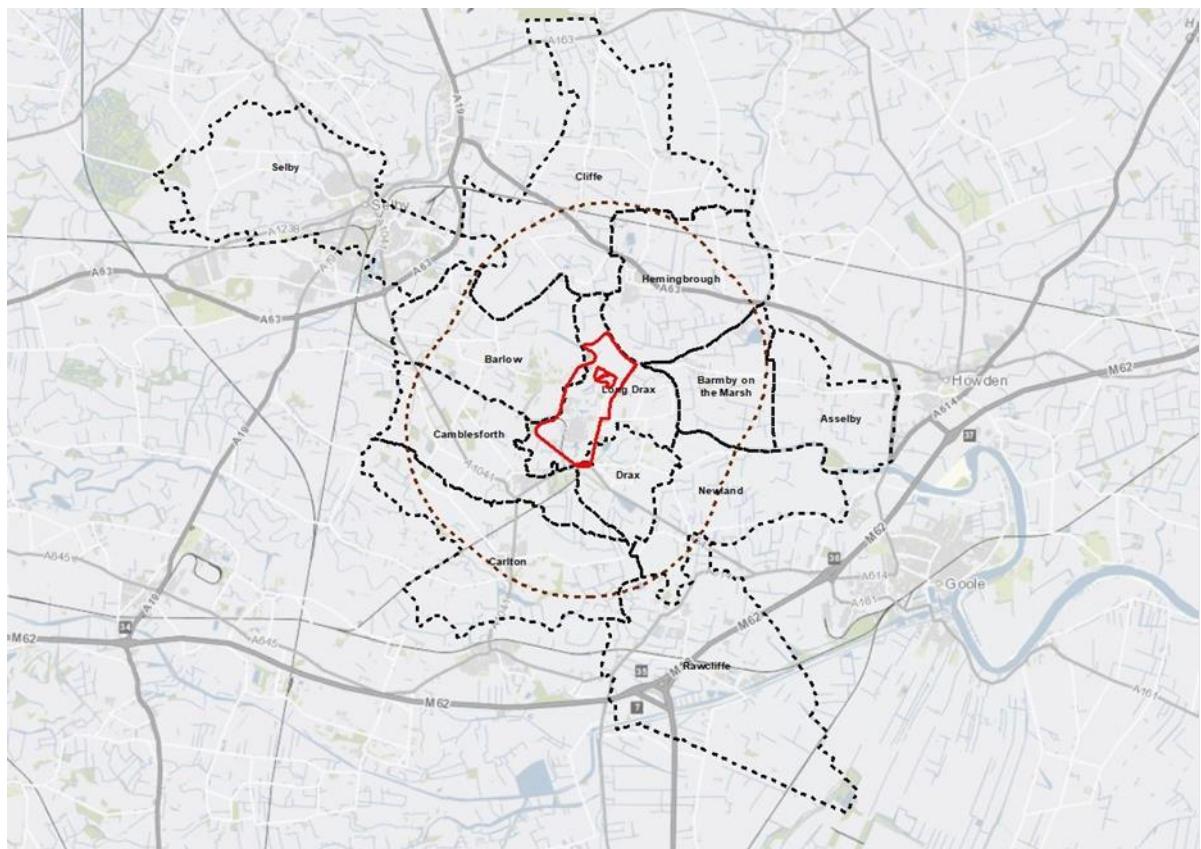
3.6.1. Plate 3.1 below highlights the area that constitutes the local community around Drax Power Station, and which we refer to as the ‘consultation zone’. This is based on the parishes that sit within 3km of the Proposed Scheme. The Proposed Scheme sits directly within Long Drax, Drax, Barlow, Cramblesforth Parish Councils. Other Parish Councils within 3km of the Proposed Scheme are Carlton, Rawcliffe, Newland, Barmby on the Marsh, Hemingbrough, Cliffe and Selby Parish Councils.

3.6.2. This consultation zone was the basis for the distribution of promotional materials during the statutory consultation in accordance with the requirements of PINS Advice Note 14. However, events and other promotional activities (such as social and traditional media) were not limited to this zone. During the non-statutory consultation, a similar zone was used but did not include Selby.

3.6.3. A postcard providing details of Drax’s proposal and how to take part in the online statutory consultation was sent to the area surrounding the power station. For anyone who was unable to access the online consultation, the postcard provided contact details for the project team who were available to support them with either guidance on how to access the website or provide hard copies of the details of the consultation through the post. The postcard was purposely in plain English.

3.6.4. The map below highlights the area where the postcards were delivered the week before the launch of the statutory consultation. In total, 13,736 properties received the postcard. To ensure that every address received a postcard to advertise the consultation we used satellite tracking software to monitor the delivery of the flyers. The postcard can be found in Appendix G4.

Plate 3.1 - Parishes within a 3km radius of the Proposed Scheme and consultation zone



4. NON-STATUTORY CONSULTATION

4.1. PURPOSE OF NON-STATUTORY CONSULTATION

4.1.1. The non-statutory consultation took place to introduce the Proposed Scheme and allowed consultees to have the chance to find out more about Drax's proposals and provide initial feedback. This engagement exercise allowed Drax to understand consultees' views on the Proposed Scheme, ahead of further refinement to the designs and ongoing assessment before the statutory consultation stage.

4.1.2. This phase of engagement took place from **Monday 1 March and Sunday 28 March 2021**, running for a total of four weeks.

4.2. NON STATUTORY CONSULTATION METHOD

WHO WAS TARGETED?

4.2.1. In total, emails and letters were sent out to 129 organisations. The list of stakeholders can be found in Appendix J9.

4.2.2. The Consultation Zone was defined by parish boundaries closest to a 3km radius of Drax Power Station. People living, working, and studying in this geographical area are deemed to have a direct interest in the Proposed Scheme, in line with the Zone of Theoretical Visibility (ZTV) which is defined in Section 9.5 (Assessment Methodology) of Chapter 9 (Landscape and Visual Impact) of the ES (document reference 6.1.9). It is considered that those within the ZTV may have visibility of the Drax Power Station from their residences or workplaces and may experience some form of direct impact from the Proposed Scheme.

4.2.3. The parishes that are located within this consultation zone are:

- a. Drax
- b. Long Drax
- c. Newland
- d. Barmby on the Marsh
- e. Barlow
- f. Camblesforth
- g. Carlton
- h. Hemingbrough
- i. Rawcliffe
- j. Cliffe

PROMOTION OF THE CONSULTATION

4.2.4. Given the Covid-19 pandemic and guidance from local and national government, the public consultation took place virtually on the website [REDACTED] As with any consultation, it was critically important to ensure that residents, stakeholders, and

community groups were aware of the plans and the upcoming consultation in good time, particularly those harder to reach audiences. Information about the plans was shared via a variety of mediums to reach as many people as possible.

NON-STATUTORY CONSULTATION MATERIALS

4.2.5. For non-statutory consultation, a range of materials were made available to provide information about the consultation as well as sign posting to where further information was available. These are provided in Appendix J2, J5 and J6.

- a.** Consultation brochure
- b.** Consultation flyer
- c.** Consultation feedback form

CONSULTATION BROCHURE

4.2.6. The consultation brochure (Appendix J2) was distributed to statutory stakeholders on 2 March 2021. The email as sent to the section 42(1)(a) and section 42(1)(b) consultees with enclosed leaflet and letter can be found in Appendix J5 and J7.

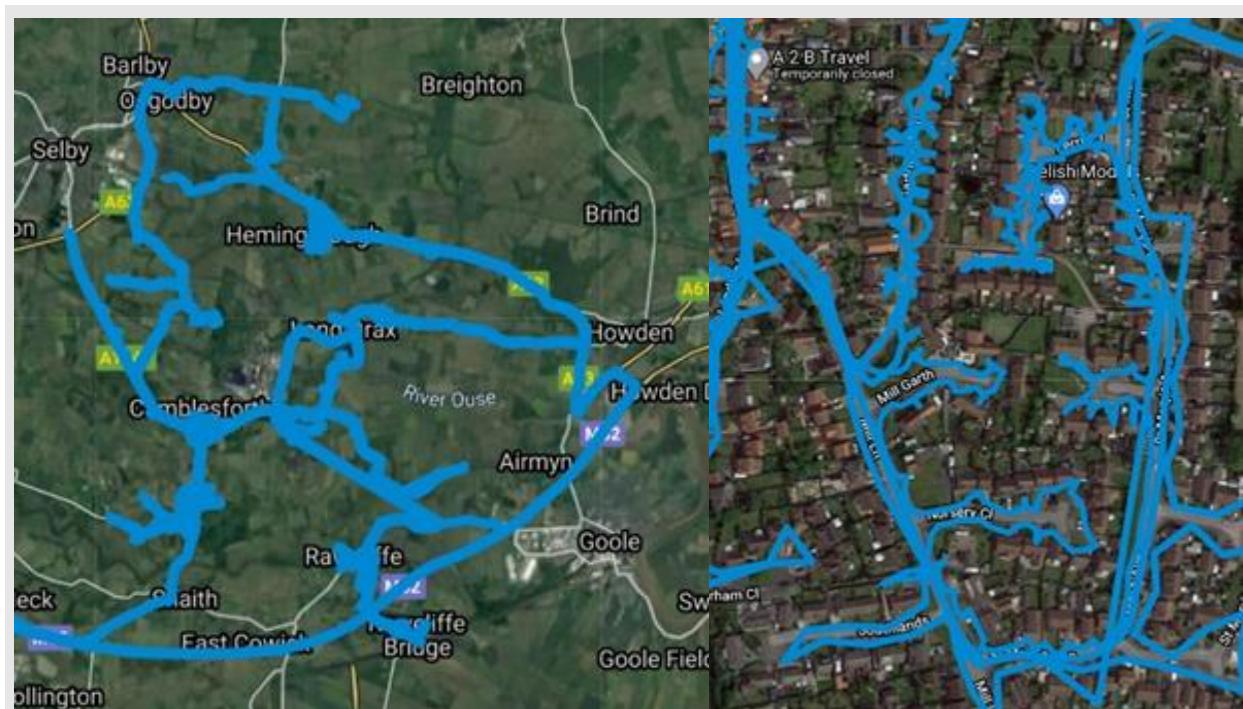
COMMUNITY FLYER

4.2.7. To advertise the consultation, communities in the consultation zone were sent a hardcopy flyer providing details of Drax's proposal and how to take part in the online consultation. A plain English format was used to improve accessibility to the information.

4.2.8. The flyer provided contact details (dedicated telephone number 01757 618 381) for the project team who were available to support them with either guidance on how to access the website or provide hard copies of the details of the consultation materials through the post.

4.2.9. To ensure that every address received a flyer to advertise the consultation, satellite tracking software was used to monitor the delivery of the flyers. The map below (Plate 4.1) shows extracts from the tracking report created to highlight where the flyer was delivered in the week before the launch of the consultation. In total, 6,801 properties received the flyer. The flyer can be found in Appendix J5.

Plate 4.1 - Example Map Showing Tracking Report of Two Areas within the Consultation Zone Distribution Area



LETTER AND BRIEFING WITH STAKEHOLDERS

4.2.10. To promote the consultation, statutory consultees (in accordance with the APFP Regulations) were contacted, including local authorities, government agencies and heritage organisations such as Historic England. In addition, specialists also reached out to officers in statutory organisations, and held formal pre-application meetings with those organisations.

4.2.11. Political non-statutory stakeholders beyond the immediate vicinity of the site were also contacted. This included parish councils, district councils, county councils and local MPs such as Nigel Adams, David Davis and Andrew Percy. Non-political non-statutory stakeholders were also contacted, these included Age UK, Salvation Army, Selby District Vision and Selby Deaf Hub. In total, emails and letters were sent out to 129 organisations.

4.2.12. On the 22 March 2021, Drax held a Parish Council Liaison meeting online in which the below stakeholders were briefed on the Proposed Scheme. In the briefing, the Parish Councils were interested in finding out more about the Proposed Scheme's part in the wider Zero Carbon Humber project. Attendees represented the following parish councils;

- a.** Drax Parish Council
- b.** Long Drax Parish Council
- c.** Barlby & Osgodby Parish Council
- d.** Newland Parish Council

- e. Carlton Parish Council
- f. Rawcliffe Parish Council & East Riding of Yorkshire Council
- g. Cliffe Parish Council
- h. Camblesforth Parish Council
- i. NYCC & Selby District Council
- j. Gowdall Parish Council
- k. Hemingbrough Parish Councils
- l. Brayton Parish Council
- m. Barlow Parish Council

SOCIAL MEDIA POSTS AND ADVERTISING

4.2.13. In addition to traditional promotion methods, the Drax communications team used social media to encourage people to use the website. To do this, posts were shared on Drax's social media channels, alongside paid social media adverts that specifically targeted local communities. Given the high levels of its consumption by the local population, and the digital nature of our consultation, social media was an important channel to promote the proposals and the consultation.

4.2.14. Advertising took place predominantly via Facebook due to its use among a wide range of demographics and its increasing use by many as virtual village community noticeboards through community groups. Advertising also took place via Twitter, helping to reach a wider range of interested parties, including those with an interest in engineering and climate change, and younger users.

4.2.15. Social media activity consisted of:

- a. Publishing a Facebook advert from Drax, which in the final week of the consultation had reached 7,260 people in the target postcode area and had gained 145 link clicks to the consultation (see Appendix J1: Non-Statutory Report).
- b. Publishing a series of posts detailing the consultation on Drax's Facebook page. The three posts reached 2,083 people in total.
- c. Sharing social media posts advertising the consultation on five Facebook local community group pages, including Drax Village News and Save Our Selby. In total, over 27,475 local people were reached (Appendix J1: Non-Statutory Report).
- d. Sharing three posts advertising the consultation on Drax's Twitter page. Overall, they reached 5,108 people.

MEDIA

4.2.16. PR and advertising were used to publicise the consultation in media titles. Ahead of the consultation, two tailored press releases were released to over 45 titles. One press release was designed for local newspapers and included dates and times for live chat sessions, driving local residents to our consultation sessions (Appendix J4)

information within the non-statutory report. A second shorter press release was sent to national and energy trade titles announcing the beginning of the planning process. 18 titles covered the news of the consultations, reaching an online readership of 6.7 million in total, including 559,000 through regional and local titles (Appendix J1: Non-Statutory Report).

- 4.2.17. The Proposed Scheme was also highlighted in the regular ‘wrap around’ that Drax has with the Goole Times during the first week of the consultation (Appendix J4).
- 4.2.18. In addition to editorial, details of the consultation were included on page three of weekly local print newspapers on Thursday 4 March, the Goole Times, and the Selby Times, which together have a reach of 14,584 people. This helped ensured that local residents were reached, that were not on social media but consumed ‘traditional’ print media (Appendix J1 information within the non-statutory report).

HOW WE RECEIVED FEEDBACK?

- 4.2.19. Due to the COVID-19 restrictions that were in place from January 2021 to March 2021, a fully digital consultation was undertaken. A dedicated BECCS at Drax website (███████████) was created to host the virtual exhibition boards, live chat, and video call functions. The website is still active with information about the consultations and historical documentation as provided during the statutory consultation.
- 4.2.20. Through planning the consultation, it was ensured that everyone who wanted to provide feedback could do so without any difficulties. The website was designed to have a detailed, yet user-friendly consultation feedback form (Appendix J6), that asked a series of questions for participants to provide their views.
- 4.2.21. A Frequently Asked Questions ('FAQs') document was produced and made available on the Drax website. This provided responses to anticipated and commonly asked questions regarding the Proposed Scheme, including technical details, the consenting process and the impact of the Proposed Scheme. The FAQs can be found in Appendix J8.
- 4.2.22. A dedicated email address and telephone number were used so that anyone could use these to contact the delivery team. The email went to the Applicant team who would use FAQs to answer questions of refer to technical specialists where necessary. Flyers, press releases and adverts ensured that it was made clear that anyone who could not take part online was able to participate by getting in touch with the team to arrange for a consultation pack to be sent to them via mail.
- 4.2.23. Through the website three live chat sessions were held, where anyone could speak directly to the delivery team using a live chat function. A video drop-in session was also held, which allowed consultees to speak directly with a member of the delivery team.
- 4.2.24. Across the different mediums, the following number of participants were recorded between 1 March and 28 March 2021:

Overall unique website visitors	966
Responses to the feedback form online	9
Email enquiries received	8
Letters received	4
Live chat and drop-in session participants	13
Telephone enquiries	1
Requests for help as no access to internet	1

4.2.25. To replicate the experience of attending a physical consultation event, a digital exhibition was deployed (open for the duration of the consultation only) that was complemented by the live chat function. This allowed participants to review the digital exhibition boards and ask questions to the delivery team in a similar way to at a physical event. Any questions that could not be answered on the chat were sent via email to consultees within 48 hours.

4.2.26. To ensure that this feature was accessible to as many people as possible, three four-hour sessions were held across three days at different times. Details of when they took place are below:

- Tuesday 9 March 2021, 16:00 to 20:00
- Thursday 11 March 2021, 16:00 to 20:00
- Saturday 13 March 2021, 10:00 to 14:00

4.2.27. A video drop-in session was held on Tuesday 23 March, where consultees had the opportunity to speak to a member of the team directly. The public could book a half an hour session between 12:00 to 17:00.

4.2.28. In total 13 individuals took part in the live chats and drop-in session asking questions and providing comments on the consultation.

4.3. RESPONSES RECEIVED

4.3.1. In total, there were 966 individual visitors to the site during the consultation period. Of these visitors to the website, 36 feedback forms were submitted. 10 responses were supportive and only one person and one group opposed the Proposed Scheme. This shows that there was a high level of interest for the Proposed Scheme with minimal opposition.

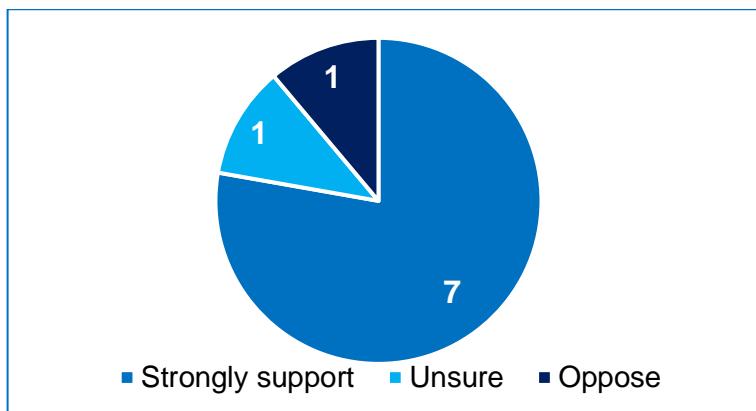
4.3.2. Respondents were from the following postcodes: YO8, SY6, DN14, HU15 and 11791 (New York State).

Overall unique visitors to the consultation website:	966
Total responses to the consultation:	36
Supportive responses:	10 (7 via website and 3 statutory letters)
Opposing responses:	2 (1 via website and 1 email)

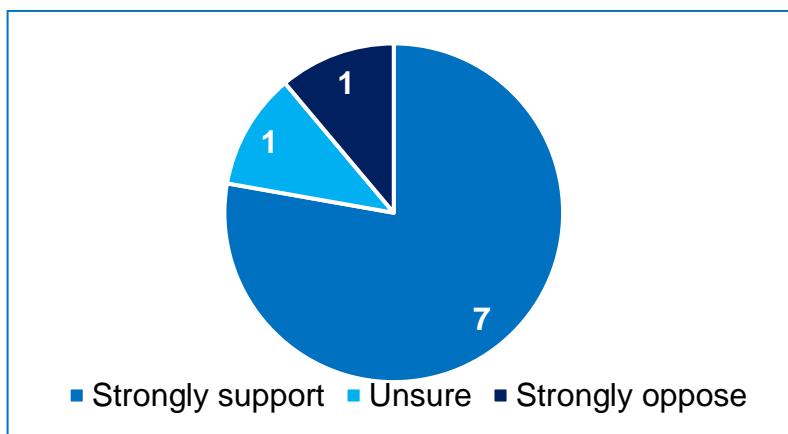
SUPPORT FOR THE SCHEME

4.3.3. The following questions were asked in the survey:

Q1, How do you feel about Drax's ambition to become carbon negative by 2030?



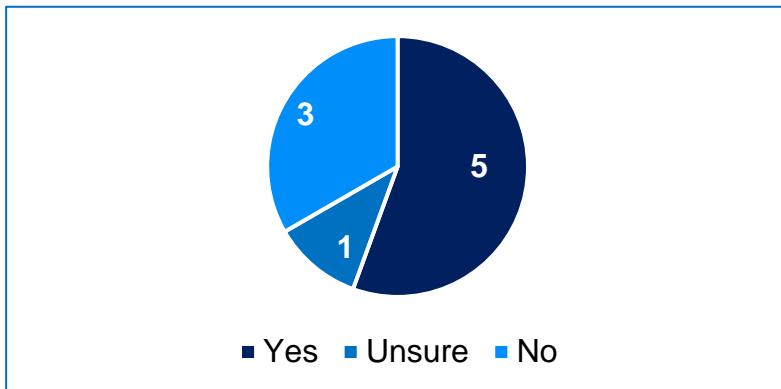
Q4, Do you support the proposals to develop Bioenergy with Carbon Capture and Storage (BECCS) within Drax Power Station's existing plant in North Yorkshire?



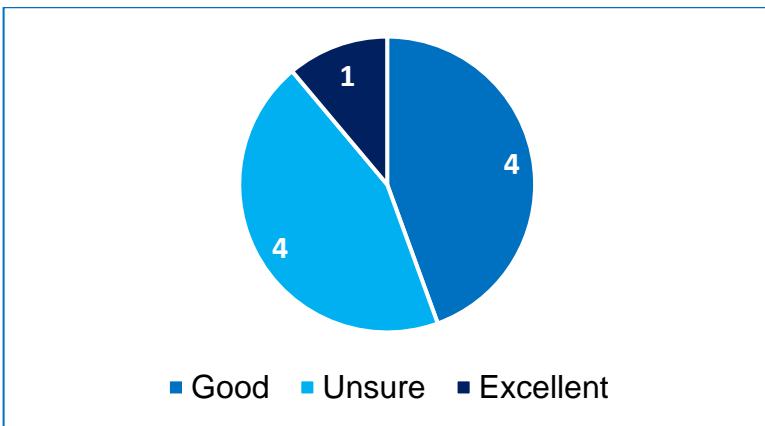
EXHIBITION SATISFACTION

4.3.4. The consultation feedback form asked if people were provided with enough information at the events. 56% of respondents stated they were happy with the information they received. Consultees were also asked how they found the consultation, and 55% felt that it was good whereas 45% of respondents were unsure. Feedback regarding the consultation is covered in the following sections of this chapter.

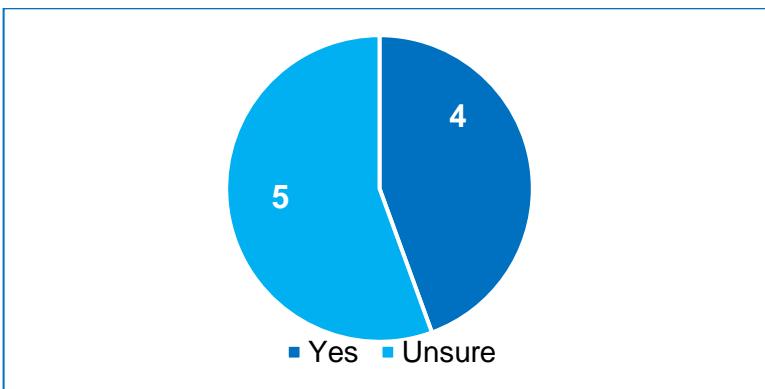
Q6, Did you find all the information you needed on the website, digital exhibition boards and leaflet to understand the proposals?



Q7, How was your experience of the consultation taking place online with the digital exhibition?



Q8, If we were to hold this consultation again, after the Covid pandemic restrictions on events have lifted, would you be happy for the consultation to take place online again?



4.4. OPEN QUESTIONS

4.4.1. The remaining questions on the feedback form were open questions allowing people to provide more detailed comments on the proposals. To aid analysis of comments, they were coded thematically, as below:

PRIMARY CONCERNS / INTERESTS

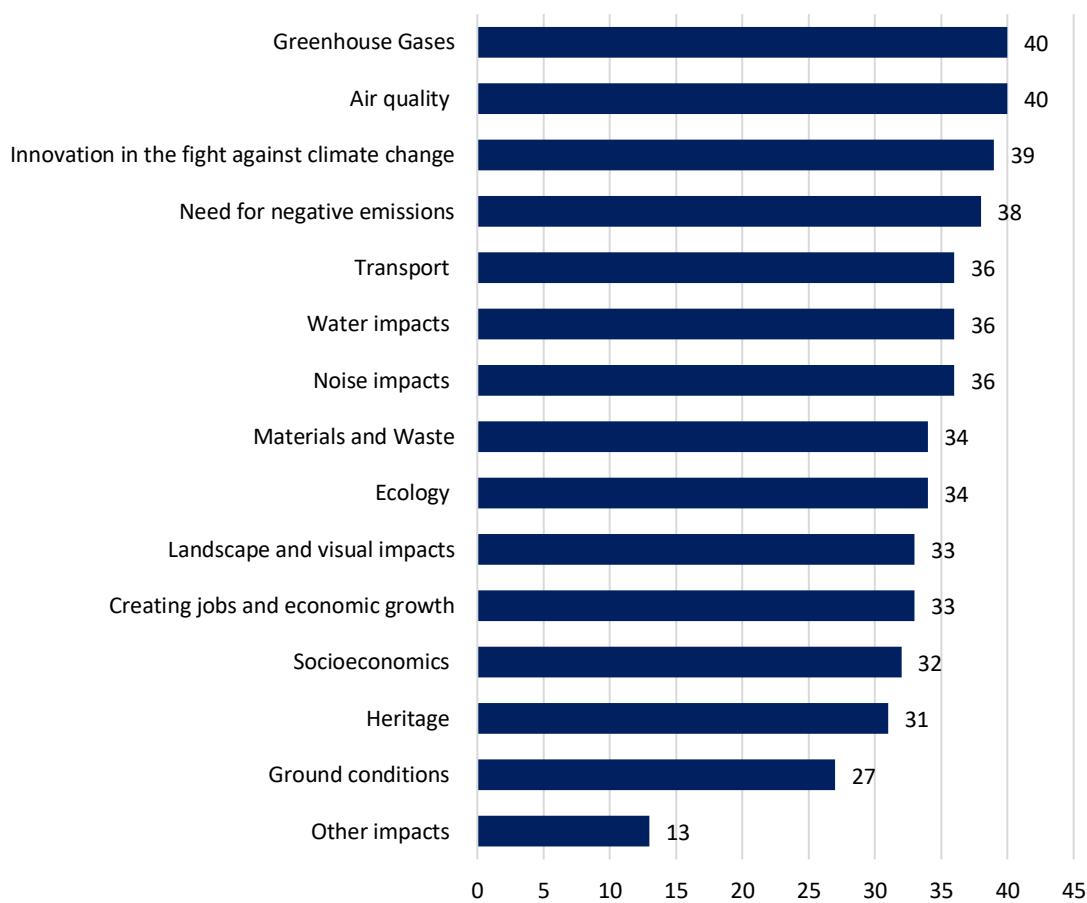
- a. **Safety** – some respondents expressed anxiety over Drax's ability to ensure CO₂ will not escape from the pipeline and issues surrounding the use of other pollutants such as ammonium.
- b. **Air quality** – consultees queried whether BECCS would lead to improved local air quality.
- c. **Noise pollution** – some respondents expressed concerns over the noise of the construction works and asked what would be done to manage disruption.
- d. **BECCS process** – respondents asked about the BECCS technology and its role in combatting climate change, how the CO₂ will be stored, and the wider Zero Carbon Humber partnership.

4.5. SECONDARY CONCERNS / INTERESTS

- a. **Economic impact** – a handful of respondents were curious about the business opportunities that would arise because of the Proposed Scheme and how this would impact local and national companies.
- b. **Wildlife** – a few respondents were concerned about the impact of the CO₂ pipeline and the Proposed Scheme on wildlife in the surrounding area.
- c. **Biomass** – respondents asked questions concerning the biomass units and the sustainability of its sourcing.
- d. **Funding** – some respondents asked how the Proposed Scheme would be funded and the criteria of the funding.
- e. **Technologies** – some respondents were concerned about the use of technology across the Proposed Scheme, BECCS technology and the challenges that could arise from the use of new technologies.

4.5.1. An aggregate score from the users was created, which shows how many times each topic was mentioned on all consultation platforms and therefore ranks the issues in order of importance by the number of times it was raised (see Plate 4.2 below).

Plate 4.2 - Response Themes at Non-Statutory Consultation



4.6. FEEDBACK FROM THE NON-STATUTORY CONSULTATION

- 4.6.1. Feedback from residents, stakeholders, and local politicians in the first phase of consultation provided insight into how Drax could address consultees' concerns on a variety of issues as the Proposed Scheme develops, as well as helping to shape the statutory phase of the public consultation.
- 4.6.2. Table 4.1 demonstrates how feedback received during the non-statutory consultation has helped shape the Proposed Scheme and the statutory consultation phase.

Table 4.1 - Feedback Topics Received during Non-Statutory Consultation

Topic	Feedback	Response
Air quality	Numerous concerns were expressed relating to the impact on air quality in the local area, with questions relating to both the construction and operational phase.	For Statutory Consultation we included information regarding air quality in Chapter 6 of the PEIR to address the concerns raised. This included consideration of emissions of dust and other particulates during construction and their impact on the local area, as well as emissions from the operation of the BECCS at Drax. Information on Air Quality is presented in Chapter 6 (Air Quality) of the ES (document reference 6.1.6) which considers impacts on air quality in the local area relating to the construction and operational phases addressing the concerns raised on this topic.
Safety	Some respondents expressed worries over the reliability of Drax and the BECCS technology in ensuring no CO ₂ escapes from storage or transportation.	Safety is an upmost priority for Drax and will be central to the designs of the CO ₂ capture and transmission systems. Information on safety, including legislation and measures to manage this, was provided in Chapter 17 of the PEIR, and is provided in Chapter 17 (Major Accidents and Disasters) of the ES (document reference 6.1.17). Consents for the CO ₂ transportation pipeline and storage facilities will be sought by a separate developer and will not form part of Drax's DCO for BECCS at Drax. Therefore, it is not possible for Drax to address this element of the comment.
Noise pollution	Consultees expressed concerns over the noise of the construction works, and what is being done to manage disruption.	Chapter 7 of the PEIR included an assessment of noise impacts including a description of mitigation measures to manage any disruption. This information has been updated and is available in Chapter 7 (Noise and Vibration) of the ES (document reference 6.1.7).
Economic impact	A few respondents were curious about the business opportunities that would arise from the Proposed Scheme and how this would impact local and national companies.	Developing BECCS at Drax will spearhead a new world-leading green industry for Yorkshire and the Humber region. The Humber region already supports 360,000 jobs but BECCS at Drax could boost skills and create and support over 10,000 jobs locally and across the entire supply chain. By deploying cutting edge green technologies across the Humber region, this could rise to 47,800 FTE according to Vivid Economics. On the assumption that the technology associated with BECCS is successful, the skills, knowledge and aptitude gained from the project would allow similar technology to be applied across a range of other industrial installations including energy generation projects. The Needs and Benefits Statement (document reference 5.3) submitted with the Application provides further information on the economic benefits of the Proposed Scheme during both the construction and operational phases. The DCO Application is accompanied by a Section 106 Heads of Terms for a proposed development consent obligation (document reference 7.1) which will include the provision of a Local Employment Scheme. The Local Employment Scheme will set out the details and mechanism for securing the use of local labour contractors, goods and services during the construction period and operational period of the Proposed Scheme. It is proposed that the Local Employment Scheme will be secured within the Section 106 Agreement and require the Applicant to submit the details of the Local Employment Scheme to SDC and NYCC for approval, prior to the commencement of the Proposed Scheme. Drax and SDC and NYCC shall work together to establish the initiatives set out in the Local Employment Scheme. Drax shall not commence the Proposed Scheme until the Local Employment Scheme has been approved by SDC and NYCC and Drax shall thereafter carry out the approved Local Employment Scheme until the Proposed Scheme is decommissioned in accordance with the Order.

Topic	Feedback	Response
Carbon dioxide storage and pipeline	Respondents expressed concerns on how the carbon will be stored and transported.	Consents for the CO ₂ pipeline and storage will be sought by a separate developer and will not form part of Drax's DCO for BECCS at Drax. Therefore, it is not possible for Drax to address this comment.
Sustainable forestry	Consultees wanted to know how the forests that Drax were sourcing biomass from were sustainable.	<p>It should be noted that the Proposed Scheme does not seek to consent biomass generation, as that is already consented.</p> <p>The majority of biomass is sawmill and other lumber process by-products, or the residuals from forestry operations. Drax Power Limited only buy from well-regulated commercial forests and all the biomass we buy comes from suppliers who are part of the Sustainable Biomass Program (SBP), a multi - stakeholder standards setting and verification scheme.</p> <p>Drax has jointly pioneered the Healthy Forest Landscapes (HFL) approach with Earthworm Foundation. HFL provides an evidence-based approach to measure and evaluate the ecological, social and economic impacts in Drax's supply areas. This includes measuring changes in the forest landscape using empirical evidence such government statistics and input from remote sensing technologies, such as earth observation from satellites.</p> <p>HFL assesses four key metrics – forest cover, carbon stock, biodiversity and community wellbeing – which will be used across Drax's sourcing areas. This approach is designed to enable Drax to identify opportunities to make appropriate interventions which support healthy forests, communities, or biodiversity.</p> <p>Further information can be found on the Drax website and the Drax Group plc Annual report and accounts 2021.</p>
Wildlife	Respondents were concerned about the impact of the CO ₂ pipeline and the Proposed Scheme on wildlife in the surrounding area.	<p>This Proposed Scheme does not include the CO₂ pipeline, and this is subject to a separate application, therefore it is not possible for Drax to comment on these concerns.</p> <p>However, as part of the Environmental Impact Assessment (EIA), Drax has assessed the likely significant effects of BECCS at Drax on sensitive ecological receptors arising from the Proposed Scheme. Information on this topic is provided in the PEIR Ecology (Chapter 8). This information has been updated and is available in Chapter 8 (Ecology) of the ES (document reference 6.1.8).</p>
Landscape and visual impact	Residents raised questions relating to the visual impact of the new facility and how this will affect the current landscape.	Information regarding this topic is provided in the PEIR Landscape and Visual Impact Assessment (LVIA) (Chapter 9), information has been updated and is available in Chapter 9 (Landscape and Visual Impact) of the ES (document reference 6.1.9).
BECCS process and wider Zero Carbon Humber plan	Respondents asked about the BECCS technology, how the CO ₂ will be stored, and the wider Zero Carbon Humber partnership.	The information brochure used at Statutory Consultation includes details of the Proposed Scheme and its operation. This information was also available in the FAQs section of the project website.
Biomass	Respondents asked questions concerning the biomass units and its sourcing.	<p>Biomass units at Drax Power Station are already consented and operational. The Proposed Scheme seeks permission to install carbon capture technology on up to two of the four existing biomass units.</p> <p>Please refer to the response above on the topic of 'sustainable forestry' regarding sourcing of biomass.</p>
Route	A consultee wanted to understand the route of the CO ₂ pipeline.	The CO ₂ pipeline is a separate scheme and is subject to a separate planning application. Therefore, Drax is not able to comment on the route of the pipeline.

Topic	Feedback	Response
Funding	A consultee wanted to know how the Proposed Scheme would be funded and the criteria of the funding.	<p>Funding for the Proposed Scheme and support mechanisms are currently being explored both with the UK government and private companies as BECCS delivers negative emissions and carbon removals.</p> <p>Further information providing a response on the need for the Proposed Scheme and Government funding for projects designed to help the UK meet its net zero targets is set out in the Needs and Benefits Statement (document reference 5.3). See also Funding Statement (document reference 4.2) which explains how the Proposed Scheme will be funded.</p>
Technologies	Several detailed questions were received from consultants based in India and Scotland who wanted to understand details about the technology. They were concerned about the use of BECCS technology, though these questions were not relevant to this stage of the DCO process.	Information regarding the Proposed Scheme and the technologies used in its operation are included within the FAQs section of the project website. This includes reference to a similar scheme at Boundary Dam '3' in Canada where the technology has been used. Further information is also set out in Chapter 2 of the Environmental Statement (document reference 6.1).
Support for the Proposed Scheme	City of York Council, York and North Yorkshire Local Enterprise Partnership (LEP) and Selby District Council supported the Proposed Scheme and expressed approval at the potential economic benefits of the Proposed Scheme.	Drax noted the support for the consultation from stakeholders.

4.7. SUMMARY OF THE NON-STATUTORY CONSULTATION

4.7.0. The rationale for BECCS at Drax is compelling. As well as presenting a realistic opportunity to make a significant contribution to the UK's net zero effort, it is also a catalyst for economic growth in the North and a showpiece of British-led innovation. The Proposed Scheme that Drax has consulted on as part of its first phase of consultation, comprised an introduction to BECCS and a relatively detailed overview of the Proposed Scheme. By consulting online, via a dedicated website, this overcame the challenges associated with COVID-19 restrictions on physical meetings.

4.7.1. The primary objective of this consultation was to engage with the community neighbouring Drax Power Station and ensure that everyone had the opportunity to take part, learn about the Proposed Scheme at an early stage and to understand current views and concerns, as well as areas of interest to feed into the following statutory consultation. This is why a variety of communication channels were utilised to reach as many people as possible – from extensive use of social media to physical flyer mailouts to media advertising and PR. To ensure that every property received an invitation flyer to participate in the consultation, satellite navigation tracking was used to monitor the delivery of the 6,801 flyers to each door. Following the conclusion of the deliveries, no feedback was received to indicate that any home had not received a flyer. A total of 129 organisations were approached directly to introduce the Proposed Scheme and inform them of the consultation.

4.7.2. The dedicated consultation website was visited by 966 unique website users representing a strong interest in the Proposed Scheme from local people. Whilst this did achieve successful engagement through the feedback form and the live chat sessions (in total the consultation received 36 responses), this was only a fraction of the overall number of residents and stakeholders who viewed the plans. Given the number of people who viewed the plans and very small number of responders, it can be said that there are a significant number of residents and stakeholder who do not feel strongly about the plans and received adequate information through the consultation materials. This suggests that respondents do not object to the Proposed Scheme.

4.7.3. Over the course of the first phase of the public consultation, Drax received feedback from both statutory and non-statutory bodies. These are summarised below.

- a. The North York Moors National Park Authority commented '*Given the long-range scale of impact of Drax on European sites, exceeding 1% of nitrogen deposition (based on 2016-2018 data) even at sites well outside the normal 10km buffer (the NYM SAC is roughly 40miles from Drax at the nearest point) it would be helpful if the Environmental Statement considered potential impacts of the development through alterations in the emissions profile on designated site in the wider area, including the North York Moors SAC and SPA*'
- b. The City of York Council supports the Proposed Scheme and commented '*The proposed development at Drax to deliver 100% Bioenergy with Carbon Capture*

and Storage (BECCS) is in line with our Climate Emergency declaration and ambition for York to be net-zero carbon by 2030’.

