The Drax Power (Generating Stations) Order

Land at, and in the vicinity of, Drax Power Station, near Selby, North Yorkshire

Planning Statement

The Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 – Regulation 5(2)(q)

Drax Power Limited

Drax Repower Project

Applicant:	DRAX POWER LIMITED
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Glossary

Term	Definition
Abnormal Indivisible Load	An 'abnormal indivisible load' (AIL) is a vehicle that has any of the following: a weight of more than 44,000 kilograms, an axle load of more than 10,000 kilograms for a single non-driving axle and 11,500 kilograms for a single driving axle, a width of more than 2.9 metres, a rigid length of more than 18.65 metres.
Above-Ground Heritage Asset	Historic earthworks, historic buildings and structures, historic landscapes and hedgerows.
Above Ground Installation (AGI)	The Minimum Offtake Connection (MOC) which will be operated by National Grid Gas and the PIG Trap Launching station (PTF-L) which will be operated by Drax. The AGI is described as Work No. 6 in Schedule 1 of the draft DCO submitted with the DCO Application.
Agricultural Land Classification (ALC)	A framework for determining the physical quality of the land at national, regional and local levels. This is based on the long term physical limitations of land for agricultural use. There are a number of factors that affect the grade and the main ones are climate, site and soil characteristics, and the interactions between them.
Ancient Woodland	Ancient woodland is defined as an area that has been wooded continuously since at least 1600 AD. Ancient Woodland is divided into ancient semi-natural woodland and plantations on ancient woodland sites. Both types are classed as ancient woods.
Associated Development	Associated development is defined by section 115(2) of the Planning Act 2008 as development which is associated with a Nationally Significant Infrastructure Project (NSIP). In the case of the Proposed Scheme, the term Associated Development includes: - the up to two gas insulated switchgear banking buildings (described as Work No. 4 in Schedule 1 of the draft DCO); - the natural gas receiving facility and natural gas compression building (described as Work No. 5 in Schedule 1 of the draft DCO); - the AGI (described as Work No. 6 in Schedule 1 of the draft DCO); - the Gas Pipeline (described in Work No. 7 in Schedule 1 of the draft DCO); - the electrical connections to the existing 400 kilovolt National Grid substation (described in Work No. 8 in Schedule 1 of the draft DCO); - temporary construction laydown areas (described in Work No. 9 in Schedule 1 of the draft DCO); - landscaping and biodiversity enhancement measures (described in Work No. 11 in Schedule 1 of the draft DCO); - decommissioning and demolition of sludge lagoons and construction of replacement sludge lagoons (described in Work No. 12 in Schedule 1 of the draft DCO); - removal of existing 132 kilovolt overhead line and associated towers and foundations (described in Work No. 13 in Schedule 1 of the draft DCO);

	- passing place on Rusholme Lane (described in Work No. 14 in Schedule 1 of the draft DCO); - the Site Reconfiguration Works (described in Work No. 15 in Schedule 1 of the draft DCO); and - further associated development as set out in Schedule 1 of the draft DCO. These developments are associated with the NSIP i.e. Unit X and Unit Y and the battery storage facilities (described in Work Nos. 1-3 in Schedule 1 of the draft DCO).
The APFP Regulations	The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.
Application	The DCO Application.
The Applicant	Drax Power Ltd.
Baseline	A reference level of existing environmental conditions against which a project is measured and controlled.
Baseline Studies	Work done to determine and describe the environmental conditions against which any future changes can be measured or predicted and assessed.
BAT Assessment Process	Assessment as part BAT of the CHP-R Guidance which must be undertaken to prove CHP or CHP-R compliance.
Below-Ground Heritage Asset	Both known and hitherto unknown buried archaeological remains.
Best and most versatile agricultural land (BMV)	Defined as Grades 1, 2 and 3a by the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). This is the land that is determined to be most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Grades 3b, 4, and 5 are used to classify land that is of moderate quality to very poor quality.
Best Available Techniques (BAT)	'Best available techniques' (BAT) means the available techniques which are the best for preventing or minimising emissions and impacts on the environment. The European Commission produces 'best available technique' reference documents or BREF notes. They contain 'best available techniques' (BAT) for installations.
Biodiversity	Abbreviated form of 'biological diversity' referring to variability among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part.
Carbon capture readiness	Carbon Capture readiness, with respect to a combustion plant's emissions of CO2, is achieved when the following conditions are met: suitable storage sites are available it is technically and economically feasible to retrofit the plant with the equipment necessary to capture that CO2; and it is technically and economically feasible to transport such captured CO2 to the storage sites.
Carbon capture readiness reserve space	Space to be set aside to accommodate future carbon capture equipment, making the proposed plant in effect "carbon capture ready" for when the Carbon capture readiness state is achieved.