- c. Selby District Council stated that they supported the Proposed Scheme and expressed approval at the potential economic benefits of the Proposed Scheme *‘We welcome this ground-breaking project that would remove millions of tonnes of carbon dioxide from the atmosphere, putting the District and Drax at the heart of the governments’ Plans for a Green Industrial Revolution’.*
- d. York and North Yorkshire Local Enterprise Partnership expressed strong support for BECCS *‘The York and North Yorkshire Local Enterprise Partnership are pleased to strongly support the proposals for BECCS at Drax and look forward to working closely with the team to help expand the project’s impact into the wider York and North Yorkshire region’.*
- e. Biofuelwatch stated that it ‘strongly disagrees’ with the concept of BECCS and submitted a list of the environmental questions. Although this was submitted after the consultation closed, the delivery team considered their submission ahead of the next phase of the Proposed Scheme. Correspondence with Biofuelwatch is provided in Appendix A5 and in chapter 7.

4.8. LESSONS LEARNT FROM NON-STATUTORY CONSULTATION

- 4.8.1. Following completion of the non-statutory events, a ‘lessons learnt’ meeting was held in April 2021 with all members of the delivery team who attended the events to discuss what went well, areas which needed to be improved or reviewed for the statutory consultation process.
- 4.8.2. It was concluded from all parties that while the digital first consultation was successful; a hybrid approach should be adopted for the statutory consultation should restrictions permit.

5. PREPARATION FOR STATUTORY CONSULTATION

5.1. DEVELOPING THE STATEMENT OF COMMUNITY CONSULTATION

- 5.1.1. Section 47 of the Planning Act 2008 requires developers to publish a SoCC that sets out how the Applicant proposes to consult on the proposed application, details of the proposed application, and people living in the vicinity of the application land.
- 5.1.2. Prior to the formal consultation with host local authorities on the SoCC, the draft SoCC was issued informally to Selby DC, NYCC (as the local authorities within whose area the Proposed Scheme is located) and East Riding of Yorkshire County Council by email on 30 April 2021. A deadline of 20 May 2021 was provided to the consultees to provide feedback on the informal SoCC.
- 5.1.3. An email response was received from East Riding of Yorkshire on 30 April 2021 to confirm they had no comment to make on the draft SoCC.
- 5.1.4. NYCC responded on 21 June 2021 to confirm that they 'accept that the statutory requirements are being met'. In addition, it was advised to add the Pontefract and Castleford Express to the listing of local papers in which to publish the notice. This paper was included in the final approved SoCC as published.

5.2. CONSULTING THE LOCAL AUTHORITIES ON THE SOCC

- 5.2.1. The draft SoCC was issued for formal consultation on 5 August 2021 and the authorities were allowed 28 days to comment until the 2 September 2021.
- 5.2.2. A response was received on 2 September 2021 from NYCC on behalf of both NYCC and Selby DC confirming that they were supportive of the approach outlined in the SoCC, commenting as follows

‘This draft SOCC relates to the statutory consultation period following on from the non-statutory consultation earlier this year. There are further comments below see Table 5.1 but overall, the Authorities support the approach set out in the consultation document and in particular are pleased to see how the consultation strategy seeks to build upon the results on the non-statutory consultation.’
- 5.2.3. The NYCC response include a table as shown in Table 5.1 (Local Authority comment) and Drax’s response to those. There were some minor comments to be addressed and these are detailed in Table 5.1.
- 5.2.4. The updated SoCC was issued to Selby DC and NYCC by email on 27 September 2021. Appendix C3 includes the revised SoCC, and the cover email issued with this (Appendix C1).

Table 5.1 - Minor Comments Made on SoCC, with Drax Response

Paragraph	Local Authority comment on 2 September 2021	Drax response on 27 September 2021
2.3.8	Q3 2022 – Q1 2023: Examination period. Please add the year as above for clarity and consistency	Year was added for clarity in the final SoCC.
3.2.2	This approach is welcomed.	Comment noted.
3.3.3	This paragraph answers a previously raised query of the Authorities the wider consultation zone and the approach is welcomed.	Comment noted.
3.4.2	The Authorities have previously advised that the Castleford and Pontefract Express should be added to the list of newspaper notices, but this has not happened. This request is in line with requests made for a previous DCO application at the Drax Power Station site. The Authorities would welcome the addition or an explanation for its exclusion.	The Castleford and Pontefract Express was added to the list of newspaper notices in Paragraph 3.4.2 of the final SoCC.
3.4.7	Political briefings; It is suggested that the briefings should include the Executive, Planning Committee and affected ward members at Selby District Council. It is also advised that a further briefing takes place at NYCC offices to include the newly appointed Executive Member for Open for Business. The Authorities look forward to arranging these briefing in the near future.	This was included as part of the briefing's strategy and paragraph 3.4.7 of the final SoCC has been updated accordingly.
3.4.11	This is a welcomed addition, covid restrictions permitting.	Comment noted.
3.6.8	This is a welcomed addition, covid restrictions permitting.	Comment noted.
3.6.11	The Authorities believe this is a robust approach and it is welcomed.	Comment noted.
3.6.12	Deposit Points - SDC offices remain closed at this time. In the past County Hall has been used as a deposit point for documentation with no visitors but, in the same way as SDC	The libraries were used as deposit point locations. SDC and NYCC offices were removed from the deposit venues list in 3.6.12 as they were not open to the public at the time of the

Paragraph	Local Authority comment on 2 September 2021	Drax response on 27 September 2021
	offices, is not accepting members of the public at this time. What are the alternatives if those in yellow can't be used?	response. The Drax Sports & Social Club was since added to the list of deposit points.
Local / Community Interest Groups	The Authorities would ask how the list has been compiled.	The list of local community / interest groups has largely been compiled through desktop research as well as previous engagement / consultation on BECCS at Drax as well as Drax Repower. We aim to identify a mix of interest groups, accessibility groups as well as community representatives. This is not an exhaustive list and can be added / updated to as required. This list does not include the prescribed consultees who will be consulted separately under section 42 of the Planning Act 2008.

5.2.5. East Riding of Yorkshire Council was also consulted as a non-prescribed host authority because of the close proximity of its area to the Site and also as highways powers sought in the DCO as part of the application relating to the construction of the Proposed Scheme would be exercised in this authority's area.

5.2.6. As no further suggestions were received from any of these authorities, the SoCC was not further revised in response to comments from the local authorities. See Appendix C3 for the final published SoCC.

5.3. PUBLICATION OF THE SOCC NOTICE AND FINAL SOCC

5.3.1. The Section 47 notice, advising where and when the finalised SoCC could be inspected, was published in local papers as listed in Table 5.2 below.

Table 5.2 - Publication of Section 47 Notice

Name of Publication	Date of publication
The Yorkshire Post	14 October 2021
The Goole Times	14 October 2021
The Selby Times	14 October 2021
The Epworth Times	14 October 2021
Pontefract and Castleford Express	21 October 2021

- 5.3.2. The newspapers listed above together ensured coverage of the Consultation Zone.
- 5.3.3. A copy of the published SoCC notice can be found in Appendix H2.
- 5.3.4. The SoCC was also available for inspection at the following locations during the period from Monday 1 November to Sunday 12 December 2021:
 - a. Selby Library (52 Micklegate, Selby YO8 4EQ)
 - b. Snaith Library (27 Market Pl, Snaith, Goole DN14 9HE)
 - c. Goole Library (Carlisle Street, Goole DN14 5DS)
 - d. East Riding of Yorkshire Council (Beverley Customer Service Centre, 7 Cross St, Beverley HU17 6TB)
 - e. Drax Sports Club (Main Rd, Drax, Selby YO8 8PJ)
- 5.3.5. Section 47(7) requires that the applicant must carry out consultation in accordance with the proposals set out in the statement. Table 5.3 shows how the commitments outlined in the SoCC have been complied with, in satisfaction of section 47(7).

Table 5.3 - Statement of Community Consultation Compliance Table

Where in the SoCC	Commitment as it appears in the SoCC	How Drax fulfilled this commitment
1.3.3	In accordance with section 47 of the PA2008, the Applicant will consult people living in the vicinity of the Proposed Scheme, including those affected by the construction and operation of the Proposed Scheme.	The six-week public consultation started on 1 November 2021 and ended on 12 December 2021 and those living within the Consultation Zone were contacted to publicise the consultation and invite responses from those affected by the Proposed Scheme.
3.3.2	Consultation Zone - This consultation zone will be the basis for the distribution of promotional materials (notably the promotional postcards, which are discussed in more detail in Section 3.6 and shown in Plate 3.1. However, events and other promotional activities (such as social and traditional media) will not be limited to this zone.	Postcards promoting the Proposed Scheme were sent to the consultation zone shown in Plate 6.2. Drax deployed social media advertising to reach younger audiences, a postcard mailout to properties with the consultation zone, newspaper advertising to reach older audiences and a letter sent to groups representing hard-to-reach groups and community groups, such as Age UK Selby District. To reach an even wider demographic, Drax also held four pop-up promotional events outside supermarkets used by local community in Selby and Goole.
3.3.4 – 3.3.5	The Applicant will also consult with local community groups, community representatives and wider interest groups who will have an interest in the Proposed Scheme. It will be particularly important to provide opportunities for participation in the consultation for all people with a potential interest in the Proposed Scheme. This includes traditionally 'hard to reach' or excluded demographic groups who may require special consideration when planning consultation activities.	<p>Drax engaged through different channels to ensure that there was maximum coverage</p> <ul style="list-style-type: none"> ~ Press releases (see Appendix G9) ~ Social media (see Appendix G6) and ~ Mail out to the consultation zone (see Appendix G) ~ Section 48 public notice published in national and local newspapers (Appendix H3). ~ Public exhibition events were set at varied times to ensure that there could be a time to suit all. See paragraphs 6.17.12 and 6.17.13. <p>Through our hybrid online and in-person statutory public consultation, Drax made it easier for people to both access the non-technical and technical consultation material and speak to the project team. Consultees could view a digital exhibition via the dedicated project website and ask questions during one of the live chat sessions from the comfort of their own home. Drax deployed social media advertising to reach younger audiences, a postcard mailout to properties with the consultation zone, newspaper advertising to reach older audiences and a letter sent to groups representing hard-to-reach groups and community groups, such as Age UK Selby District. To reach an even wider demographic, Drax also held four pop-up promotional events outside supermarkets used by local community in Selby and Goole.</p>
3.3.7 – 3.38	<p>Time-poor people - It will be important to provide opportunities to participate in the consultation both inside and outside of normal working hours, as well as providing a combination of online and in-person opportunities (where possible, having regard to COVID-19 restrictions) for people to participate at their convenience.</p> <p>Older people and people with disabilities - Ensuring that digital platforms and materials are accessible to all audiences. If COVID-19 restrictions allow, any in-person event (such as public exhibitions or deposit points) venues should be close to local residents, with adequate means of access and suitable opening hours. Everyone that receives postal publicity will be invited to request the consultation information in alternative formats, including large text.</p>	<p>Three live Q&A events were held on the following days;</p> <ul style="list-style-type: none"> ~ Thursday 11 November 2021, 10am -2pm ~ Thursday 18 November 2021, 4pm -8pm ~ Wednesday 24 November 2021, 2pm – 6pm <p>Three in-person exhibition events were held on the following days;</p> <ul style="list-style-type: none"> ~ Thursday 23 November 2021, 12pm – 6pm at Drax Sports and Social Club, Main Road, Drax, Selby YO8 8PJ ~ Saturday 27 November 2021, 10am – 4pm at Junction Goole, Paradise Place, Goole, DN14 5DL ~ Wednesday 1 December 2021, 1.30pm – 7.30pm at Selby Town Hall, York Street, Selby YO8 4AJ <p>For those wanting in-person engagement, Drax held three in-person events in locations accessible in terms of disabled access to the buildings and local transport connectivity. These locations were in communities closest to Drax power station. One event was held</p>

Where in the SoCC	Commitment as it appears in the SoCC	How Drax fulfilled this commitment
		on a Saturday and the other two were held on weekdays, from afternoon to the early-evening so working people could attend. The project also provided a direct phone number and email address for consultees to reach the project team directly with questions. To advertise the statutory consultation, the project deployed a range of communication methods aimed at effectively reaching a diverse audience. Drax deployed social media advertising to reach younger audiences, a postcard mailout to properties with the consultation zone, newspaper advertising to reach older audiences and a letter sent to groups representing hard-to-reach groups and community groups, such as Age UK Selby District. To reach an even wider demographic, Drax also held four pop-up promotional events outside supermarkets used by local community in Selby and Goole.
3.3.9	People whose first language is not English - Publicity for the consultation will invite recipients to request consultation information and the feedback questionnaire in other languages or formats.	All materials were produced to be accessible and easy to understand. The Proposed Scheme website was compatible with assistive technology such as screen readers to ensure accessibility for all members of the public engaging with the consultation, including those whose first language is not English.
3.3.10	A full list of the community groups to be consulted can be found in SoCC Appendix A. These groups have been identified through desktop research, in liaison with local authorities, and from feedback received as part of the non-statutory consultation.	The community groups in SoCC Appendix A were sent a notification of the start of consultation on 5 October 2021 see Appendix A3 of this report.
3.4.1	<p>The PA2008 states that the applicant must:</p> <ul style="list-style-type: none"> ~ 'Make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land' ~ 'Publish in a newspaper circulating in the vicinity of the land, a notice stating where and when the statement can be inspected, and' ~ 'Publish the statement in such manner as may be prescribed.' 	<p>A statement was published in the newspapers listed below under paragraph 3.4.2 in the manner prescribed. The statement confirmed the SoCC was available for inspection by the public at the following locations in the vicinity of the land during the period from Monday 1 November to Sunday 12 December 2021;</p> <ul style="list-style-type: none"> ~ Selby Library (52 Micklegate, Selby YO8 4EQ) ~ Snaith Library (27 Market Pl, Snaith, Goole DN14 9HE) ~ Goole Library (Carlisle Street, Goole DN14 5DS) ~ East Riding of Yorkshire Council (Beverley Customer Service Centre, 7 Cross St, Beverley HU17 6TB) ~ Drax Sports Club (Main Rd, Drax, Selby YO8 8PJ)
3.4.2	<p>Newspaper Adverts - the Applicant will publicise a section 47 notice summarising the contents of this SoCC, in the following local newspapers:</p> <ul style="list-style-type: none"> ~ Selby Times; ~ Goole Times; ~ Castleford and Pontefract Express; ~ Yorkshire Post. 	<p>Appendix H2 contains evidence of the section 47 Notice, which was published in the following local newspapers on the 14 October 2021 for the following;</p> <ul style="list-style-type: none"> ~ The Selby Times, ~ The Goole Times, ~ The Epworth Times ~ The Yorkshire Post and ~ The Castleford & Pontefract Express, on the 21 October 2021
3.4.3	The section 47 notice will include details on how people can engage and participate in the consultation (including details of online / in-person events), the URL of the project website and contact details for the Applicant in the event of questions or queries.	Appendix H1 provides the section 47 notice which contained a description of the planned events, project website url, and the email address for the Applicant.
3.4.4	The advertisements will be published before the start of the statutory period of public consultation.	The section 47 notice was published on the 14 October 2021 and 21 October 2021 covering 5 local papers, 18 days prior to the start of the statutory consultation.

Where in the SoCC	Commitment as it appears in the SoCC	How Drax fulfilled this commitment
3.4.5	<p>In addition to the requirements for publicising the section 47 notice in local newspapers, the Applicant will undertake further promotional activities to ensure that the consultation reaches as many people as possible. These activities will include distribution of publicity materials, social media, public notes and emails / letters to community groups identified.</p>	<p>To ensure that the consultation reached as many people as possible, Drax promoted the Proposed Scheme in the following ways:</p> <ul style="list-style-type: none"> ~ 13,736 postcards to properties within the consultation zone as shown in Plate 6.2, ~ Social media activities are provided in Appendix G6 ~ Emails / letters were issued as described in Section 6.21 of this report
3.4.6	<p>Distribution of project postcard - An A5 information postcard will be distributed to every residential and business address within the proposed consultation zone (Plate 3.1), containing:</p> <ul style="list-style-type: none"> ~ A brief description of what is proposed; ~ Ways in which recipients can get involved in the consultation, including by viewing the Proposed Scheme information and submitting feedback online; ~ The URL of the project website; ~ Contact details for the project team; <p>Dates and times of events (online and in-person, where possible) and how to join them</p>	<p>The postcard distributed is provided in Appendix G and contained a brief description of the Scheme as follows “Our plan is to install carbon capture technology on up to two of our existing biomass power generating units at Drax Power Station. This will help us to permanently remove more carbon dioxide from the atmosphere than is produced across our operations.”</p> <p>It confirmed that the consultation runs from 1 November to 12 December 2021. You can find more information at; [REDACTED]</p> <ul style="list-style-type: none"> ~ Email info@BECCS-Drax.com ~ Phone 01757 618381 ~ Post FREEPOST CARBON CAPTURE BY DRAX ~ Dates and times of the online and in-person events
3.4.7	<p>Political briefings - Prior to the launch of the consultation in November 2021, the Applicant will hold briefings with elected members to ensure that they are aware of the Proposed Scheme, to outline the purpose of the consultation (and how people can get involved), and to encourage sharing of the consultation details throughout their networks in order to maximise engagement by the community in the consultation. In line with local authority suggestions, this will include invitations to the Executive, Planning Committee and affected ward members at Selby District Council, and the appointed Executive Member for Open for Business at North Yorkshire County Council. Briefings will be offered at both Council offices as well as online. In addition, site tours of the Proposed Scheme.</p>	<p>Briefings were held prior to the launch of the consultation as detailed in section 6.21 of this consultation report.</p>
3.4.8 – 3.4.9	<p>Community Groups update - On launch of the consultation, an email / letter will be issued to all community groups outlined in Appendix A to introduce them to the Proposed Scheme, the consultation and how they can provide their comments. This will include communications with groups who have established networks within the vicinity of the Proposed Scheme and encouraging them to publicise the consultation to those networks.</p>	<p>Drax issued a letter to the community groups on 5 October 2021 on the launch of the consultation.</p>
3.4.10	<p>Social Media - Existing Drax social media platforms (Twitter and Facebook) will be used to generate interest and participation in the consultation. Communications will provide bitesize factual information on the Proposed Scheme, making clear how people can participate in the consultation.</p>	<p>Social media was used to promote the Proposed Scheme as described in Section 6.21 of this report.</p>
3.4.11	<p>Manned promotion pop-up events - The Applicant will hold manned promotional events in local venues with high footfall, subject to COVID-19 restrictions, to raise awareness of the Proposed Scheme at a glance and to generate interest in the consultation. Members of the</p>	<p>In addition to the planned pop-up events the team also held two further events as follows:</p> <ul style="list-style-type: none"> ~ Morrisons, Goole, Boothferry Road, Goole, DN14 6EN 3 November 2021 12-17.30pm

Where in the SoCC	Commitment as it appears in the SoCC	How Drax fulfilled this commitment
	<p>project team will be on hand at these events with promotional materials, and to publicise the different consultation events (online and in-person) which people can attend.</p> <p>Thursday 4 November 2021 - 12.00pm – 5.30pm Morrisons Selby, Market Cross Selby Y08 4YR</p> <p>Thursday 11 November 2021 - 12.00pm – 5.30pm Morrisons Selby, Market Cross Selby Y08 4YR</p>	~ Morrisons, Goole, Boothferry Road, Goole, DN14 6EN 10 November 2021 12-17.30pm
3.5.1	Drax Internal networks - Drax will use internal communication channels to inform their workforce about the consultation, how to get involved, and how to promote the consultation to their own networks.	A static exhibition was hosted on site at Drax Power Station to inform their employees.
3.6.1	Website - The main portal for the consultation will be the established website: [REDACTED] [REDACTED]	The website went live on the 1 November 2021, access to the online consultation feedback form ceased at the close of consultation, while the documents remain online in the consultation documents section.
3.6.3	<p>Brochure, factsheets and feedback form - A suite of consultation materials will be available for people to view and inform themselves around the Proposed Scheme. These materials will include:</p> <ul style="list-style-type: none"> ~ A brochure outlining background information on the Proposed Scheme, details of what is proposed and ways to submit feedback; ~ Exhibition boards which provide further information on specific elements of the Proposed Scheme, including information on BECCS technology, the planning process and construction considerations. ~ The PEIR; ~ A non-technical summary of the information included in the PEIR; ~ This SoCC; ~ A feedback questionnaire. 	Copies of the consultation material can be found in Appendix G of this Consultation Report. The PEIR is available on the project's website, while the PEIR Non-Technical Summary (NTS) is available in Appendix I and Appendix G7.
3.6.4	All materials will be available online to view and download. Hard copies and alternative formats of the materials will also be made available to people upon request. Details on how to request hard copies or alternative formats will be made clear on the website and on the publicity postcard which will be issued to all addresses within the consultation zone.	<p>Materials are available on the project website and under the Digital exhibition section, there are details of how to view the information online and how to request hard copies by contacting the project team</p> <p>[REDACTED]</p> <p>The consultation postcard contained information on how to contact the project team and the following text <i>'if you would prefer a hard copy of the consultation materials, require these in different formats or have any questions about the proposed scheme, please contact us'</i> and the project contact details for email, phone and post are included.</p>
3.6.5	Copies of the brochure and non-technical summary of the PEIR will be provided free of charge. Due to the size of the PEIR as a detailed technical document, a charge will incur for the printing and delivery of the PEIR upon request. (Cost to be confirmed once PEIR has been finalised).	The section 48 notice included the following text: <i>Hard copies of the consultation documents are available on request. Copies of the consultation brochure and non-technical summary of the PEIR will be provided free of charge. Due to the size of the PEIR as a detailed technical document, a charge of £210 will incur for the printing and delivery of the PEIR upon request.</i>
3.6.6 – 3.6.7	Online events - Three online events will be held over the course of the consultation period. These will be held via live-chat, providing communities an opportunity to hear more about the	The online events were held, and further information is provided in Section 6.17

Where in the SoCC	Commitment as it appears in the SoCC	How Drax fulfilled this commitment
	<p>Proposed Scheme and discuss their views directly with members of the project team on the website one-to-one chat function.</p> <p>The online events will be held on:</p> <ul style="list-style-type: none"> ~ Thursday 11 November 2021 (10am - 2pm) ~ Thursday 18 November 2021 (4pm - 8pm) ~ Wednesday 24 November 2021 (2pm - 6pm) 	
3.6.8 – 3.6.9	<p>In-person events - three in-person exhibition events will be held. The exhibitions will include materials for members of the public to view information on the Proposed Scheme.</p> <ul style="list-style-type: none"> ~ Thursday 23 November 2021, 12pm – 6pm at Drax Sports and Social Club, Main Road, Drax, Selby YO8 8PJ ~ Saturday 27 November 2021, 10am – 4pm at Junction Goole, Paradise Place, Goole, DN14 5DL ~ Wednesday 1 December 2021, 1.30pm – 7.30pm at Selby Town Hall, York Street, Selby YO8 4AJ 	The in-person events were held, and further information is provided in Section 6.17
3.6.12	<p>Deposit points</p> <ul style="list-style-type: none"> ~ Selby Library (52 Micklegate, Selby YO8 4EQ) ~ Snaith Library (27 Market Pl, Snaith, Goole DN14 9HE) ~ Goole Library (Carlisle Street, Goole DN14 5DS) ~ East Riding of Yorkshire Council (Beverley Customer Service Centre, 7 Cross St, Beverley HU17 6TB) ~ Drax Sports Club (Main Rd, Drax, Selby YO8 8PJ) 	Although not required in hard copy, consultation documents were available at the deposit points listed.
3.7.1	An online feedback form will be available for people to provide their comments and views on the Proposed Scheme.	The online feedback form was available for the duration of the consultation from the 1 November 2021 to 12 December 2021. The printable copy of the feedback form is available on the project website and in Appendix G5.
3.7.4	Responses to the consultation will be collated and analysed. All responses received will be carefully considered and will feed into the developing the Proposed Scheme where appropriate. This feedback will be analysed alongside any and all responses received as part of the consultation activities held in lines with sections 42 and 48 of the PA2008.	Chapter 7 of this Consultation Report sets out how the applicant has collated, analysed and had regard to all the responses received in developing the Proposed Scheme.
3.7.5	An explanation of how regard has been had to comments received, and where practicable, how they have shaped and influenced the Proposed Scheme will be reported in a Consultation Report which will accompany the Application as required by section 37(3)(c) of the PA2008.	Chapter 7 of this Consultation Report sets out how the applicant has had regard to all the responses received in developing the proposals. Tables 7.2 7.3 and 7.5 include the summary of the consultee comments and Drax's regard to those comments. Chapter 10 includes information on the changes to the proposed scheme following consultation.
3.7.6	The Consultation Report will include a summary of the consultation process undertaken in accordance with this document, the feedback received and how it has influenced the Proposed Scheme.	Chapter 5 of this Consultation Report sets out how the applicant has carried out the statutory consultation in accordance with the SoCC and how the comments have influenced the Scheme.

6. OVERVIEW OF STATUTORY CONSULTATION

6.1. WHO WAS CONSULTED?

6.1.1. Drax complied with its duties to consult under section 42 of the PA2008 and its duty to notify the Planning Inspectorate under section 46.

6.1.2. Section 42 of the PA2008 specifies the parties that the applicant must consult on the proposed application, outlined as:

- a. Section 42(1)(a) - such persons as may be prescribed;
- b. Section 42(1) (aa) - the Marine Management Organisation ('MMO');
- c. Section 42(1)(b) - each local authority that is within section 43;
- d. Sections 42(1)(c) - the Greater London Authority if the land is in GreaterLondon; and
- e. Sections 42(1)(d) - each person who is within one or more of the categories set out in section 44 of the PA2008.

6.2. SECTION 42(1)(A) AND SECTION 42(1) (AA)

6.2.1. Section 42(1)(a) - Prescribed consultees were identified by reference to Schedule 1 of the APFP Regulations. Schedule 1 identifies prescribed consultees as either:

- a. A specified person or organisation (for example Natural England); or
- b. A category of person or organisation (for example the relevant statutory undertakers).

6.2.2. Where specific persons or organisations are identified in Schedule 1 of the APFP Regulations, the Applicant has consulted that person. In all cases where an organisation identified in Schedule 1 has a local office, Drax has consulted the local office and the registered/head office unless advised otherwise. An example of this is Natural England, where information was sent to the head office as well as the local manager.

6.2.3. All those identified as being consultees in reference to Schedule 1 of the APFP Regulations are provided in Appendix D1. As explained in Chapter 9, the identification of the parties in each of the categories set out in Schedule 1 of the APFP Regulations and listed in Appendix D1 was informed by the list of Regulation 11(1)(a) consultees provided by the Planning Inspectorate in Appendix D3; with the exception of two parties (as identified in Chapter 9).

6.2.4. A full list of Section 42(1)(a) and Section 42(1) (aa) consultees is included in Appendix D1. This appendix has been laid out as per the annex for Advice Note 3 and identifies the bodies prescribed in the table in Schedule 1 of the APFP Regulations in line with the circumstances test set out in the Annex which the Planning Inspectorate uses when determining whether a prescribed consultee should be consulted or not.

- 6.2.5. In addition, Appendix D1 identifies the bodies which fall within the category of 'relevant statutory undertakers', as defined in Schedule 1 of the APFP Regulations.
- 6.2.6. Chapter 6 identifies additional consultees who have been deemed to have a potential regulatory or other interest in the Proposed Scheme, but which are not prescribed consultees under section 42(1)(a)-(c). These consultees are utilities companies (generally communications and pipeline companies), two combined authorities, nearby airfields, and additional parish councils.

6.3. SECTION 42(1)(B)

- 6.3.1. Section 42(1)(b) - requires the applicant to consult each local authority that is within section 43.
- 6.3.2. The Applicant applied section 43 of the PA2008 as outlined in Table 6.1.

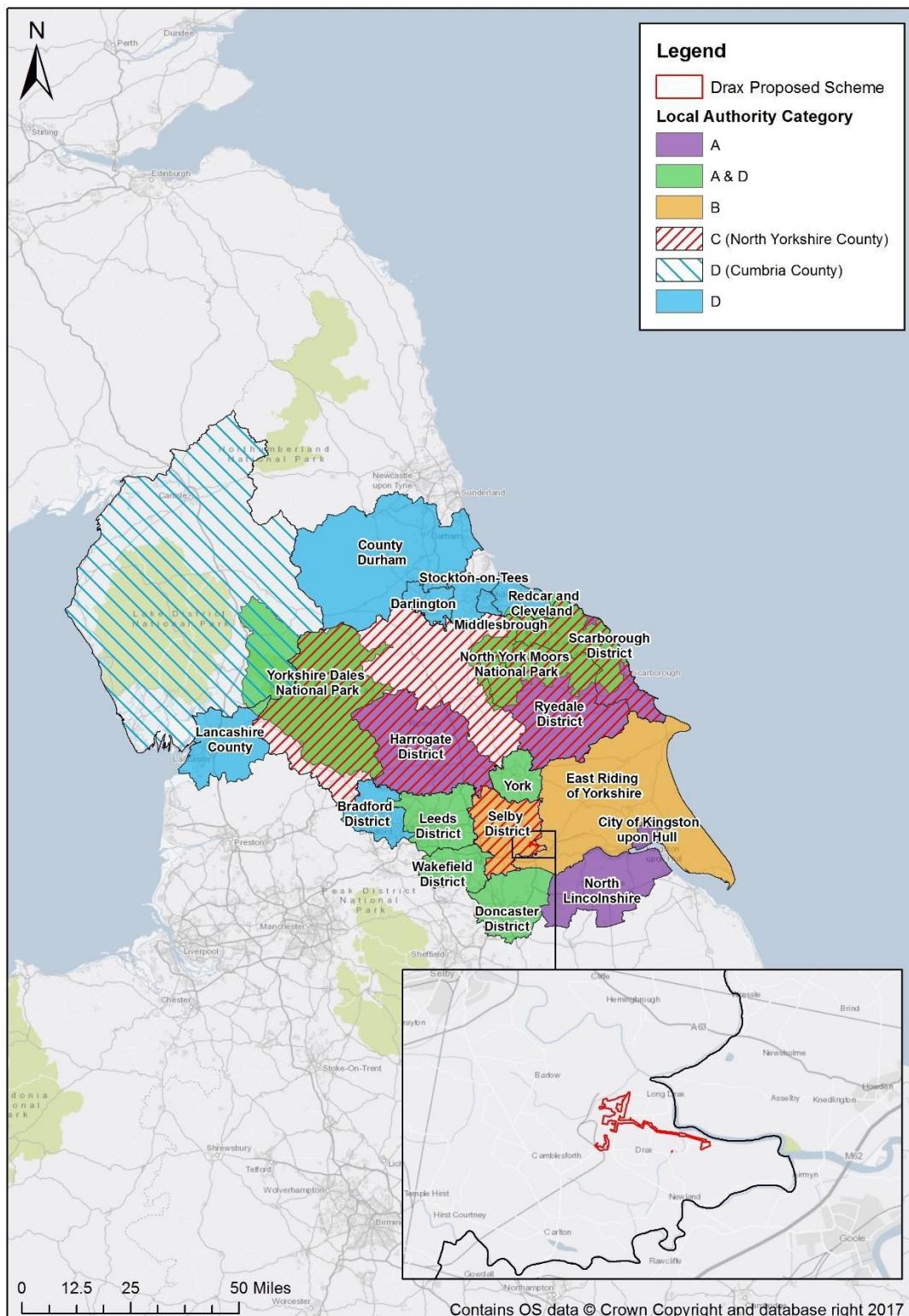
Table 6.1 - Local Authorities Under Section 43 of the PA2008

Local Authority	Provision	Category for s.43(2) or s.43(2A)	Description
Selby District Council	s.43(1), s.43(2)(a)s.43(2)(aa)	B	The land to which the proposed application relates is in the authority's area, and this authority is a lower-tier district council.
East Riding of Yorkshire Council	s.43(2), s.43(2A)	A and D under the PA2008 (also considered as a non-Prescribed B category)	East Riding of Yorkshire Council is the neighbouring authority to Selby DC, which is a lower tier authority. East Riding of Yorkshire Council is a unitary authority and is also part of the boundary of a "C" authority (NYCC). East Riding of Yorkshire Council was also treated as a non-prescribed category "B" host authority because of the close proximity of its area to the Site and also as highways powers sought in the DCO as part of the DCO Application relating to the construction of the Proposed Scheme would be exercised in this authority's area.
North Yorkshire County Council	s.43(1), s.43(2A)	C	The land to which the proposed application relates is in the authority's area, and this authority is an upper-tier county council.
Yorkshire National Authority Dales Park	s.43(2) and s.43(2A)	A and D	Part of the boundary of the authority's area is also part of the boundary of category "B" and "C" local authorities, and this authority is a National Park Authority and is not a lower-tier district council.
City of York Council	s.43(2) and s.43(2A)	A and D	Part of the boundary of the authority's area is also part of the boundary of category "B" and "C" local authorities and this authority is not a lower-tier district council. City of York Council is a unitary authority.
Harrogate Borough Council	s.43(2)	A	Part of the boundary of the authority's area is also part of the boundary of a category "B" local authority.
Ryedale District Council	s.43(2)	Considered as a non-prescribed A authority	Part of the boundary of the authority's area is also part of the boundary of East Riding of Yorkshire Council, which
Scarborough Borough Council	s.43(2)	Considered as a non-prescribed A authority	Part of the boundary of the authority's area is also part of the boundary of East Riding of Yorkshire Council, which
Hull City Council	s.43(2)	Considered as a non-prescribed A authority	Part of the boundary of the authority's area is also part of the boundary of East Riding of Yorkshire Council, which
North Lincolnshire Council	s.43(2)	Considered as a non-prescribed A authority	Part of the boundary of the authority's area is also part of the boundary of East Riding of Yorkshire Council, which we have considered as a non-prescribed category "B" local authority. The authority is a unitary authority.
Leeds City Council	s.43(2) and s.43(2A)	A and D	Part of the boundary of the authority's area is also part of the boundary of a category "B" and "C" local authorities and the authority is not a lower-tier district council. The authority is a unitary authority.
Wakefield Metropolitan District Council	s.43(2) and s.43(2A)	A and D	Part of the boundary of the authority's area is also part of the boundary of a category "B" and "C" local authorities and this authority is not a lower-tier district council. The authority is a unitary authority.

Local Authority	Provision	Category for s.43(2) or s.43(2A)	Description
Doncaster Metropolitan Borough Council	s.43(2) and s.43(2A)	A and D	Part of the boundary of the authority's area is also part of the boundary of a category "B" and "C" local authorities and this authority is not a lower-tier district council.
Bradford Metropolitan District Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council. The authority is a unitary authority.
Darlington Borough Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council. The authority is a unitary authority.
Stockton-on-Tees Borough Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council. The authority is a unitary authority.
Redcar and Cleveland Borough Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council. The authority is a unitary authority.
Middlesbrough Borough Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council. The authority is a unitary authority.
North York Moors National Park Authority	s.43(2) and s.43(2A)	A and D	Part of the boundary of the authority's area is also part of the boundary of a category "B" and "C" local authorities, and this authority is a National
Lancashire County Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council.
Cumbria County Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council.
Durham County Council	s.43(2A)	D	Part of the boundary of the authority's area is also part of the boundary of a category "C" local authority and this authority is not a lower-tier district council. The authority is a unitary authority.

- 6.3.3. The relevant local authority boundaries of “A”, “B”, “C” and “D” authorities are shown in Plate 6.1.
- 6.3.4. A full list of Section 42(1)(b) consultees is included in Table 6.1, including the local authorities we have considered as bordering East Riding of Yorkshire Council, which we have treated as a non-prescribed host authority.

Plate 6.1 - Local Authority Boundaries



6.4. SECTION 42(1)(C)

6.4.1. Section 42(1)(c) – As the affected land is not located within Greater London, the Greater London Authority was not consulted.

6.5. SECTION 42(1)(D)

6.5.1. Section 42(1)(d) requires the applicant to consult each person who is within one or more of the categories set out in section 44 of the PA2008. The Applicant undertook a land referencing exercise to identify all those persons with an interest in land within Categories 1, 2 and 3 within section 44 of the PA2008 through diligent inquiry the results of which are set out in the Book of Reference (document reference 4.3).

6.5.2. Category 1 includes owners, lessees, tenants (whatever the tenancy period) or occupiers of the land within the Site.

6.5.3. Category 2 includes parties that have an interest in the land or who have the power to sell, convey or release the land within the Site.

6.5.4. Category 3 includes parties that the applicant thinks, if the Order sought by the Application were made and fully implemented, the person would or might be entitled to make a relevant claim for compensation under section 10 of the Compulsory Purchase Act 1965 (Ref. 4.1), Part 1 of the Land Compensation Act 1973 (Ref. 4.2) or section 152(3) of the PA2008.

6.6. APPROACH TO IDENTIFYING CATEGORY 1 AND 2 INTERESTS

6.6.1. Drax carried out a number of processes to identify and consult those with an interest in the Site.

6.6.2. Desktop referencing for the Site was undertaken through extraction of Land Registry data, request for land interest information from landowners and other desktop activities to identify open spaces and rights of way.

6.6.3. Land Interest Questionnaires (LIQs) were sent out during September 2021 to all parcels of land within the Site to confirm the interests and request further information. This included a request for information about a recipient's own interests, associated third party interests and spatial extent of the property.

6.6.4. Site referencing was undertaken through site visits to understand the occupation details for properties (ownership, leases, tenants or occupiers) in addition to confirming details which had been gathered through desktop methods.

6.6.5. Where land ownership information was not ascertained through desktop or site referencing methods, the land referencing team erected notices on site requesting information (see Appendix F8 for location plan and notice). The notice showed the land ownership boundary in question and provided details of how anyone with information could contact the land referencing team with any relevant information they were aware of. All updates were recorded in the land referencing database and GIS.

6.6.6. Confirmation of accuracy of information through Land Registry updates and confirmation schedules where recipients were requested to confirm information or amend by providing corrections. These letters were sent on 9 April 2022.

6.6.7. Details of the land referencing methodology which was undertaken as part of the Proposed Scheme can be found in Appendix K.

6.6.8. Appendix D2 includes a full list of section 42(1)(d) consultees who were considered section 42(1)(d) consultees prior to submission of the DCO Application. The section 42(1)(d) list includes all Category 1 and 2 interests. It was initially deemed that no Category 3 interests were affected. However, following ongoing assessments as part of the EIA, Category 3 interests were identified and listed in Appendix F. Regarding the lists of “unknown interests”, the locations of these unknowns can be found in Appendix F8. The list also includes relevant statutory undertakers prescribed by section 42(1)(a) and consultees not prescribed by section 42(1)(a) (for the most part, communications and pipeline companies) where such companies were considered to have the potential to have apparatus or an interest in the Order limits. Where the existence of such apparatus or interest has not been confirmed (or confirmed not to exist) these companies are still included in the section 42(1)(d) list and were consulted (see Appendix D2). Any statutory undertakers that were considered not to have an interest were not included in the Book of Reference; these parties are listed in Appendix D2 Table 2.2. This is explained further below in this report, in relation to the Book of Reference (document reference 4.3).

6.7. CATEGORY 3 LAND INTERESTS

6.7.1. The Applicant conducted a review of potential Category 3 land interests and considered there to be no interests, at Statutory Consultation, that have a relevant claim under Part 1 of the Land Compensation Act 1973 (compensation for depreciation of land value by physical factors caused by the use of public works) in relation to each of the factors listed below:

- a.** Noise – Following a noise assessment as part of the EIA for the DCO Application, it was considered at the time of Statutory Consultation that there were no Category 3 land interests as part of the Proposed Scheme. As explained in section 6.11 below, this changed post Statutory Consultation, further to on-going assessment work now reported in Chapter 7 (Noise and Vibration) (document reference 6.1.7), Figure 7.1 (Baseline Noise Survey and Sensitive Receptor Locations) and Figure 7.3 (Operational Predicted Mitigated Noise Levels) of the ES (document reference 6.2.7.1 and 6.2.7.3 respectively) for further details.
- b.** Vibration - It was considered that there were no Category 3 land interests as part of the Proposed Scheme further to the assessment work as it stood at the time and is now reported in Chapter 7 (Noise and Vibration) (document reference 6.1.7)).

- c. Fumes –The emission of fumes are deemed to not be of sufficient quantity to generate any significant effects further to the assessment work as it stood at the time and is now reported in the Statutory Nuisance Statement (document reference 5.4) and Chapter 6 (Air Quality) of the ES (document reference 6.1.6).
- d. Smoke - The emission of smoke is deemed to not be of sufficient quantity to generate any significant effects further to the assessment work as it stood at the time and is now reported in the Statutory Nuisance Statement (document reference 5.4) and Chapter 6 (Air Quality) of the ES (document reference 6.1.6).
- e. Artificial lighting – No significant effects identified further to the assessment work as it stood at the time and is now reported in the Statutory Nuisance Statement (document reference 5.4) and Chapter 9 (Landscape and Visual Amenity) document reference 6.1.9) of the ES.
- f. Discharge of any solid or liquid substance onto land - No significant effects identified that would affect the viability of the land further to the assessment work as it stood at the time and is now reported in (the Statutory Nuisance Statement (document reference 5.4), Chapter 11 (Ground Conditions) (document reference 6.1.11) and Chapter 13 (Materials and Waste) (document reference 6.1.13) of the ES.

- 6.7.2. All relevant interests identified at Statutory Consultation with the potential to make a claim under Section 10 of the Compulsory Purchase Act 1965, because they are people with the benefit of a right or restrictive covenant over the land within the Order limits, have been included within the Book of Reference (document reference 4.3) as Category 2 and 3 interests.
- 6.7.3. All relevant interests identified at Statutory Consultation with the potential to make a claim under Section 152(3) of the PA2008, because they are people with the benefit of a right or restrictive covenant over the land within the Order limits, have been included within the Book of Reference (document reference 4.3) as Category 2 and 3 interests.

6.8. RELATION TO THE BOOK OF REFERENCE

- 6.8.1. Appendix D2 includes a full list of section 42(1)(d) consultees that were consulted for the statutory consultation. In some instances, due to the developing design of the Proposed Scheme since consultation and the creation of new interests in the Site following consultation, there are discrepancies between the list of land interests that were consulted because they came within section 42(1)(d) at the time of the statutory consultation and the list of land interests now recorded within the Book of Reference (document reference 4.3). The reasons for these discrepancies include:
 - a. Refinement of the Order limits meaning that land interests who were originally consulted no longer fall under section 42(1)(d). This has generally been because the Order limits has been reduced following the adjustments made to the laydown area. The area within the Order limits has also been reduced as a result

of removing the option of construction transportation via the jetty from the Proposed Scheme;

- b.** Continued due diligence in identifying land interests has identified that previously consulted land interests no longer fall under section 42(1)(d);
- c.** Where companies prescribed as relevant statutory consultees pursuant to section 42(1)(a) or companies included in Appendix D1 as being consultees not prescribed by section 42(1)(a) (such as communications and pipeline companies) were considered to have the potential to have apparatus or other interests within the Order limits, those companies were added to the section 42(1)(d) list and duly consulted. Where those companies have either not confirmed they have apparatus or an interest, or have confirmed they do not have apparatus or an interest, they do not appear in the Book of Reference (document reference 4.3);
- d.** Where land ownership information was not ascertained through desktop or site referencing methods, the land referencing team erected notices on site requesting information. The notice showed the land ownership boundary in question and provided details of how anyone with information could contact the land referencing team with any relevant information they were aware of. These unknown land interests are set out in Appendix F8.

6.8.2. In order to highlight where these discrepancies exist, Appendix D2 and Appendix F1 has grouped the list of section 42(1)(d) interests consulted according to:

- a.** Section 42(1)(d) consultees that are also in the Book of Reference (document reference 4.3);
- b.** Section 42(1)(d) consultees that were removed from the Book of Reference (document reference 4.3) as they are no longer section 42(1)(d) persons for the reasons set out in Appendix D & F;
- c.** Interests within the Book of Reference (document reference 4.3) that have not been consulted as section 42(1)(d) consultees because (1) the interest is unknown and therefore only site notice could be placed on the land relating to the interest and (2) a new interest was created in the Order Land post statutory consultation.

6.9. SECTION 42 CONSULTATION ACTIVITIES

6.9.1. The consultation with prescribed bodies, local authorities, and land interests (under section 42) ran in parallel to the consultation with local communities and people living in the vicinity of land required for the Proposed Scheme (under section 47). The consultation was advertised to run from 1 November 2021 to 12 December 2021, for six weeks.

6.9.2. Under regulation 13 of the EIA Regulations 2017, the applicant is required to send a copy of the section 48 notice to the consultation bodies and any person notified to the applicant in accordance with regulation 11(1)(b). The consultation bodies are defined in the EIA Regulations 2017 to include consultees prescribed under sections 42(1)(a)

and 43 of the PA2008. The letters to section 42(1)(a)-(b) consultees therefore explained that they were prescribed consultees under the PA2008 and also the EIA Regulations 2017 and enclosed the section 48 notice as well as the section 42 pack. PINS did not identify any regulation 11(1)(c) in their Regulation 11 list dated 26 February 2021.

6.9.3. Drax contacted statutory consultees section 42(1)(a) and section 42(1)(b) in advance of the launch of statutory consultation to ascertain whether the consultee would be happy to receive information via email.

Drax sent the email to the s42(1)(a) and section 42(1)(b) on 28 September 2021 with the following text

‘Following on from our initial consultation for BECCS at Drax held in March 2021, we will soon be launching our statutory consultation to present further details for our proposals to develop Bioenergy with Carbon Capture and Storage at our existing plant in North Yorkshire. We are planning to launch this consultation in November this year.

In advance of this consultation, please could you confirm that you are happy for us to consult and send you the relevant project information via email? We would be grateful if you could confirm that you are happy with this approach by responding to this email by Friday 8 October. If you would prefer, we use an alternative email address, please respond with updated details.

If we do not hear from you, we will, as a default, issue information by post. However, we appreciate that, given the current Covid-19 pandemic, providing information by email may be easier for most people to access’.

6.9.4. Twenty-six consultees responded they would be content to receive information via email with attachments only. Hard copy letters were posted to those who had not responded or wished to receive postal information.

6.9.5. Section 42(1)(a) and Section 42(1)(b) consultees were issued the consultation notification letter and enclosures on Friday 29 October 2021. The letter outlined that they had been identified as a section 42 consultee under the PA2008 and invited the recipient to comment on the proposals (see Appendix E1).

6.9.6. Where section 42 consultees received letters after the start of consultation on 1 November 2021, information is provided in section 6.10.

6.9.7. Alongside the letter, the section 42(1)(a), section 42(1)(b) and section 42(1)(d) consultees received a hard copy of the consultation brochure and a copy of the section 48 notice, together with a link to the consultation materials on the website.

6.9.8. There were seven instances where hardcopies of the section 42 packs were returned to sender as they were unable to be delivered by post to the contact details held by the Applicant. Six received the statutory consultation email sent on 1/11/2021 and did not need a hardcopy resent. An email address was not available for Leeds Teaching

Hospital and the hardcopy was returned to sender. A hardcopy of the section 42 pack was redelivered to the Trust's Headquarters. Appendix L provides further information.

- 6.9.9. In April 2022, the Applicant identified that it had not specifically consulted a section 42(1)(a) party, being the Port of Goole, as a relevant harbour statutory undertaker affected by the Proposed Scheme. However, it is the case that the Applicant has worked together with Associated British Ports – Humber, the harbour authority for the Port of Goole, on a number of projects and initiatives in the past and have engaged with them on the Proposed Scheme as part of its on-going engagement activities.
- 6.9.10. In any event, the Applicant did send the Port a statutory consultation letter on 29 April 2022 inviting formal comments from them. The letter can be found in Appendix E1, and whilst the Applicant recognises that this letter has a less than statutory minimum period for responses to be received, in light of the programme for the Proposed Scheme, it had discussed the need for a quick response with the Port beforehand and so considered that there would be no prejudice to the Port in there being a reduced period.
- 6.9.11. This is demonstrated by the fact that a response was received on 3 May 2022, which can also be found in Appendix E2.

6.10. ADDITIONAL CONSULTATION

- 6.10.1. Consultation was also held with additional consultees prior to submission of the Application (see Appendix F for correspondence issued). The additional consultees included in sections 6.12 and 6.14 are not "prescribed" under section 42(1)(a)-(b) but have been identified on a voluntary basis given their potential to have a regulatory or other interest in the Proposed Scheme.
- 6.10.2. In addition, as part of minor changes to the Order limits made after the statutory consultation, a targeted consultation was conducted for new section 42 (1)(d) consultees from 2 April 2022 – 2 May 2022 to ensure that they had received opportunity to view and comment on the Proposed Scheme within 28 days of the notification. Further information is provided in Chapter 8 and Appendix M.

6.11. ONGOING DUE DILIGENCE

- 6.11.1. As part of ongoing land referencing exercises and due diligence, it was noted that some section 42(1)(a) and section 42(1)(d) consultees had not received the original consultation information issued on 29 October 2021. These consultees were issued consultation letters with a revised deadline to ensure that they had received the opportunity to view and comment on the Proposed Scheme within 28 days of the notification. These parties are identified in Appendix F1, and the process of their identification is set out below.
- 6.11.2. In some instances, ongoing discussions with consultees and ongoing Land Referencing exercises, provided further insight into land interest or other consultee details. Ongoing land referencing also led to new contact details for section 42(1)(d)

consultees (these were Category 1, 2 and 3 parties). In these instances, a consultation letter was issued to those consultees with a revised deadline to ensure that they had received the opportunity to view and comment on the Proposed Scheme within 28 days of the notification. These parties are identified in Appendix F1. Some parties identified were considered to be unknown, and where this was the case, an unknown site notice was erected (see Appendix F8 for location plan and notice).

6.11.3. As a result of on-going assessments as part of the EIA process post Statutory Consultation, the Applicant newly identified there to be parties that would have a “relevant claim” as a Category 3 interest pursuant to Part 1 of the Land Compensation Act 1973 (that is, people who live outside the Order limits but whose property may be sufficiently close to be depreciated in value due to noise, vibration, smells, smoke or light emissions caused by the use of the Proposed Scheme once it is in operation). The Applicant issued a consultation letter to those land interests (142 consultees) and provided for a 28-day period of consultation. The initial list of consultees was taken from Her Majesty’s Land Registry. The letter was initially issued to 142 parties on 22 February 2022 with an end date of 23 March 2022. In order to capture all relevant consultees, WSP conducted site visits to ascertain any deviation from the current owners of the properties and land registry data. As a result of these site visits, an additional 12 letters were sent on 12 March 2022 with an end date of 4 of April 2022 and a further 9 letters were sent on 23 March 2022 with an end date of 20 April 2022. A list of all such consultees can be found in Appendix F1 and copies of the letters sent can be found in Appendices F2-F5.

6.11.4. Further to on-going design development and consideration that the Applicant may need flexibility to extinguish existing tenancies to facilitate the construction and operation of the Proposed Scheme, the Applicant consulted with commercial tenants within the power station. The Applicant issued a consultation letter (36 consultees) (and followed up with emails) to those land interests and provided for a 28-day period of consultation on the 7 March 2022 with an end date 4 April 2022. A list of all consultees can be found in Appendix F1 and a copy of the letter sent can be found in Appendix F3.

6.12. ADDITIONAL NON-PRESCRIBED AIRFIELDS CONSULTATION

6.12.1. While it is not anticipated that the Proposed Scheme will result in changes to the scale and massing of the Drax site, it is possible that lighting or other undetermined factors may affect aviation operations within the region. Consultation has therefore been undertaken with local airfields to seek views on aviation lighting and the potential for navigational hazard. This is in addition to the statutory consultation with the Civil Aviation Authority (CAA) and Ministry of Defence (MoD). The following local airfields were consulted on 14 January 2022, with a deadline for response of 11 February 2022, see Appendix F7 for the notification letter.

- a. Leeds Bradford;**
- b. Sherburn-in-Elmet Airfield;**

- c. Full Sutton airfield;
- d. The Real Aeroplane Company;
- e. Burn Gliding Club;
- f. Doncaster Sheffield Airport;
- g. Humberside Airport; and
- h. Sandtoft Airfield.

6.12.2. Due to restrictions on work practices resulting from the COVID-19 pandemic, the information letter was issued to the airports and airfields by email, with a follow up phone call to confirm receipt. All airports and airfields were spoken to, with emails circulated further as required.

6.12.3. No responses were received from the airports and airfields. However, in taking steps to raise awareness of the Proposed Scheme and in following up to ensure receipt, the applicant has demonstrated efforts to consult with local aviation operators as well as the national bodies.

6.13. CONSULTATION UNDER REGULATION 11(1)(C) OF THE EIA REGULATIONS 2017

6.13.1. On 26 February 2021, the Planning Inspectorate notified the Applicant that they had not identified any consultees under regulation 11(1)(c) of the EIA Regulations 2017 whom the Planning Inspectorate considers 'to be, or to be likely to be, affected by, or to have an interest in the Proposed Scheme.'

6.14. ADDITIONAL CONSULTATION WITH NON-PRESCRIBED CONSULTEES

6.14.1. Due to previous input provided to the Proposed Scheme, the Applicant was asked by Trans Pennine Trail to be kept on the consultation list going forward. A letter was issued by email to a representative of the organisation on 20 January 2022, the email included a link to the consultation brochure to ensure the organisation was kept informed (Appendix F6).

6.14.2. A response was received from Trans Pennine Trail, a response was received from Trans Pennine Trail, which the Applicant has had regard to and a summary of the consultee response is included in Table 7.5.

6.14.3. Additionally, the Applicant consulted a number of organisations who are not prescribed consultees or land interests and are not groups identified in the SoCC. These organisations are organisations that were consulted on previous schemes brought forward by the Applicant (or successor organisations to them) and it was determined that it would be appropriate for them to be consulted on the Proposed Scheme. These parties are listed below. These parties were sent letter at the same time as the statutory consultation activities set out in section 6.9.

a. The Council of British Archaeology, 92 Micklegate, York, YO1 6JX

- b.** DEFRA, 2 Marsham Street, London, SW1P 4DF
- c.** Design Council Enterprises Limited, Eagle House, 167 City Road, London, EC1V 1AW
- d.** Tata Limited, 18 Grosvenor Place, London, SW1X 7HS
- e.** Serco Group Plc, Serco House, 16 Bartley Wood Business Park, Bartley Way Hook, RG27 9UY
- f.** Lynx Couriers Limited, Letraset Building Suite 2080, Kingsnorth Industrial Estate, Wotton Road, Ashford, TN23 6LN
- g.** Excelredstone Converged Solutions Limited, 85 Great Portland Street, First Floor, London, W1W 7LT
- h.** Energie, Drax Power Station, Drax, Selby, YO8 8PH

6.15. NOTIFYING THE SECRETARY OF STATE UNDER SECTION 46

- 6.15.1. Section 46 of the PA2008 requires that the applicant supply the Secretary of State with the same information in relation to the proposed application as it has provided to the section 42 parties. The section 42 pack (including the section 48 notice and the consultation brochure) was sent to PINS on Friday 29 October 2021 before the section 42 consultation commenced.
- 6.15.2. Appendix B1 includes the letter to PINS and an email from PINS on 29 November 2021 confirming receipt of the letter and the documents (Appendix B2).

6.16. CONSULTING THE COMMUNITY UNDER SECTION 47

- 6.16.1. Section 47 of the Act sets out an applicant's duty to consult the local community about a proposed application. See Table 5.3 for compliance with the SoCC.
- 6.16.2. To ensure wider engagement we also contacted political non-statutory stakeholders beyond the immediate vicinity of the site including parish councils, district councils, county councils and local MPs such as Nigel Adams and David Davis. Non-political non-statutory hard-to-reach groups were also contacted, these included Age UK and Selby and District Carers Centre.
- 6.16.3. In total, 58 emails with letters (includes 3 which were sent by contact forms) were sent to non-statutory (section 47) stakeholder groups. The full list of stakeholders consulted is provided in Appendix A of the SoCC.

6.17. CONSULTATION INFORMATION ENQUIRY CHANNELS AND EVENTS

- 6.17.1. Through our hybrid online and in-person statutory public consultation, Drax made it easier for people to both access the non-technical and technical consultation material and speak to the project team. Consultees could view a digital exhibition via the dedicated project website and ask questions during one of the live chat sessions from the comfort of their own home. In the context of the COVID-19 pandemic, this allowed

people anxious about the pandemic or those self-isolating to still engage with the public consultation.

6.17.2. For those wanting in-person engagement, Drax held three in-person events in locations accessible in terms of disabled access to the buildings and local transport connectivity. These locations were in communities closest to Drax power station. One event was held on a Saturday and the other two were held on weekdays, from afternoon to the early-evening so working people could attend. The project also provided a direct phone number and email address for consultees to reach the project team directly with questions. Correspondence between the Applicant and members of the public who contacted the team through email can be found in Appendix A6. In addition, it was specified on the website and consultation leaflet that consultation materials could be made available in large print, braille or other languages.

6.17.3. To advertise the statutory consultation, the team deployed a range of communication methods aimed at effectively reaching a diverse audience. Drax deployed social media advertising to reach younger audiences, a postcard mailout to properties with the consultation zone, newspaper advertising to reach older audiences and a letter sent to groups representing hard-to-reach groups and community groups, such as Age UK Selby District. To reach an even wider demographic, Drax also held four pop-up promotional events outside supermarkets used by local community in Selby and Goole.

6.17.4. Further information on the consultation activities highlighted above are detailed in this chapter.

6.17.5. The **consultation materials** available on the project website were as follows:

- a. **Consultation Brochure** – providing a summary of the Proposed Scheme and details of the consultation events and comments could be submitted.
- b. **Preliminary Environmental Information Report (PEIR) and Technical Appendices** – setting out the preliminary assessment of the likely significant environmental effects of the Proposed Scheme.
- c. **Non-technical summary of the PEIR** - a summary of the key information as presented in the PEIR, explained in non-technical language.
- d. **Section 48 Notice** - containing a summary of the proposals for the Scheme, detail of where the consultation documents could be viewed and how consultees could request copies of the documents, and details of how to respond to the consultation, including the deadline for such responses.
- e. **SoCC** – details of how Drax planned to consult with people living in the vicinity of the Proposed Scheme (in accordance with section 47 of the PA2008).
- f. **Consultation Feedback form** – this contained eight qualitative and quantitative questions, as well as questions to identify the demographics of respondents.

- g. **Consultation Exhibition Banners** - provide further information on specific elements of the Proposed Scheme, including information on BECCS technology, the planning process and construction considerations.
- h. **Frequently asked questions** – see Appendix G8 for the pdf of these as presented on the consultation website
- i. **Promotional consultation materials** - as mailed are provided for in Appendix G
- j. **Consultation Poster** – promoting the documentation available at the deposit points and consultation events to Drax employees (Appendix G3).
- k. **Consultation Postcard** - A5 information postcard was distributed to every residential and business address within the consultation zone.

6.17.6. Drax provided the **following channels** to manage feedback and enquiries

Email: info@BECCS-Drax.com

Phone: 01757 618381

Post: FREEPOST CARBON CAPTURE BY DRAX

6.17.7. **Digital exhibition** – the digital exhibition presented the exhibition boards as well as the consultation brochure. Visitors to the site could use their mouse, trackpad or swiping on the mobile device to rotate the perspective to view the proposals. Users could zoom in using their scroll-wheel or by pinching on their mobile device. Visitors were also given the option to view pdf of the information or request hard copies.

6.17.8. The digital exhibition on the website was complemented by the live chat function at certain times and dates. This allowed participants to review the digital exhibition boards and ask questions to the project team in a similar way to how they could at a physical event. To ensure that the live chat feature was accessible to as many people as possible, Drax held the live sessions over three four-hour timeslots across three days at different times. In total, one consultee took part in the live chat sessions, which took place.

6.17.9. **Three live chat** sessions took place over four-hour timeslots across three days at different dates and times. This allowed participants to review the digital exhibition boards and ask questions of the project team in a similar way to how they could at a physical event. Any questions that we were unable to answer on the chat, were sent via email to consultees. Please find below the dates and times at which the live chat sessions took place.

- a. Thursday 11 November 2021, 10:00 – 14:00 (no participants attended)
- b. Thursday 18 November 2021, 16:00 – 20:00 (1 participant attended)
- c. Wednesday 24 November 2021, 14:00 – 18:00 (no participants attended)

6.17.10. On Thursday 18 November 2021 the participant which attended the live chat session was from Biofuelwatch, and they raised several detailed questions during the session.

6.17.11. During the statutory consultation six-week period **three in-person public consultation** events were held at locations surrounding Drax Power Station which

were all Covid-19 compliant. These events were held at local venues that were familiar to the local community and were held during both the week and the weekend. All venues were fully accessible. The events provided an opportunity for the local community and stakeholders to view the proposals and speak directly with the project team. Across the events, a total of 41 consultees attended. The attendees ranged from residents, community organisation and previous and current Drax employees.

6.17.12. The in-person events took place on the following dates and times:

- a. Tuesday 23 November 2021, 12:00 – 18:00 – Drax Sports and Social Club, Main Road, Drax, Selby, YO8 8PJ (19 attendees)
- b. Saturday 27 November 2021, 10:00 – 16:00 – Junction Goole, Paradise Place, Goole, DN14 5DL (11 attendees)
- c. Wednesday 1 December 2021, 13:30 – 19:30 – Selby Town Hall, York Street, Selby, YO8 4AJ (11 attendees)

6.17.13. **Manned pop – up promotional events** - In addition to the two events noted in the SoCC, a further two events were also held. Morrisons supermarket in Goole and one in Selby were both selected as suitable venues for handing out promotional material due to their location for high levels of footfall throughout the day and being accessible for the local community. They were held on:

- a. Wednesday 3 November 2021, 12pm -5.30pm at Morrisons Goole, Boothferry Rd, Goole DN14 6EN
- b. Thursday 4 November 2021, 12pm -5.30pm Morrisons Selby, Market Cross, Selby YO8 4YR
- c. Wednesday 10 November 2021, 12pm -5.30pm Morrisons Goole, Boothferry Rd, Goole DN14 6EN
- d. Thursday 11 November 2021, 12pm -5.30pm Morrisons Selby, Market Cross, Selby YO8 4YR

6.17.14. Across the four pop-up promotional events, a total of 1169 postcards were handed out. The highest levels of engagement were between 12:00-14:30, coinciding with the surge in footfall from lunchtime shopping, although a steady flow of people remained throughout the entirety of the afternoons.

6.18. SECTION 48 REQUIREMENT

6.18.1. Section 48 of the PA2008 requires the applicant to publicise a proposed application in the prescribed manner. Regulation 4 of the APFP Regulations prescribes the manner in which an applicant must undertake the publicity. Regulation 4(2) sets out the requirements for the publication of a notice by the applicant (known as the "section 48 notice"), and Regulation 4(3) provides detail of the matters which must be included in that notice, including that the notice gives not less than 28 days from the last publication of the notice for receipt of responses.

6.18.2. The APFP Regulations require the section 48 notice to be published as follows.

- For at least two successive weeks in one or more local newspapers circulating in the vicinity of the proposed development;
- Once in a national newspaper;
- Once in the London Gazette.

6.18.3. The section 48 notice was published as detailed in Table 6.2 (see Appendix H3).

Table 6.2 - Publication of section 48 notice

Name of publication	Week 1	Week 2
National Papers		
The Guardian	23 October 2021	N/A
London Gazette	21 October 2021	N/A
Local Paper		
The Yorkshire Post	21 October 2021	28 October 2021

6.18.4. In line with Regulation 13 of the EIA Regulations 2017 the section 48 notice was sent on 1 November 2021 to Regulation 11(1)(a) consultees save for two parties, as discussed in Chapter 9. The notice was also added to the Proposed Scheme website under the consultation documents section.

6.18.5. The section 48 notice was also placed in the vicinity of the Proposed Scheme, see Appendix F8 for photos and site notice location plan.

6.19. CONTENT OF NOTICE – SECTION 48

6.19.1. The section 48 notice was prepared with reference to Regulation 4(3) of the APFP Regulations and included all matters prescribed by it.

6.19.2. The notice contained:

- The name and address of the Applicant;
- A statement that the Applicant intends to make an application for development consent to the Secretary of State;
- A statement as to whether the application is EIA development; a summary of the main proposals, specifying the location or route of the proposed development;
- A statement that the consultation documents showing the nature and location of the proposed development are available to view and comment on the Proposed Scheme website and available for inspection free of charge at the deposit locations;
- The latest date on which the consultation documents will be available for inspection (being a date not later than the deadline for consultation);

- f. Details of online and in-person events which would provide an opportunity for the local community and stakeholders to view the proposals and speak to the delivery team; a statement on the rearrangement of in-person events due to restrictions relating to the COVID-19 pandemic.
- g. How people could request copies of the documents (including any charges);
- h. Details of how to respond to the consultation; and
- i. The deadline for responses which was 12 December 2021.

6.20. RESPONSES RECEIVED TO THE CONSULTATION

6.20.1. No responses specifically identified themselves as a response to section 48 publicity. As a result, any response that was potentially received following section 48 publicity from a known section 42 consultee was treated as a section 42(1)(a), section 42 (1)(b) and section 42(1)(d) consultee. All other responses were treated as a section 47 consultee.

6.21. OTHER ENGAGEMENT ACTIVITIES

6.21.1. Drax contacted stakeholders directly to promote the statutory consultation itself and provide opportunities for key stakeholders and community groups to meet the team. A number of activities as identified in the SoCC (Appendix C3) were undertaken.

SITE TOURS

6.21.2. Prior to the start of the statutory consultation period, three site visits were organised for political stakeholders. The first site visit took place on Monday 20 September 2021 as part of Drax's routine engagement with local parish councillors. A 1-hour site tour was organised before the parish council liaison meeting at a request of one of the councillors. Areas covered during the site tour was a general overview of operations at the power station and of the BECCS process.

6.21.3. Representatives from the following parish councils attended on the 20 September 2021:

- a. Long Drax
- b. Drax
- c. Hemingbrough
- d. Gowdall
- e. Rawcliffe
- f. Camblesforth
- g. Carlton
- h. Cliffe

6.21.4. On 25 October 2021 and 27 October 2021, a further two site visits were organised. The purpose of the site tours was to provide an overview of operations at the power station and how BECCS at Drax would work. A presentation was provided by

members of the project team with time for questions. The representatives that attended the site visits were from the councils as follows:

25 October 2021

- a.** Camblesforth and Carlton, Selby District Council
- b.** Camblesforth and Carlton, Selby District Council

27 October 2021

- a.** Executive Member for Open to Business, NYC
- b.** Deputy Leader, Selby District Council

Selby District Council briefings

6.21.5. An in-person and online briefing was organised with the planning team at Selby DC, and they forwarded the invite for the briefings to all elected members. The purpose of the briefings was to provide a presentation to elected members to ensure that they are fully briefed on the proposals for BECCS at Drax. The in-person briefing took place on 25 October 2021 at Selby DC's offices. A presentation was provided by the project team and time was provided for questions. The presentation briefed stakeholders on what BECCS is, how it works and the proposal. The project team also provided information on the planning process and what BECCS will mean for the local communities which the elected members represent.

6.21.6. Details of those councils which attended the in-person briefing on 25 October 2021.

- a.** Leader of Selby District Council
- b.** Sherburn in Elmet, Selby District Council
- c.** Tadcaster, Selby District Council
- d.** Riccall, Selby District Council
- e.** Selby West, Selby District Council
- f.** Brayton, Selby District Council
- g.** Selby District Council

6.21.7. An online briefing was held on 3 November 2021 during the statutory consultation period for members of Selby District Council. The meeting was held via Microsoft Teams with members of the BECCS at Drax project team. The same presentation from the in-person briefing was provided and there was an opportunity for members to ask questions. The members that attended were from the following council:

- a.** Selby and Ainsty, Selby DC
- b.** Hambleton, Selby DC
- c.** Selby Barlby, Selby DC
- d.** Selby West, Selby DC
- e.** Cawood and Saxton, Selby DC
- f.** Riccall, Selby DC

- g. Selby East, Selby DC
- h. Appleton Roebuck and Church Fenton, Selby DC
- i. Selby District Council

North Yorkshire County Council Briefings

6.21.8. The planning team at NYCC were contacted to arrange an in-person and online briefing for elected members. NYCC did not take the project team up on their offer. However, prior the statutory consultation period commencing members of NYCC were written to and informed of the BECCS at Drax proposals, encouraged to take part in the consultation, invited to a site tour and offered a briefing with the project team.

Briefings for hard-to-reach groups, community groups and environmental interest groups

6.21.9. The project made a conscious and significant effort to engage hard-to-reach, easy-to-forget and time poor people, as well as making provision for the elderly and people with disabilities. Prior to the statutory consultation beginning hard-to-reach groups, community groups and environmental interest groups were contacted regarding the BECCS at Drax proposal. In the communication those groups were offered the opportunity to engage with the project team if they required a briefing on the project. No such briefings were organised as there was no take-up from those groups contacted.

Social Media

6.21.10. Facebook was selected as the most suitable social media platform for advertising due to its use among a wide range of demographics and its increasing use by many as virtual village community noticeboards through community groups.

6.21.11. Facebook activity consisted of publishing five Facebook adverts from Drax over the six-week consultation period. Three adverts were designed up, each with a specific call to action to coincide with the upcoming consultation events. As there were some weeks where the online and in-person events overlapped, the in-person adverts were prioritised as consultees required additional notice to plan their travel to the physical venue. Additionally, the adverts drove users to the consultation website to access the information for both the online and in-person events so even with the in-person adverts running consultees were able to view the dates and times for the online events. The social media adverts can be found in Appendix G6.

- a. Ad 1 Online public consultation – With the message to get people to view the website and provide feedback as well as getting people to attend one of the three live chat sessions planned.
- b. Ad 2 In person event – Driving people to the Drax site to discover where to attend an in-person event.
- c. Ad 3 Feedback on website – Driving people to the Drax site to feedback on the BECCS project using the website's survey form.

Table 6.3 - Events and promoted Facebook adverts

Week commencing	Consultation event	Advert type
1 November 2021	No events	No ad
8 November 2021	Thursday 11 November – Online event	Ad 1
15 November 2021	Thursday 18 November – Online Event	Ad 2
22 November 2021	~ Tuesday 23 November – In-person event ~ Wednesday 24 November – Online event ~ Saturday 27 November – In-person event	Ad 2
29 November 2021	Wednesday 1 December – In-person event	Ad 2
6 December 2021	No events	Ad 3

6.21.12. In total, the Facebook adverts received 58,826 impressions and had gained 1,198 link clicks to the consultation page.

Media

6.21.13. In the run-up to the public consultation events, a press release was issued to regional and trade media to announce the launch of the consultation period. The release included information on the BECCS proposal and contextualised these plans against the backdrop of the Government's recently announced Net Zero Strategy and backing for the East Coast Cluster. Regional and trade titles covered the news, equating to a combined online readership of 3.79 million.

6.21.14. The story additionally received 422 views on Drax's own website and was featured on the social media channels of relevant trade media.

Statements of Common Ground

6.21.15. A SoCG is a written statement jointly produced by the Applicant and another party to assist the ExA in examining the DCO application by providing an understand of the status of discussions and negotiations between the Applicant and the other party (or parties).

6.21.16. Nine draft SoCGs are being prepared with key interested parties as follows:

- 8.1.1 Statement of Common Ground with National Grid Electricity System Operator
- 8.1.2 Statement of Common Ground with National Grid Carbon Limited
- 8.1.3 Statement of Common Ground with Selby District Council and North Yorkshire County Council

- d. 8.1.4 Statement of Common Ground with the Environment Agency
- e. 8.1.5 Statement of Common Ground with Natural England
- f. 8.1.6 Statement of Common Ground with Historic England
- g. 8.1.7 Statement of Common Ground with National Highways
- h. 8.1.8 Statement of Common Ground with Selby Area Internal Drainage Board
- i. 8.1.9 Statement of Common Ground with East Riding of Yorkshire Council

6.21.17. The SoCGs are currently at different stages of preparation with key interested parties at this stage, although it is anticipated that the draft SoCGs will evolve during the pre-examination stage and a set of SoCGs will be submitted confirming the position reached on issues with each party prior to the commencement of the examination.

7. RESPONSES TO STATUTORY CONSULTATION

7.1. CHAPTER SUMMARY

7.1.1. This chapter of the report sets out how the Applicant has complied with its duty under section 49 of the PA2008 to have regard to consultation responses received by the Applicant.

7.2. SECTION 49 REQUIREMENTS

7.2.1. Section 49(2) of the PA2008 requires the applicant to have regard to any relevant responses to the consultation and publicity that has been undertaken under sections 42, 47 and 48 about the proposed application, when deciding whether the actual application is to be made in the same terms as that which was proposed for the purposes of the consultation. A relevant response is one received by the applicant under sections 42, 47 or 48 of the PA2008 within the deadline specified in each case. It is to be noted that the Applicant has had regard to consultation response whether or not they were received within the deadline, or extension to the deadline, originally set.

7.2.2. Paragraph 80 of the DCLG guidance notes that there is a clear expectation that the views and impacts identified through the consultation should influence the final application. Promoters should therefore be able to demonstrate that they have acted reasonably in fulfilling the requirements of section 49 of the PA2008.

7.2.3. The Applicant has considered the consultation responses for section 42(1)(a), (aa), (b) and (d) and section 47 (including section 48) consultees. The sections below set out a summary of the comments made for each consultee group, how Drax has had regard to those comments in preparing the Application, and whether the comment has resulted in a change to the Proposed Scheme.

7.3. RESPONSE TO THE CONSULTATION

7.3.1. Feedback forms and bespoke responses were accepted as consultation feedback. As with the section 47 consultees, section 42 consultee responses were analysed and themed.

7.3.2. The responses were analysed and 'coded' (grouped thematically) to understand themes and issues from the responses. This process enabled the distilling, categorising and summarising of issues raised by respondents. When reading through stakeholder correspondence, issues requiring a response were identified and logged in a table so that a response to the issues raised could be prepared by experts in that subject area. The issues raised were assigned to a relevant theme – for example, if the issue raised related to traffic, then a 'traffic' theme would be assigned. Where subsequent issues were raised relating to the same topic area, these were assigned with the same theme. In the event that an issue was raised which did not fit into an existing theme, a new theme would be added to reflect the sentiment.

7.3.3. All responses were taken into account, and the regard had to each is recorded within Tables 7.2 and 7.3.

7.4. SECTION 42 RESPONSES

7.4.1. 21 responses were received from consultees under section 42 of the PA2008.

7.4.2. Section 42 consultees provided a range of detailed comments. An outline of those comments and the Applicant's response to them are provided in the following sections. The full correspondence from which these summaries are drawn, can be viewed within Appendix E2.

Table 7.1 - Section 42(1)(a) section(1)(b) Respondents

Consultation category	Count of responses	Consultee
Section 42(1)(a)	18	Associated British Ports British Transport Police Canal and River Trust Coal Authority DEFRA Environment Agency Health and Safety Executive Historic England National Grid National Grid Ventures National Highways Natural England Network Rail North Yorkshire Fire and Rescue North Yorkshire Moors PA Sky UK UK Health Security Agency Vodafone
Section 42(1)(b)	3	Hull City Council Selby District Council Joint response from North Yorkshire County Council and Selby District Council

7.5. SECTION 42(1)(A) PRESCRIBED CONSULTEES

7.5.1. Responses received from section 42(1)(a) consultees were largely based around environmental considerations and specifications for the ES, as well as recommendations for ongoing engagement. A summary of responses is provided below by stakeholder (alphabetically) with the key themes also shown, including our responses to those comments and how these have been taken into account. Further details can also be found in the ES where noted in Table 7.2.