	The Carbon capture readiness reserve space is described as Work No. 10 in Schedule 1 of the draft DCO submitted with the DCO Application.
Carbon capture and storage (CCS)	Technology to facilitate the capture of carbon dioxide to prevent such gases entering the atmosphere.
The Carbon Capture and Storage (CCS) Directive	Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC, 2008/1/EC and Regulation (EC) No 1013/2006, and which stipulates the requirements for a CCS plant.
Carbon Capture Readiness Guidance / CCR Guidance	Carbon Capture Readiness (CCR): A guidance note for Section 36 Electricity Act 1989 consent applications (Department of Energy & Climate Change, November 2009). This guidance is intended to give practical advice on the types of information applicants need to submit to the Secretary of State to demonstrate that a proposed new combustion plant can be built carbon capture ready.
Characteristics	Elements, or combinations of elements, which make a contribution to distinctive landscape character.
CHP-R Guidance	CHP Ready Guidance for Combustion and Energy from Waste Power Plants' (Environment Agency, 2013) – Guidance notes / series of tests which are required to be proven before design or build of a plant to ensure it is 'CHP ready'.
Climate Change	Large scale, long term shift in the planet's weather patterns or average temperature.
Combined Cycle Gas Turbine (CCGT)	A combined cycle gas turbine is an assembly of turbines that convert heat into mechanical energy. Combustion of a fuel within a gas turbine produces hot gases that expand over a complex series of blades that cause the turbine to rotate which in turn drives an electrical generator. The principle of combined cycle is that the exhaust gases from the turbine are used as a heat source in a heat recovery steam generator (HRSG), increasing the system's overall efficiency by utilising energy from the fuel that would otherwise be wasted.
Combined Heat and Power (CHP)	Combined Heat and Power is the simultaneous generation of electrical power and usable heat in a single process, and is also known as co-generation. A CHP station may either supply steam direct to customers or capture heat from low-pressure steam after it has been used to drive electricity generating turbines for hot water or space heating purposes.
Compensation	Measures devised to offset or compensate for residual adverse effects which cannot be prevented/avoided or further reduced.
Compensation Area	Parcels of land on and/or off the Power Station Site within the confines of the Site Boundary, plus areas of land outside the Site Boundary but under Drax ownership identified to compensate and offset landscape / habitats lost as a result of construction, site clearance and/or the construction and retention of permanent infrastructure.
Construction Environmental	Document setting out methods to avoid, minimise and mitigate environmental impacts on the environment and surrounding area and the

Management Plan (CEMP)	protocols to be followed in implementing these measures in accordance with environmental commitments during construction.
Consultation Documents	These are “the documents, plans and maps showing the nature and location of the proposed development” as referred to in Regulation 4(3)(e) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. With respect to the Proposed Scheme, the Consultation Documents consisted of: the Statement of Community Consultation (SoCC), the Preliminary Environmental Information Report (PEIR) (required pursuant to Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017) including the PEIR Non-Technical Summary, an information leaflet and a project overview report. These documents can be found at Appendices 6.0 and 21.0 of the Consultation Report (document reference 5.1).
Cultural Heritage Significance	The value of a Heritage Asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a Heritage Asset's physical presence, but also from its setting.
Cumulative effects	The summation of effects that result from changes caused by a development in conjunction with other reasonably foreseeable development that is either consented but not yet constructed or is in the process of seeking consent. Also referred to as "in combination" effects.
DCO Application	The application for a DCO in respect of the Proposed Scheme.
Decibel (dB)	The decibel scale is used in relation to sound because it is a logarithmic rather than a linear scale. The decibel scale compares the level of a sound relative to another. The human ear can detect a wide range of sound pressures, typically between 2x10-5 and 200 Pa, so the logarithmic scale is used to quantify these levels using a more manageable range of values.
Designated Heritage Assets	World Heritage Site, scheduled monument, listed building, protected wreck site, registered park and garden, registered battlefield or conservation area.
Designated Landscape	Areas of landscape identified as being of importance at international, national or local levels, either defined by statute or identified in development plans or other documents.
Development Consent Order (DCO)	A Development Consent Order (DCO) is made by the Secretary of State (SoS) pursuant to the Planning Act 2008 (PA 2008) to authorise a Nationally Significant Infrastructure Project (NSIP).
Development Parcels	Development areas A to F and H to L (as shown on Figure 1.3 Current and Proposed Land Use in the Environmental Statement Volume 1)
Direct effect	An effect that is directly attributable to the Proposed Scheme.
Direct employment	Refers to the initial injection of expenditure, i.e. people employed in the construction of the Proposed Scheme (direct and contracted employment) and expenditure of goods, services and capital for the construction.
Disaster	In the context of the Proposed Scheme, a naturally occurring phenomenon such as an extreme weather event (e.g. storm, flood, temperature) or ground-related hazard events (e.g. subsidence, landslide, earthquake) with the potential to cause an event or situation that meets the definition of a Major Accident.