Table 7.2 - Comments from Section 42(1)(a) Prescribed Consultees

Stakeholder	Summary of consultee comment	Topic area (Theme)	Regard had to the consultee response	Change (Yes / No)
Associated British Ports (ABP)	The response from ABP notes that ABP and Drax have worked together on a number of projects and initiatives in the past and it is positive that the two organisations will be working together in the future. ABP are very supportive of the initiatives proposed by Drax which will help secure jobs in the region as well as driving the Humber towards a low carbon economy. ABP have been tracking the progress of various low carbon projects associated with the Humber, including Drax. ABP are grateful for the continued engagement and consultation as the project moves through the planning process and they look forward to working with Drax to deliver the project in the future.	General	The Applicant welcomes the response from ABP and will continue to consult and engage with ABP following submission of the DCO Application.	No
British Transport Police (BTP)	Confirm that BTP has no licence or apparatus on or in the designated area and have no further comments to make in relation to this enquiry.	General	Noted, the Applicant welcomes the response from BTP.	No
Canal and River Trust	Works within Environmental Mitigation Area: Unsure if works in this area would constitute construction and could pose a risk to stability of the banks of the Ouse, particularly to plant or machinery. PEIR does not include this and recommended that the document is expanded to consider these risks.	Ground Conditions	The PEIR is a consultation document, to allow consultees to comment on preliminary environmental information available at the time of statutory consultation. The purpose of a PEIR is not to be updated or expanded following consultation. Following the statutory consultation, the Applicant has reviewed all consultee responses provided, and, having regard to them, progressed the design of the Proposed Scheme. The full Environmental Impact Assessment is contained within the Environmental Statement (document reference 6.1 – 6.3) which forms part of the DCO Application. With regard to the River Ouse, the Order Limits have been updated since the PEIR assessment and the Habitat Provision Area (formerly the Environmental Mitigation Area) has a much-reduced perimeter along the River Ouse with no proposed construction activities along the banks. Therefore, potential effects to the River Ouse from construction activities are not considered by the Applicant to be significant. The River Ouse is identified as a sensitive receptor with a high sensitivity within the Environmental Statement – Volume 1 – Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11), with the assessment of effect provided within Section 11.9.	Yes
Canal and River Trust	Landscape: The methodologies for the analysis are not fully consistent, with some viewpoints using a baseline of existing panorama, others using wire frame and some using photomontages. A consistent approach is recommended.	Landscape and Visual	As per GLVIA guidance, representative viewpoint photography has been used to assist the communication of assessment judgements for nearby visual receptor groups. Where considered by the Applicant to be appropriate, and in agreement with Planning Authorities, a	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Regard had to the consultee response	Change (Yes / No)
			combination of wireframe and fully rendered photomontages (in accordance with LI TGN 06/19) have been included where considered necessary, in order to adequately illustrate the effects of the Proposed Scheme in respect of massing and appearance. The Applicant considers this to be acceptable best practice rather than treating every viewpoint in the same way.	
Canal and River Trust	Note that details of mitigation have not been finalised, so request details are provided prior to commencing development.	Landscape and Visual	<p>Mitigation for likely significant effects of the Proposed Scheme has been identified, and the details are set out in Chapter 9 (Landscape and Visual Impacts) of the ES (document reference 6.1.9) and included within the Outline Landscape and Biodiversity Strategy (document reference 6.6). A detailed set of mitigation measures will be finalised and approved by the relevant planning authorities prior to commencement of development.</p> <p>There are no specific mitigation measures in relation to recreational users of the River Ouse as they are not considered by the Applicant to be necessary, since there are no likely significant effects anticipated at this receptor.</p>	No
Canal and River Trust	Depending on the exact nature of the proposed works in the Mitigation area, works could result in contamination to the river due to mobilisation of soils or water.	Water Environment / Ground Conditions	The Order Limits have been updated since the PEIR assessment and the Habitat Provision Area (HPA) (formerly the Environmental Mitigation Area) has a much-reduced perimeter along the River Ouse with no proposed activities constituting construction along the banks of the River Ouse. Therefore, potential effects to the River Ouse from construction activities are not considered by the Applicant to be significant. However, the impact of the works in HPA and Off-site HPA are scoped out from the assessment. This is because the works proposed in the HPA and Off-Site HPA are limited to biodiversity improvements to planting. No increase in impermeable areas or runoff volumes / rates are expected. No works within watercourses, including the River Ouse, and / or within 7 m of their banks are proposed. No increase of the existing ground levels associated with the proposed planting is expected. The works proposed in these areas are therefore not envisaged to have impact on the water environment resulting from contamination.	Yes
Coal Authority	Whilst the proposed development site falls within the coalfield, it is located outside the Development High Risk Area as defined by the Coal Authority. Therefore, the planning team at the Coal Authority, have no specific comment to make on this Proposed Scheme.	Ground Conditions	The Applicant thanks the Coal Authority for their response.	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Regard had to the consultee response	Change (Yes / No)
Department for Environment, Food and Rural Affairs	Issues raised fall within the responsibility of the Department for Business, Energy & Industrial Strategy (BEIS) and the letter has been forwarded to that department.	General	The Applicant thanks DEFRA for their response.	No
Environment Agency	For emissions to air, the operator will need to complete an air emissions risk assessment and compare the impact of any emissions to the environmental standards provided in the following guidance: <i>Air emissions risk assessment for your environmental permit, air-emissions-risk-assessment-for-your-environmental-permit</i> .	Air Quality	The air quality assessment completed for the operational phase of the Proposed Scheme, as reported in Chapter 6 (Air Quality) of the ES (document reference 6.1.6), has been completed with reference to the EA's air emissions risk assessment guidance. Impacts associated with the Proposed Scheme, both alone and cumulatively with other projects, have been assessed within the context of relevant environmental standards contained within the EA guidance.	Yes
Environment Agency	In relation to post-combustion Carbon Dioxide capture this development will require a variation to the existing Environmental Permit, EPR/VP3530LS for Drax Power Station, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR) issued by the Environment Agency. The operator has received initial pre-application advice from the Environment Agency regarding this. The operator is strongly advised to twin track applications for both the DCO process and the EPR permit variation and seek further 'enhanced' pre-application advice from us to support their application. Early engagement with us and submission of the permit application will give us the best opportunity to align the permit decision (or draft decision) with the DCO examination process.	Air Quality	The Applicant will be submitting an application to vary the existing Environmental Permit (EPR/VP3530LS). The air quality assessment reported within Chapter 6 (Air Quality) of the ES (document reference 6.1.6) was undertaken with reference to the Environment Agency's 'Air emissions risk assessment for your environmental permit' guidance.	No
Environment Agency	Post combustion carbon capture (PCC) plants utilising an amine process is recognised as an 'emerging technique' for CO2 capture processes in the Large Combustion Plant Best Available Techniques (BAT) reference document for Large Combustion Plants (2017). Under Article 14(6) of the Industrial Emissions Directive, the Environment Agency has issued BAT guidance, in consultation with industry, for both new plants and in retrofitting PCC to existing power generation plant - ukccsrc.ac.uk/best-available-techniques-bat-information-for-ccs/ . As a retrofit to an existing power generating activity the environmental permit variation application will be assessed against this BAT guidance. The operator is reminded to include a full BAT justification detailing why, in their opinion, it is BAT to retrofit PCC plant to existing boilers and a detailed assessment of the change in overall energy efficiency (the energy penalty) regarding net electrical output from the units to which PCC is to be retrofitted.	Air Quality	The Applicant will include a detailed BAT assessment, including justification, for the proposed BECCS plant within the application to vary the existing Environmental Permit (EPR/VP3530LS).	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Regard had to the consultee response	Change (Yes / No)
Environment Agency	The Biodiversity Net Gain assessment should include an assessment of the rivers and stream habitat on site. In line with the guidance, we expect the development to deliver, at least, 10% net gain for each habitat type present on site (including rivers and streams).	Ecology / Water Environment	<p>Watercourses within the Order Limits and within area of the Site required for the delivery of the carbon capture and storage infrastructure and associated facilitatory works, included in the on-site BNG baseline (see the Biodiversity Net Gain Report (document reference 6.10)). The Applicant can confirm that they intend to deliver 10% net gain against river and streams habitats in this area.</p> <p>Watercourses in areas required for the provision of ecological enhancements will be assessed as off-site baseline habitats and therefore, a net gain on the baseline values in these areas will not be sought. Inclusion of these areas within the BNG baseline would result in "mitigating the mitigation", which the Applicant does not consider appropriate and is an issue considered in the recent Government consultation on BNG. Opportunities to provide on-site enhancements are limited by the requirement to retain access and not impede ongoing management and maintenance practices of the local IDB.</p> <p>Consequently, The Applicant is actively engaging with the Environment Agency, Yorkshire Wildlife Trust and Yorkshire Dales Rivers Trust to identify appropriate locations for local enhancements to contribute to net gain, whilst also considering local options within their landholdings for delivering BNG for watercourses.</p> <p>The Applicant has also identified land within and outside the Order Limits for the provision of area-based terrestrial habitats and linear habitats (hedgerows). On the basis of the worst-case habitat loss assumed for the Proposed Scheme (as set out in Table 3.1 of the Biodiversity Net Gain Report) there would be a net gain for linear habitats of 51.70% and a net gain of area-based habitats of 3.66%. In reality, it is unlikely that the worst-case scenario for habitat loss on which the BNG assessment is based will actually occur; this will be explored further as the Proposed Scheme develops, with a view to confirming additional areas of habitat that would not need to be removed or disturbed to facilitate the Proposed Scheme. The BNG Report includes a sensitivity test for a more realistic scenario for habitat loss and disturbance in Table 3.2. Under this scenario, the net gain for linear units increases to 54.14%, whilst the position for area-based habitats improves to a net gain of 17.08.%.</p>	Yes
Environment Agency	Where river habitat is concerned, a river condition assessment survey (using the MoRPh field survey method) is required in order to assess the condition of the baseline habitat. It is not clear whether this information has been collected as part of the PEA. If a river condition assessment survey has not yet been undertaken an accredited	Ecology / Water Environment	This information was not collected as part of the PEA. The Applicant has completed River Condition Assessments and Ditch Condition Assessment, which is discussed in section 2 of the Biodiversity Net Gain Assessment (document reference 6.10), using the MoRPh field method for qualifying watercourses. Surveys within the Order Limits	Yes

Stakeholder	Summary of consultee comment	Topic area (Theme)	Regard had to the consultee response	Change (Yes / No)
	surveyor should undertake a river condition assessment for the development site at the earliest opportunity.		and rivers and ditches within 10 m the Order Limits were completed by accredited surveyors in 2022.	
Environment Agency	The PEIR, although it makes a reference to the Ouse from River Wharfe to Upper Humber when referring to the river Ouse and Carr Dyke, makes no mention of the Aire from River Calder to River Ouse catchment. This is something the applicant needs to explore further.	Ecology	Whilst the Aire from River Calder to River Ouse catchment is not impacted by the Proposed Scheme, it is referred to in the baseline section in the Chapter 12 (Water Environment) of the ES (document reference 6.1.12).	No
Environment Agency	The applicant needs to revise Table 12.7 - Construction Phase – Preliminary Assessment of Likely Significant Impacts	Water Environment	The table was revised. The assessment of likely significant effects is provided in Section 12.11 Chapter 12 (Water Environment) of the ES (document reference 6.1.12) and summarised in Table 12.14 Summary of Water Environment Effects. Insignificant effects are summarised in Appendix 12.4.	No
Environment Agency	The findings of a Water Framework Directive (WFD) screening assessment were recently presented to the EA. The EA expressed agreement with the conclusions of the WFD screening assessment that, based on current designs, the Proposed Scheme presents low risk to WFD receptors, and that further impact assessment is therefore not currently required. Should the designs change (including any design changes associated with the delivery of Biodiversity Net Gain which may affect WFD receptors), this assessment should be revisited and updated where necessary.	Water Environment	<p>The WFD screening report (document reference 6.3.12.2) has been completed and submitted as part of the DCO Application. The activities associated with known terrestrial BNG activities were considered and scoped out of the WFD screening assessment as no potential impacts were identified.</p> <p>The EA's comment is noted, and the Applicant is in agreement for the need to revisit and update the assessment as the proposals for water-related BNG delivery progress, which will be completed after submission of the DCO Application.</p> <p>Options for the delivery of water-related BNG are being discussed with local stakeholders and these options would likely be delivered with these stakeholders to improve a watercourse(s) within the WFD water body. It is intended that the selected project for delivery of water BNG will contribute to WFD objectives. Local projects that have the potential to have an adverse impact on the water environment would be discounted for the delivery of water-related BNG. Therefore, Water BNG proposals are not anticipated to have a significant impact to WFD status of any water bodies and therefore are currently screened out for WFD assessment.</p>	No
Environment Agency	Sub water table storage poses risks to groundwater due to problems of leak detection. It is advised that a scheme with underground tanks has a monitoring system. A full detailed risk assessment should be conducted for any proposals that may include sub-water table storage, pipelines or fluid filled cables that transport pollutants.	Water Environment	There is no underground/sub-water table storage planned for the Proposed Scheme. The underground flow and return lines would be for cooling water and the transport of liquid CO ₂ . The Carbon Capture Wastewater Treatment Plant would treat effluents recovered from the Proposed Scheme for reuse as cooling water, while liquid CO ₂ would be transported from Carbon Capture Plant to Carbon Dioxide Delivery Terminal Compound. Both the cooling water entering the system and the liquid CO ₂ are considered an inert non-contaminant. Chapter 2	No

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			(Site and Project Description) of the ES (document reference 6.1.2, Section 2.2.33).	
Environment Agency	The PEIR does not contain a thorough examination of the site's hydrology. The site falls within two river catchments. The majority of the site falls within the Ouse from R Wharfe to Upper Humber river catchment. However, according to our records, a small part of the site (southeast) falls within the Aire from River Calder to River Ouse catchment. Properly identified the hydrology of the site is paramount given that it affects the scope and baseline information of the EIA.	Water Environment	Chapter 12 (Water Environment) of the ES (document reference 6.1.12) recognises that Drax Power Station Site is located in two different river catchments. The vast majority of Drax Power Station Site is located in the Ouse from R Wharfe to Upper Humber river catchment. Only the southern part of Drax Power Station Site is located in the Aire from River Calder to River Ouse catchment. In this area only road modification works are proposed. The proposed road modifications include removal of some of street furniture and clearance of vegetation and pruning to facilitate the movement of large components or plant on to site and around site to allow for the transport of abnormal indivisible loads. No increase in impermeable areas or runoff volumes / rates are expected. No works to or in the vicinity of watercourses are proposed. The road modification works are therefore not envisaged to have an impact on the water environment.	No
Environment Agency	Construction stage - Application for an environmental permit is required for any discharge of either surface water run-off or excess water resulting from dewatering, or for any activity falling within the definition of water discharge activity or groundwater activity.	Water Environment	No groundwater dewatering is planned for the Proposed Scheme or considered to be required. An environmental permit will be required for Construction Phase activities in terms of surface water discharge.	No
Environment Agency	An abstraction license may be required. Operational stage - We are pleased that the applicant has considered our prior comment on potential changes to water abstraction volumes. However, our comment on potential changes on the nature of the discharge has not been addressed. The EIA needs to consider such changes. If such changes do occur the applicant may need to apply for a permit variation.	Water Environment	No change to groundwater and surface water abstraction/discharge licences are anticipated for the Proposed Scheme during the operational phase Chapter 2 (Site and Project Description) of the ES (document reference 6.1.2, Section 2.2.33).	No
Environment Agency	The CEMP needs to include the following: ~ Containing run off water (management plan) ~ Vehicle Movements (reduce risk of silt transfer) ~ Oil storage (any tanks comply with regulations to prevent pollution due to leaks).	Water Environment	The requested information is considered in the REAC (document reference 6.5) and for inclusion in the CEMP (and secured by a dDCO requirement).	No
Environment Agency	Any proposed penetrative methods (e.g., piling or foundation works) and result in risks to groundwater. Any proposed activities that present a hazard to groundwater resources, quality or abstractions must identify appropriate mitigation where a hydrogeological risk assessment identifies unacceptable risks	Water Environment / Ground Conditions	The impact of piling on groundwater, taking into consideration the proposed Piling Risk Assessment (see Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11, Section 11.10) and mitigation measures set out in Chapter 12 (Water Environment) of the ES (document reference 6.1.12, section 12.10) and set out in the REAC (document reference 6.5) (including undertaking an updated risk	Yes

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			assessment and applying the recommendations of that risk assessment), was assessed as having an insignificant residual effect in Section 12.11 of Chapter 12.	
Environment Agency	If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12-month period, the developer will need to register with the Environment Agency as a hazardous waste producer.	Materials and Waste	<p>As of 1 April 2016, developers do not need to register their premises as a hazardous waste producer. This change affects the entire hazardous waste control system.</p> <p>The associated guidance from the Environment Agency (Hazardous waste: premises registration – supplementary guidance) was withdrawn on 4 April 2016.</p> <p>Developers must follow the updated guidance from the Environment Agency, however:</p> <ul style="list-style-type: none"> ~ Consignment note guidance; ~ Consignee returns guidance; and ~ Rejected loads guidance. <p>The Applicant will adhere to these guidance documents during the construction and operation of the Proposed Scheme.</p>	No
Environment Agency	Environmental permitting - Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology.	Materials and Waste	Good and best practice measures to ensure that construction waste is effectively managed and minimised, including (inter alia) a SWMP (which forms part of the CEMP which is secured through a dDCO requirement) will be deployed during site activities. In this, the appointed construction contractor will be responsible for providing sufficient and robust evidence to assure construction waste data (for example, in accordance with the stated PAS or their own quality / environmental management system, whichever is more comprehensive) to ensure full confidence in any associated analysis or reporting.	No
Health and Safety Executive	It is not clear whether the Applicant has made contact with the relevant Operators, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.	Major Accidents	<p>The HSE has identified that the Site falls within the consultation zone of three major hazard sites. Consultation has been undertaken with major hazard sites whose Consultation Zone the Proposed Scheme overlaps. This includes Drax Power Station itself, as well as Lytag Ltd and Capture Power Ltd. Drax Power Ltd and Lytag Ltd have been consulted with as part of the statutory consultation. Consultation has not been undertaken with Capture Power Limited as they no longer exist.</p> <p>The MA&D assessment has considered potential MA&D events and whether these could have an impact on the existing major hazard sites. Consideration has also been given to whether an event (such as an explosion) at Lytag Ltd or the Existing Drax Power Station could impact the operations of the Proposed Scheme.</p>	No

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Health and Safety Executive	The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The Applicant is advised to consider whether Hazardous Substances Consent would be required. Further information on HSC should be sought from the relevant Hazardous Substances Authority.	Major Accidents	The 'Other Consents and Licences' document (Document Reference 5.5) submitted with the DCO Application sets out that Hazardous Substances Consent may be required, and that this will be determined prior to operation of the BECCS units.	No
Historic England	Overall, we would support the methodology adopted to assess the likely significant effects of the Proposed Scheme the historic environment in the PEIR report (Chapter 10) and endorse the findings of this preliminary report.	Archaeology and Heritage	The support of Historic England is noted. The methodology followed is that outlined in the PEIR, using 10km, 1km and 500m study areas. Additional sources were consulted specifically LiDAR data and aerial photographs	No
National Grid	National Grid have confirmed that they have assets in the area and have requested that they are kept updated.	Engineering	The Applicant confirms that National Grid have been and will continue to be involved throughout the DCO process. In particular, the Applicant is engaging and will continue to engage with all relevant National Grid departments, including: NG ESO and NGET in relation to alterations to existing electricity grid connections from the existing 400KV NGET substation within the Drax Power Station site; and NG ESO and NGCL in relation to the HLCP project. Draft Statements of Common Ground have been prepared and sent to relevant National Grid departments in advance of the submission of the DCO Application. The Applicant did contact NGET in respect of potential protective provisions in the DCO, but in the absence of a response from NGET has included standard protective provisions for their benefit in the dDCO. The Applicant will undertake further engagement with NGET and NG ESO during the pre-examination and examination stages.	No
National Grid Ventures	NGV would wish to be closely involved in the design of the vent arrangements and the development of the procedures to be used as they could have an impact of the design and/or operation of the NGV CO2 transportation system and associated facilities.	Engineering	A Statement of Common Ground is being progressed with National Grid V/NGCL which will document discussions and agreement with relevant parties regarding the impact of the Proposed Scheme on the design and/or operation of the NGV CO2 transportation system and associated facilities. A draft SoCG was sent to NGCL for their review and consideration, and to assist future discussions on 25 April 2022. (This will be progressed and submitted to the Planning Inspectorate in due course. However, it does not form part of the DCO Application submission.)	No
National Grid Ventures	NGV would additionally wish to see protective provisions included in the proposed DCO for its apparatus. NGV would be happy to progress a Statement of Common Ground with Drax.	Engineering	The Applicant received draft bespoke protective provisions from NGV shortly before submission of the DCO Application, following a request from the Applicant. The Applicant is considering these draft protective provisions and will respond to NGV in due course.	No
National Grid Ventures	NGV should be closely involved and consulted in relation to the compression and drying options, in order to ensure their compatibility with NGV's requirements, efficiency, technical and safety merits.	Engineering	A Statement of Common Ground is being progressed with National Grid NG V/NGCL which will document discussions and agreement with relevant parties regarding the impact of the Proposed Scheme on the design and/or operation of the NGV CO2 transportation system and associated facilities, including in relation to the compression and drying options.	Yes

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National Highways	Cumulative assessments should consider emerging major sites and seek to avoid significant cumulative traffic flow impacts at M62 J36.	Cumulatives	The cumulative assessment considers any emerging 'major developments' as part of LPA Local Plans and / or Core Strategies and 'other development' agreed with LPA's as part of the establishing a long list and short list. This is set out in Chapter 5 (Traffic and Transport) (document reference 6.1.5) and Chapter 18 (Cumulative Effects) of the ES (document reference 6.1.18). The Applicant will seek to avoid significant cumulative traffic flow impacts at M62 J36 through managing the construction traffic flows, with measures to minimise the development impacts contained within the CTMP and CWTP. The Applicant is aware of the potential improvements at this junction identified as part of the East Riding Infrastructure Study (2014) and the Infrastructure Delivery Plan (2015) and will discuss this further with National Highways.	No
National Highways	It is noted that the Drax Power Station site area includes areas of hard standing and car parks. Elsewhere within the Transport Scoping Note, we are advised that the BECCS project is to be supported by the provision of a 400-space car park. It should be confirmed whether existing car parking or hard standing within the Drax site will also be used for construction personnel parking during the BECCS Construction Phase. If car parking for the BECCS Construction Phase is to be limited to the proposed 400-space car park, then WSP should outline how Drax will prevent overspill use of available parking within the Drax site or on the surrounding highway. Should traffic generation estimates (and associated development impacts) be informed by the scale of available car parking, then it will be important to manage the scale of BECCS parking provision to that assessed.	Transport	<p>Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) confirms that during the construction phased of the Proposed Scheme, it is identified that there will be a need to accommodate approximately 429 vehicles at the site for BECCS construction workers.</p> <p>Construction workers will park within the existing 500 car parking spaces available within the Drax Power Station Site or in the overflow carpark within the East Construction Laydown area. The combined capacity of 800 carparking spaces across the two areas will not be required throughout the entire construction programme but is included to ensure operational resilience throughout the construction phase as the existing operational units at The Drax Power Station Site will still require maintenance and outages.</p> <p>Information on staff parking during construction is included in the Construction Traffic Management Plan, Chapter 4, Section 4.1.</p> <p>At the PEIR stage reference was made to a new 400 space car park. The estimated number of parking spaces was based on previous assessment work undertaken for Drax Repower, however, the use of existing car parking spaces during construction reduces this requirement. In conclusion, with use of the existing 500 spaces and additional 300 overflow spaces there is sufficient capacity to prevent any need for parking on the surrounding road network including when taking into consideration existing operations at the Drax Power Station Site.</p>	No
National Highways	Additional traffic surveys may be commissioned during 2021 or Q1 2022 subject to agreement with the highway authorities that traffic conditions are considered representative. This approach will need to be discussed with National Highways through additional Scoping discussions.	Transport	Additional traffic surveys were not undertaken. Traffic surveys collected during March 2018 as part of Drax Repower have been used to date to inform the ES. However, more recent data (October 2018) was provided by National Highways for M62 (J36) which has also been used in this assessment. This approach was agreed with National Highways.	No

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National Highways	<p>In regard to the rationale and selected option of utilising the Port of Goole for the transportation of AILs during construction, JSJV would suggest that National Highways should be consulted regarding survey requirements and understanding the practicalities of moving AIL by road. JSJV and National Highways will further review the proposed impact of this route on the M62 J36 in the ES and CTMP.</p>	Transport	<p>National Highways were consulted in accordance with their Water Preferred Policy and the AIL strategy was 'Agreed in Principle' including utilising the Port of Goole. National Highways also discussed the approach with the Department for Transport who were also happy with the approach.</p> <p>The Outline CTMP (document reference 6.1.5.1) outlines the AIL strategy and sets out the approach to scheduling AIL movements to avoid peak hours where possible, an outline communications plan, details of advanced signage, neighbour notifications, haulage responsibilities, and condition surveys (where appropriate). Further consultation will be held with National Highways in line with the regulations for notifying authorities.</p> <p>The results of the AIL route survey will be submitted as part of the DCO application. This includes details of street furniture and vegetation that is required to be removed to allow the transport of the AILs. Further details of the temporary works required to facilitate the transport of AILs is included in Chapter 2 (Site and Project Description) of the ES (document reference 6.1.2).</p>	No
National Highways	<p>WSP detail that highway powers may be necessary for temporary works to facilitate transport of plant and AILs during construction. Further details of the road modifications should be provided within the full ES.</p>	Transport	<p>The Applicant confirms that information on Abnormal Indivisible Loads (AILs) access routes and potential highways modifications can be found in the Construction Traffic Management Plan, Chapter 5, Section 5.5. Further information is also available in Chapter 2 (Site and Project Description) of the ES (document reference 6.1.2). The required powers are also set out in the Access and Rights of Way Plans (document reference 2.4) and the associated DCO Schedule.</p>	Yes
National Highways	<p>Preliminary assessment of the likely impacts and effects classifies the M62 westbound and M62 eastbound as being of negligible sensitivity given it is a 3-lane motorway with a derestricted speed limit and subject to motorway regulations. This assertion is not robust enough when considering the cumulative pressures of the emerging Selby Local Plan onto this network. The link sensitivity of M62 eastbound (link 6) and M62 westbound (link 9) should be greater than negligible, and consideration should be given to Junction 34 on the M62.</p>	Transport	<p>Details of the assessment methodology used to assess the links on the M62 is set out in Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) and is based on the guidance in DMRB LA104. The sensitivity of the M62 eastbound (Link 6) and M62 westbound (Link 9) have been increased to Low in response to National Highways consultation comments. In addition, the sensitivity of Junction 36 has been considered with respect to the operational performance of the junction and therefore classified as 'High'.</p> <p>Junction 34 (M62) is outside the the agreed Study Area and it is considered that the Proposed Scheme would have a negligible impact on this junction.</p> <p>Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) includes details of the background traffic modelling using TEMPRO to</p>	No

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			model background traffic growth associated with Local Plans and assesses the cumulative impacts on M62 J36, both without and with BECCS traffic. This assessment concludes that there will be temporary large adverse effects. Further discussions are required with National Highways to consider these impacts.	
National Highways	The difference in growth rates presented by WSP at the different stages is due to daily averages being adopted in the latest PEIR per MSOA in East Riding and Selby, and the future years presented in this instance are 2026 and 2029. We would suggest that the ES should include AM and PM growth rates, as previously agreed.	Transport	The ES includes AM, PM and Daily growth factors as requested by National Highways. However, the TEMPro Growth Factors differ from those originally proposed within the EIA Scoping Report. TEMPro v7.2c was released after the submission of the EIA Scoping Report. The same methodology has been applied but the rates reflect the latest available forecasts and are therefore considered appropriate.	No
National Highways	Given the proposed development's scale and proximity to the Strategic Road Network, JSJV would agree that a CTMP should be produced and agreed with National Highways prior to the determination of this planning application. JSJV would suggest that the CTMP includes the following: <ul style="list-style-type: none"> ~ Length of construction period ~ Hours of operation ~ Peak trip generation (including type of vehicles) ~ Access routes, including consideration of abnormal loads (vehicle swept path analysis may be required) and details of proposed signage, implementation and enforcement ~ Mitigation measures – limited delivery times (and details of enforcement e.g., penalty clauses for contractor, noise reduction, wheel washing). 	Transport	<p>The Applicant confirms that an Outline CTMP (document reference 6.3.5.1) has been prepared to include the matters raised by National Highways. In particular, the document:</p> <ul style="list-style-type: none"> ~ Cross references Chapter 2 (Site and Project Description) of the ES (document reference 6.1.2) for the construction programme. ~ Hours of operation are presented in Section 3.2 of the Outline CTMP. ~ Peak trip generation is cross referenced to Section 5.11 of Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5). ~ Access routes for construction worker and HDV movements is considered in Section 4 of the CTMP. ~ Abnormal loads is considered in Section 5 of the CTMP. A detailed description of the AIL route is presented in Chapter 2 Site and Project Description of the ES (document reference 6.1.2) <p>The preparation of a CTMP is covered by a requirement in the dDCO and this will be substantially in accordance with the submitted Outline CTMP (document 6.3.5.1)</p>	Yes
National Highways	JSJV would support the production of a Construction Worker Travel Plan alongside the ES to demonstrate how the impact of construction workers will be minimised on the SRN. The CWTP should include: <ul style="list-style-type: none"> ~ Travel plan type measures (e.g., staff recruitment policies (local staff), mini-bus for staff, number of parking spaces, car share database). 	Transport	<p>The Applicant confirms that details as requested by National Highways will be contained in the Construction Worker Travel Plan.</p> <p>A Framework Construction Worker Travel Plan is submitted with the Application (document reference 6.3.5.2) alongside the ES.</p> <p>The preparation of a CWTP is covered by a requirement in the dDCO and this will be substantially in accordance with the submitted Framework CWTP (document 6.3.5.2).</p>	Yes

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National Highways	<p>In Summary –</p> <ul style="list-style-type: none"> ~ Further trip estimates and junction capacity assessment work should be undertaken in the ES, as outlined in previous scoping reviews. ~ National Highways will further review the proposed impact of the route from the Port of Goole on the M62 Junction 36 in the ES and CTMP. ~ The Applicant has anticipated that there will be no residual traffic and transport effects associated with the Proposed Scheme during construction, operation or decommissioning. National Highway's comment that this will be subject to further analysis in the ES. ~ would state that the NSIP BECCS at Drax should consider the cumulative assessment of the Selby District Local Plan in its assessments. ~ Given the proposed development's scale and proximity to the Strategic Road Network, JSJV would agree that a CTMP should be produced and agreed with National Highways prior to the determination of this planning application. <p>National Highways would support the production of a Construction Worker Travel Plan alongside the ES to demonstrate how the impact of construction workers will be minimised on the SRN.</p>	Transport	<p>The Applicant confirms that the Application documents respond to all of the matters raised by National Highways. In particular, in order of the points made</p> <ul style="list-style-type: none"> ~ Information on trip estimates and junction capacity assessment work is contained in the submitted Environmental Statement (document reference 6.1.5) ~ This comment is noted ~ This comment is noted ~ The cumulative developments which form part of the traffic modelling considered in the Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) include allocations in the Selby Local Plan where this is appropriate in line with traffic modelling guidance ~ An Outline Construction Traffic Management Plan (document reference 6.3.5.1) has been prepared and submitted as part of the Application and ~ A Framework Construction Worker Travel Plan (document reference 6.3.5.2) has been prepared and submitted as part of the DCO Application. 	
Natural England	<p>Potential air quality impacts during construction and operation: We note that the assessment of cumulative (in-combination) impacts from other plans and Proposed Schemes is still ongoing. We therefore advise that likely significant effects for other pollutants on these sites, and on other sites, cannot be ruled out at this stage. If in-combination effects exceed the 1% threshold, then these effects will also need to be assessed at the detailed assessment stage both alone and in-combination.</p>	Air Quality	<p>In-combination effects have been assessed and are reported in Section 6.12 in Chapter 6 (Air Quality) of the ES (document reference 6.1.6). Where necessary, the results of the assessment have been passed to the scheme ecologists to determine conclusions on likely significant effects, including consideration of the 1% threshold. Please refer to Chapters 8 (Ecology) and 18 (Cumulative Effects) of the ES (document references 6.1.8 and 6.1.18), and the Habitat Regulations Assessment Report (document reference 6.8.1 and associated figures and appendices).</p>	Yes
Natural England	<p>Designated Sites: Applicant should determine whether the proposal is likely to have a significant effect on any European site.</p>	Ecology	<p>The Applicant has determined that in the absence of targeted mitigation measures, the Proposed Scheme will trigger Likely Significant Effects to the following European Sites:</p> <ul style="list-style-type: none"> ~ River Derwent SAC ~ Lower Derwent Valley SAC ~ Lower Derwent Valley SPA 	Yes

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			<ul style="list-style-type: none"> ~ Lower Derwent Valley Ramsar ~ Humber Estuary SPA ~ Humber Estuary Ramsar <p>The findings of the Applicant's HRA screening are set out in Section 3 of the Habitats Regulations Assessment (HRA) Report (document reference 6.8.1). The Applicant has identified mitigation measures in response to the identified LSE. These are set out in Section 4.1 of the Applicant's HRA Report. With these mitigation measures applied, there are predicted to be no adverse effects on the integrity of any European Site, either alone or in-combination with other plans and projects.</p>	
Natural England	Four SSSIs –Barn Hill Meadows, Eskamhorn Meadows, Went Ings Meadows and Burr Closes, Selby –that are not listed in the PEIR - should be included.	Ecology	These SSSI have been added to the relevant baseline descriptions in the ES (see Table 8.5 in Chapter 8 (Ecology) of the ES (document reference 6.8.1). The assessment of effects on these SSSI's is presented in Sections 8.9, 8.11, and 8.12 of Chapter 8 (Ecology) of the ES (document reference 6.1.8).	Yes
Natural England	There appears to be no data available specifically on the effects of ammonia gas on riparian vegetation. There is some evidence for effects on herbaceous species, for example woodland ground flora, upon which the critical level for the protection of higher plants was based.	Ecology	<p>The Applicant understands that this comment was made by Natural England in response to predicted operational emissions of ammonia that were reported in the PEIR (document reference 0.8.1). Table 6.11 of Chapter 6 (Air Quality) of the PEIR (document reference 0.8.6) identified a Process Contribution (impact) from the in with Proposed Scheme scenario of 1.5% of the Critical Level for ammonia (NH3). This impact was predicted solely for the River Derwent SAC, which is the closest European Site to the Proposed Scheme (see Figure 1 of the Habitats Regulations Assessment Report (document reference 6.8.2.1). This impact was driven primarily by emissions of gaseous ammonia from the Carbon Capture Wastewater Treatment Plant. At the time of PEIR production, the design proposed for the Carbon Capture Wastewater Treatment Works required venting of NH₃ to air. The design of the Carbon Capture Wastewater Treatment Works has since been changed, to utilise a closed steam stripper system, which eliminates emissions of NH₃ to air from the Carbon Capture Wastewater Treatment Plant (see Primary Mitigation in Section 2 of Chapter 2 (Site and Project Description) of the ES (document reference 6.1.2)).</p> <p>With the change in design of the Carbon Capture Wastewater Treatment Plant, the previously reported NH₃ emissions from it no longer occur. As reported in paragraphs 6.9.24 – 6.9.25 of Chapter 6 (Air Quality) of the ES (document reference 6.1.6), the current air quality modelling predicts that the Process Contribution for NH₃ will be</p>	No

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			below 1% of Critical Level for all European Sites. The cumulative impact of NH3 in the with Proposed Scheme scenario and other plans and projects on River Derwent SAC is also under 1% of the Critical Level (0.3%). Process contributions at or under 1% of Critical Level are below the significance screening thresholds used in the Air Quality assessment. As such LSE are no longer predicted in relation to NH3 and the River Derwent SAC and further analysis is not required.	
Natural England	<p>In nutrient rich systems, whilst ammonia deposition will contribute to the total nitrogen input, consideration is needed as to the relative contribution of atmospheric ammonia to the total nitrogen budget for the site. In many cases, it is likely that the dominant input will be from surface water (or groundwater) sources and that ammonia deposition will have little effect. Note: In some areas these habitats may even emit ammonia. Given the absence of information on direct damage to this type of vegetation, in instances where there are other overwhelmingly dominant sources of nitrogen, the application of the critical level is not considered defendable. This advice will have implications for wetland sites where the critical level for higher plants was originally applied. Further investigation is required on a site-by-site basis to determine if the system is considered to be nutrient poor or nutrient rich and to identify the source and relative magnitude of other nutrient inputs. Where the critical level for the protection of lower plants has been applied with expert judgement, then our original advice remains unchanged, i.e., that the critical level applies, as there is evidence for direct effects of ammonia on lichens and bryophytes.</p>	Ecology	<p>This comment was made by Natural England in relation to the air quality modelling presented in the Preliminary Environmental Information Report. At this time, exceedances of the 1% screening criterion for the ammonia critical level were predicted for the River Derwent. A maximum impact equivalent to 1.5% of the critical level was predicted. Following design changes as described above, the maximum cumulative impact on the River Derwent SAC is now predicted to be 0.3% of the critical level of 3ug/m3. Even if a critical level of 1ug/m3 were applied, this would still equate to an impact under 1% of this more stringent Critical Level.</p> <p>The River Derwent sits within a primarily agricultural lowland landscape within the 15 km Study Area for AQ effects. As such, nutrient nitrogen inputs into the River are likely to be dominated by surface water inputs, with aerial inputs (from all sources) minimal by comparison.</p> <p>The APIS website identifies a critical level of 3ug/m3 as being appropriate for the River Derwent SAC and as such this critical level has continued to be applied.</p> <p>The Critical Level for NH3 for lower plants of 1ug/m3 has been applied to Thorne Moor SAC, Thorne, Crowle, and Goole Moors SSSI, Skipwith Common SAC, and Skipwith Common SSSI, on the basis that lower plants form part of the qualifying interests and are listed on the citations for these sites. Furthermore, the APIS website identifies a critical level of 1ug/m3 as being appropriate for these sites.</p>	No
Natural England	Some consideration will still need to be given to potential acidification effects caused by ammonia deposition, in acid-sensitive areas.	Ecology	<p>The Applicant can confirm that acidification effects arising from aerial emissions from the Proposed Scheme have been considered in the HRA Report and ES where relevant.</p> <p>The Applicant has identified potentially significant acidification effects from the Proposed Scheme on the following European Sites:</p> <ul style="list-style-type: none"> ~ Lower Derwent Valley SAC; 	No

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			<p>~ Lower Derwent Valley Ramsar; ~ Thorne Moor SAC; and ~ Skipwith Common SAC.</p> <p>In addition, the Applicant has identified potentially significant acidification effects from the Proposed Scheme on the following SSSI (some of which also form part of the underpinning SSSI for the European Sites listed above):</p> <ul style="list-style-type: none"> ~ Thorne Moor SSSI; ~ Brighton Meadows SSSI; ~ Derwent Ings SSSI ~ Barn Hill Meadows SSSI; and ~ Skipwith Common SSSI. <p>Mitigation measures have been developed to reduce the Proposed Scheme's contribution to acid deposition.</p> <p>The assessment of effects on European Sites is set out in Sections 3.5, 3.6, and 4.2 of the HRA Report (document reference 6.8.1). Mitigation measures are set out in Section 4.1 of the HRA Report.</p> <p>The assessment of effects specific to SSSI and other designated sites is set out in Sections 8.9, 8.11, and 8.15 of Chapter 8 (Ecology) of the ES (document reference 6.1.8). Mitigation measures are identical to those set out in Section 4.1 of the HRA Report.</p> <p>With the air quality mitigation measures applied, there are predicted to be no adverse effects on the integrity of any European Site, either alone or in-combination with other plans and projects. Significant adverse effects to SSSI are also not predicted to occur.</p>	
Natural England	Potential for offsite impacts, such as loss of functionally linked land and/ or construction/operational disturbance impacts on functionally linked land, should be considered in assessing what, if any, potential impacts the proposal may have on European sites.	Ecology	<p>Potential for impacts on functionally linked land used by European Site qualifying features are assessed in detail in the Applicant's HRA Report (document reference 6.8.1). The potential for LSE has been identified in relation to the following European Sites:</p> <ul style="list-style-type: none"> ~ River Derwent SAC ~ Lower Derwent Valley SAC ~ Lower Derwent Valley SPA ~ Lower Derwent Valley Ramsar ~ Humber Estuary SPA 	No

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			<p>~ Humber Estuary Ramsar</p> <p>Potential LSE in relation to functionally-linked land could arise through disturbance of otters and their habitats associated with the River Derwent SAC and Lower Derwent Valley SAC. LSE have also been identified in relation to potential disturbance of wintering birds associated with the Lower Derwent Valley SPA and Ramsar, and the Humber Estuary SPA and Ramsar. A summary of this assessment is provided in Table 3.18 of the HRA Report (document reference 6.8.1). With the application of mitigation measures, as set out in section 6.10 of the HRA Report (document reference 6.8.1), no adverse effects on the integrity of any European Site are predicted to occur alone or in-combination with other plans and projects as a result of impacts to functionally linked land, or more generally.</p>	
Natural England	<p>Peregrine are listed in Schedule 1 of the Wildlife and Countryside Act 1981. If any construction activities take place near to the main stack that may cause disturbance to the birds, then appropriate mitigation measures would need to be put in place.</p>	Ecology	<p>The Applicant considers there is very limited potential for construction, decommissioning or operational activities to disturb peregrine falcon, should they breed on the Main Stack in the future as they are known to have done in the past. The Applicant has previously assessed this matter in detail, including in 2020 as part of a planning application for demolition of existing infrastructure at the Drax Site. The Applicant considers disturbance is unlikely for three main reasons:</p> <ol style="list-style-type: none"> 1. The height of the Main Stack and hence the distance above ground level that peregrine breed at the Site exceeds 200m (estimated at ~239m above ground level). 2. There is an abundance of literature demonstrating that peregrine falcon can and do habituate to regular human (and other) forms of disturbance near their breeding sites. 3. The existing Drax Power Station site is a noisy, active, and (by night) well-lit site. As an operational power station there is regular human activity on site, as part of usual operations, maintenance, and other Proposed Schemes. <p>Given the above, the Applicant considers that the Proposed Scheme is unlikely to lead to disturbance of any peregrines breeding on the Main Stack in future years. This assessment is set out in full in the Applicant's ES.</p> <p>In addition, the assessment of Noise and Vibration for the Proposed Scheme has included both construction / decommissioning and operational noise impacts at the location and height on the Main Stack where peregrine have been reported breeding. Appendix 7.6 (Biodiversity Receptor Results) in Volume 3 of the ES (document</p>	No

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			reference 6.3.7.6) identifies maximum construction noise levels of 61dB and maximum operational noise levels of 51dB. As set out in paragraph 8.9.66 of Chapter 8 (Ecology) of the ES (document reference 6.1.8), these noise levels and associated visual disturbance are not expected to have any disturbing effect on peregrine falcon, given these would already be habituated to existing levels of disturbance at the Drax Power Station Site.	
Natural England	Natural England recommends that water vole displacement should be implemented if any proposed activities in the "Environmental Mitigation Area" will impact sections of watercourse used by water vole.	Ecology	The Applicant notes Natural England's comments. The Applicant does not expect to complete any activities as part of the Proposed Scheme, that would be within 7 m of any watercourse supporting populations of water vole and that would trigger the requirement for displacement of water vole.	No
Natural England	Please note that Chapter 8 of the Preliminary Environmental Information Report (PEIR) refers to the River Derwent Special Protection Area (SPA), which does not exist.	Ecology	Noted. The Applicant thanks Natural England for this notification.	Yes
Natural England	It is noted from paragraph 8.6.25 of Chapter 8 of the PEIR that "Great crested newt presence was identified in a waterbody to the north west of the Site Boundary during ecological surveys for the FGD Planning Permission in June 2020" and "Further population size class assessments... identified a small population of great crested newts using two ponds." A relevant licence should be secured from Natural England if these ponds will be affected by proposed activities in the "Environmental Mitigation Area." Please note that Natural England has recently launched District Level Licensing (DLL) for GCN in North East Yorkshire. For further information on joining a DLL scheme to manage GCN populations see https://www.gov.uk/government/publications/great[1]crested-newts-district-level-licensing-schemes	Ecology	The Applicant intends to shortly submit an application to Natural England to confirm the use of the North East Yorkshire District Level Licence to address potential effects on great crested newts.	No
Natural England	Natural England notes that roosting bat surveys were completed in 2018 and the suitability of buildings and trees within the Site was also reassessed during the Extended Phase 1 Habitat Survey in 2021. As the surveys "...confirmed the likely absence of roosting bats in buildings" and "the suitability of trees and buildings for roosting bats has not changed significantly since 2018," we agree that further bat surveys are not required at this stage. We note that "Five trees within existing Power Station Site northeast corner ('North Station Wood') identified as having potential suitability for roosting bats." If proposed development is likely to impact these trees, further surveys should be	Ecology	The Applicant notes Natural England's response. The Applicant can confirm that the trees in North Station Wood are not expected to be affected by the Proposed Scheme, as they are located more than 30 m from the Order Limits.	No

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	completed, and a licence should be secured from Natural England prior to development if roosts are identified.			
Natural England	As stated in paragraph 8.6.21 Chapter 8 of the PEIR, surveys carried out for the Drax Repower scheme in 2018 identified otter prints and spraints and a potential couch within the “Environmental Mitigation Area”. We therefore recommend that the ES considers potential impacts on otter habitat, including potential impacts associated with air quality and water quality. Potential significant effects on otter associated with the River Derwent SAC should also be considered in the HRA. We welcome the response in Table 12.1, Chapter 12 of the PEIR that “Potential impacts on water habitats will be consulted upon with the project ecologists and included in the ES.	Ecology	Potential effects on otter have been considered in Chapter 8 (Ecology) of the ES (document reference 6.1.8) and in the HRA report (document reference 6.8.1) in the context of them being qualifying interests of the River Derwent SAC and the Lower Derwent Valley SAC. This has included assessment of the potential for significant air quality and water quality impacts on otter habitats.	No
Natural England	As a finite resource, soil should be considered in the Environmental Statement in terms of the degree to which soils are going to be disturbed/harmed as part of this development. If required, an agricultural land classification and soil survey of the land should be undertaken. The Environmental Statement should also provide details of how any adverse impacts on soils can be minimised.	Ground Conditions	Impacts on soil have been considered in Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11). An agricultural land classification and/or soil survey has been undertaken within areas of the Order Limits which have not previously been surveyed (this includes the East Construction Laydown Area, the woodyard and the Offsite Habitat Provision Area). This is provided as Appendix 11.2. Information on soils is provided within the baseline section Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11, Section 11.7). An assessment of the effect on agricultural land and soils from construction is provided in Section 11.9. Mitigation includes a Soil Handling Management Plan (within the CEMP), and the residual effect is assessed as slight adverse (not significant).	Yes
Natural England	An external lighting plan should be put in place	Landscape and Visual	A draft lighting strategy (document reference 6.7) has been developed by the Applicant, which details an external lighting plan and mitigation measures to reduce lighting levels while observing all necessary health and safety requirements. The preparation of a detailed lighting strategy is secured through a requirement of the dDCO (document reference 3.1).	No
Natural England	Natural England broadly welcomes the proposed “Environmental Mitigation Area” to the north of the Drax Power Station Site. However, we are currently not clear what the purpose and plans for this “Environmental Mitigation Area” are. Please provide further detailed information in the Environmental Statement and /or Habitats Regulations Assessment, where appropriate.	Landscape and Visual	The HPA (formerly Environmental Mitigation Area) and Off-site HPA have been provisioned for the purposes of ecological mitigation, compensation and landscape enhancement. Outline Landscape and Biodiversity Strategy (OLBS) (document reference 6.6.1) comprises details of the HPA and Off-site HPA proposed including that referred to	No

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			by Natural England, which comprises a Landscape Mitigation Plan setting out all proposals.	
Natural England	It is recommended that further information is provided on how "Any contaminants would be removed prior to disposal", outlined in 12.8.10 Chapter 12 of the PEIR.	Water Environment	Runoff from potentially highly contaminated areas will be treated appropriately prior to discharge. The Contractor will prepare a Site Waste Management Plan (SWMP), which will include information about pollution prevention measures. The SWMP will form part of the Construction Environmental Management Plan, as set out in the Register of Environmental Actions and Commitments (REAC) (document reference 6.5) and secured in the dDCO.	No
Natural England	The River Ouse adjacent to the proposal is a Humber Estuary lamprey migration route and it should be determined whether the proposal is likely to have a significant effect on river and sea lamprey associated with the Humber Estuary SAC/Ramsar.	Water Environment	Potential deterioration of water quality and habitats within the boundary of the Humber Estuary designated Ramsar Site, SSSI, SAC and SAP are scoped out due to the significant dilution that would occur over the approximate 7 km distance from the Proposed Scheme. Impacts to the River Ouse were assessed as part of the ES. Impacts to the mobile species outside of the boundary of designated sites are assessed in the HRA (document reference 6.8.1) and in Chapter 8 (Ecology) of the ES (document reference 6.1.8).	No
Network Rail	Given the nature of the proposals and that work will be required in proximity to the operational railway environment, early engagement with Network Rail will be essential to discuss and agree the scheme and any licences that may be required to implement it.	Transport	The Applicant welcomes the comments from Network Rail. The Applicant has since requested the protective provisions from Network Rail and is awaiting a response. The Applicant will provide an update to the Examining Authority before or during the examination.	No
North Yorkshire Fire and Rescue	North Yorkshire Police, Fire and Crime Commissioner Fire and Rescue Authority have no objection / observation to the proposed development.	General	Noted, the Applicant thanks North Yorkshire Fire and Rescue for responding to the consultation and for confirming they have no objection/observation to the proposed development.	No
North Yorkshire Moors National Park Authority	Authority has reviewed the submitted documentation for this interesting project, however it has no comments to make.	North Yorkshire Moors	Noted, the Applicant thanks the North Yorkshire Moors National Park Authority for responding to the consultation and for confirming they have no comment.	No
Sky UK Limited	Updated contact details provided for Plant Enquiry Team.	General	Noted, contact details as provided have been updated.	No
UK Health Security Agency	We note that other Proposed Schemes potentially having interactions and relevant cumulative effects have been identified. At this stage, only a brief discussion of each of the developments is presented and the cumulative effects do not appear to have been adequately assessed. We would expect a full evaluation of potential cumulative effects within	Cumulatives	An updated planning application search (undertaken in liaison with the relevant local authorities) of 'other Proposed Schemes' was completed at the end of February 2022 and has captured any other developments since the previous planning application search in October 2021. Further detail on the methodology for inter-project (as well as intra-	No

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	the Environmental Statement (ES). Further detail is also needed on the proposed methodology for identifying in-combination effects.		project) cumulative effects is provided in Chapter 18 (Cumulative Effects of the ES (document reference 6.1.18). PINS Advice Note 17 has been used to guide the methodology for Chapter 18 (Cumulative Effects). The ES submitted with the Application provides a full response to this matter raised by the UKHSA, taking in to account the most up to date information available on other proposed schemes.	
UK Health Security Agency	The UK Health Security Agency acknowledge that the policy and legislation context set out in the PEIR is well defined in each of the chapters. There is a strong focus on ensuring the impacts of the Development Consent Order (DCO) Project are compliant with the legal frameworks. However, the policy and legislation should be kept under review between now and submission of the ES to reflect any changes/alterations.	Policy and Legislation	The Applicant welcomes the UKHSA's comments on the policy and legislative context of the Proposed Scheme and has ensured that changes or alterations to relevant policy and legislation are kept under review and the information submitted with the DCO Application documents is as up to date as possible.	No
UK Health Security Agency	The UK Health Security Agency noted that there are gaps in the information provided in the consultation material, particularly the water environment and land quality. Also, with regard to human health and wellbeing, the PEIR lacks detail or data on which to comment, with many references to intended content within the final ES. This prevents detailed responses at this stage and increases the risk of comments at the DCO stage. It is recommended that further targeted consultation is undertaken prior to the DCO submission.	Population and Health / Ground Conditions / Water Environment / Transport	The Applicant notes that the following Chapters of the ES provide further information that was not available at the PEIR stage of the project: Chapter 11 (Ground Conditions, document reference 6.1.11), Chapter 12 (Water Environment, document reference 6.1.12), Chapter 16 (Population, Health and Socio-Economics, document reference 6.1.16) and Chapter 17 (Cumulative Effects, document reference 6.1.17). This information addresses the matters raised by the UKHSA, but the Applicant welcomes further engagement with the UKHSA following their consideration of the Application.	Yes
UK Health Security Agency	The report recognised that the presence of significant numbers of construction workers (up to 1,000) could foreseeably have an impact on the local availability of affordable housing. Demand for temporary accommodation and local services by the non-home-based workers should be identified and an assessment made regarding the potential impact, including on local housing supply, affordability, and homelessness provision of short-term accommodation.	Population and Health / Cumulatives	The assessment of increased demand for accommodation due to an influx of construction workers has been included in paragraphs 16.5.3, 16.5.4 and 16.5.5 of Chapter 16 (Population Health and Socio-economics) (document reference 6.1.16) in the ES. It is anticipated that there will be a reasonable availability of accommodation to meet demand from transient workers temporarily relocating during the construction phase of the Proposed Scheme. Therefore, there is likely to be a direct, temporary, long-term, slight adverse (not significant) effect on temporary accommodation facilities. The magnitude of change prior to mitigation is considered to be minor for all facilities including healthcare, as there would be a small difference in the ability of community facilities to fulfil their function. Therefore, there is likely to be a direct, temporary, long-term, slight adverse (not significant) effect on all community facilities including education, healthcare and other local services.	No

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UK Health Security Agency	The Cumulative Effects Assessments identifies other development within the Zone of Influence which may also require increased numbers of non-home-based workers to travel to the work area. The cumulative effects on accommodation provision should also be considered.	Population and Health / Cumulatives	<p>Increased demand for accommodation and local facilities from specialist contractors who may come from outside the area to undertake the construction works, has now been scoped into the Population Health and Socio-Economics assessment as set out in paragraphs 16.5.3, 16.5.4 and 16.5.5 of Chapter 16 (Population Health and Socioeconomics) of the ES (document reference 6.1.16). The cumulative effects of this are considered within Chapter 18 (Cumulative Effects) of the ES.</p> <p>The cumulative assessment concludes that there may be temporary slight (not significant) adverse cumulative effects on increased demand for accommodation and community facilities during construction due to the location and anticipated construction periods of other developments located within the study area.</p>	No
UK Health Security Agency	The proposed construction timeline results in the need for very clear reporting on the temporal impacts and effects on the local population. In this context "temporary" impacts can extend over long periods, but the PEIR does not comment on how the temporal scope will be defined. The reporting of temporary effects is therefore not clear.	Population and Health	<p>The ES provides further clarification over assessment durations for temporary effects. For the purposes of this assessment, these are classified as: Short term - < 1 year; Medium term - 1-4 years; Long term - 5+ years. This is further explained in paragraph 16.5.21. within Chapter 16 (Population, Health and Socio-Economics) of the ES (document reference 6.1.16).</p>	No
UK Health Security Agency	<p>The PEIR makes no qualitative assessment on the impact from construction on walkers, cyclists or horse riding using the affected road network, but this is to be reported in the ES. The PEIR does not contain any details of pedestrian/cycle usage of the local highway network which can inform the findings in Table 5.10 and Para 5.7.2.</p> <p>The assessment of sensitivity within Table 5.10 should be checked with the local highways department and informed by usage, for example the A645W may be suitable for higher sensitivity given there is no lighting, but a footpath is available for use.</p>	Transport	<p>The Applicant confirms that Chapter 5 (Transport) of the ES (document reference 6.1.5) assesses the impact of the construction stage of the Proposed Scheme on walkers, cyclists and horse riders within the Study Area in relation to severance, pedestrian amenity, fear and intimidation and concludes the significance of effect is not significant.</p> <p>The assessment of sensitivity of a road link, or the immediate area through which it passes including PRoW, is defined by the type of user groups who may use it and is described in Table 5.15 of the ES.</p> <p>Amendments have been made to the sensitivity of link from the PEIR stage based on feedback received from local highway authority, National Highways and other consultees. The sensitivity has also been informed by information obtained from viewing Strava 'heat maps' of the local area showing the usage of routes including PRoW and other non-PRoW routes, in addition to local knowledge.</p>	Yes
UK Health Security Agency	Local consultation or usage data results should be used to review the existing allocation of sensitivity and final assessment of significance to each of the affected PRoWs and local highway sensitivity for pedestrians and cyclists.	Transport	<p>Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) assesses the impact of the Proposed Scheme on the PRoW network and takes into consideration consultation responses received through non-statutory and statutory consultation stages as well as information obtained from viewing Strava 'heat maps' of the local area showing the</p>	Yes

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			usage of routes including PRoW and other non-PRoW routes. PRoW 35.47/6/1 and PRoW 35.6/6/1 are directly affected by the Proposed Scheme. PRoW 35.47/6/1 which is a footpath follows the alignment of an existing agricultural vehicular access route to the west of New Road and will be utilised to access Habitat Provision Areas. PRoW 35.6/6/1 which is a footpath will be temporarily stopped up to enable the establishment of an Off-site Habitat Provision Area.	
UK Health Security Agency	There should be continued local consultation in order to identify any additional enhancements for active travel and physical activity and agree effective mitigation measures.	Transport	<p>A Framework Construction Worker Travel Plan (CWTP) (document reference 6.3.5.2) has been prepared and submitted as part of the application. No additional enhancements for active travel and physical measures have been identified, with the focus on encouraging alternative forms of sustainable travel, namely car sharing and minibus travel. This approach reflects the Site's location and travel characteristics of the temporary workforce and is proportionate to the temporary nature of the impacts. A Travel Plan coordinator is an integral part of the CWTP and will undertake an active role in promoting sustainable transport on behalf of Drax.</p> <p>It is considered that the existing sustainable infrastructure is sufficient for the operational stage and no additional enhancements for active travel and physical activity, or mitigation measures are required.</p>	No
UK Health Security Agency	The ES should screen and address any impacts on pedestrians and cyclists including delay, amenity, or safety using the local road network, as outlined within the IEMA GEART Guidelines.	Transport	Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) assesses the impacts on pedestrians and cyclists including delay, amenity, and highway safety in line with the IEMA GEART Guidelines. The significance of effect is classified as slight (not significant) or neutral (not significant) across all links within the Study Area.	No
UK Health Security Agency	In the PEIR (particularly water environment and land quality), there is limited justification for the classification criteria and how these criteria have enabled Drax Power Limited to reach judgements as to the significance of the risk. It is important that we understand the rationale behind the criteria and how they have been applied to specific assessments. There is no stipulation of weighting, suggesting that each criterion is of equal consideration in characterising risk. We would expect to see in the ES, a clear explanation as to how and why such conclusions have been reached. It is difficult to understand what parameters/inputs have been used to describe worst case scenarios.	Water Environment / Ground Conditions	<p>Chapter 12 (Water Environment), of the ES (document reference 6.1.12, Section 12.5 (Assessment Methodology) has been written to outline the methodology used for the assessment, detailing the receptor importance, magnitude of impact and significance criteria. The methodology has been undertaken in general accordance with the principles as set out within Design Manual for Roads and Bridges (DMRB) LA 113 - Road Drainage and the Water Environment Rev 1 and DMRB LA104 - Environmental Assessment and Monitoring and the criteria have been applied within the assessment in accordance with those principles.</p> <p>Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11, Section 11.5 (Assessment Methodology) presents the assessment methodology details for assessing Ground Conditions and follows DMRB LA109 - Geology and Soils guidance and DMRB LA104 -</p>	No

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			Environmental Assessment and Monitoring. Characterising risk is not part of the Environmental Impact Assessment, the land quality assessment references CIRIA C552 guidance on the definition of risk and an explanation of the significance of effects (relative to risk assessment) is provided in paragraph 11.5.14.	
UK Health Security Agency	In the PEIR, there are gaps in baseline and methodology details for assessment of areas such as the water environment, and land quality.	Water Environment / Ground Conditions	The Applicant considers that the ES methodology undertaken is robust and the baseline is appropriately reported.	No
UK Health Security Agency	Based on the number of water abstractions for agricultural use identified, we would recommend that the Food Standards Agency are consulted to ensure water is of the appropriate quality.	Water Environment / Ground Conditions	The proposed construction works are considered to be standard with no untypical water quality risks. Therefore, the Applicant does not consider it necessary to consult the Food Standards Agency on protecting groundwater quality. Protection of groundwater is managed by the Environment Agency, who have been consulted.	No
UK Health Security Agency	The possible health impact of electric and magnetic fields should either be considered using the framework provided in the scoping response, and either assessed fully or scoped out as necessary.	Population and Health	<p>A large part of the electrical works that will be undertaken for the Proposed Scheme include upgrades and modifications to existing Drax Power Station infrastructure, to include substation, switchgear, cabling and overhead lines. As this work is upgrade and modification to existing infrastructure, the impact of the change to electro-magnetic field (EMF) in these areas will be insignificant.</p> <p>Other electrical works to be undertaken for the Proposed Scheme include installation of new distribution voltage infrastructure including associated HV and LV transformers and distribution voltage cabling to and from new switchroom buildings. The exact detail and routing of this new distribution voltage infrastructure has not yet been defined but the Applicant does not envisage EMF to be an issue that will lead to significant effects, given the proximity of this new equipment within the Drax Power Station Site.</p> <p>At the detailed design stage, the new distribution voltage infrastructure will have been further defined and enable a complete EMF Assessment to be undertaken. Based on expected extent of the new distribution voltage infrastructure and allowable flexibility for specific location of these works within the designated work area (Work No. 1F), no significant effects are envisaged. Any actions or mitigations that come about from the EMF Assessment would be able to be addressed within the Order Limits and with no impact to or with other cumulative developments.</p> <p>The requirement for the EMF Assessment is set out in the REAC (document reference 6.5) and secured in the dDCO.</p>	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Regard had to the consultee response	Change (Yes / No)
Vodafone	No comment received on the consultation. Future information should include location plan details.	General	The Applicant notes the comments received from Vodafone.	No

7.6. SECTION 42(1)(B) LOCAL AUTHORITIES

7.6.1. Local authorities provided a range of comments around environmental impacts, particularly around landscape and visual impacts, nature conservation, biodiversity and cultural heritage. Local authorities also provided comments on construction details, traffic and highways impacts, and engagement opportunities (Table 7.3).

Table 7.3 - Comments from Section 42(1)(b) Local Authorities

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
Hull City Council	While no additional measures are needed relating to the potential air quality impact within Hull City Council boundaries, this would need to be reconsidered in the event that the proposed development would result in significant additional traffic movements on the city's road network beyond those predicted within Chapter 5 to the PEIR.	Air Quality	Local air quality impacts associated with exhaust emissions of NOX / NO2 and particulate matter (PM10/PM2.5) from construction phase traffic and operational phase traffic, generated by the Proposed Scheme, have been scoped out of the assessment (including therefore in Hull's area). This was done based on a screening exercise, with reference to EPUK/IAQM air quality planning guidance criteria, applied to the relevant Scheme traffic data reported in Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5). Please see Section 6.4 in Chapter 6 (Air Quality) of the ES (document reference 6.1.6) for further details and justification for these impacts being scoped out.	No
Hull City Council	Ecology in-combination effects should be explored in relation to impacts on designated sites, and this should be an integral part of the habitat regulations screening process.	Ecology	The Applicant can confirm that in-combination impacts on European Sites are considered in the HRA Report. The in-combination screening for LSE is set out between paragraphs 3.6.26 to 3.6.54 of the HRA Report (document reference 8.6.1). Where in-combination LSE are identified, these are also considered in the in-combination appropriate assessment. This is set out in Section 4.3 of the HRA Report.	No
Hull City Council	While no additional measures are needed relating to the potential noise and vibration impacts within Hull City Council boundaries, this would need to be reconsidered in the event that the proposed development would result in significant additional traffic movements on the city's road network beyond those predicted within Chapter 5 to the PEIR.	Noise and Vibration	A noise assessment is presented in Chapter 7 (Noise and Vibration) of the ES (document reference 6.1.7) to assess the likely noise effects arising from the Project traffic. The assessment concludes that significant adverse effects are not expected.	No
Hull City Council	The authority would wish to be consulted on the proposed Construction Traffic Management Plan and the Construction Worker Travel Plan in order to consider the likely traffic impacts on the City's highway network as the development proposals are firmed up.	Transport	An Outline Construction Traffic Management Plan (document reference 6.3.5.1) and Framework Construction Worker Travel Plan (document reference 6.3.5.2) have been prepared and submitted as part of the DCO Application. The extent of the study area was agreed with Local Authorities (NYCC, ERoYC and SDC) and National Highways, and the levels of traffic associated with the Proposed Scheme towards Hull are negligible. Therefore, Hull City Council do not need to be consulted prior to finalising the Construction Traffic Management Plan and the Construction Worker Travel Plan.	Yes
Hull City Council	For abnormal load routings, Hull City Council would wish to be consulted on any alternative arrangements that, for any reason, may need to be considered further down the line as part of the NSIP process.	Transport	The preferred Abnormal Indivisible Load (AIL) route is between the Port of Goole and the Site. Hull City Council would be consulted on the proposed AIL routing strategy if the route changes and uses routes within Hull City Council's highway network.	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
NYCC and Selby District Council (SDC) (joint)	Air Quality: Emphasise the need to accurately set the baseline data to reflect the assessment, notably by ensuring that data source modelling is aligned to the operation of two biomass units without BECCS from the main stack in the absence of coal-fired units.	Air Quality	Please see Section 6.5 in Chapter 6 (Air Quality) of the ES (document reference 6.1.6) for details on how the baseline emissions scenario was set for the assessment. All biomass units in the baseline scenario are assumed to be running at full load for 4,000 hours per year, representing a reasonable likely operating profile based on a 'mid-merit' operating regime.	Yes
NYCC and Selby District Council (SDC) (joint)	At this stage in the assessment process there are a number of potential residual effects identified. If these are expected to remain once the final assessment has been undertaken, we would like to discuss these impacts. In relation to the operational air quality impact, we would welcome a joint meeting with Natural England in this regard.	Air Quality and Ecology	It was not possible to hold a joint meeting to discuss the air quality impacts of the Proposed Scheme due to limited availability of Natural England, and due to the Applicant's air quality modelling work being completed only shortly prior to the DCO submission. The applicant has passed a copy of the HRA Report (document reference 6.8.1) to Natural England for comment. This includes the Applicant's assessment of effects on European Sites, including those arising from operational air quality impacts. The Applicant would welcome a meeting with Natural England and NYCC to discuss the operational effects of the Proposed Scheme on ecological receptors and intends that this be held prior to Examination of the DCO Application, pending confirmation from NYCC that they would still wish to attend such a meeting and subject to NE availability.	No
NYCC and Selby District Council (SDC) (joint)	In relation to the residual impacts upon species we would be keen to investigate if any advanced works could be undertaken to offset the time delay in compensatory habitat reaching maturity.	Ecology	The Applicant will explore opportunities for delivering ecological enhancement as early in the project as possible. It will only be possible to start habitat creation and enhancement works once the DCO has been granted, as prior to this time the Applicant will not know if the compensatory habitat is actually required or have the powers in place to complete the necessary work, which will limit how far ahead of construction habitat measures can be implemented.	No
NYCC and SDC (joint)	Regarding the approach to ecological assessment set out in the PEIR. Where full survey information or assessment is not yet available it is understood that a worst-case scenario has been considered at this stage and we would agree with this approach.	Ecology	The Applicant can confirm that the assessment of effects on ecological receptors has been refined since the PEIR. Additional information on the design and construction of the Proposed Scheme has been taken into account in the assessment of ecological impacts and effects. Refinement of proposed mitigation measures has also been proposed. Chapter 8 (Ecology) of the ES (document reference 6.1.8) explains the approach to baseline data collection. The assessment of ecological impacts and effects remains based on a reasonable worst-case scenario, based on the likely maximum impacts on ecological receptors. The assumptions underpinning the assessment are set out in paragraph 8.5.25 of Chapter 8.	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
NYCC and SDC (joint)	We are fully supportive of the intention of this project to provide a minimum of 10% biodiversity net gain in line with current guidance set out in the recent Environment Act 2021.	Ecology	<p>The findings of the Applicant's initial BNG assessment are set out in the Biodiversity Net Gain Report (document reference 6.10). This identifies an initial position for BNG.</p> <p>The Applicant is pursuing opportunities to deliver watercourse enhancements such that BNG of 10% is achieved for river habitat units, through discussions with the Environment Agency, Yorkshire Wildlife Trust and Yorkshire Dales Rivers Trust to identify appropriate locations for local enhancements to contribute to net gain, whilst also considering local options within their landholdings for delivering BNG for watercourses. The Applicant has identified land within and outside the Order Limits for the provision of area-based terrestrial habitats and linear habitats (hedgerows). On the basis of the worst-case habitat loss assumed for the Proposed Scheme (as set out in Table 3.1 of the Biodiversity Net Gain Report (document reference 6.10) and extracted above) there would be a net gain for linear habitats of 51.70% and a net gain in area-based habitats of 3.66%. In reality, it is unlikely that the worst-case scenario for habitat loss on which the BNG assessment is based will actually occur; this will be explored further as the Proposed Scheme develops, with a view to confirming additional areas of habitat that would not need to be removed or disturbed to facilitate the Proposed Scheme. The Biodiversity Net Gain Report (document reference 6.10) includes a sensitivity test for a more realistic scenario for habitat loss and disturbance, with the BNG results for this scenario set out in Table 3.2 of that report. Under this scenario, the net gain for linear units increases to 54.14%, and the position for area-based habitats improves to a net gain of 17.08%. The BNG assessment will be revisited post-submission.</p>	Yes
NYCC and SDC (joint)	To the north of the Existing Drax Power Station is a Scheduled Monument, Grade I and Grade II listed buildings, plus non-designated heritage assets. There would need to be a review of historic maps and a walk around the area to determine potential non-designated heritage assets.	Archaeology and Heritage	<p>A walkover survey and a review of historic mapping has been carried out to support the preparation of the Historic Environment Desk Based Assessment (technical appendix in support of Chapter 10). The results of previous archaeological investigations, LiDAR data and aerial photographs were also examined for this area.</p>	No
NYCC and Selby District Council (SDC) (joint)	Historic Environment - The term 'Non-Designated Heritage Asset' should only be used for sites or buildings that have a specifically defined level of interest, e.g. inclusion on a local list. There is medium value ascribed to the medieval fishponds at Drax Abbey (MNY10071). Medieval fishponds are quite regularly Scheduled in their own right and this one is adjacent and directly related to the Scheduled Monument at Drax Abbey. The association and potential to contain waterlogged organic deposits means that this feature is of high value and potentially of equivalent significance	Archaeology and Heritage	<p>Assets within the HER were defined as non-designated.</p> <p>The value of the medieval fishponds was reassessed in response to the consultation and was increased to high.</p> <p>The requirement for a watching brief, carried out to ClfA standards and approved by the NYCC Principal Archaeologist has been included within the mitigation requirements and REAC.</p>	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
	to a Scheduled Monument. 'a watching brief' as appropriate mitigation for the recording of archaeological remains within the laydown area and environmental mitigation area if required. The watching brief should be carried out according to the guidance set out in Chartered Institute for Archaeologists. 2014. Standard and guidance for an archaeological watching brief. CfA.			
NYCC and Selby District Council (SDC) (joint)	<p>As stated at the Scoping stage, the principle of using representative viewpoints to illustrate the experience of different types of visual receptor is acceptable, however the assessment should aim to describe and assess the full effects of the development (not limited to a summary of viewpoints). The assessment should provide mapping of the landscape and visual effects to help quantify and illustrate the geographical extent of all receptors and likely effects of the development.</p> <p>A list of representative viewpoints, photograph and photomontages (including night-time views) was discussed and agreed with the LPA.</p>	Landscape and Visual	<p>The list of representative viewpoints and photomontages (including night-time views) are presented in Table 9.4 of Chapter 9 of the ES (document reference 6.1.9) as agreed with the LPA.</p> <p>The assessment takes account of specific visual receptor groups, residential and recreational, which are considered at an appropriate level of detail to describe and assess the full effects of the development. The closest representative viewpoint photography for each receptor group is referenced as a means of providing additional illustration and clarity for the reviewer.</p>	No
NYCC and Selby District Council (SDC) (joint)	We would consider that for annotated photo-panoramas TGN 06/19 Type 1 or additional wirelines to TGN 06/19 Type 2 are most appropriate. For viewpoints selected for photomontages we would suggest at least Type 3 but Type 4 should be considered where sensitivity of context, scale and proximity of the development warrant it. We would wish to see a realistic impression of scale and detail.	Landscape and Visual	<p>Annotated photo-panoramas conform with LI TGN 06/19 Type 1.</p> <p>The field verified wireline representations are to LI TGN 06/19 Type 4, Level 1 and detail the location and size of the Proposed Scheme. The field verified photomontages are to Type 4, Level 3 and detail not only the size and location of the Proposed Scheme but also the degree of visibility and the architectural form, which the Applicant considers to give a realistic impression.</p>	No
NYCC and Selby District Council (SDC) (joint)	<p>It is noted that the Wireline for Viewpoint 3 Figure 9.25b shows the proposed scheme partly obscured by the perimeter security fence. We suggest that the Applicant should consider re-taking the photograph in an adjusted location to allow an open full view of the proposed scheme and that this should be produced as a full rendered visualisation Level 3 (rather than wireline).</p> <p>We would wish to see photomontages explain how adverse effects will be mitigated over time. Photographs should include winter views where possible to explain the worst-case scenario. We would welcome the opportunity to discuss viewpoints and photomontages further once final Proposed Scheme details and mitigation have been developed.</p>	Landscape and Visual	<p>Following discussions with the LPA, the photography for Viewpoint 3 has been subsequently re-taken at an adjusted location (as requested), in order to be further away from the perimeter fence. This amended viewpoint location provides a clearer view of the Proposed Scheme from this position and is less obscured by the perimeter security fence. This amended viewpoint location is shown on Figure 9.6 (document reference 6.2.9.6).</p> <p>The photomontage for this viewpoint has been generated to TGN 06/19 Type 4, Level 3.</p> <p>Viewpoint photography has been taken during winter conditions and so the photomontage accordingly represents the worst-case scenario.</p>	Yes
NYCC and Selby District	Site Design / Alternative Design Options – The Design Framework and Design Principles document proposed by the Applicant is welcome. The Applicant should consider both	Landscape and Visual	The Design Framework Document (document reference 6.9) provides an illustration of how primary design measures contribute to the overall appearance of the Proposed Scheme in context with the Power Station	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
Council (SDC) (joint)	functionality and aesthetics as far as possible, in-line with National Planning Policy Statement criteria for good design. This document should explain how the current application achieves principles of 'good design' in context of the site as a whole, for the overall composition of site structures, massing, layout, colour and materials, aiming to reduce overall massing, visual coalescence and site clutter.		Site. This includes the discussion of site layout options, massing and visual appearance. It presents an overview of the historic landscape vision for Drax Power Station and the evolving design context in terms of new / ancillary infrastructure. Principles of good design are explained and referenced against NPS criteria.	
NYCC and SDC (joint)	Overall, the mitigation measures proposed are considered to be achievable and they can be secured through the DCO process. We would like the opportunity to discuss specific mitigation proposals once the final assessment has been undertaken.	Landscape and Visual	Mitigation for the Proposed Scheme has been identified and finalised, set out in Chapter 8 (Landscape and Visual Impacts) of the ES (document reference 6.1.9) and included within the Outline Landscape and Biodiversity Strategy (OLBS) (document reference 6.6) which is secured in the requirements of the dDCO. The OLBS is in outline and a detailed plan will be produced, which will be subject to approval by the relevant planning authority. The proposed mitigation detailed in the OLBS has been discussed in a meeting held with NYCC and SDC on 27 May 2022.	Yes
NYCC and SDC (joint)	Regarding the landscape, we would welcome the opportunity to provide further detailed landscape comment once the various aspects of the design have been finalised, strategies and mitigation are more fully developed.	Landscape and Visual	Mitigation for the Proposed Scheme has been identified and finalised, set out in Chapter 8 (Landscape and Visual Impacts) of the ES (document reference 6.1.9) and included within the Outline Landscape and Biodiversity Strategy (OLBS) (document reference 6.6) which is secured in the requirements of the DCO. The OLBS is in outline and a detailed plan will be produced, which will be subject to approval by the relevant planning authority. The proposed mitigation detailed in the OLBS has been discussed in a meeting held with NYCC and SDC on 27 May 2022.	Yes
NYCC and SDC (joint)	The Landscape assessment should provide mapping of the landscape and visual effects to help quantify and illustrate the geographical extent of all receptors and likely effects of the development.	Landscape and Visual	Mapping for Landscape Character (Figure 9.1, document reference 6.2.9.1), Visual Receptors (Figure 9.2, document reference 6.2.9.2) and ZTV (Figure 9.3, document reference 6.2.9.3) have been produced as part of the Environmental Statement.	Yes
NYCC and SDC (joint)	It is noted that Appendix 9.1 LVIA Methodology para. 1.10.2 states wirelines are to Level 1 which seems not in accordance with TGN 06/19, and this should be clarified.	Landscape and Visual	The paragraph wording has been modified in ES Appendix 9.3 LVIA Methodology paragraph 2.12.2 to read "wireline representations consistent with TGN 06/19 Type 4, Level 1".	Yes
NYCC and SDC (joint)	Regarding potential cumulative impacts, the Authorities would welcome early and ongoing discussions on the cumulative impact assessment, given the number of projects which are coming forward in location of the proposed development concurrently.	Cumulatives	A meeting was held with Selby District Council and North Yorkshire County Council on 21 January 2022 to verify the methodology and confirm the 'other developments' on the short-list. Doncaster Borough Council, East Riding of Yorkshire Council, Selby District Council and North Yorkshire County Council were issued the finalised short-list of 'other developments;' and proposed final methodology on 17 February	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
			2022. The final shortlist is presented in the ES as Appendix 18.2 (Short List of Other Developments) (document reference: 6.3.18.2).	
NYCC and SDC (joint)	The proposed approach and site investigation works mentioned in the PEIR are considered to be acceptable.	Ground Conditions	This feedback has been noted.	No
NYCC and SDC (joint)	During the construction phase, high-impact noise activities should be well defined, for example piling works, rollers and tunnel boring, and consideration given to a more representative LAeq,T for such works.	Noise and Vibration	Further consultation was held on 4 February 2022, after the PEIR submission. The EHO representing SDC agreed the methodology proposed for the construction and operation assessments. An assessment related to piling and roller activities has been undertaken concluding that significant adverse effects are not expected.	No
NYCC and SDC (joint)	There is potential for construction works outside of 'core hours' and it is assumed that core hours are 0800-1800 Monday to Friday, 0800-1300 Saturday, and not at all on Sundays and Bank Holidays. Would question the need for construction during evenings and on Sundays/Bank Holidays, and in any event construction hours should be clearly defined due to its relationship with the likelihood of significant noise effects.	Noise and Vibration	<p>Further consultation was held on 4 February 2022, after the PEIR submission. The EHO representing SDC agreed the methodology proposed for the construction and operation assessments. A dDCO requirement secures the production of a CEMP which will set out the construction hours to be in accordance with the REAC. The REAC states the following:</p> <p>Construction hours</p> <p>1.—(1) Construction work relating to the authorised development must not take place on Sundays, bank holidays nor otherwise outside the hours of—</p> <ul style="list-style-type: none"> (a) 0700 to 1900 hours on Monday to Friday; and (b) 0700 to 1430 hours on a Saturday. <p>(2) Delivery or removal of materials, plant and machinery must not take place on Sundays, bank holidays nor otherwise outside the hours of—</p> <ul style="list-style-type: none"> (a) 0800 to 1800 hours on Monday to Friday; and (b) 0800 to 1300 hours on a Saturday. <p>(3) The restrictions in sub-paragraphs (1) and (2) do not apply to construction work or the delivery or removal of materials, plant and machinery, where these—</p> <ul style="list-style-type: none"> (a) are carried out within existing buildings or buildings constructed as part of the authorised development; (b) are carried out with the prior approval of the relevant planning authority; or (c) are associated with an emergency. <p>(4) The restrictions in sub-paragraph (2) do not apply to the delivery of abnormal indivisible loads, where this is—</p> <ul style="list-style-type: none"> (a) associated with an emergency; or (b) carried out with the prior approval of the relevant planning authority. <p>(5) Sub-paragraph (1) does not preclude—</p>	No