'Do nothing' scenario	Continued change or evolution in the landscape in the absence of the Proposed Scheme.
Drax Power Station	The existing biomass and coal fired power generation facility at the Existing Drax Power Station Complex.
Dust	Dust comprises particles typically in the size range 1-75 micrometres (µm) in aerodynamic diameter and is created through the action of crushing and abrasive forces on materials.
Effect	The consequence of an impact on the environment.
Electrical connection	In respect of Unit X, underground electrical cables connecting Unit X to the existing 400 kilovolt National Grid substation as described in Work No. 8A of the draft DCO. In respect of Unit Y, underground electrical cables connecting Unit Y to the existing 400 kilovolt National Grid substation and which may include a sealing end compound with overhead conductors and gantry as described in Work No. 8B of the draft DCO; and the removal of an existing 132 kilovolt overhead line and associated towers and foundations. The removal of the overhead line is described as Work No. 13 in Schedule 1 of the draft DCO submitted with the DCO Application.
Elements	Individual parts which make up the landscape, such as, for example, trees, hedges, and buildings.
Emission	A material that is expelled or released to the environment. Usually applied to gaseous or odorous discharges to the atmosphere.
Emission rate	The quantity of a pollutant released from a source over a given period of time.
Enhancement	Proposals that seek to improve the landscape resource and the visual amenity of the Proposed Scheme and its wider setting, over and above its baseline condition.
Environment Agency	A non-departmental public body sponsored by the United Kingdom government's Department for Environment, Food and Rural Affairs (DEFRA), with responsibilities relating to the protection and enhancement of the environment in England.
Environmental Impact Assessment (EIA)	A systematic means of assessing a development project's likely significant environmental effects undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
EIA Regulations 2017	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which prescribe the information to be included in the Environmental Statement and the consultation to be carried out in connection with development requiring an Environmental Statement.
Environmental Statement	A statement that includes the information that is reasonably required to assess the environmental effects of a development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile, but that includes at least the information required in the EIA Regulations 2017 and which is prepared in accordance with the latest Scoping Opinion adopted by the Secretary of State (where relevant).

Examining Authority (ExA)	A panel or single person appointed from the Planning Inspectorate to be responsible for conducting the examination of, and recommendation to the SoS as to a decision on, the DCO Application.
Exceedance	A period of time where the concentrations of a pollutant is greater than the appropriate air quality standard.
Existing Drax Power Station Complex	The facilities comprising the existing Drax Power Station, and the land upon which it is situated.
Feature	Particularly prominent or eye-catching elements in the landscape, such as tree clumps, church towers or wooded skylines OR a particular aspect of the Proposed Scheme.
Feeder(s)	A number of gas pipelines that make up the National Transmission System (NTS). Multiple Feeders make up the NTS.
Flood Map for Planning	Defines flood zones based on annual probability of flooding from fluvial and tidal sources to inform development planning and flood risk assessment. Nationally consistent delineation of 'high', 'medium' and 'low' flood risk updated by the Environment Agency as deemed appropriate, typically on a quarterly basis.
Flood Zone 1	This zone comprises land assessed as having less than a 1 in 1000 (0.1%) annual probability of flooding from rivers or the sea in any year.
Flood Zone 2	This zone comprises land assessed as having between a 1 in 100 (1%) and 1 in 1000 (0.1%) annual probability of flooding from rivers, or between a 1 in 200 (0.5%) and 1 in 1000 (0.1%) annual probability of flooding from the sea in any year.
Flood Zone 3a	This zone comprises land assessed as having a 1 in 100 (1%) or greater annual probability of flooding from rivers or a 1 in 200 (0.5%) or greater annual probability of flooding from the sea in any year.
Flood Zone 3b	This zone comprises land where water has to flow or be stored in times of flood.
Fluvial	Of, or relating to, or inhabiting a river or stream.
Gas Pipeline	The approximately 3 km underground pipeline which connects the Gas Receiving Facility to the National Transmission System. The Gas Pipeline is described as Work No. 7 in Schedule 1 of the draft DCO submitted with the DCO Application.
Gas Receiving Facility (GRF)	This is required to receive the natural gas from the Gas Pipeline. The GRF is described as Work No. 5 in Schedule 1 of the draft DCO submitted with the DCO Application.
gas turbine	Gas turbines produce electricity. Air is drawn into the compressor of the gas turbine and is compressed. The fuel is then injected into the combustion chamber. The mixture of fuel and compressed air is ignited, producing gases at high temperatures. As the gas expands, it rotates the turbine to produce electricity. The gas turbines form part of Work No. 1A (which includes up to two gas turbines in connection with Unit X) and Work No. 2A (which includes up to two gas turbines in connection with Unit Y) in Schedule 1 of the draft DCO submitted with the DCO Application.

Generating station equipment	Equipment comprising electricity generating stations, battery storage facilities and gas insulated switchgear buildings. The Generating station equipment is described as Work Nos. 1, 2, 3 and 4 in Schedule 1 of the draft DCO submitted with the DCO Application.
Greenhouse Gas (GHG)	Greenhouse gases are gases that absorb and emit radiation at specific wavelengths within the spectrum of infrared radiation emitted by the Earth's surface, the atmosphere, and clouds. The six main GHGs whose emissions are human-caused are: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbon and sulphur hexafluoride. In combination, these GHG emissions are commonly expressed in terms of 'carbon dioxide equivalents' (CO2e) according to their relative global warming potential. For this reason the shorthand 'carbon' may be used to refer to GHGs.
Groundwater Source Protection Zone	Source Protection Zones (SPZs), defined for 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply, show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment) and a fourth zone of special interest, which the Environment Agency occasionally apply, to a groundwater source.
Habitat	The environment in which populations or individual species live or grow.
Habitats Directive	Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017, which implement the Habitats Directive.
Habitats Regulations Assessment (HRA)	An appropriate assessment of the implications of a plan or project for a European site or a European offshore marine site in view of that site's conservation objectives. Such an assessment is required pursuant to the Habitats Regulations where a plan or project — (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site.
Harm	Change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a Heritage Asset.
Heat Recovery Steam Generators (HRSG)	HRSGs recover the hot flue gases from the Gas Turbines. The heat is used to produce steam that will drive the existing steam turbines. HRSGs are required where the generating station is operating in CCGT mode. The HRSGs form part of Work No. 1A (up to two HRSGs in connection with Unit X) and Work No. 2A (up to two HRSGs in connection with Unit Y) in Schedule 1 of the draft DCO submitted with the DCO Application.
Heritage	The historic environment and especially valued assets and qualities such as historic buildings and cultural traditions.
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions,