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
			<p>(a) a start up period from 0600 to 0700 and a shut down period from 1900 to 2000 Monday to Friday and a start up period from 0600 to 0700 and a shut down period from 1430 to 1530 on a Saturday; or</p> <p>(b) maintenance at any time of plant and machinery engaged in the construction of the authorised development.</p> <p>(6) In this requirement “emergency” means a situation where, if the relevant action is not taken, there will be adverse health, safety, security or environmental consequences that in the reasonable opinion of the undertaker would outweigh the adverse effects to the public (whether individuals, classes or generally as the case may be) of taking that action.</p> <p>“shut down period” means a period after physical construction works have finished for the day during which activities including changing out of work gear, the departure of workers, post-works briefings and closing and securing the site take place; and</p> <p>“start up period” means a period prior to physical construction works starting for the day during which activities including the opening up of the site, the arrival of workers, changing into work wear and pre-work briefings take place.</p>	
NYCC and SDC (joint)	Unable to locate the NOEL for operational noise.	Noise and Vibration	Further consultation was held on 4 February 2022, after the PEIR submission. The EHO representing SDC agreed the methodology proposed for the construction and operation assessments. It was agreed that the NOEL will not be defined and that instead the operational noise assessment will follow guidance in BS4142:2014.	No
NYCC and SDC (joint)	The BS4142 initial assessment identifies instances of adverse and significant noise effects during the operational phase of between +1 and +16dB, albeit based on assumed noise levels. This contradicts local and national planning policy in its current form, which is acknowledged in 7.11 to explore additional mitigation for the compressors and update the operational noise model and assessment within the ES.	Noise and Vibration	Further consultation was held on 4 February 2022, after the PEIR submission. The EHO representing SDC agreed the methodology proposed for the construction and operation assessments. Mitigation has been included such that there are no significant adverse effects due to operational noise at any noise sensitive receptor. A dDCO requirement secures a limit to the noise levels arising from the main equipment.	No
NYCC and SDC (joint)	As the PEIR is preliminary, the Local Highway Authority will need to be consulted further in due course.	Transport	Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) sets out the Proposed Scheme impacts. NYCC have been involved in the scoping of the transport methodology including as part of EIA Scoping and the issuing of a separate Transport Scoping Note. The Transport Scoping Note issued covered all transport related parameters including baseline conditions, predicted trip generation, trip distribution, assessment scenarios, proposed growth factors, and other general items ahead of a scheduled meeting with consultees. NYCC provided comments on the proposed transport assessment parameters and the assessment in the ES has been based on these discussions. The	Yes

Stakeholder	Summary of consultee comment	Topic area (Theme)	Response Regard had to the consultee response	Change (Yes / No)
			outcome of the assessment will be discussed with the Local Highway Authority during the examination stage of the project and the Applicant will continue to engage with NYCC and SDC as part of the preparation of a SoCG. SDC have been engaged in relation to the long list and short list of other development that have been used to inform the cumulative assessment. All other matters have been discussed with NYCC as the highway authority.	
NYCC and SDC (joint)	The study should include assessment of available aerial photographs and LiDAR data, useful for identifying former water channels, ponds and drainage.	Water Environment	Aerial photographs and LiDAR data were used as part of the assessment.	No
Selby District Council	SDC issued an information letter regarding Community Infrastructure Levy (CIL) and how this may apply to planning applications.	General	The Applicant notes that CIL is not applicable to this form of development.	No

7.7. SECTION 47 RESPONSES

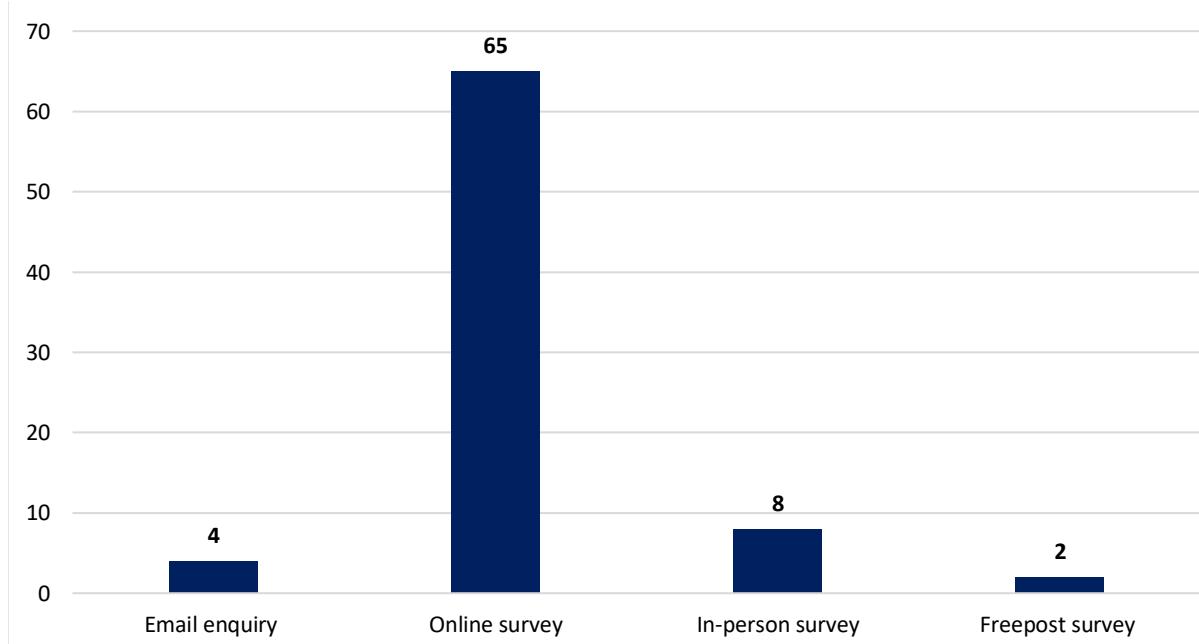
7.7.1. Consultees who have not been identified under section 42 of the PA2008 have been identified as section 47 consultees. This includes responses from residents and environmental groups who were made aware of the consultation through publicity carried out pursuant to the SoCC.

7.7.2. There was a total of 79 responses from section 47 consultees. The majority of responses received through the online feedback form (65). Four responses were received through email, eight copies of the feedback form were received at the exhibition events and two paper copies of the feedback form were posted.

7.7.3. The feedback form contained both closed (choose option) and open (free text) questions

- a. Q1 Closed question with free text box
- b. Q2 Closed question with free text box
- c. Q3 Closed question
- d. Q4 Open question
- e. Q5 Closed question with free text box
- f. Q6 Closed question
- g. Q7 Open question

Plate 7.1 - How Section 47 responses were received



7.8. CONSULTATION RESPONSES

7.8.1. Of the 79 responses, 75 respondents completed the feedback form. The feedback form included a series of closed questions (where respondents select their answer from a pre-defined list) regarding the Proposed Scheme and the consultation programme. They also had the option to share their views through a free text box.

7.8.2. We received 68 feedback forms from individuals and 7 feedback forms from the following organisations:

The Lifescape Project and Partnership for Policy Integrity

York and North Yorkshire Local Enterprise Partnership

Opus Energy

Alderley plc

The Old Sidings Serviced Accommodation Goole

EnerMech

Hunt Thermal Technologies Ltd

7.8.3. The feedback form can be found in Appendix G5. The following sections provide a breakdown of the responses to these closed questions within the feedback form responses.

7.9. RESPONDENT POSTCODES

7.9.1. The feedback form requested people to provide their postcode to provide an indication of where respondents were from. Plate 7.1 highlights where the people that provided their postcode on the feedback form were from:

Plate 7.2 - Geography of Section 47 Consultees who Provided Postcode Data



7.9.2. The respondents that provided their locations were from the following postcodes:

Table 7.4 - Postcode Data

Postcode	Post Town	Quant.	Postcode	Post Town	Quant.
BL26	Bolton	1	IP5	Ipswich	1
DG1	Dumfries	1	IP11	Felixstowe	1
DL8	Leyburn	2	LS15	Leeds	1
DN6 DN7 DN8	Doncaster	3	OX28	Witney, Oxfordshire	2
DN14	Goole	13	NE2	Newcastle Upon Tyne	1
DN17	Scunthorpe	2	NG19	Mansfield	1
DN18	Barton Upon Humber	1	SG8	Royston	1
DN22	Retford	1	ST3	Stoke on Trent	1
DN38	Barnetby	1	SK16	Dukinfield, Tameside	1

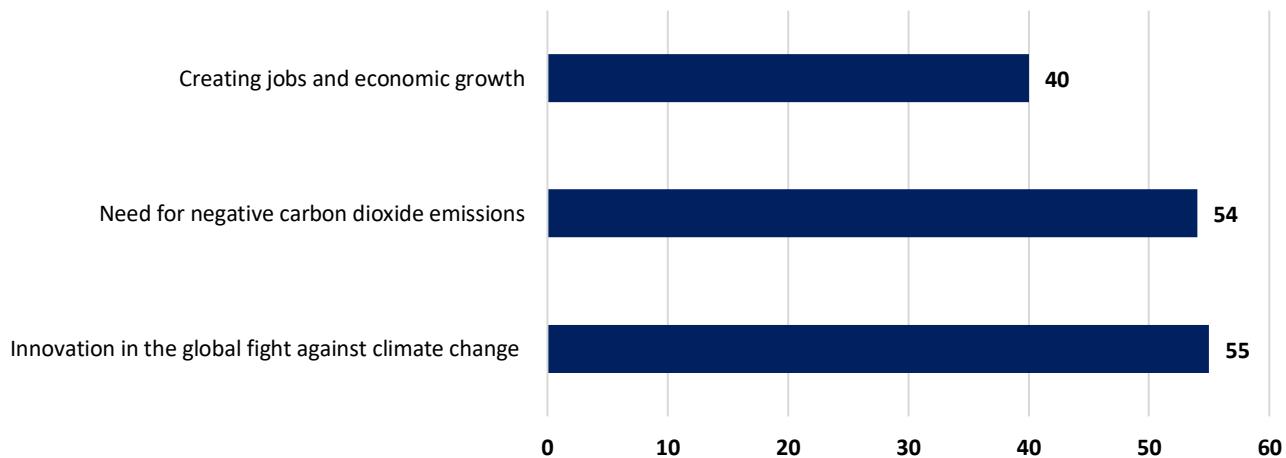
Postcode	Post Town	Quant.	Postcode	Post Town	Quant.
E14	Poplar, London	1	TN2	Wadhurst, Tunbridge Wells	1
EX4	Exeter	1	W4	London	1
GL12	Gloucester	1	YO10	York	2
HU16	Hull	1	YO8	Selby	18

7.10. FEEDBACK FORM - QUESTION ON THE VISION FOR BECCS

7.10.1. The feedback form asked for a view on the three core pillars that the Applicant has identified as key focus points to allow the Applicant to understand through the consultation process the priority attached to these pillars by stakeholders and the public. Respondents classified that fighting climate change through innovation and the need for negative emissions as important as each other. It should be noted that respondents were able to make multiple choices in response to this question.

Q1 Our vision for BECCS at Drax focuses on three core pillars: the need for negative carbon dioxide emissions, creating jobs and economic growth, and innovation in the global fight against climate change. Which of these pillars are most important to you? [please tick all that apply]

Plate 7.3 - Three Core Pillars and Importance



7.10.2. Comments submitted in support of **Pillar 1** - Need for negative carbon dioxide emissions.

- a. We will need carbon negative emissions to offset any hard to abate sectors that continue to emit higher levels of Co2. Without this, we are unlikely to solve the climate crisis and will suffer the consequences.
- b. Genuine concern over the future of our planet - feels like action needs to be taken ASAP as I fear it may already be too late
- c. To slow and potentially reverse the effect of global temperature rise in line with COP26 (no greater than 1.5 Deg C) aspirations, not the final communique
- d. To combat the climate crisis, we need action which decarbonises our economy
- e. As the single greatest carbon emitter in the UK Drax urgently needs carbon capture to ensure its emissions become carbon negative.
- f. The climate is in crisis due to rising levels of carbon dioxide in the atmosphere. It could become very hard for humanity to survive the situation.
- g. All 3 are important, but I think this pillar is most pressing.
- h. I don't believe carbon reduction targets will be met without negative carbon
- i. It's very important to counteract the years of fossil fuel usage, whilst maintaining stability of synchronous generation.
- j. BECCS is a pioneering technology which is needed to help the UK reach its target of reducing carbon dioxide emissions. Without BECCS this will not be possible.
- k. We need to stop burning carbon in whatever form as an energy source. Not only is this process inefficient but it generates greenhouse gases which are very expensive to capture and dispose of.

7.10.3. Comments submitted in support of **Pillar 2** - Creating jobs and economic growth;

- a. Grow the local economy and create top jobs and put our location on the map.
- b. Employment and the economy is more important than "aiming" for zero carbon dioxide emissions and "the fight" against climate change.
- c. Drax is a major employer in the area providing high-quality, well-paid jobs and supporting many others through the supply chain.

7.10.4. Comments submitted in support of **Pillar 3** - Innovation in the global fight against climate change.

- a. Reducing the global rise in temperature is vitally important
- b. Innovative solutions should inherently provide economic growth and opportunities, and the pursuit in fighting global climate change must minimise carbon dioxide emissions.
- c. We need to find new ways of producing electricity without damaging the atmosphere.

- d. We need technology to scale up to help fight climate change, and the BECCS project will do this.
- e. Carbon capture is an innovative technology which is a potentially useful tool in the global fight against climate change, so its development at Drax is to be welcomed.
- f. It is difficult to accurately measure how much CO2 is being absorbed from the atmosphere, so it is far better not to produce CO2 in the first place. The well-intentioned proposal BECCS system sounds too good to be true - the whole scheme is unproven at the scale required.
- g. Innovation will enable us to better balance the need for sustainable, affordable energy, the provision of jobs (including export growth) vital to underpinning a civil society in the UK, the development with care for the environment.
- h. Innovation is happening which is great but also behavioral change is not happening fast enough and no political lead for this. e.g. less flying.

7.10.5. Comments submitted in **support of more than one pillar**.

- a. Emissions and climate change require innovations going forward as well as creating jobs.
- b. Drax is important to global climate change and carbon dioxide emissions. It has long been an important sector to the economy and jobs in Selby.
- c. For Drax to survive (with most coal fired generation stopped), it needs to move on from biomass to cleaner methods. By using BECCS, it will ensure its future and employment opportunities continues.
- d. All of the above are important especially the fight against climate change of which BECCS will be of great importance.
- e. Drax can be at the forefront of negative emission technologies and will inspire other businesses to do the same.
- f. The rate of change required to reach our climate targets is increasingly steep, so innovation is needed to achieve it and negative emissions potential helps the industries that can't move as quickly toward net zero. Also recognising that a lot of carbon-heavy industries provide employment in this region, enabling employment in the green economy will sustain the local economy.
- g. There is no silver bullet for climate change and therefore we need innovative solutions and ways to "net" out the residual emissions
- h. Global warming will adversely affect the local community - it is already with flooding & this is only likely to get worse. High skill, well paid jobs & training are essential for community cohesion.
- i. We all need to do our bit to help with limiting the damage caused by global warming.
- j. I find all of Drax's BECCS pillars important with the 'Need for negative carbon dioxide emissions' being upheld the most valuable amongst the three.

- k.** The climate crisis is the biggest challenge the world faces so we need to do all we can to find ways to beat it - if we can do that, whilst creating new jobs for people in the North - then it's a win-win situation.
- l.** tackling climate change is the basis for everything else, fail and one can forget economical growth or job creation. a stable world climate is priority once that is established then growth can start. if growth is but as priority it would soon lose its appeal if natural disaster caused by climate would cost more than the potential growth
- m.** Fantastic work, Drax! This development is an exciting, much needed step forward in fighting climate change. It's great too for the local economy and I hope it goes ahead.
- n.** it's important to remove carbon from the air to reverse the impact of carbon releases over the last 100+ years, it will deliver growth/jobs/opportunities in the Yorkshire/Humber region and develop a technology that is exportable to further support the wider UK economy.
- o.** All important, most important is the fight against climate change and sharing that technology globally
- p.** In order to support the UK's net zero ambition, we need to demonstrate commitment by supporting innovation, set the blueprint for how it can be achieved and boost jobs and skills in the process.
- q.** We need to make big changes and fast if we're to preserve our planet for generations to come. Anything we can do to reduce emissions has to be a good thing, so if it's possible to achieve negative emissions in some areas, it's critical that we do. Also, being from the north and growing up on the doorstep of Drax Power Station, I'm passionate about the economic growth of the North
- r.** As a business whose heritage lies in supplying equipment into Oil & Gas we see the huge importance of innovation to fight against climate change. We believe the results from a combination of past experience and innovation would result in the achievement of job creation and economic growth. The added benefit would be the delivery of negative emissions.
- s.** We do need this type of system we cannot hope to have all our eggs in one basket we must have a different means of producing electricity
- t.** Carbon capture needs to become the norm, and this can only be achieved with innovation in climate change mitigation.
- u.** Reduce the rate of marine and land desertification and biodiversity loss.
- v.** We need the economy to thrive by providing jobs but more importantly we need to reduce carbon emissions globally. Capturing carbon from a sustainable source that supports businesses to plant more trees is a win win for the planet and the quality of lives also.
- w.** As a member of the local community the creation of jobs and economic growth - especially in green/sustainable field is very important. The fact that these jobs are intrinsically linked to the ability to offset the hard to abate local industry can

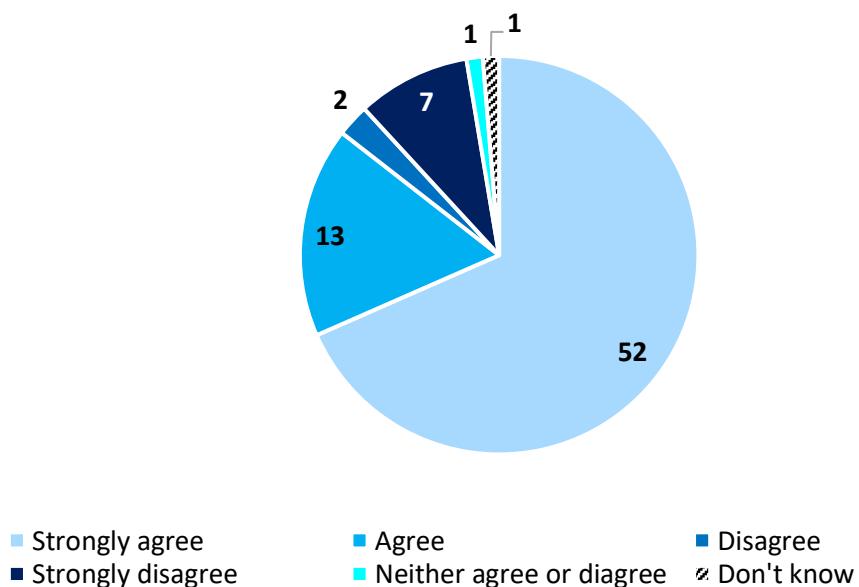
only be a good thing with those hard to abate industries thus enabled to transform and continue to thrive.

- x. All the above while also working to prove the BECCS works at scale with the potential to pave the way for other BECCS projects either nationally or globally.
- y. UK should support this local project, which will have a positive impact on global climate change, and act as a catalyst to other similar projects.
- z. BECCS is crucial in the fight against climate change if the Biomass comes from Sustainable forests. We won't hit our 2050 Net Zero targets without it.
- aa. A great opportunity to help decarbonise the Humber and rejuvenate the wider region.
- bb. We require all the three above, wealth in the area, build a healthy future, and help the climate

7.11. FEEDBACK FORM - SUPPORT FOR THE PROPOSED SCHEME

7.11.1. The feedback form asked respondents whether they agreed or disagreed with Drax's approach to helping the UK reach its net zero targets by 2050. Of the 75 consultees who responded to this question, 52 people strongly agreed, 12 people agreed, 7 people strongly disagreed, 2 people disagreed, 1 person neither agreed or disagreed and another 1 person didn't know. whether they supported, opposed or were neutral regarding the proposals. Of the 75 consultees who responded to this question, 88% of the respondents noted support for the Proposed Scheme, 3% were neutral, and 9% opposed it.

Q2 To what extent do you agree or disagree with Drax's approach to helping the UK reach its net zero targets by 2050? (Count of responses)



7.11.2. Comments submitted supporting the view **strongly agree**.

- a. This will be an amazing achievement in a sustainable future for my kids and their kids.
- b. As the largest power station in the UK, reducing any Co2 going into the atmosphere will help the UK in reaching its targets.
- c. Drax needs to continue generating a power to stop possible shortages in future, wind and sun can only supply so much
- d. Something now has to be done, now rather than later
- e. Our response is 'strongly agree' assuming that all 4 biomass units will be converted to BECCs
- f. It combines renewable energy with carbon capture to make negative emissions, as opposed to using carbon capture to offset polluting methods
- g. I strongly agree as the next decade is critical to climate change for generations to come. Drax will play a key role in achieving net zero in the UK by 2050
- h. As the Government is moving towards electric cars & heating, we need to produce so much more electricity so anything that reduces the emissions has to be good
- i. As a large producer of carbon emissions, it makes sense for Drax to be leading the way with new technology and processes to reach net zero
- j. Biomass, when managed sustainably, is an endless resource that has always been used for energy. Careful management of the forests also reduces risk of forest fires. Carbon capture on renewable biomass makes more sense than on fossil fuels, that should be left in the ground as far as possible.
- k. I think BECCS at Drax offers the most cost-effective way to generate carbon negative emissions. It can also be done at scale today (unlike other GGR technologies) and can be deployed and operational by 2030s.
- l. A realistic and sustainable approach given continued management and commitment.
- m. Drax has done more than perhaps any other business - the transformation away from coal to biomass and now the plans to go further with BECCS to permanently remove CO2 demonstrates how clear the vision is.
- n. It's very impressive that you have the technology to actually remove carbon. You obviously have some very clever people.
- o. BECCS at Drax has the potential to open up so many opportunities which will support the UK in reaching its net zero goal. It's great to see the investment and the passion that Drax is putting into developing BECCS and its belief in what can be achieved.
- p. We need a range of technologies to meet future decarbonisation targets, including those that remove carbon dioxide from the air.
- q. Drax's ambition to be a carbon negative company by 2030

- r. Many scientists have confirmed negative emissions and bioenergy are vital in our fight against climate change, I have to support anything we can do in this fight.
- s. I think the world isn't moving fast enough to be more efficient and decarbonise in that way. So, we need to start extracting carbon at the same time.
- t. For the UK to meet its targets will require a mix of approaches and the Drax solution can be a key feature
- u. The creation of a circular economy and the complete exhaustion and re-use of all energy for the benefit of the planet is something that is essential for the future generations. Drax's approach meets these key elements.
- v. Drax is using its position as a large energy producer, with grid-stabilising capabilities, using a renewable source of fuel to provide negative emissions. It is uniquely able to do this.
- w. Drax hits the right balance between keeping the lights on and reducing carbon emissions
- x. it's a cheaper and safer alternative to nuclear and reliable when the wind doesn't blow, and sun doesn't shine.
- y. Flexible on the grid system so with BECCS it will be carbon negative so better for the planet than wind and solar.
- z. While reducing carbon emissions through all walks of life is imperative to reaching net zero, I don't believe this can be achieved without the negative emissions from BECCS, working to offset areas such as domestic heating, travel and industry and others which I don't believe could be offset fully by any one single method along.
- aa. We still need a clean means of producing power into the national grid.
- bb. Strongly agree whilst supporting maximum integration of renewable and intermittent electrical generation technologies.
- cc. They have made huge progress from coal towards sustainable bioenergy and ultimately, negative emissions.
- dd. Carbon negative solutions go above and beyond the net zero and will be a huge part of reducing the grid.
- ee. Drax is constantly pushing the boundaries and the target of negative emissions before 2030 shows their commitment to this cause.
- ff. There is going to be a need for dispatchable power even in a renewable based electricity grid. If this dispatchable power can also remove CO2 this is a double benefit.
- gg. Quite simply, we won't hit the targets without it. You can't rely on just Wind and Solar

7.11.3. Comments submitted supporting the view **agree**.

- a. Drax needs to continue generating power to stop possible shortages in future, wind and sun can only supply so much

- b. Something now has to be done, now rather than later
- c. Balance in how energy is generated from renewables so eggs not all in one basket, the sustainability part is of some concern with the focus on deforestation can we demonstrate we are not creating any carbon debt.

7.11.4. Comments submitted supporting the view neither agree or disagree.

- a. Drax Power should not be having forests cut down and after making into chips brought in and burnt. It should be shut down immediately.

7.11.5. Comments submitted supporting the view **disagree**.

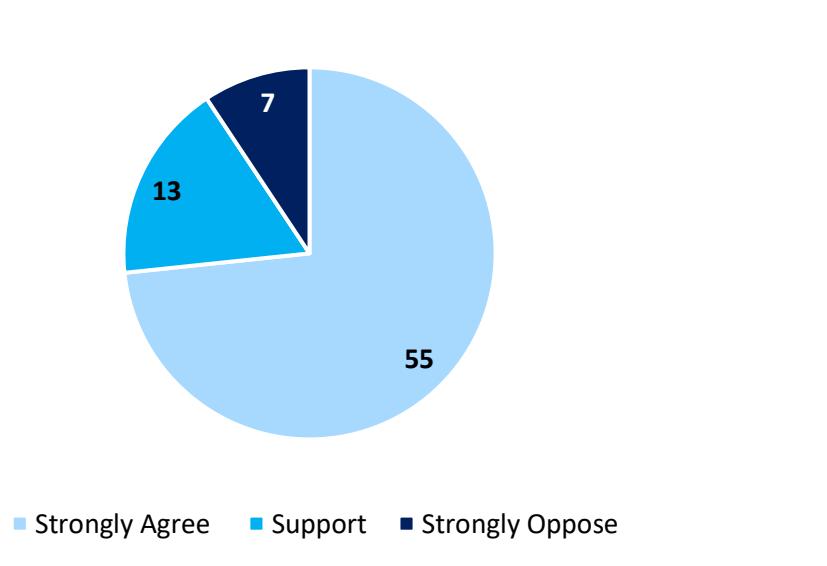
- a. While there is a case for very limited continued use of biomass generation of energy as a short term fix, its use in the medium to long term is a false solution to global heating and climate change. Far from being carbon neutral, the use of biomass is damaging the environment and having an adverse effect on the climate in a number of alarming ways.

7.11.6. Comments submitted supporting the view **strongly disagree**

- a. We strongly disagree with Drax's approach for the following reasons. Drax claims that its BECCS project will help the UK to reach net zero emissions by 2050 by capturing the carbon dioxide ("CO2") released from burning wood pellets in order to provide so-called 'negative emissions'. However, carbon capture technology is unlikely to be truly carbon negative when used at a power station burning woody biomass feedstocks.
- b. Creating wood pellets in USA, shipping them across Atlantic, transport across UK.....I can't see Drax reaching net zero targets, or the UK!
- c. Something positive to aid carbon capture is needed. Action rather than words
- d. The best development made by Drax has been the acquisition of hydro-generation in Scotland. Development of waterpower - different forms of tidal, wave and micro generation on rivers - has to be given higher priority. Waterpower gives a slower return on capital but once installed can give hundreds of years of service if maintained properly. The energy generated by hydropower is predictable whereas wind and solar are less so. Sadly, Drax have not developed hydro power but continue to add more and more CO2 to the atmosphere.
- e. Biomass as used at Drax is not Carbon neutral, it is a net emitter of CO2. It is unlikely Carbon Capture and Storage (CCS) will be as efficient as claimed. This is being done to attract billions in subsidy (£800 million last year alone).
- f. The ability of BECCS to deliver negative emissions is dependent on the carbon neutrality of biomass, an assumption that is no longer reasonable within the current regulatory framework. Currently if the biomass is imported then it does not count in the carbon equation and therefore DRAX can claim to be carbon neutral.

7.11.7. In another question (**Q3**) on the feedback form respondents were asked whether they supported, opposed or were neutral regarding the proposals. Of the 75 consultees who responded to this question, 88% of the respondents noted support for the Proposed Scheme, 3% were neutral, and 9% opposed it.

Q3 To what degree do you support or oppose our proposals for BECCS at Drax? (Count of responses)

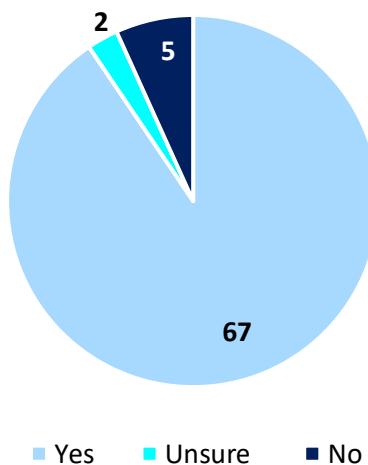


7.12. FEEDBACK FORM - ABOUT THE CONSULTATION

7.12.1. As part of the feedback form, we asked respondents how they felt about the various consultation methods on offer.

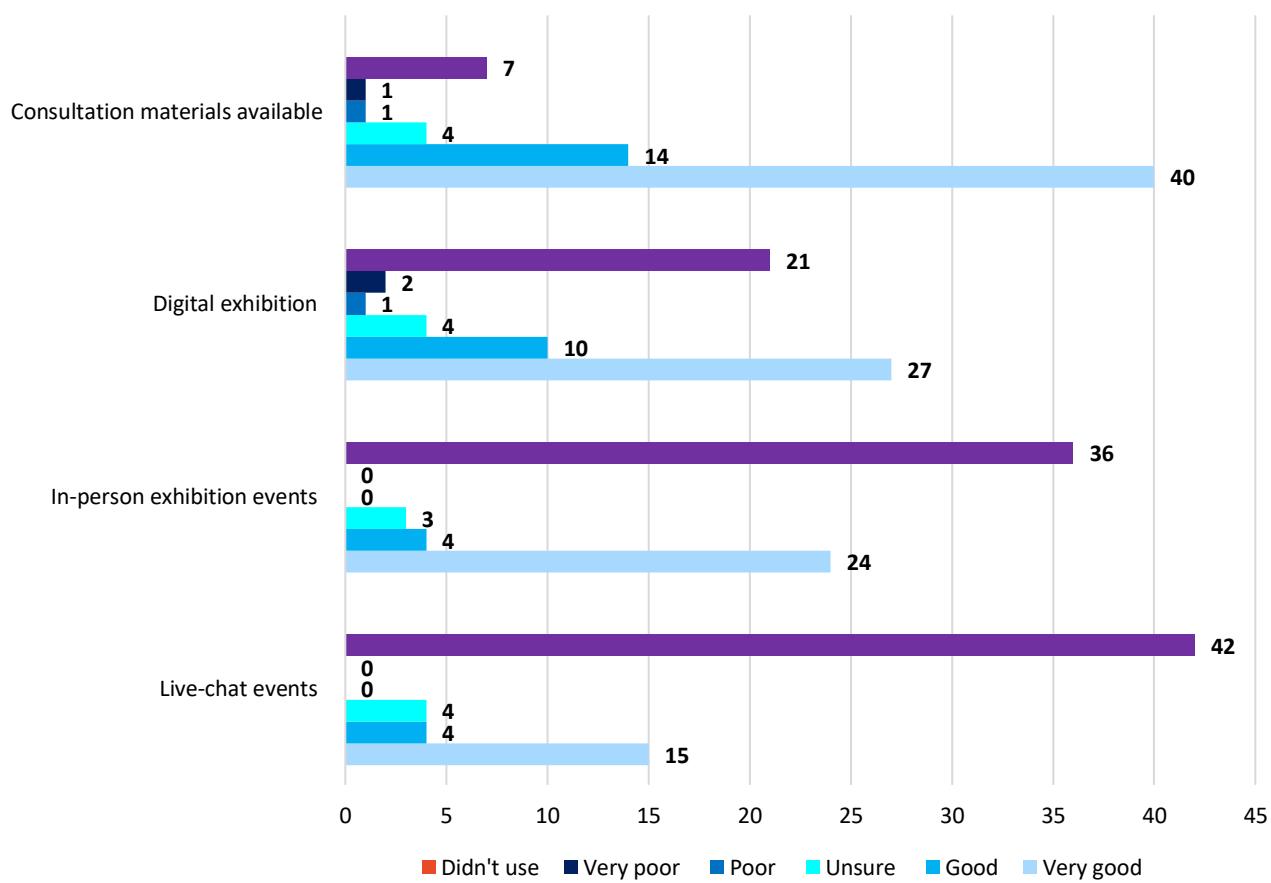
7.12.2. For question 5 we asked respondents whether they found the information on BECCS at Drax that they were interested in. Of the 74 respondents to this particular question 67 people said yes, 5 people said no and 2 people were unsure, Table 7.5 provides responses to matters raised in the open comments section of the question.

Q5 Did you find the information on BECCS at Drax that you were interested in (Count of responses)



- 7.12.3. For question 6 respondents were asked how helpful did they find the following consultation activities: consultation materials available, digital exhibition, in-person exhibition events and the live-chat sessions.
- 7.12.4. For the consultation materials available, 40 respondents said that they were good, 14 said that they were good, 7 didn't use them, 4 were unsure, 1 said that they were poor, and another 1 respondent said that they were very poor.
- 7.12.5. For the digital exhibition, 27 respondents said that it was very good, 21 didn't use it, 10 thought it was good, 4 were unsure, 2 thought it was very poor and 1 thought it was poor.
- 7.12.6. For the in-person public exhibition events 36 respondents didn't use them, 24 thought they were very good, 4 thought they were good and 3 were unsure.
- 7.12.7. For the live-chat events 42 respondents didn't use them, 15 thought they were very good, 4 thought they were good, and another 4 respondents were unsure.

Q6 How helpful did you find the following consultation activities? (Count of responses)



7.13. FEEDBACK FORM - COMMENTS ON THE PROPOSALS

- 7.13.1. Questions 4 and Question 7 on the feedback form were open questions (free-text format response) allowing people to provide more detailed comments on the proposals.
- 7.13.2. Q4 in the feedback form which asked respondents for any comments on the proposals for BECCS at Drax, including on environmental impacts and the construction process. While the final question – Q7 - asked respondents for comments or suggestions regarding this BECCS at Drax consultation.
- 7.13.3. To aid analysis of these responses, comments were coded (grouped thematically) to understand emerging themes and issues from the responses. This process enables the distilling, categorising, and summarising of issues received by all respondents.
- 7.13.4. We also received around six free-text responses from section 47 consultees through non-feedback form channels (for example through emails). These comments have also been considered in the below sections and Table 7.5 - Free-text Responses from Section 47 Consultees.
- 7.13.5. Additionally, we responded to six residents and environmental stakeholders who raised detailed questions at the site tour, public exhibition and live chat events. Biofuelwatch participated in the live chat event and shared their feedback via email.

Biofuelwatch provides information, advocacy and campaigning in relation to the climate, environmental, human rights and public health impacts of large-scale industrial bioenergy. To ensure that this report captures all consultee views, as well as clearly distinguishing between local community concerns and wider campaign concerns, the analysis of the responses has been separated as such.