	because of its heritage interest. Heritage Assets include Designated Heritage Assets and Non-Designated Heritage Assets.
Hydrology	The movement, distribution and quality of water throughout the earth.
Impact	A physical or measurable change to the environment attributable to the Proposed Scheme.
Important Ecological Features	Species and habitats present within the zone of influence of the Proposed Scheme that are of sufficiently high value that an effect upon them as a result of the Proposed Scheme could be considered to be significant.
Important Landscape Areas (ILAs)	A local landscape designation defined by East Riding of Yorkshire Council.
Indirect effects	Effects that result indirectly from the proposed project, in this case the Proposed Scheme, as a consequence of the direct effects, often occurring away from the site, or as a result of a sequence of interrelationships or a complex pathway. They may be separated by distance or in time from the source of the effects.
Indirect employment	Refers to the subsequent rounds of expenditure generated throughout the supply chain by the initial expenditure on goods, services and capital.
Invasive Non-Native Species	Non-native UK animal or plant that has the ability to spread causing damage to the environment, the economy, our health and the way we live.
Iterative design process	The process by which project design is amended and improved by successive stages of refinement which respond to a growing understanding of environmental issues.
Key characteristics	Those combinations of elements which are particularly important to the current character of the landscape and help to give an area its particularly distinctive sense of place.
Land use	What land is used for, based on broad categories of functional land cover, such as urban and infrastructure use and the different types of agricultural and forestry.
Landform	The shape and form of the land surface which has resulted from combinations of geology, geomorphology, slope, elevation and physical processes.
Landscape	An area, as perceived by people, the character of which is a result of the action and interaction of natural and/or human factors.
Landscape and Visual Impact Assessment	A tool used to identify and assess the likely significant effects of change resulting from development both on the landscape as an environmental resource in its own right and on people's views and visual amenity.
Landscape Character	A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another.
Landscape Character Areas	These are single unique areas which are the discrete geographical areas of a particular landscape type.
Landscape Character Assessment	The process of identifying and describing variation in the character of the landscape, and using this information to assist in managing change in the landscape. It seeks to identify and explain the unique combination of elements and features that make a landscape distinctive. The process results in the production of a Landscape Character Assessment.

Landscape Character Types	These are distinct types of landscape that are relatively homogenous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation and historical land use and settlement patterns, and perceptual and aesthetic attributes.
Landscape Effects	Effects on the landscape as a resource in its own right.
Landscape Receptors	Defined aspects of the landscape resource that have the potential to be effected by a proposal.
Large Combustion Plant Directive (LCPD)	Directive 2001/80/EC of the European Parliament and of The Council of 23 October 2001 on the limitation of emissions of certain pollutants into the air from large combustion plants. The Directive provides limits for flue gas emissions from combustion power plants greater than 50 MW.
Laydown Area	Areas that will be used during construction for the temporary locating of construction offices, warehouses, workshops, open air storage areas and car parking. The main construction laydown areas are described in Work No. 9 in Schedule 1 of the draft DCO submitted with the DCO Application, whilst construction laydown areas for the construction of the AGI are described in Work Nos. 6C and D, and for the construction of the Gas Pipeline are described in Work No. 7B in Schedule 1 of the draft DCO.
Lead Local Flood Authority	The local authority responsible for taking the lead on local flood risk management as defined within the Flood and Water Management Act 2010.
Likely significant effect	An effect is the consequence of an impact or change to the environment. Effects do not have quantifiable values (e.g. opening up of new views as a result of loss of trees/hedgerows), but have significance (e.g. major, moderate or minor). Those effects predicted to have a significance of moderate to major are classified as likely significant effects.
Local Development Plan (LDP)	The set of documents and plans that sets out the local authority's policies and proposals for the development and use of land in their area. The Local Development Plan for Selby District Council is the Selby District Core Strategy Local Plan 2013 (CS) and the Selby District Local Plan 2005 (SDLP).
Local Employment Scheme	A scheme setting out the details and mechanisms for securing the use of local labour contractors goods and services during the construction period and operational period of the Proposed Scheme.
Local Planning Authority (LPA)	The local authority or council that is empowered by law to exercise statutory town planning functions for a particular area of the United Kingdom.
Locally Important Landscape Areas	A local landscape designation defined by Selby District Council.
Lowest Observed	The level above which adverse effects on health and quality of life can be detected as a result of noise or vibration.