7.13.6. Table 7.5 provides a breakdown of the issues raised within each theme by section 47 consultees.

Table 7.5 - Free-text Responses from Section 47 Consultees

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
<p>Questions posed regarding the impact of air quality, particularly the toxicity of released chemicals from the construction and operational phase of the Proposed Scheme.</p>	<p>Air Quality</p>	<p>The operational phase air quality assessment has included detailed atmospheric dispersion modelling of all relevant pollutant emissions arising in a with Proposed Scheme scenario, with model inputs based on Scheme-specific information, local baseline data, and with conservative assumptions applied, where relevant. A full list of the pollutants included, along with details of the modelling approach and inputs, are provided in Section 6.5 in Chapter 6 (Air Quality) of the ES (document reference 6.1.6). The modelling has enabled the Proposed Scheme pollutant impacts at ground level, both for human and ecological receptors, to be assessed relative to baseline conditions.</p> <p>The construction phase air quality assessment has considered the potential risk of dust nuisance and impacts of fugitive dust / particulate matter emissions from construction activities on human health. Based on the assessed risk rating (low-medium-high), appropriate mitigation measures are stipulated with reference to best practice guidance, to ensure that any residual impacts would have no significant air quality effect. Such measures would be secured within a Construction Environmental Management Plan (CEMP) for the Proposed Scheme, pursuant to a DCO Requirement.</p> <p>The assessment of effects on European Sites is set out in Sections 3.5, 3.6, and 4.2 of the HRA Report (document reference 6.8.1). Mitigation measures are set out in Section 4.1 of the HRA Report.</p> <p>The assessment of effects specific to SSSI and other designated sites is set out in Sections 8.9, 8.11, and 8.15 of Chapter 8 (Ecology) of the ES (document reference 6.1.8). Mitigation measures are identical to those set out in Section 4.1 of the HRA Report. With the air quality mitigation measures applied, there are predicted to be no adverse effects on the integrity of any European Site, either alone or in-combination with other plans and projects. Significant adverse effects to other designated sites are also not predicted to occur.</p>	<p>Yes</p>
<p>Less smog (smoke pollution in the air) which will be much better for the planet and town and around surrounding areas and community and society.</p>	<p>Air Quality</p>	<p>Thank you for your comment.</p>	<p>No</p>
<p>Argument that government subsidies would be better invested in researching and developing clean, sustainable energy such as wind, solar, hydro tidal, ocean and geothermal alongside initiatives such as mini nuclear power plants and nuclear fusions. Nuclear generation was also suggested as the best option for energy supply and hydrogen power should be given higher priority. Also, whether Micro Nuclear is a consideration for Drax?</p>	<p>Alternatives</p>	<p>The Applicant is not able to comment on the Government's priorities for funding or subsidising energy generation projects. However, it is noted that the British Energy Security Strategy (April 2022) does support improving energy efficiency, reducing dependence on imported oil and gas, and accelerating the roll out of renewable energy developments, and investment in nuclear power generation.</p> <p>The Proposed Scheme seeks permission to install innovative technology to capture carbon dioxide and support the UK's objectives to reach net zero by 2050. This will be fitted on to up to two existing units at Drax Power Station which use biomass as a fuel to generate electricity. This is a low-carbon, renewable and sustainable fuel source. The Proposed Scheme supports the Government's Net Zero Strategy (2021) which reinforces the need to fully decarbonise the power system by 2035.</p> <p>Further information providing a response on the need for the Proposed Scheme and Government supporting for projects designed to help the UK meet its net zero targets is set out in the Needs and Benefits Statement (document reference 5.3). This document notes that the British Energy Security Strategy seeks to achieve "20 to 30 MT CCUS target" by 2030, assisted through a £1 billion commitment to</p>	<p>No</p>

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
		<p>delivering four CCUS clusters by 2030. In addition, it identifies that the government is also developing business models for industrial and power CCUS, low-carbon hydrogen production and CO₂ Transport and Storage in order to support CCUS projects and stimulate private sector investment, with the aim to finalise business models in 2022</p> <p>The Special Report of the Intergovernmental Panel on Climate Change (IPCC) on the impacts of Global Warming of 1.5°C anticipates that 85% of power will come from renewables, like wind and solar, by 2050 (IPCC, 2019). The other 15% will therefore need to come from reliable technologies like sustainable biomass. The use of BECCS therefore ensures renewable energy with negative emissions and a reliable supply.</p> <p>The IPCC published the Sixth Assessment Report 'Climate Change 2022: Impacts, Adaptation and Vulnerability' (2022) which assesses the impacts of climate change at global and regional levels (IPCC, 2022). This reinforces the urgent need to respond to this global emergency, finding that without immediate and deep emissions reductions across all sectors, limiting global warming to 1.5°C is beyond reach. However, there is increasing evidence of climate action, and there are significant opportunities to reduce emissions by 2030. BECCS is an example of such 'climate action' being taken.</p> <p>The urgent need for climate action, including carbon capture technology, is supported by the government. This is evidenced in the Government's Ten Point Plan for a Green Industrial Revolution, published in November 2020 (HM Government, 2020b) outlines the government's key targets relating to clean energy, transport, nature and innovative technologies. One of these points is:</p> <p style="padding-left: 40px;">"Carbon capture: Becoming a world-leader in technology to capture and store harmful emissions away from the atmosphere, with a target to remove 10 MT of carbon dioxide by 2030, equivalent to all emissions of the industrial Humber today".</p> <p>The references for the above reports above are:</p> <ul style="list-style-type: none"> ~ IPCC. (2019). Global Warming of 1.5C. ~ IPCC. (2022). Climate Change 2022: Impacts, Adaptation and Vulnerability. ~ HM Government. (2020b). The Ten Point Plan for a Green Industrial Revolution. <p>Currently, Drax has no plans to invest in Micro-Nuclear power generation.</p>	
Further elaboration on national grid storage processes and CCS Humber cluster tie ins needed.	CCS Cluster	<p>The Northern Endurance Partnership ('NEP') is a partnership between BP, Shell, National Grid, Equinor and Total (Net Zero Teesside, 2021). NEP will develop the offshore pipeline and Endurance saline aquifer carbon storage infrastructure in the southern North Sea for the carbon dioxide captured by Net Zero Teesside and Zero Carbon Humber (ZCH) (Zero Carbon Humber, 2021). The Applicant is a formal partner of ZCH.</p> <p>The NEP, ZCH and Net Zero Teesside unite as the East Coast Cluster, whose goal is to remove 50% of the UK's industrial cluster carbon dioxide emissions (Zero Carbon Humber, 2021).</p> <p>Further to the above, National Grid Carbon Limited ('NGCL') is part of National Grid Ventures ('NGV'), a division of National Grid plc. NGCL is responsible for the Humber Low Carbon Pipeline DCO Project, which is a separate Nationally Significant Infrastructure Project ('NSIP') which will provide the carbon dioxide pipeline required to enable the export of the carbon dioxide captured by the Proposed Scheme (and</p>	No

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
		collecting carbon dioxide from other emitters en route) to the Humber Coast, for onward transportation to the Endurance storage site under the North Sea. The NGCL pipeline and the Endurance storage site are both separate projects and do not form part of the Proposed Scheme and they are not included in the DCO Application but will be the subject of separate consent applications by third parties, such as by NGCL.	
Contractors to be informed in their site induction to respect the area.	Construction	Contractors who work on the Site will attend a site induction meeting and as part of the briefing they will be given information about the local area and required to respect the environment and the communities in which they are working. Other measures for the protection of the local community are set out in the CEMP, which is secured in the dDCO.	No
This document only appeared on Linked In today, which was later than the 'presentation' dates and only allowing 12 days before closure of the consultation. This hasn't been on the news at all and for such an important matter it should have been.	Consultation	<p>Drax engaged through different channels to ensure that there was maximum coverage</p> <ul style="list-style-type: none"> ~ Press releases (see Appendix G9) ~ Social media (see Appendix G6) and ~ Mail out to the consultation zone (see Appendix G) ~ Section 48 public notice published in national and local newspapers (Appendix H3). ~ Public exhibition events were set at varied times to ensure that there could be a time to suit all. See paragraphs 6.17.12 and 6.17.13. <p>Through our hybrid online and in-person statutory public consultation, Drax made it easier for people to both access the non-technical and technical consultation material and speak to the project team. Consultees could view a digital exhibition via the dedicated project website and ask questions during one of the live chat sessions from the comfort of their own home. Drax deployed social media advertising to reach younger audiences, a postcard mailout to properties with the consultation zone, newspaper advertising to reach older audiences and a letter sent to groups representing hard-to-reach groups and community groups, such as Age UK Selby District. To reach an even wider demographic, Drax also held four pop-up promotional events outside supermarkets used by local community in Selby and Goole.</p>	No
Welcome the opportunity to discuss the plans with the consultation team at Selby Town Hall. The people there were naturally enthusiastic and knowledgeable about the project they are closely associated with but at the same time, they were prepared to listen to different points of view and gave the impression of taking them seriously.	Consultation	Thank you for your comment, our specialists were available at the event to enable meaningful and open discussion with attendees.	No
The in-person exhibitions were far away, would take an hour each way to travel to the Selby exhibition.	Consultation	Drax held three in-person events in locations accessible in terms of disabled access to the buildings and local transport connectivity. These locations were in communities closest to Drax power station. One event was held on a Saturday and the other two were held on weekdays, from afternoon to the early-evening so working people could attend. The project also provided a direct phone number and email address for consultees to reach the project team directly with questions.	No
Drax fail to supply information on schemes elsewhere in the world.	Consultation	The aim of the consultation was to provide information to enable meaningful feedback to be gathered regarding the Proposed Scheme itself and consultees were requested to provide feedback on the Proposed Scheme.	No

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
Concerns were expressed regarding how much the BECCS Proposed Scheme would cost the taxpayer, citing the current government subsidies that Drax receives.	Costs	<p>Analysis conducted by Baringa Consultants (see Appendix 1 of the Needs and Benefits Statement for the executive summary of their report, document reference 5.3), an expert energy consultancy, for Drax has shown that the social cost of achieving the UK's near-term Carbon Budgets and long-term Net Zero commitment, both of which are legally binding, is far more cost effective with Drax's BECCS project on the energy system. For example, the Baringa analysis found that during the 5th Carbon Budget period of 2028 – 2032, the UK could save around £13bn by pursuing carbon reduction from BECCS compared to a portfolio of alternative policy options. That figure increased to around £26bn when considering pathways to achieving the UK's Net Zero emissions target in or before 2050.</p> <p>Furthermore, how the funding support for Drax's BECCS project is raised and from which obligated parties is ultimately a policy decision for the UK Government, which is aiming to publish a consultation paper on the BECCS power business model later this year. The UK Government is also consulting on the inclusion of Greenhouse Gas Removal technologies in the UK Emissions Trading Scheme, which would achieve a similar outcome of raising revenue from the Proposed Scheme from other emitters.</p>	No
The consultation material states that the transport and storage infrastructure will be consented through separate applications, these projects are linked, and therefore should be included in the cumulative impact assessment.	Cumulatives	<p>The National Grid Ventures pipeline (application reference EN070006) is included on the Long List of 'Other Developments' (Appendix 18.1, document reference 6.3.18.1).</p> <p>At the time of writing Chapter 18 (Cumulative Effects) of the ES (document reference 6.1.18) there was no environmental information available for the development, so an inter-project cumulative assessment was unable to be produced. The Applicant is aware that a Scoping Report was subsequently submitted to PINS on 11 April 2022, which was too late to include in the assessment for the Proposed Scheme. However, following submission of the DCO Application, a cumulative inter-project assessment for this development will be completed.</p>	No
It was noted that emissions released as a result of the carbon capture process will include nitrogen and therefore nitrogen deposition could be a relevant consideration. The potential impacts of nitrogen deposition should not be limited to statutory and non-statutory designated sites but should also be applied to the proposed environmental mitigation area, as this may limit the feasibility or proposed condition assessments of proposed habitat creation as part of Biodiversity Net Gain.	Ecology	<p>The Environmental Mitigation Area (now referred to as the Habitat Provision Area (HPA) for the purpose of DCO Application documents) is located adjacent to the existing Drax Power Station Site. Specific dispersion modelling of habitats within the HPA has not been completed but has been completed for several statutory and non-statutory designated sites within 2 km of the Proposed Scheme. With Proposed Scheme operational emissions controls in place (see section 6.10 of Chapter 2 (Air Quality) of the ES (document reference 6.1.2), significant adverse effects on designated sites are not predicted to arise, either as a result of the with Proposed Scheme scenario alone or cumulatively with other plans or projects. In addition, the effect of the Proposed Scheme on nitrogen and acid deposition is negligible compared to baseline deposition rates. As an example, modelled future baseline nitrogen deposition onto Barn Hill Meadows SSSI is 20.43 kgN/ha/yr. In the with Proposed Scheme scenario there are increases in predicted deposition to a maximum of 20.48 kgN/ha/yr, i.e., a maximum increase of 0.2% compared to the modelled future baseline (see Table 1.5 in Appendix 6.5 of Chapter 6 (Air Quality) of Volume 3 of the ES (document reference 6.3.6.5). The air quality impacts of the Proposed Scheme are considered negligible. They would have imperceptible and inconsequential effects on habitats within the HPA and Off-Site HPA compared to the far greater effects of proposed physical habitat measures in these areas. Proposals for the HPA and Off-site HPA are set out in the Outline Landscape and Biodiversity Strategy (document reference 6.6).</p>	No
Feedback received regarding Biodiversity Net Gain and the use of a biodiversity metric.	Ecology	<p>The findings of the Applicant's initial BNG assessment are set out in the Biodiversity Net Gain Report (document reference 6.10). This identifies an initial position for BNG.</p>	Yes

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		<p>The Applicant is pursuing opportunities to deliver watercourse enhancements such that BNG of 10% is achieved for river habitat units, through discussions with the Environment Agency, Yorkshire Wildlife Trust and Yorkshire Dales Rivers Trust to identify appropriate locations for local enhancements to contribute to net gain, whilst also considering local options within their landholdings for delivering BNG for watercourses. The Applicant has identified land within and outside the Order Limits for the provision of area-based terrestrial habitats and linear habitats (hedgerows). On the basis of the worst-case habitat loss assumed for the Proposed Scheme (as set out in Table 3.1 of the Biodiversity Net Gain Report (document reference 6.10) and extracted above) there would be a net gain for linear habitats of 51.70% and a net gain in area-based habitats of 3.66%. In reality, it is unlikely that the worst-case scenario for habitat loss on which the BNG assessment is based will actually occur; this will be explored further as the Proposed Scheme develops, with a view to confirming additional areas of habitat that would not need to be removed or disturbed to facilitate the Proposed Scheme. The BNG Report includes a sensitivity test for a more realistic scenario for habitat loss and disturbance, with the BNG results for this scenario set out in Table 3.2 of that report. Under this scenario, the net gain of for linear units increases to 54.14%, whilst the position for area-based habitats improves to a net gain of 17.08%. The BNG assessment will be revisited post-submission.</p>	
<p>The habitat surveys work has used the Phase 1 classification methodology. For ease of interpretation for use of the Defra metric which utilises UK Habitat Classification (2018), further survey in this format may prove beneficial. The metric will need to account for impacts associated with temporary laydown areas, construction offices, warehouses, workshops, open air storage areas and car parking.</p>	Ecology	<p>Phase 1 habitat data has been used as this had been gathered from the Site and has been modified for use in the Defra Metric 3.0, as per the translation tab contained therein.</p> <p>The Applicant has considered both permanent and temporary loss when preparing their Biodiversity Net Gain Assessment (document reference 6.10), including impacts associated with temporary laydown areas, construction offices, warehouses, workshops, open air storage areas and car parking.</p>	No
<p>Concern the BECCS construction process would affect local wildlife.</p>	Ecology	<p>Many construction projects inevitably have effects on local wildlife, due to the need to work in areas that support local wildlife. Where work in land supporting habitats and species is required, such effects cannot be avoided entirely. Measures can however be developed to any effects, such that significant effects on local wildlife are avoided as far as possible. The Proposed Scheme has included a number of measures to avoid or minimise effects on local wildlife. These are summarised below, with additional detail provided in Section 2.2 of Chapter 2 (Site and Project Description) of the ES (document reference 6.1.2) and Section 8.10 of Chapter 8 (Ecology) of the ES (document reference 6.1.8.).</p> <p>Measures included in the Proposed Scheme design to avoid or reduce effects on local wildlife include the following:</p> <ul style="list-style-type: none"> ~ Changes in the design of the Carbon Capture Wastewater Treatment works, so that this no longer emits ammonia to air; ~ The Drax Jetty would not be used for receiving abnormal Indivisible Loads, meaning there would be no works in the River Ouse and surrounding habitats. This avoids impacting areas used by otters, bats, breeding and wintering birds, and rare fish such as lampreys; and 	No

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		<ul style="list-style-type: none"> ~ The majority of the Proposed Scheme is located inside the Drax Power Station Site, avoiding more valuable habitats for wildlife that are outside the Power Station Site. <p>Targeted mitigation during construction and / or operation to avoid or reduce effects on local wildlife includes the following:</p> <ul style="list-style-type: none"> ~ Surveys to check for protected and notable species would be carried out before vegetation removal and site clearance; ~ Measures to manage and control the risk of pollution during construction and operation, protecting rivers and streams near to the Site; ~ Use of solid fencing to screen wildlife habitats from construction areas; ~ Creation of new habitat and enhancement of existing habitat to mitigate the impact of the Proposed Scheme on local wildlife habitat; and ~ Timing of works to avoid the most sensitive periods, e.g., cutting vegetation back outside the breeding bird season whenever possible. 	
Ecological surveys for the project are ongoing and likely significant environmental effects are still being assessed. The planned completion of a Habitats Regulations Screening Assessment, to test if the project could significantly harm the designated features of a European site is welcomed.	Ecology	Ecological surveys for the Proposed Scheme are complete and are reported in appendices 8.1 to 8.4 of Volume 3 of the ES (document references 6.3.8.1 to 6.3.8.4). Habitats Regulations Assessment screening, and information to inform Appropriate Assessment are included with the DCO application (document reference 6.8.1).	No
<p>Concerns were expressed about the ecological impact of biomass generation on forests and questioned the effectiveness of sustainable forests. Criticism of the threat that logging pellets has on inland temperate rainforests and cited that the rate in which trees are replanted is too slow to counteract the impact on using trees for woody biomass. They also state that sourcing wood pellets for woody biomass-burning power stations has significant negative impacts on forests, a fact which installing BECCS will not change and may in fact worsen if it leads to greater demand for woody biomass feedstock.</p> <p>It was further commented that Drax needs to be transparent about the mass of trees consumed compared to the speed of tree growth.</p> <p>The long term sustainability of the fuel source is a concern for a consultee who stated that fuel should only be sourced from sustainable generated sources, as close</p>	Ecology (Biomass)	<p>It should be noted that the Proposed Scheme does not seek to consent biomass generation, as that is already consented.</p> <p>The majority of biomass is sawmill and other lumber process by-products, or the residuals from forestry operations. Drax Power Limited only buy from well-regulated commercial forests and all the biomass we buy comes from suppliers who are part of the Sustainable Biomass Program (SBP), a multi-stakeholder standard setting and verification scheme.</p> <p>Drax has jointly pioneered the Healthy Forest Landscapes (HFL) approach with Earthworm Foundation. HFL provides an evidence-based approach to measure and evaluate the ecological, social and economic impacts in Drax's supply areas. This includes measuring changes in the forest landscape using empirical evidence such as government statistics and input from remote sensing technologies, such as earth observation from satellites.</p> <p>HFL assesses four key metrics – forest cover, carbon stock, biodiversity and community wellbeing – which will be used across Drax's sourcing areas. This approach is designed to enable Drax to identify opportunities to make appropriate interventions which support healthy forests, communities, or biodiversity.</p> <p>Further information can be found on the Drax website and the Drax Group plc Annual report and accounts 2021.</p>	No

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to the power generation site as possible and no virgin forest should be used.			
It was claimed that sourcing the biomass fuel has involved expanding monoculture pine plantations in America, Canada, the Baltic States and Russia at the expense of the rich forest ecosystems that are being clearcut. They are 'sterile' plantations with virtually no undergrowth, inhospitable to wildlife. Biodiversity is threatened or being wiped out. Irrigating the plantations requires a lot of water which puts a stress on local water resources while impacting aquatic habitats and the amount of water available for other purposes.	Ecology Biomass	<p>The Proposed Scheme does not involve the consenting of biomass, which is already consented. However, it is noted that the Applicant Sustainability policy, which is available on Drax's website, includes the following requirement:</p> <p>Our procurement process is aimed at ensuring that the production and delivery of biomass will:</p> <p>Not adversely affect protected or vulnerable biodiversity and where possible we will give preference to biomass production that strengthens biodiversity.</p>	No
Question of whether the capacity of the proposed storage system would be large and secure enough to store CO ₂ for a number of years.	Engineering	<p>It is proposed that CO₂ will be stored in Endurance, which is a geological feature (a saline aquifer) which lies approximately 145 km offshore from Teesside in the North Sea. The aquifer has the capacity to store 450 m tonnes of CO₂. Other potential stores nearby take potential storage capacity to around 1 billion tonnes. The East Coast Cluster has the potential to transport and securely store up to 27 million tonnes of CO₂ emissions a year by 2030 and there should therefore be sufficient storage capacity for many years. Consents for the carbon dioxide pipeline and storage will be sought by a separate developer and will not form part of Drax's DCO Application for BECCS at Drax.</p>	No
In regard to the pipeline route are there any impacts related to this. The pipeline route needs careful routing to minimize impact on Drax village and countryside.	Engineering	<p>Relevant consents for the carbon dioxide transportation pipeline (as part of the Humber Low Carbon Pipelines project) and the carbon dioxide storage facility (in the saline aquifer under the southern North Sea) located outside the Proposed Scheme's Order Limits will be sought by a separate developer and do not form part of Drax's DCO Application for the Proposed Scheme.</p> <p>The Applicant confirms that the elements of the carbon dioxide pipeline route within the Order Limits of the Proposed Scheme are identified in Chapter 2 (Site and Project Description) of the ES (document reference 6.1.2) and any impacts identified are assessed in the suite of ES documents. However, these elements of the pipeline route are contained within the boundary fence of the existing Drax Power Station site and do not extend into countryside areas beyond the boundary fence or encroach on Drax village.</p>	No
There is an opportunity locally to support the potential accommodation required for contractors and workers.	General	Thank you for your comment and as a local employer Drax is keen to ensure there are opportunities for local businesses to support and be involved.	No
Everything looks well thought out and planned. Construction process with minimal impact.	General	Thank you for your comment.	No
It is a large project but situated on a site that is already well set up for large infrastructure projects (unlike wind farms in areas of natural beauty) so is a preferable option to enable lower emissions.	General	Thank you for your comment.	No

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Keep the local people well informed of plans etc.	General	The project team will continue to keep the website updated as the Proposed Scheme progresses. Once the DCO Application has been accepted by the Planning Inspectorate for Examination, anyone with an interest in the Proposed Scheme can follow progress and get involved by registering with the Planning Inspectorate for email updates or as an interested party and participate in the Examination.	No
Need for a feasible and consideration of environment and economic impacts. The consumption of energy and resources to develop & construct BECCS will be horrendous for such a high risk of failure as such they would invest in hydro development & construction - genuinely clean energy.	General	<p>The Applicant has submitted an Environmental Statement (document references 6.1 – 6.3) with the DCO Application which assesses likely significant effects on the environment. Where necessary, mitigation measures as set out in the Register of Environmental Actions and Commitments (document reference 6.5) will be secured.</p> <p>In terms of economic impacts, chapter 5 of the Need and Benefits Statement (document reference 5.3) sets out the economic benefits of the Proposed Scheme, including benefits for the national, local and regional economy and benefits associated with the regeneration of the area. The first phase of BECCS at Drax will permanently remove at least 8 million tonnes of CO₂ from the atmosphere each year, making Drax Power Station the world's largest single site carbon capture project. BECCS at Drax will accelerate clean growth, protect British industries across the Humber, create thousands of new green jobs.</p>	No
Amine scrubbing - 20 years ago the technology was extremely power hungry, reducing cycle efficiencies by up to 10%. Has the technology improved any in this regard?	General	There is an inherent energy penalty in operating Carbon Capture Facilities and this is apparent regardless of the fuel and type of generating units being operated. The Proposed Scheme has sought to, and through the ongoing FEED process will continue to seek to, reduce the energy penalty as much as possible by integrating systems where possible.	No
BECCS using woody biomass feedstocks is likely at best to have zero emissions at the smokestack, but will have net emissions from upstream harvesting, plus processing and transport of pellets. This is far from the image portrayed by Drax of a carbon negative technology which could help to achieve net zero by 2050 by offsetting CO ₂ emissions elsewhere in the UK economy. Because it is unlikely to generate any or any significant negative emissions BECCS using woody biomass cannot be used to offset the emissions from economic sectors which are difficult to decarbonise, defeating its main purpose.	Greenhouse Gases	<p>The upstream carbon emissions associated with processing and supply chain elements for biomass are accounted for as part of the Green House Gas Assessment. Bioenergy with Carbon Capture and Storage (BECCS) is recognised as a technology which can deliver negative emissions which will allow the UK to achieve net-zero by 2050.</p> <p>Under IPCC guidelines CO₂ emissions at the point of combustion of biomass for energy generation are considered as "zero". Other GHGs from the combustion of biomass (CH₄, N₂O) are captured in the operational assessment.</p> <p>The biomass generation units that are the subject of the Proposed Scheme are already fully consented and operational. As such, the biomass supply chain GHG emissions are outside the direct scope of the DCO Application, however they represent a material source of GHG emissions relevant to the Proposed Scheme and so have been included as an emission source.</p> <p>The supply chain of biomass sourcing involves several stages that cause the release of GHG emissions. These are categorised as follows and are accounted for in the baseline and operational GHG assessment:</p> <ul style="list-style-type: none"> ~ Processing at origin; ~ Feedstock transport; ~ Drying; ~ Pelleting; ~ Transport to Port; ~ Shipping; 	No

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		<ul style="list-style-type: none"> ~ Rail to Drax; and ~ Combustion of CH4 and N2O. <p>The lifecycle emissions for the Proposed Scheme (which comprise the construction phase emissions, and operational emissions, including supply chain emissions) are considered to have a significant beneficial effect as the sequestered emissions during operation occur over a longer timeframe and are greater than the construction phase adverse emissions, resulting in a net reduction in emissions in comparison to the baseline scenario. Further detail is provided in Section 15.9 of Chapter 15 (Greenhouse Gases) of the ES (document reference 6.1.15).</p>	
Concerns were expressed regarding the amount of CO2 emitted from the extraction, transportation, and generation of biomass, particularly as a counter-argument to the BECCS at Drax net zero claims. One consultee specifically stated that Drax cannot capture emissions with harvesting, pellet drying and transportation. It was suggested that there should be consideration of installing a biomass generator.	Greenhouse Gases	<p>The biomass generation units that are the subject of the Proposed Scheme are already fully consented and operational. As such, the biomass supply chain GHG emissions are outside the direct scope of the DCO Application, however they represent a material source of GHG emissions relevant to the Proposed Scheme and so have been included as an emission source in the assessment of GHG emissions (reported in Chapter 15 (Greenhouse Gases) of the ES (document reference 6.1.15)).</p> <p>The lifecycle emissions for the Proposed Scheme (which comprise the construction phase emissions, and operational emissions, including supply chain emissions) are considered to have a significant beneficial effect as the sequestered emissions during operation occur over a longer timeframe and are greater than the construction phase adverse emissions, resulting in a net reduction in emissions in comparison to the baseline scenario. Further detail is provided in Section 15.9 of Chapter 15 (Greenhouse Gases) of the ES (document reference 6.1.15).</p>	No
Questions were raised regarding the CO2 auditing process used to calculate and determine the claim that BECCS will deliver negative emissions. Drax's carbon account methodology is flawed and questioned the claim that BECCS will help offset emissions from economic sectors. As this is a detailed process the auditing process needs to be completely independent and verified by a body other than the government, stating that they are 'too close' to the project.	Greenhouse Gases	<p>For the purposes of this DCO Application, the assessment approach for considering GHG emissions from the Proposed Scheme (reported in Chapter 15 (Greenhouse Gases), of the ES (document reference 6.1.15), aligns with industry guidance. This comprises the IEMA guidance (Assessing Greenhouse Gas Emissions and Evaluating their Significance 2022) and follows the lifecycle assessment approach outlined in PAS 2080: Carbon Management in Infrastructure. The chapter sets out the emissions for the relevant stages of the lifecycle.</p>	No
A flawed rationale relied on by Drax is that the UNFCCC carbon accounting methodology for CO2 emissions supports considering emissions from burning woody biomass as zero at the point of combustion. However, this is not the case. This accounting methodology provides that for international carbon accounting purposes woody biomass emissions should be counted in the land sector in the country where the wood is harvested rather than in the energy sector in the country where the wood pellets are burned for energy. However, this is not the same as	Greenhouse Gases	<p>The Applicant acknowledges and supports the UNFCCC carbon accounting methodology by which carbon emissions for all forms of biomass are reported in the land sector rather than in the sector of end use. However, the Applicant equally acknowledges that not all sources of biomass are good for the climate. Therefore, for biomass to be considered 'zero rated' at the point of combustion, it is vital that its sourcing has a neutral or positive impact on the land sector. Evaluating the impact of Drax's biomass on land carbon stocks is therefore critical in assessing the overall climate impact of Drax's value chains.</p> <p>To evidence Drax's impact on land carbon stocks Drax use several approaches. First, Drax ensures suppliers meet the land sustainability criteria laid out in the Renewables Obligation regulations by conducting Drax's own due diligence and ensuring sustainability commitments are agreed in contracts with Drax's suppliers. This is underpinned by independent auditing in accordance with ISAE 3000. Second, Drax encourages suppliers to use third party certification – primarily the Sustainable Biomass Program –</p>	No

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burning woody biomass actually having zero emissions at the smokestack.		<p>for evidencing that biomass sourcing contributes to creating and maintaining healthy forest ecosystems. In 2021, 98% of Drax's biomass carried an SBP compliant claim. Third, Drax have commissioned a suite of independent reports - catchment area analyses (Sustainable bioenergy Archives - Drax Global) – providing a detailed breakdown of carbon stocks and forest product markets in the regions from which we source, and where the authors have concluded that Drax's sourcing has a neutral to positive impact on the forests. Drax's activities are underpinned by an industry-leading responsible sourcing policy - Responsible Sourcing - Drax Global – which relies on the latest science for ensuring use of our biomass positively affects the climate, and independent scrutiny from Drax's Independent Advisory Board - Independent Advisory Board on Sustainable Biomass - Drax Global.</p> <p>Ultimately, these activities provide a robust basis for the zero rating of combustion emissions for the sources of biomass the Applicant will use in BECCS.</p>	
The regional Carbon Abatement Pathways modelling takes account of the proposal for BECCS at Drax – however it is built on the assumption that all 4 biomass units would be converted to BECCS. However, the proposal details that only 2 of these will be taken forward. It is unclear whether the remaining 2 biomass units would continue emitting carbon or would cease operation. This would affect the net zero and carbon negative timeline for the region and the nation. Drax to consider installing 2 more BECCS units (retrofits or new build) at the site in future, to take the amount of carbon potentially captured to levels commensurate with the Carbon Abatement Pathways study and achieving up to 80% of the engineered GGR for the UK.	Greenhouse Gases	<p>The Applicant has looked at installing BECCS technology on up to two of its existing units. Each unit will deliver around 4Mt of negative CO₂ emissions per annum. CCS technology is evolving rapidly as the world takes steps toward meeting the challenge of climate change. It is entirely possible that a new, novel technology is developed which may supersede the technology installed for BECCS on the first two units. The other aspect to consider is that as well as removing CO₂, Drax Power Station will still be capable of generating renewable power from its two remaining biomass units to meet the country's electricity demands.</p> <p>Taking a phased approach to deploying carbon capture technology at Drax Power Station, initially focusing on two of the station's four biomass units, has a number of benefits. First, the combined volume of negative emissions produced by the two units would support the delivery of the UK Government's ambition to deploy at least 5 million tonnes per year of negative emissions from BECCS and Direct Air Capture facilities. Second, constructing and deploying two units as a pair has a number of economies of scale that combined result in a lower overall project cost than developing each unit sequentially. Third, additional feasibility work is required to demonstrate with sufficient confidence that conversion of all four biomass units to CCS is viable given certain site constraints, such as land availability and cooling demand. Fourth and finally, Drax recognises that the Government's policy development around BECCS specifically and CCS more generally continues to evolve and therefore the investment framework for retrofitting additional biomass units at Drax to CCS may be different to the support regime for the initial two units being deployment in the late 2020s.</p>	No
The proposed development needs to properly account for the carbon emissions it will create, in the embodied carbon of the construction materials to the energy requirements for the construction process. The PEIR includes a section on this, but recognises that there are still data gaps in operational lifetime carbon and that plans have not yet been made for reducing construction-phase emissions. Drax is encouraged to ensure this process is completed to a high standard to build confidence in the company's commitment to sustainability.	Greenhouse Gases	<p>The GHG assessment in Chapter 15 (Greenhouse Gases) of the ES (document reference 6.1.15)) follows the PAS 2080 lifecycle assessment which includes the following in-scope stages during construction:</p> <ul style="list-style-type: none"> ~ Product stage (manufacture and transport of raw materials to suppliers) ~ Transport of materials to Site ~ Plant and equipment use during construction ~ Transport of waste ~ Land use, land use change and forestry (LULUCF) at construction phase <p>Based on the current design information, the construction phase would result in an increase in GHG emissions compared to the baseline scenario where there is no construction. This is considered to constitute a moderate, significant adverse effect. However, taking into account the lifecycle emission</p>	No

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		<p>(which comprise construction and operational emissions), the Proposed Scheme is considered to have a significant beneficial effect as the sequestered emissions during operation occur over a longer timeframe and are greater than the construction phase adverse emissions, resulting in a net reduction in emissions in comparison to the baseline scenario.</p> <p>The design and construction process will also take into account the following mitigation measures, as set out in the REAC, and secured via the DCO:</p> <p>GHG1: The detailed design will reflect the carbon hierarchy and include feasible measures to reduce embodied carbon as part of the design, as outlined in PAS 2080, where reasonably practicable. This will include potential for re-using or refurbishing existing assets; and use of low carbon solutions (technologies, materials and products) to minimise resource consumption.</p> <p>GHG2: Use of efficient construction processes such as design for manufacture and assembly aligning with the carbon hierarchy outlined in PAS 2080. This will include re-using site arisings; using low carbon solutions (technologies, materials and products) to minimise resource consumption; and using construction techniques that reduce resource consumption.</p> <p>G3 and MW3: Implementation of a Site Waste Management Plan (SWMP) and Materials Management Plan (MMP), by the Principal Contractor; and re-use of material resources and site arisings where practicable (further details are noted in Chapter 13 (Materials and Waste) (document reference 6.1.13) of this ES.</p>	
The temporary absorber of carbon dioxide within the plant is a mix of toxic chemicals and should never allowed to be allowed to escape from the plant.	Greenhouse Gases	The use of solvents within Carbon capture plants have been applied in various developments around the world and are now being used at scale in this country. The use of solvents for Carbon Capture will be carefully monitored and any emissions closely controlled as part of the Environmental Permit which regulates any emissions to the environment.	No
The environmental impact of the materials and waste produced during the construction process was questioned, with a Drax being urged to recycle and reuse materials where possible. It was argued that data gaps remain in operational lifetime carbon and that the plans have not yet been made for reducing construction-phase emissions.	Materials and Waste	<p>The materials and waste assessment (document reference 6.1.13) concludes there are no significant effects during the construction and operation of the Proposed Scheme in the type and volume of materials used and waste disposed of to landfill (both non-hazardous and hazardous).</p> <p>The contractor will develop and implement a Site Waste Management Plan (SWMP) and Materials Management Plan (MMP) for the Proposed Scheme, to drive performance to the highest tiers of the Waste Hierarchy as required by the Site environmental permit, thereby maximising reuse, recycling and recovery. This will include testing site arisings to determine suitability for reuse.</p> <p>Earthworks from excavations are to be reused on the Proposed Scheme, where suitable e.g. recompacting them as backfill for piling, drainage and cabling.</p> <p>Aggregate, which comprises granular material, will be initially used for temporary piling platforms and laydown areas. Following removal of the temporary platforms, this material is to be retained and reused on site for use as structural backfill.</p> <p>General construction waste will be reused on the Proposed Scheme, where possible, or sent to an off-site recycling facility. This aligns with the Applicant's current commitment to divert 95% of waste from landfill.</p>	No

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		<p>A Register of Environmental Actions and Commitments (REAC) (document reference 6.5) has been produced for the Proposed Scheme. The REAC collates the mitigation relied upon in the EIA in order to manage the environmental impacts of the Proposed Scheme. The dDCO contains a requirement to secure the production of a CEMP, to be prepared substantially in accordance with the requirements set out in the REAC for the CEMP. The CEMP will include the SWMP and MMP.</p> <p>The quantification of construction GHG emissions have been calculated for the construction of the Proposed Scheme on the basis of the materials expected to be used and waste generated. The carbon quantification tasks have been undertaken using best practice carbon management methods, professional judgement, and guidance including ISO 14064, the GHG Protocol, BS EN 15978, and PAS 2080 (BSI, 2016). The construction carbon footprint is divided into four main categories: embodied carbon, transport of materials, plant equipment and transport of construction waste.</p> <p>Based on the current design information the construction phase would result in an increase in GHG emissions compared to the baseline scenario where there is no construction. This is considered to constitute a moderate, significant adverse effect.</p> <p>The design and construction process will also take into account the following mitigation measures, as set out in the REAC, and secured via the DCO:</p> <p>GHG1: The detailed design will reflect the carbon hierarchy and include feasible measures to reduce embodied carbon as part of the design, as outlined in PAS 2080, where reasonably practicable. This will include potential for re-using or refurbishing existing assets; and use of low carbon solutions (technologies, materials and products) to minimise resource consumption.</p> <p>GHG2: Use of efficient construction processes, such as design for manufacture and assembly aligning with the carbon hierarchy outlined in PAS 2080. This would include potential for re-using site arisings; using low carbon solutions (technologies, materials and products) to minimise resource consumption; and using construction techniques that reduce resource consumption.</p> <p>G3 and MW3: Implementation of a Site Waste Management Plan (SWMP) and Materials Management Plan (MMP), by the Principal Contractor; and re-use of material resources and site arisings where practicable (further details are noted in Chapter 13 (Materials and Waste) (document reference 6.1.13) of this ES.</p> <p>It should also be noted that when taking into account the lifecycle emission (which comprise construction and operational emissions), the Proposed Scheme is considered to have a significant beneficial effect as the sequestered emissions during operation occur over a longer timeframe and are greater than the construction phase adverse emissions, resulting in a net reduction in emissions in comparison to the baseline scenario.</p>	
<p>The creation of a circular economy and the complete exhaustion and re-use of all energy for the benefit of the planet is something that is essential for the future generations. Drax's approach meets these key elements. During demolition and construction Drax needs to recycle and reuse materials where possible.</p>	Materials and Waste	<p>In accordance with the commitments set out in the REAC (document reference 6.5) the Applicant will implement the following best practice design and construction methods to minimise impacts from using construction and other materials, to support the drive to a circular economy. Specific mitigation measures are set out in the REAC submitted alongside the ES and include the following general and materials and waste-specific measures:</p> <ul style="list-style-type: none"> ~ Implementation of a Site Waste Management Plan which will be produced and updated throughout the construction of the Proposed Scheme and will be part of the CEMP; 	No

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
		<ul style="list-style-type: none"> ~ Implementation of a Materials Management Plan; ~ Maximise the specification and use of recycled and secondary content in imported materials (e.g., earthworks, aggregate, concrete and asphalt); ~ Specify materials and products with higher sustainability performance than typical industry standards (e.g., low carbon materials, closed loop plasticised cable ducting); ~ Capture and communicate actions already undertaken (or planned) within the design for deconstruction and disassembly, to encourage reuse and recycling at end of life. 	
<p>Question over what construction methods will be used? Cement/Concrete manufacturing is one of the most polluting industries globally in terms of CO2 emissions, will there be more environmentally friendly materials used or offsetting the CO2?</p> <p>It would be good to see some sort of figure to say how Drax saved so many tons of CO2 we emitted or how much less compared to using typical construction methods, or to reuse some decommissioned existing structures on site to save on CO2 emissions.</p>	Materials and Waste	<p>The Applicant has a current commitment to divert 95% of waste generated at the site from landfill. It is anticipated that this figure will still be in place (or even improved upon) by end-of-life stage, particularly as technological advances develop in response to achieving circular economy ambitions and targets. The Applicant will implement the following design and construction methods to maximise recovery and reuse of resources and divert waste from landfill (the following data is correct at the time of issue):</p> <ul style="list-style-type: none"> ~ 77% of earthworks excavated to facilitate construction will be reused on the proposed scheme for recompacting as backfill for piling, drainage and cabling, surplus suitable for reuse could be recovered and stockpiled for reuse on other schemes (subject to testing); ~ 69% of granular material imported for temporary piling platforms and laydown areas will be retained on site for use as structural backfill, surplus suitable for reuse could be recovered and stockpiled for reuse on other schemes (subject to testing); ~ The main contractor will be required to consolidate environmental mitigation measures in the Construction Environmental Management Plan (CEMP), which will incorporate a Site Waste Management Plan (SWMP) and a Materials Management Plan (MMP). The production of the CEMP and associated documents is secured in the dDCO. The SWMP will be used to manage and monitor site waste effectively to reduce waste and potential harm to the environment during construction. The MMP will be used to monitor the maximum reuse of both natural soils and Made Ground (contaminated or otherwise). <p>The GHG assessment reported in Chapter 15 (Greenhouse Gases) of the ES (document reference 6.1.15) includes and assessment of construction phase emissions based on the current design.</p> <p>The quantification of construction GHG emissions have been calculated for the construction of the Proposed Scheme on the basis of the materials expected to be used and waste generated. The carbon quantification tasks have been undertaken using best practice carbon management methods, professional judgement, and guidance including ISO 14064, the GHG Protocol, BS EN 15978, and PAS 2080 (BSI, 2016). The construction carbon footprint is divided into four main categories: embodied carbon, transport of materials, plant equipment and transport of construction waste.</p> <p>Based on the current design information, the construction phase would result in an increase in GHG emissions compared to the baseline scenario where there is no construction. This is considered to constitute a moderate, significant adverse effect. However, taking into account the lifecycle emission (which comprise construction and operational emissions), the Proposed Scheme is considered to have a significant beneficial effect as the sequestered emissions during operation occur over a longer timeframe</p>	No