Adverse Effect Level (LOAEL)	
Made Ground	Areas where material is known to have been placed by people on the pre-existing (natural or artificial) land surface (including engineered fill).
Magnitude	A combination of the scale, extent and duration of an impact.
Main river	Main rivers are usually larger streams and rivers, but also include smaller watercourses of strategic drainage importance. A main river is defined as a watercourse shown as such on the Flood Map for Planning (Rivers and Sea), and can include any structure or appliance for controlling or regulating the flow of water in, into or out of a main river. Main rivers are under the jurisdiction of the Environment Agency who have powers to carry out flood defence works to main rivers.
Major Accident	In the context of the Proposed Scheme, an event that threatens immediate or delayed serious damage to human health, welfare and/or the environment and requires the use of resources beyond those of the Applicant or its contractors to respond to the event. Serious damage includes the loss of life or permanent injury and/or permanent or long-lasting damage to an environmental receptor that cannot be restored through minor clean-up and restoration efforts. The significance of this effect will take into account the extent, severity and duration of harm and the sensitivity of the receptor.
Minimum Offtake Connection (MOC)	The Minimum Offtake Connection will be part of the AGI to be owned and operated by National Grid. The MOC will provide the gas connection to the National Grid Natural Transmission System. The MOC is described as Work No. 6A in Schedule 1 of the draft DCO submitted with the DCO Application.
Minimum Environmental Stable Load (MESL)	The load in which the gas generating stations can operate at and still be within environmental limits (air emissions, noise, etc.)
Mitigation Hierarchy	The mitigation hierarchy is to first try to avoid, then prevent and then reduce likely significant adverse effects on the environment and, if possible, offset likely significant adverse effects on the environment.
Mitigation Measures	Actions proposed to avoid, reduce and where possible offset likely significant adverse effects arising from the whole or specific elements of a development.
National Nature Reserve (NNR)	Established to protect sensitive features and to provide ‘outdoor laboratories’ for research.
National Planning Policy Framework (NPPF)	A document that sets out government's planning policies for England and how these are expected to be applied.
National Policy Statement (NPS)	Overarching policy designated under the Planning Act 2008 concerning the planning and consenting of NSIPs in the UK.
Nationally Significant	A project meeting the criteria for a “nationally significant infrastructure project” set out in section 14 of the Planning Act 2008, and therefore requiring authorisation under the PA 2008 by way of a DCO.

Infrastructure Project (NSIP)	The Proposed Scheme constitutes a Nationally Significant Infrastructure Project (NSIP) by virtue of s.14(1)(a) and s.15 of the PA 2008 as it is an onshore generating station in England of 50 MW capacity or more.
Natural Environment White Paper (NEWP)	This document outlines the government's vision for the natural environment over the next 50 years. It also describes the actions that will be taken to deliver that vision.
No Observed Effect Level (NOEL)	The level below which no effect from noise or vibration can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise.
Noise	A noise can be described as an unwanted sound. Noise can cause nuisance.
Noise Sensitive Receptors	Any identified receptor likely to be affected by noise. These are generally human receptors, and may include residential dwellings, work places, schools, hospitals, community facilities, places of worship, recreational spaces and ecological receptors.
Non-Designated Heritage Assets	Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions and which could be locally listed, but which are not formally designated heritage assets.
Open Cycle Gas Turbine (OCGT)	An open cycle gas turbine converts heat into mechanical energy. Combustion of a fuel within a gas turbine produces hot gases that expand over a complex series of blades that cause the turbine to rotate which in turn drives an electrical generator.
The Order	The DCO which, if made by the SoS, will authorise the construction and operation of the Proposed Scheme and which will be known as "The Drax Power (Generating Stations) Order".
Order limits	The limits shown on the works plans (document reference 2.3) within which the development authorised by the Order may be carried out.
Ordinary watercourse	An ordinary watercourse is every river, stream, ditch, drain, cut, dyke, sluice, sewer (other than a public sewer) and passage through which water flows that does not form part of a main river. The Lead Local Flood Authority, or Internal Drainage Board where relevant, has powers for ordinary watercourses that are similar to those held by the Environment Agency for main rivers.
Ordnance Survey (OS)	Great Britain's national mapping agency.
Parameters	A limit or boundary which defines the scope of a particular process or activity.
Phase 1 Habitat Survey	An ecological survey technique that provides a standardised system to record vegetation and wildlife habitats. It enables a basic assessment of habitat type and its potential importance for nature conservation.
Pipeline Area	The area required in connection with the construction, operation and maintenance of the Gas Pipeline, the AGI and the GRF, comprising the Pipeline Construction Area and the Pipeline Operational Area.
Pipeline Construction Area	The extent of land needed for the construction phase of the Gas Pipeline, the AGI, the GRF and the Rusholme Lane Area.

Pipeline Inspection Gauge (PIG) Trap Facility (PTF)	System to allow remote cleaning of long stretches of pipeline. Will have a launching (PTF-L) and a receiving (PTF-R) either side of the pipeline stretch.
Pipeline Operational Area	The area within which the Gas Pipeline, the AGI and the GRF will be situated once constructed.
Planning Inspectorate (PINS)	The government agency responsible for administering and examining applications for development consent for NSIPs under the Planning Act 2008 on behalf of the SoS.
Power Station Site	Areas within the Existing Drax Power Station Complex where: 1. The Site Reconfiguration Works are proposed to take place; 2. The temporary construction Laydown Area is to be located described in Work No. 9A in Schedule 1 of the draft DCO submitted with the DCO Application; 3. The Generating station equipment is proposed to be located; 4. The Electrical connection is proposed to be located; and 5. The decommissioning and demolition of sludge lagoons and construction of replacement sludge lagoons is proposed to take place, described as Work No. 12 in Schedule 1 of the draft DCO submitted with the DCO Application.
Preliminary Ecological Appraisal (PEA)	Preliminary ecological surveys have a range of purposes; one key use is to gather data on existing conditions, often with the intention of conducting a preliminary assessment of likely impacts of development schemes or establishing the baseline for future monitoring. As a precursor to a proposed project, some evaluation is usually made within these appraisals of the ecological features present, as well as scoping for notable species or habitats, identification of potential constraints to proposed development schemes and recommendations for mitigation.
Principal Aquifer	These are layers of rock or drift deposits that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. In most cases, Principal Aquifers are aquifers previously designated as major aquifer.
Proposed Scheme	Drax Power Limited is proposing to repower up to two existing coal-powered generating units (Units 5 and 6) at the Existing Drax Power Station Complex with new gas turbines that can operate in both combined cycle and open cycle modes. The term "repower" is used as existing infrastructure, such as the steam turbine and cooling towers, that are currently used for the coal fired units would be reutilised for the new gas fired generating units/stations. The repowered units (which each constitute a new gas fired generating station) would have a new combined capacity of up to 3,600 MW in combined cycle mode (1,800 MW each), replacing existing units with a

combined capacity to generate up to 1,320 MW (660 MW each). This is explained further below:

Each gas generating station would have up to two gas turbines, with each gas turbine powering a dedicated generator of up to 600 MW in capacity. The gas turbines in each generating station (or unit), therefore, would have a combined capacity of up to 1,200 MW. The gas turbines in each generating station (or unit), in combined cycle mode, would provide steam to the existing steam turbine (through Heat Recovery Steam Generators (HRSGs)) which would generate up to 600 MW per unit. Each unit would have up to two HRSGs. This results in a capacity for each generating station of up to 1,800 MW and, should both units be repowered, a combined capacity of up to 3,600 MW. The new gas turbine generating units have been designated the terms "Unit X" and "Unit Y". In OCGT mode, the combined capacity would be up to 2,400MW (as in OCGT mode, there would be no HRSG capacity).

Each unit would have (subject to technology and commercial considerations) a battery energy storage facility with a capacity of up to 100 MW per unit, resulting in a combined battery energy storage capacity of up to 200 MW. All battery units would be stored in a single building.

The total combined capacity of the two gas fired generating stations and two battery storage facilities (i.e. the total combined capacity of the Proposed Scheme) is therefore 3,800 MW.

Drax is seeking consent for the flexibility to either:

Repower one unit (either Unit 5 or 6) and construct Unit X as a gas fired generating station; or

Repower both Units 5 and 6 and construct Unit X and Unit Y as two gas fired generating stations.

In the single unit scenario, up to two gas turbines and up to two HRSGs and (subject to technology and commercial considerations) a battery energy storage facility of up to 100 MW storage capacity would be constructed. The size of the building housing the battery storage facility would not change, as the building could house one larger battery which would allow the 100 MW output to be sustained for a longer duration. However, the fuel gas station and gas insulated switchgear would be smaller.

In the event that two units are repowered and two new generating stations are constructed, then construction works would be undertaken consecutively rather than concurrently.

In order to repower to gas, a new Gas Pipeline would be constructed from the Existing Drax Power Station Complex to the National Transmission System (NTS) operated by National Grid. Pipeline infrastructure would be the same for both one and two unit scenarios.

A gas receiving facility (GRF) comprising Pipeline Inspection Gauge (PIG) Trap Facility (PTF), Pressure Reduction and Metering Station (PRMS) and compressor station is proposed south of woodland to the east of New Road.

At the connection to the NTS there will be an AGI comprising - a Pig Trap Launching station (PTF-L) which will be operated by Drax, and a Minimum Offtake Connection (MOC), which will be operated by National Grid.