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
		<p>and are greater than the construction phase adverse emissions, resulting in a net reduction in emissions in comparison to the baseline scenario.</p> <p>The design and construction process will also take into account the following mitigation measures, as set out in the REAC, and secured via the DCO:</p> <p>GHG1: The detailed design will reflect the carbon hierarchy and include feasible measures to reduce embodied carbon as part of the design, as outlined in PAS 2080, where reasonably practicable. This will include potential for re-using or refurbishing existing assets; and use of low carbon solutions (technologies, materials and products) to minimise resource consumption</p> <p>GHG2: Use of efficient construction processes such as design for manufacture and assembly aligning with the carbon hierarchy outlined in PAS 2080. This will include re-using site arisings; using low carbon solutions (technologies, materials and products) to minimise resource consumption; and using construction techniques that reduce resource consumption</p> <p>G3 and MW3: Implementation of a Site Waste Management Plan (SWMP) and Materials Management Plan (MMP), by the Principal Contractor; and re-use of material resources and site arisings where practicable (further details are noted in Chapter 13 (Materials and Waste) of the ES (document reference 6.1.13)).</p>	
The skills, revenue and profit generated from the BECCS project should be invested into future projects and innovation will enable us to better balance the need for sustainable, affordable energy and the provision of jobs (including export growth). Local and UK content is maximised so that the skills (and revenue and profit) benefit from this project can be harnessed for future projects both here in the UK and worldwide.	Need and Benefits	Developing BECCS at Drax will spearhead a new world leading green industry for Yorkshire and the Humber region. The Humber region already supports 360,000 jobs but BECCS at Drax could boost skills and create and support over 10,000 jobs locally and across the entire supply chain. By deploying cutting edge green technologies across the Humber, this could rise to 47,800 at peak according to Vivid Economics. On the assumption that the technology associated with BECCS is successful, the skills, knowledge and aptitude gained from the project would allow similar technology to be applied across a range of other industrial installations including energy generation projects.	No
Concern was raised about the proposal for Drax to only convert two of its biomass units to BECCS, citing that this would limit the net zero timeline for the region and urged that Drax consider installing BECCS on the other two units. There is going to be a need for dispatchable power even in a renewable based electricity grid. If this dispatchable power can also remove CO2 this is a double benefit. The addition of removal of BECCS will show that the UK is fully committed to CO2 reduction & removal and be setting an example to others. The environmental impact of the project would be very good as it removes CO2.	Need and Benefits	<p>The Applicant has looked at installing BECCS technology on up to two of its existing units. Each unit will deliver around 4Mt of negative CO2 emissions per annum. CCS technology is evolving rapidly as the world takes steps toward meeting the challenge of climate change. It is entirely possible that a new, novel technology is developed which may supersede the technology installed for BECCS on the first two units. The other aspect to consider is that as well as removing CO2, Drax Power Station will still be capable of generating renewable power from its two remaining biomass units to meet the country's electricity demands.</p> <p>Taking a phased approach to deploying carbon capture technology at Drax Power Station, initially focusing on two of the station's four biomass units, has a number of benefits. First, the combined volume of negative emissions produced by the two units would support the delivery of the UK Government's ambition to deploy at least 5 million tonnes per year of negative emissions from BECCS and Direct Air Capture facilities. Second, constructing and deploying two units as a pair has a number of economies of scale that combined result in a lower overall project cost than developing each unit sequentially. Third, additional feasibility work is required to demonstrate with sufficient confidence that conversion of all four biomass units to CCS is viable given certain site constraints, such as land availability and cooling demand. Fourth and finally, Drax recognises that the Government's policy development around BECCS specifically and CCS more generally</p>	No

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
		continues to evolve and therefore the investment framework for retrofitting additional biomass units at Drax to CCS may be different to the support regime for the initial two units being deployment in the late 2020s.	
The long-term value of the Proposed Scheme was questioned, citing BECCS as an interim solution to a long-term goal to reduce emissions. BECCS was cited as 'potentially effective' but it was questioned whether BECCS was scalable to meet UK and global forecast energy requirements as the energy generation efficiencies and fuel densities are not sustainable at a global scale.	Need and Benefits	<p>The UK Government, Climate Change Committee and National Infrastructure Committee have all published analysis in the past 12 months that highlight the significant role BECCS technologies will play over the coming decades to achieve the UK's legally binding Net Zero commitment. For example, UK Government analysis for its Net Zero Strategy estimated that around 5 million tonnes of carbon dioxide would need to be removed from the atmosphere from BECCS or Direct Air Capture projects by 2030, rising to over 20 million tonnes per year by 2035. This is aligned with similar analysis the Climate Change Committee conducted for its Sixth Carbon Budget advice to government.</p> <p>Furthermore, there is a well-established body of expert analysis highlighting at a global level the need for BECCS and other carbon removal technologies to scale up over the coming decades to achieve the Paris Climate Agreement ambition of limiting climate change to 1.5 degrees of global warming compared to pre-industrial levels. This overarching message was reinforced in the IPCC's Climate Change 2022: Mitigation of Climate Change document published in April, which stated that: "carbon dioxide removal is necessary to achieve net zero CO₂ and GHG emissions both globally and nationally, counterbalancing 'hard-to-abate' residual emissions. CDR is also an essential element of scenarios that limit warming to 1.5°C or likely below 2°C by 2100, regardless of whether global emissions reach near zero, net zero or net negative levels."</p>	No
The massive infrastructure development will create economic value for the area, supporting the core purpose the Local Enterprise Partnership, in the form of jobs for local people in construction, supply chain and operations. Also, the infrastructure that this particular consultation focuses on is a core part of wider CCS infrastructure investment in the area, which will be vital for decarbonisation of other nearby industries, thus safeguarding jobs at risk of being offshored as environmental regulations rightly tighten.	Need and Benefits	The Applicant acknowledges and welcomes the response from the LEP and is grateful for the support offered. The Proposed Scheme will indeed help generate significant employment across the region and assist the region to decarbonise as well as supporting other industrial sectors which take longer to decarbonise.	No
BECCS is of paramount importance to the fight against climate change and would like to see the government supporting Drax in achieving this.	Need and Benefits	Thank you for your comment.	No
It may be interesting to understand the environmental payback period of the proposed construction phase of BECCS at Drax.	Need and Benefits	The GHG calculations set out in Chapter 15 (Greenhouse Gases) of the ES (document reference 6.1.15) note that the embodied carbon associated with the construction of the Proposed Scheme is 104,488 tonnes of CO ₂ , which results in a net total of 7,975,620 tonnes of CO ₂ per annum (across both BECCS units); this represents 910 tonnes per hour. The time taken to payback the embodied carbon associated with construction is therefore equal to just under 5 days.	No

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
Concern was raised regarding the noise impact of the installation of BECCS at Drax Power Station and whether noise would increase.	Noise and Vibration	<p>Additional noise modelling was undertaken after the PEIR submission to reflect the evolution of the design. Conclusions in Chapter 7 (Noise and Vibration) of the ES (document reference 6.1.7) are based on this. Mitigation has been included such that there are no significant adverse effects due to construction or operational noise at any noise sensitive receptor.</p> <p>A dDCO requirement secures the production of a CEMP which will set out the construction hours to be in accordance with the REAC.</p>	No
With regards to the impact on local businesses, please ensure your supply chain follow the procurement protocol all of the way through, rather than just they are saying they will to please you initially.	Supply Chain	<p>The Proposed Scheme will help generate significant employment across the region and other opportunities throughout the supply chain, including for local businesses. The DCO Application is accompanied by a Section 106 Heads of Terms for a proposed development consent obligation (document reference 7.1) which will include the provision of a Local Employment Scheme. The Local Employment Scheme will set out the details and mechanism for securing the use of local labour contractors, goods and services during the construction period and operational period of the Proposed Scheme. It is proposed that the Local Employment Scheme will be secured within the Section 106 Agreement and require the Applicant to submit the details of the Local Employment Scheme to SDC and NYCC for approval, prior to the commencement of the Proposed Scheme. Drax and SDC and NYCC shall work together to establish the initiatives set out in the Local Employment Scheme. Drax shall not commence the Proposed Scheme until the Local Employment Scheme has been approved by SDC and NYCC and Drax shall thereafter carry out the approved Local Employment Scheme until the Proposed Scheme is decommissioned in accordance with the Order.</p>	No
It was noted that the Drax train is diesel powered and therefore does not use green transport.	Transport	<p>Currently, diesel trains are used to move freight around the UK, and this is equally applicable to moving biomass fuel. As the electricity sector decarbonises and electrification of more of the rail network takes place, this will hopefully allow more freight to be moved with a lower carbon emission. Drax would of course welcome and support the further electrification of the rail network and indeed is also following closely the development of other low carbon options in terms of railway locomotives.</p> <p>The biomass supply chain emissions have been included in Chapter 15 (Greenhouse Gas Assessment) of the ES (document reference 6.1.15) This includes transport of biomass by rail as well as the following processes and transportation methods</p> <ul style="list-style-type: none"> ~ Processing at origin; ~ Feedstock transport; ~ Drying; ~ Pelleting; ~ Transport to Port; ~ Shipping; ~ Rail to Drax; and ~ Combustion of CH₄ and N₂O. <p>The supply chain emissions (including rail transport) are considered in the baseline and the operational phase GHG assessment.</p>	No

Summary of consultee comment	Topic area (Theme)	Regard had to the consultee responses	Change (Yes / No)
Questions around the frequency of HGV movements during the construction phase were raised.	Transport	<p>The frequency of HGV movements during the construction phase is set out in Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5).</p> <p>An Outline Construction Traffic Management Plan (document reference 6.3.5.1) has been prepared and submitted as part of the application. The Outline CTMP details how HGV movements would be managed during construction phase including routeing, signage, and other measures to minimise the impacts of the construction phase on users of the highway network, residents, and local businesses.</p>	Yes
Facilities for employees using sustainable transport should also be incorporated within the further development of the site. Such measures could include cycle storage that accommodates all cycles including adapted cycles and trikes, safe walking and cycling routes demarcated around the site to ensure safe access to parking facilities and employment location.	Transport	<p>Chapter 5 (Traffic and Transport) of the ES (document reference 6.1.5) includes a review of the baseline conditions including access to the Site by sustainable modes.</p> <p>A Framework Construction Worker Travel Plan (document reference 6.3.5.2) has been prepared and submitted as part of the Application. The Framework CWTP sets out how sustainable travel would be promoted through the following 9 SMART Measures:</p> <ul style="list-style-type: none"> ~ SMART Measure 1: Travel Plan Coordinator ~ SMART Measure 2: Travel Plan Steering Group ~ SMART Measure 3: Construction Worker Travel Surveys ~ SMART Measure 4: Travel Plan Marketing ~ SMART Measure 5: Car Park Management Strategy ~ SMART Measure 6: Car Sharing and Minibuses ~ SMART Measure 7: Construction Worker Facilities ~ SMART Measure 8: Senior Staff to Lead by Example ~ SMART Measure 9: Monitoring of Traffic Flows. 	Yes

7.13.7. Biofuelwatch – throughout the non-statutory and statutory consultation, Drax has been in correspondence with representatives from Biofuelwatch. A copy of the correspondence with Biofuelwatch is provided in Appendix A5. This section of the report identifies the key matters raised by Biofuelwatch regarding the Proposed Scheme.

7.13.8. On the 29 March 2021, post non- statutory consultation, Biofuelwatch contacted the Applicant with the following questions. The Project team considered the submission ahead of the statutory consultation to ensure that they would be able to meaningfully respond to any questions or queries in the next phase of consultation. The Applicant has responded to those questions raised below.

7.13.9. Biofuelwatch - We understand that the current consultation is seeking input prior to Drax Plc. submitting a formal Scoping Application to the Planning Inspectorate. In this context, we would like to take the opportunity to list the different questions which we believe must be addressed in detail in an Environmental Impact Assessment for this project:

1. *Net energy efficiency of Drax's generating station when operated with carbon capture: How much energy will be required for capturing and compressing carbon dioxide and, once this is accounted for, how much of the energy contained in the wood pellets burned will be converted into electricity supplied to the grid? We believe that the answer to this question should be backed up with evidence from carbon capture trials involving combustion of wood pellets.*
 - i. There is an inherent energy penalty in operating Carbon Capture facilities, and this is apparent regardless of the fuel and type of generating units being operated. The Proposed Scheme has sought to, and through the ongoing FEED process will continue to seek to, reduce the energy penalty as much as possible by integrating systems where possible.
 - ii. Energy efficiency when concerned with electricity generation is a fundamental issue; ideally any thermal generating plant would be looking to maximise energy efficiency and generate as much electricity for each quantum of fuel used. When you apply negative emissions technology to a biomass power station such as BECCS, you are getting two products; namely renewable, dispatchable, clean energy and negative emissions in the form of biogenic CO₂. It can also be geologically, you get two things for one, so some of the energy input to the power station is being diverted from electricity production to capture biogenic CO₂ and thereby negative emissions. The way power station efficiency is measured is traditionally through fuel input to electricity output. That model does not really work in a BECCS power plant, because you have two outputs. The exact reduction in the cyclic efficiency under BECCS will be determined as part of the detailed Front-End Engineering and Design (FEED) study which is due to commence this year.

2. Information about how the inevitable reduction in the plant's net energy efficiency resulting from carbon capture would be compensated: would it result in a reduction of the amount of electricity delivered to National Grid, or would it result in an increase in the amount of wood pellets burned and, if so, by what amount?
 - i. There would be a reduction of electricity delivered to National Grid from the two units which will have carbon capture technology installed (Unit 1 and Unit 2). Input of wood pellets to Unit 1 and Unit 2 would not change.
3. *Detailed assessments of potential air quality impacts as well as public health impacts;*
 - i. The Environmental Statement submitted as part of the Application includes an assessment of air quality impacts and human health in Chapter 6 (Air Quality) (document reference 6.1.6) and Chapter 16 (Population, Health and Socio-economics) (document reference 6.1.16).
4. *Detailed assessment of any potential impacts on water quality;*
 - i. The Environmental Statement submitted as part of the Application includes an assessment of water quality impacts in Chapter 12 (Water Environment) (document reference 6.1.12).
5. *Information as to whether Drax's proposal is contingent upon the approval, construction and availability of a CO2 pipeline proposed by the Zero Carbon Humber Partnership, so that CO2 can be stored underneath the North Sea. If Drax proposes CCS for the biomass units even in the absence of an operational carbon storage project offshore, then how would the CO2 captured be stored or used?*
 - i. The Proposed Scheme is separate from the CO2 pipeline proposed by National Grid Ventures and associated storage by the Northern Endurance Partnership. However, it is the case the carbon dioxide captured by the Proposed Scheme requires that infrastructure in order to leave the site. As such, Drax would not seek to implement the Proposed Scheme if the pipeline and storage facilities were not going to be provided.
 - ii. However, it is important to note that absent consent for the Proposed Scheme, it would not be possible for BECCS to be installed at Drax in any scenario. As such any concerns with the pipeline and storage projects should not be a reason why consent should be in question for the Proposed Scheme. The substantial benefits and opportunities provided by the Proposed Scheme should instead be facilitated by the consent that is sought being granted.

7.13.10. These are questions raised by Biofuelwatch during statutory consultation on the live chat event (18 November 2021), the team took the questions away to follow up with a written response provided on the 19 November 2021:

1. *Q, How much CO2 has been captured and how much has been stored as part of the joint trial with MHI and over what period?*
 - i. A The carbon capture pilot captures around 250 kg/h of CO2. The purpose of the trial was to provide data on the capture of CO2 from biomass flue gas that will help to validate the full-scale design of the capture system.
 - ii. The CO2 was released into the flue gas stream after capture, as there is not yet any CO2 transportation & storage infrastructure in place for permanent sequestration.
2. *Q, What percentage of CO2 from a biomass unit do you expect to capture in future?*
 - i. The plant will be designed to capture up to 95% of the CO2 in the flue gas
3. *Q, Has it been established through the trial how much of a biomass unit's electricity will be required to capture a set proportion of CO2? Are there trial results from which to deduce the energy penalty?*
 - i. This was not within the scope of the trial; however, it has been an important consideration in the selection of the vendor and energy efficiency is an essential part of the project design. Specific values are commercially confidential at this point, but this aspect will be considered in the relevant chapter of the Environmental Statement.

7.13.11. Biofuelwatch contacted Drax with further questions on 22 November 2021, these questions and responses are below:

1. *How much CO2 has been captured in total over the course of the trial?*
2. *How long have you been conducting the trial?*
3. *How many hours have you been able to capture 250Kg/hour without interruption?*
 - i. In response to your questions, the trial unit has been running since mid-2020, during which time it has been regularly taken in and out of operation. The aim of the trial was to not to prove operational reliability, as a pilot plant is not representative of a large-scale process in that regard. Instead, the trial has been successful in its aim of providing data on the interaction of the carbon capture solvent with Drax flue gas.

7.13.12. Biofuelwatch emailed Drax (8 December 2021) and stated 'We are writing in response to the statutory consultation about the Drax Bioenergy with Carbon Capture and Storage Project proposal. We feel there is some key information missing that we believe must be addressed in the Environmental Information Report: We believe that the Environmental Information Report must address impacts of all amine degradation products on public health as well as those on-air quality. We note with concern that the information provided about amine degradation products relies on manufacturer information from Mitsubishi Heavy Industries (6.4.35 of the air quality section of the

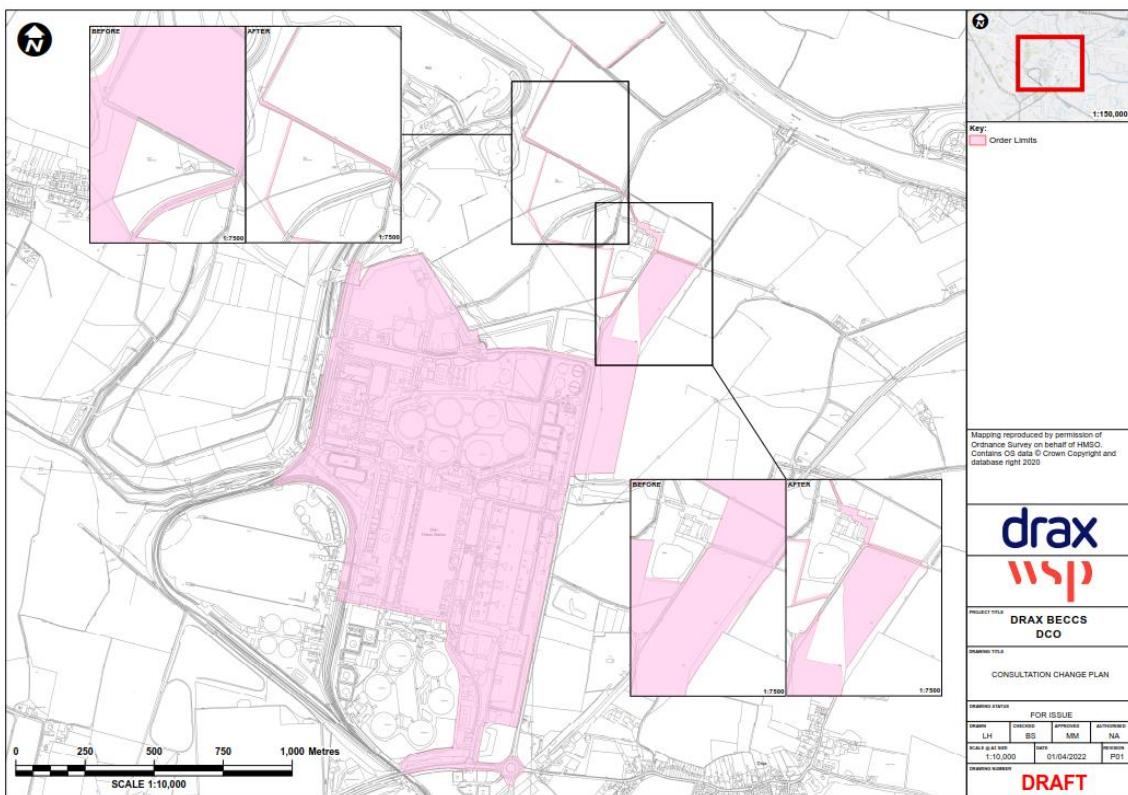
PEIR). We believe that real world data verifying MHI's findings should be provided, based on data from relevant trials, given that this particular amine solvent - KS-21 - is newly developed and may therefore have different properties from amine solvents used elsewhere. We can see no data about the expected conversion efficiency of the two biomass units once operating with carbon capture. We would ask for relevant data to be set out in the final Environmental Information Report.

- 7.13.13. The Applicant provided a response as follows – 'The PEIR was generated to help stakeholders understand the current position of the proposed development. We will provide a full consideration of emissions to air as part of our assessments which will be published within the Environmental Statement and will assess impacts on public health and air quality. As an integral part of the Environmental Statement, we will assess and model the solvent to comply with the requirements of the EIA regulations. We are commencing the studies which will form part of the Environmental Statement. This will include the relevant information required for a DCO application'.
- 7.13.14. Following the correspondence with Biofuelwatch to date, as set out above, the Applicant can confirm the following updates.
- 7.13.15. The trial undertaken at Drax Power Station was designed to assess how specific solvents performed in capturing CO₂ from biomass fuels. These trials were designed to assess the performance of the solvents using biomass flue gas only rather than assess the energy required to run the carbon capture plant and equipment as part of an enduring, long-term BECCS scheme. Following engineering and design work, efficiency and energy data have been calculated and applied in specific chapters of the EIA in order to assess the impact of operating the units fitted with BECCS technology for the design of the Proposed Scheme. It should be noted that the efficiency of other units without CCS at Drax Power Station is not impacted by the application of CCS to Units 1 and 2.
- 7.13.16. Further detail around both the air quality and greenhouse gas assessments, as relevant to the comments raised above, is provided in Chapter 6 (Air Quality) of the ES (document reference 6.1.6) and Chapter 15 (Greenhouse Gases) of the ES (document reference 6.1.15). Furthermore, the air quality assessment, which has been agreed with the EHO at Selby District Council, is set out in Section 6.5 of Chapter 6 (Air Quality), with the approach to the modelling of amine solvent detailed in Appendix 6.3 (Atmospheric Dispersion Modelling) (document reference 6.3.6.3). This also has been produced based on the requirements of the Environment Agency in relation to assessment, disclosure and the use of environmental assessment levels as per associated guidance and discussion. The GHG assessment methodology, which aligns with the IEMA guidance (IEMA, 2022) and follows the lifecycle assessment approach outlined in PAS 2080 (BSI, 2016), is set out in Section 15.5 of Chapter 15 (Greenhouse Gases).

8. ADDITIONAL CONSULTATION

- 8.1.1. Following the conclusion of the statutory consultation, the Applicant has continued to develop the Scheme. This process has been guided by the results of the Applicant's survey activity and the feedback received through the statutory consultation.
- 8.1.2. The Order Limits have reduced in size since the statutory consultation, with the refinement of Habitat Provision Areas and types of planting and ecological enhancement measures, as well as refinements to the East Construction Laydown Area to avoid impacts on existing trees and a PRoW, and to provide additional areas for habitat provision and the removal of land within the Drax Power Station Site which is not required for the Proposed Scheme. Further details of these refinements and the reasons for this are set out in Chapter 3 (Consideration of Alternatives) of the ES (document reference 6.1.3) at paragraphs 3.4.4 and 3.4.5.
- 8.1.3. In undertaking this refinement, to avoid unnecessary impacts on farming land when alternative existing access routes had been identified, the Order limits have included a minor amendment to include an existing access track from the junction of Pear Tree Avenue/New Road junction, via Drax Abbey Farm and the existing access track at the northern edge of the Drax Priory Scheduled Monument. This access track was not previously included in the land identified for the Proposed Scheme at the statutory consultation stage. The Consultation Change Plan (see below Plate 8.1) was sent to relevant parties with consultation letters to explain the changes to Order Limits arising from the inclusion of the access track.

Plate 8.1 - Consultation Change Plan



8.1.4. There are no proposed works to the access track, but the inclusion of the access track within the Order limits now is to identify that this track is proposed to be used to access locations to undertake environmental mitigation and enhancement measures that specifically connect to this track. The areas to be planted using this access track means the planting of new hedgerows, or the enhancement of existing hedgerows. It is anticipated that this planting will be undertaken utilising vehicles that are smaller in size and weight than the typical farm vehicles already using this track. The utilisation of the access track avoids the need to create temporary access tracks through agricultural land currently in use and thus minimises disturbance to agricultural operations and avoids potential damage to crops or agricultural land.

8.1.5. Additional consultation took place from 2 April 2022 to 23:59pm 2 May 2022 allowing for the statutory minimum consultation period of 28 days.

8.1.6. All landowners directly affected by the use of this track have previously been consultees during the statutory consultation, and they have been notified of this change to the Order limits (as provided in Appendix M).

8.1.7. All persons/entities with rights to use the access track, have been consulted to ensure they are aware of the amended Order limits.

8.1.8. Following the change in order limits, occupiers at Foreman's Cottage and Drax Abbey Farm were identified as new consultees and were consulted under section

42(1)(d) between 2 April 2022 and 2 May 2022. Example of the letter can be found in Appendix M.

- 8.1.9. Landowners who had already been consulted were also formally informed of these Order limits changes.
- 8.1.10. No responses were received by the Applicant to the additional consultation.

9. ENVIRONMENTAL IMPACT ASSESSMENT

9.1. OVERVIEW

- 9.1.1. This chapter provides an overview of how the Proposed Scheme was identified as requiring an EIA and how consultation has been conducted in line with the EIA Regulations 2017.
- 9.1.2. Full details of compliance with the EIA Regulations 2017, in terms of the EIA itself, are detailed within Chapter 1 (Introduction) of the ES (document reference 6.1.1) and Chapter 4 (EIA Methodology) of the ES (document reference 6.1.4).

9.2. ENVIRONMENTAL IMPACT ASSESSMENT

- 9.2.1. The Proposed Scheme falls under Schedule 1, paragraph 23 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations 2017') (HM Government, 2017) as 'Installations for the capture of carbon dioxide streams for the purposes of geological storage pursuant to Directive 2009/31/EC from installations referred to in this Schedule, or where the total yearly capture of carbon dioxide is 1.5 megatonnes or more'. The Proposed Scheme will have the capability of capturing in excess of 1.5 megatonnes of carbon dioxide per annum per biomass unit and is therefore classified as 'EIA development' and as such the DCO Application is supported by an EIA.
- 9.2.2. The Proposed Scheme has not been subject to an EIA Screening Request or Opinion, as all development listed within Schedule 1 is automatically classified as EIA development under the EIA Regulations 2017.
- 9.2.3. A Regulation 8(1)(b) (of the EIA Regulations 2017) notification was submitted to the SoS alongside a request for a Scoping Opinion under Regulation 10 which included an EIA Scoping Report and a request for a Scoping Opinion under Regulation 10 on 15 January 2021. The submission confirmed that the Applicant intended to submit a DCO Application. The SoS adopted the Scoping Opinion on 26 February 2021, having consulted with the relevant consultation bodies in accordance with Regulation 10(6) of the EIA Regulations 2017.
- 9.2.4. The PEIR was produced for the statutory consultation which took place between 1 November and 12 December 2021. The role of the PEIR is to provide information reasonably required to enable members of the public (including local communities), local authorities, statutory bodies and people whose land or interests would potentially be affected to understand the likely significant environmental effects of the Proposed Scheme so that they may provide meaningful feedback.
- 9.2.5. PEI is defined in Regulation 12(2) as information referred to in Regulation 14(2) which:
 - a. Has been compiled by the Applicant; and

- b.** Is reasonably required for the consultation bodies to develop an informed view of the likely significant environment effects of the development (and of any associated development).

9.2.6. The PEIR was formed of three volumes. Volume 1 being the Main Text (Chapters) and Figures, Volume 2 containing the Technical Appendices and Volume 3 comprising the Non-Technical Summary (NTS), which summarised the PEIR in non-technical language.

The ES is formed of four volumes. Volume 1 (Main Text), Volume 2 (Figures), Volume 3 (Technical Appendices) and Volume 4 (NTS) and has been prepared in accordance with Regulation 14(2) which specifies what environmental information must be included in an ES. Regulation 14(3)(b) requires that an ES must include information 'reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment'. Chapter 1 (Introduction) of the ES (document reference 6.1.1) sets out how the regulations have been complied with.

9.2.7. In terms of consultation in relation to the Scoping Report, the Planning Inspectorate, on behalf of the SoS, consulted with a list of consultation bodies upon receipt of the Scoping Report, before adopting the Scoping Opinion. The full list of consultation bodies notified by the Planning Inspectorate under Regulation 11(1)(a) of the EIA regulations and provided to the Applicant under Regulation 11(1)(b) is provided at Appendix D3.

9.2.8. The parties in Appendix D3 were used by the Applicant to help identify the relevant parties that should be consulted as prescribed consultees and are therefore reflected in the list of those parties in Appendix D1 who were consulted at statutory consultation.

9.2.9. This is with the exception of two organisations who were identified in the Regulation 11(1)(a) list provided by the Planning Inspectorate, but who the Applicant considered were not required to be consulted as prescribed consultees. These parties are:

- a. Murphy Gas Networks Limited and Murphy Power Distribution Limited – the Applicant considered that these undertakers would not have apparatus in the geographical area of the Proposed Scheme; and
- b. the Humber Bridge Board – in considering the initial traffic assessments undertaken for the Proposed Scheme, the Applicant considered that traffic flows on the bridge would not be significantly affected due to the distance of the bridge from the Proposed Scheme, and the type of vehicles potentially using the Humber Bridge crossing as part of the route to the site. Furthermore, the bridge will not be physically affected by the Proposed Scheme.

9.2.10. The following consultation bodies provided responses to the Planning Inspectorate on the Scoping Report:

- a. Cadent
- b. Canal and River Trust

- c.** Civil Aviation Authority
- d.** Doncaster Council
- e.** Durham County Council
- f.** Environment Agency
- g.** Forestry Commission
- h.** East Riding of Yorkshire Council
- i.** Health and Safety Executive
- j.** Historic England
- k.** Hull City Council
- l.** Lancashire County Council
- m.** Last Mile
- n.** Leeds City Council
- o.** Marine Management Organisation
- p.** Ministry of Defence
- q.** National Grid
- r.** NATS
- s.** Natural England
- t.** Network Rail
- u.** North Lincolnshire Council
- v.** NYCC (joint response with Selby District Council)
- w.** North Yorkshire Fire and Rescue Services
- x.** North York Moors National Park Authority
- y.** Public Health England
- z.** Redcar and Cleveland Borough Council
- aa.** Selby District Council (joint response with NYCC)
- bb.** Stockton-on-Tees Borough Council
- cc.** The Coal Authority
- dd.** Yorkshire Water

9.3. EIA REQUIREMENTS DURING STATUTORY CONSULTATION

9.3.1. In developing and delivering the statutory consultation relevant requirements in the EIA Regulations 2017 were complied with. The below outlines how these were satisfied:

- a.** Regulation 12(1) requires that the SoCC must have reference to the Proposed Scheme being an EIA development, and how the Applicant intends to publicise and consult on the preliminary environmental information. The SoCC confirmed that the Proposed Scheme is EIA development. The SoCC also explained how

the Applicant intended to publicise and consult on the PEIR (see the final published SoCC in Appendix C3).

- b.** Regulation 13 requires at the same time as publishing notice of the proposed application under section 48(1), a copy of that notice must be sent to the consultation bodies and to any person notified to the Applicant in accordance with Regulation 11(1)(c). A copy of the section 48 notice was sent to the consultation bodies on 1 November 2021 as outlined in Chapter 6 of this report, save for the two parties discussed in section 9.2.
- c.** The Planning Inspectorate initially issued the Regulation 11 list of consultees to the Applicant on 26 February 2021. This response confirmed that there were no Regulation 11(1)(c) consultees. The consultation bodies identified by the Planning Inspectorate and notified to the Applicant under Regulation 11(1)(b) are captured in Appendix D1 and Appendix D3 of this report and were subsequently sent the section 48 notice along with their section 42 letter.

- 9.3.2. Volume 1 of the ES (document reference 6.1) contains each of the technical ES chapters and these each provide detail of the consultation and engagement held with the relevant statutory consultees in relation to the respective environmental topics.
- 9.3.3. Consultation with key stakeholders began in early 2021 and has been ongoing to date to engage stakeholders at an early stage of the process, to discuss points raised in the Scoping Opinion and to reach agreement on these matters and further comments received since. A full list of the consultation carried out with key stakeholders to date and a summary of the matters discussed is provided within Section 3 of each of the ES Chapters (Chapter 5 – 18).

10. CONCLUSION

10.1.1. The Proposed Scheme will include:

- a. The installation of new carbon capture technology on up to two of the existing biomass-fired generating units at Drax Power Station;
- b. A habitat provision area, designed to protect and improve habitats for local wildlife and farmland, and
- c. An area for construction laydown, which will be used for the temporary location of offices, warehouses, workshops, open air storage areas and car parking.

10.1.2. Statutory consultation under sections 42, 47 and 48 of the PA2008 was held from 1 November to 12 December 2021, in addition to an earlier non-statutory consultation that ran from 1 March to 28 March 2021. Statutory consultation included:

- a. Consultation with local authorities on the SoCC, ensuring that the Applicant's approach to consultation took into account local knowledge;
- b. Consultation documents which provided information on the proposed layout of the Proposed Scheme,
- c. A series of online and in person exhibition events including exhibition boards and consultation materials providing information on the proposals;
- d. Briefings with parish councils, elected members and stakeholders
- e. Proposed Scheme website with updated information; and
- f. Advertisements in local and national newspapers publicising the proposals and the consultation.

10.1.3. Responses were received to the statutory consultation, 79 responses from section 47 consultees and 21 responses received from section 42(1)(a) and section 42(1)(b) statutory consultees. Responses to the consultation were received from local authorities, statutory bodies, local residents and landowners as well as responses from a campaign group, Biofuelwatch. All responses have been carefully considered and regard has been had to those responses in finalising the application for development consent as is required under section 49 of the PA2008. Some of the key issues which have been raised as part of this consultation are:

- a. Concerns about the ecological impact of biomass generation on forests.
- b. The impact of air quality, particularly the toxicity of released chemicals from the construction and operational phase of the Proposed Scheme
- c. The long-term value of the Proposed Scheme, citing BECCS as an interim solution to a long-term goal to reduce emissions.

10.1.4. In response to feedback received some changes have been made to the Proposed Scheme following the statutory consultation period.

10.1.5. Following the close of the statutory consultation period in December 2021, a number of design changes have been incorporated into the Proposed Scheme design. Proposed design amendments were carefully considered in the context of

environmental constraints and opportunities, engineering feasibility and cost, planning policy and other relevant considerations and these are summarised below:

- a.** Amendments to the Order Limits to reduce impacts;
- b.** Updates to the extent of the Habitat Provision Area;
- c.** Refinement of the extent of the East Construction Laydown Area;
- d.** Refinement to the extent of the Drax Power Station Site;
- e.** Refinements of the construction transport route to minimise impacts;
- f.** Refinement of the water pre-treatment design options to select the option to retrofit the existing sedimentation tanks rather than install new infrastructure;
- g.** Refinement of the cooling water connection design options to select the option to modify existing water pumps rather than install new infrastructure;
- h.** Refinement of the wastewater treatment plant design for the stripping of ammonia during the quenching of flue gas to reduce environmental impacts;
- i.** Location of the proposed compressors selected as being a single location on areas of existing hardstanding rather than in the old woodyard area;
- j.** The inclusion of the Carbon Dioxide Delivery Terminal Compound within the Proposed Scheme;
- k.** Updates to the maximum parameters, set out in Table 2.3 of Chapter 2 (Site and Project Description).

10.1.6. These changes are set out in further detail in Chapter 3 (Consideration of Alternatives) of the ES (document reference 6.1.3).

10.1. COMPLIANCE WITH THE PLANNING ACT 2008

10.1.1. This consultation report sets out the consultation activities which have been undertaken under sections 42, 47, 48 and 49 of the PA2008. Drax developed the approach to the statutory consultation in line with the requirements of the PA2008 (and the APFP Regulations and EIA Regulations 2017), as well as DCLG Guidance and PINS Advice Note Fourteen as set out in Section 3 of this report

10.1.2. Chapter 3 provides detail of how each requirement from the legislation, regulations, as well as the guidance and advice notes, have been met as part of this consultation. Compliance with the PA2008 can be summarised as follows:

- a.** Undertaking of consultation under section 47 of the PA2008, as identified in Chapter 4 of this report. This includes consultation on the SoCC with local authorities, publication of the SoCC notice, making the SoCC available for inspection and undertaking consultation as set out in the SoCC.
- b.** Undertaking of consultation under section 42 of the PA2008, as identified in Chapter 5 of this report. This includes consultation with all relevant consultees under section 42(1)(a), section 42(1)(b) and section 42(1)(d). Section 42(1) (aa) and Section 42(1)(c) are not relevant to this Proposed Scheme.

- c. Notification to the SoS of the proposed application under section 46 of the PA2008, as identified in Chapter 6 of this report.
- d. Publicising of consultation under section 48 of the PA2008, as identified in Chapter 6 of this report. This included the publication of the Section 48 notice in a local newspaper (Yorkshire Post), London Gazette and The Times. This also included notification to consultation bodies in line with the EIA Regulations 2017.
- e. Regard to all consultation responses received, as per section 49 of the PA2008. Further detail of the issues raised and our response to these are included in Chapter 7 of this report.

10.2. ONGOING ENGAGEMENT

- 10.2.1. Drax will continue its commitment to engagement after the DCO application submission in order to finalise detailed designs; this will include the agreement of SoCG with stakeholders where appropriate. In addition, engagement will continue with persons with interests in the land throughout the examination and beyond, in order to acquire any necessary rights by agreement as far as possible.
- 10.2.2. In addition, engagement will continue to take place with key consultees through detailed design and with the wider community to maintain interest and support for the Proposed Scheme. SoCGs have been initiated pre-application with the aim of submitting all SoCGs prior to Examination. The status of the SoCGs prior to the start of the examination will depend on the discussions had with key consultees during the pre-examination stage. Further discussions will take place during the examination, if appropriate, to enable final signed versions of respective SOCGs to be submitted by the end of the examination.