	The Proposed Scheme includes the Site Reconfiguration Works and the Electrical connection. Drax's Proposed Scheme is described in more detail in Chapter 3 (Site and Project Description) of the ES Volume 1 (document reference 6.1). Schedule 1 of the draft DCO submitted with the DCO Application lists out the elements comprised within the Proposed Scheme.
Proposed Scheme Elements	For the purposes of the Climate Risk and Vulnerability Assessment, the Proposed Scheme elements consist of repowering infrastructure (comprising: gas turbines, HRSGs, above ground gas installation, gas pipeline and sludge lagoons) and supporting infrastructure (comprising: batteries, switchgear banking buildings, electrical connection to local substation).
Ramsar Site	Wetlands of international importance, designated under the Convention on Wetlands of International Importance Especially as Waterfowl Habitat adopted 1971 (known as the Ramsar Convention).
Rating Level	As part of the BS4142 assessment method the Rating Level is the sum of the Specific Sound and any acoustic feature corrections, which may be applied for tonal, impulsive or intermittent characteristics. Acoustic feature corrections are added linearly to the Specific Sound and can range from 2 dB to 5 dB, depending on the characteristic.
Reasonable worst case environmental effect	A challenging manifestation of the consequence(s) of a Risk Event occurring, after highly implausible or less significant consequences are excluded.
Receptor	A component of the natural, created or built environment such as a human being, water, air, a building, or a plant that has the potential to be affected by the Proposed Scheme.
Repower	Decommissioning of existing coal-fired units and replacement with newly constructed gas-fired units utilising some of the existing infrastructure.
Residual Effects	Those effects of a development that cannot be mitigated following implementation of mitigation proposals.
Residual Sound	Another component of the ambient sound, associated with any sources other than the specific source(s) under consideration.
Risk	The likelihood of an impact occurring combined with effect or consequence(s) of the impact on a receptor if it does occur.
Risk Event	An identified, unplanned event, which is considered relevant to the Proposed Scheme and has the potential to be a Major Accident or Disaster subject to assessment of its potential to result in a significant adverse effect on an environmental receptor.
Rusholme Lane Area	Area required for passing places during the construction of the Gas Pipeline, AGI and GRF (described as Work No. 14 in Schedule 1 to the draft DCO submitted with the DCO Application).
Scoping	An exercise undertaken pursuant to regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to determine the topics to be addressed within the Environmental Statement.

Scoping Opinion	A written statement by the Secretary of State as to the information to be provided in the Environmental Statement; for the Proposed Scheme. This was provided by the Planning Inspectorate on 23 October 2017.
Secondary Aquifer	These include a wide range of rock layers or drift deposits with an equally wide range of water permeability and storage. Secondary Aquifers are subdivided into two types: Secondary A - permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers; Secondary B - predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. These are generally the water-bearing parts of the former non-aquifers. The term “Secondary Undifferentiated” is also used in cases where it has not been possible to attribute either category A or B to a rock type. In most cases, this means that the layer in question has previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type.
Selby District Core Strategy Local Plan 2013 (CS)	The first part of the replacement for the Selby District Local Plan 2005. This sets out the high level strategic policies for the District for the period 2012 - 2028. The policies in the Core Strategy replace much of the SDLP policies.
Selby District Local Plan 2005 (SDLP)	A suite of local plan policies that was implemented in 2005. Some policies have been saved for joint consideration with the Selby District Core Strategy Local Plan 2013. Others have been deleted and replaced with new policies in the Core Strategy.
Selective Catalytic Reduction (SCR)	A NOx abatement technology.
Sensitivity	A term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.
Sequential	Where two or more features are not present in views from the same point on a route and cannot therefore ever be seen at the same time even if the arc of view experienced by the observer changes. The observer must move to another point along the same route to see the second or more of them and then they appear in a sequence. Sequential views often occur when moving along a linear route as the observer moves from one point to another and may occur in both directions.
Significance	A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic.
Significant Observed	The level above which significant adverse effects on health and quality of life occur as a result of noise or vibration.

Adverse Effect Level (SOAEL)	
Site	The Site refers to the Power Station Site, the Carbon capture readiness reserve space (which is also the location of temporary construction laydown described as Work No. 9B in Schedule 1 to the draft DCO submitted with the DCO Application) and the Pipeline Area.
Site Boundary	The Site Boundary refers to the outer perimeter of the Site.
Site of Importance for Nature Conservation (SINC)	Sites of Importance for Nature Conservation are usually selected within a local authority area and support both locally and nationally threatened wildlife. Many sites will contain habitats and species that are priorities under the county or UK Biodiversity Action Plans (BAP).
Site of Special Scientific Interest (SSSI)	A site statutorily notified under the Wildlife and Countryside Act 1981 (as amended) as being of special nature conservation or geological interest. SSSIs include wildlife habitats, geological features and landforms.
Site Reconfiguration Works / Stage 0	The Site Reconfiguration Works or Stage 0 refers to the works described below that are necessary to prepare the Power Station Site for the construction of the generating station equipment and the electrical connection. The works comprise: 1. Demolition of the private squash court (no replacement), Learning Centre (consolidated into existing facilities); and 2. Demolition of and reconstruction of car parking, turbine outage stores, contractor's compounds and welfare facilities. 3. Construction of a cooling water spray screen between relocated facilities and the southern cooling towers. The Site Reconfiguration Works are the subject of a separate planning application under the TCPA (applied for in February 2018 and given reference no. PP-06688208v1) and are also included as part of the Proposed Scheme in the DCO Application, and may be carried out under either: 1. Any TCPA planning permission that may be granted; or 2. The Order. The Site Reconfiguration Works are described in Work No. 15 in Schedule 1 of the draft DCO submitted with the DCO Application.
Source Protection Zone (SPZ)	Designated zones around public water supply abstractions and other sensitive receptors that sign there are particular risks to the groundwater source they protect.
Special Area of Conservation (SAC)	Areas of protected habitats and species as defined in the Habitats Directive (92/43/EEC).
Special Protection Area (SPA)	Sites classified in accordance with Article 4 of the Birds Directive (79/409/EEC). They are classified for rare and vulnerable birds (as listed on Annex 1 of the Directive), and for regularly occurring migratory species.

Species	A group of interbreeding organisms that seldom or never interbreed with individuals in other such groups, under natural conditions; most species are made up of subspecies or populations.
Specific Sound	A component of the ambient sound, associated with a specific source/s under consideration.
Stage 1	This stage assumes that the Site Reconfiguration Works have been completed (either under a TCPA planning permission or under the DCO for the Proposed Scheme). This stage refers to the construction of Unit X, along with the construction of the Gas Pipeline, the GRF, the AGI, the battery storage facility for Unit X, and the building to house the battery storage (for both Units X and Y). During this stage one coal unit (either 5 or 6) continues to operate while Unit X is being constructed.
Stage 2	This stage refers to the operation and maintenance of Unit X, the Gas Pipeline, the GRF, the AGI and the battery storage facility and the construction of Unit Y (including the installation of 100MW storage capability into the battery storage building constructed under Stage 1). The construction of Unit Y is assumed to take place 12 months after Unit X is complete, however this could be longer. If Unit Y is not built then this Stage 2 is a worst case assessment of the operation of Unit X. The construction laydown areas associated with the construction of the Gas Pipeline, GRF and AGIs will be reinstated during this stage.
Stage 3	This stage refers to the operation and maintenance of Unit X, Unit Y, the Gas Pipeline, the AGI, the GRF and the battery storage facility. The remaining construction laydown/parking areas (associated with the construction of Units X and Y) will be reinstated after Unit Y is built.
Standard of Protection (SoP)	The SoP that a flood defence offers is expressed in terms of the likelihood of a particular flood event (or level) being equalled or exceeded in any given year. Therefore, if a flood defence offers a SoP of 1 in 50, it will take a 1 in 50 (or greater) flood event to overtop it.
Statement of Common Ground (SoCG)	A Statement of Common Ground is a means of capturing the areas of agreement and material differences between the Applicant and third parties.
Statement of Community Consultation (SoCC)	The Planning Act 2008 requires the Applicant to undertake public consultation in advance of submitting the DCO Application to the Secretary of State. A Statement of Community Consultation must be prepared, setting out how the Applicant proposes to consult people living in the vicinity of the Proposed Scheme.
Substitution	Where a firm substitutes one activity for a similar activity (e.g. to take advantage of public sector assistance).

Susceptibility	The ability of a defined landscape or visual receptor to accommodate the Proposed Scheme without undue negative consequences.
Townscape	The character and composition of the built environment including the buildings and the relationships between them, the different types of open urban space, including green spaces, and the relationship between buildings and open spaces.
Trial trenching	Archaeological intrusive evaluative technique.
Uniform Network Code (UNC)	The UNC is the hub around which the competitive gas industry revolves, comprising a legal and contractual framework to supply and transport gas. It has a common set of rules that ensure that competition can be facilitated on level terms. It governs processes, such as the balancing of the gas system, network planning, and the allocation of network capacity.
Unit X	The construction of a gas fired generating station capable of operating in CCGT and OCGT modes and which would have a generating capacity of up to 1,800 MW. Unit X would be connected to a battery storage facility, with a capability of up to 100MW. The total output from Unit X would be 1,900MW. Unit X is described in Work No. 1 of Schedule 1 to the draft DCO submitted with the DCO Application.
Unit Y	The construction of a gas fired generating station capable of operating in CCGT and OCGT modes and which would have a generating capacity of up to 1,800 MW. Unit Y would be connected to a battery storage facility, with a capability of up to 100MW. The total output from Unit Y would be 1,900MW. Unit Y is described in Work No. 2 of Schedule 1 to the draft DCO submitted with the DCO Application.
Visual amenity	The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through the area.
Visual Effects	Effects on specific views and on the general visual amenity experienced by people.
Visual Receptors	Individuals and/or defined groups of people who have the potential to be affected by a proposal.
Visualisation	A computer simulation, photomontage or other technique illustrating the predicted appearance of a development.
Vulnerability	In the context of the 2014 EU Directive, the term refers to the 'exposure and resilience' of the Proposed Scheme to the risk of a major accident and/or disaster. Vulnerability is influenced by sensitivity, adaptive capacity and magnitude of impact.
Waste Hierarchy	Sets out the priorities that must be applied when managing waste.
Water Framework Directive	European Union directive which commits member states to achieve good qualitative status of all water bodies.
Waterbody	A discrete body of water forming a physical feature.

White Rose Carbon Capture Project	A proposed project to construct and operate a new 448 MW power station (super critical coal-fired with oxygen combustion technology) adjacent to the Existing Drax Power Station Complex.
Wildlife and Countryside Act 1981 (as amended)	The principal piece of UK legislation relating to the protection of wildlife.
Zone of Theoretical Visibility	A map, digitally produced, showing areas of land within which a development is theoretically visible.

Abbreviations

Abbreviation	Term in full
AAA	Association of Air Ambulances
AGI	Above Ground Installation
AIL	Abnormal Indivisible Load
ALARP	As Low as Reasonably Practicable
ALC	Agricultural Land Classification
AOD	Above Ordnance Datum
APFP	Applications: Prescribed Forms and Procedures
AQAL	Air Quality Assessment Level
AQMA	Air Quality Management Area
ATV	Agreement to Vary
BAT	Best Available Techniques
BCA	Bilateral Connection Agreement
BECCS	Bioenergy Carbon Capture Storage
BEIS	Department of Business, Energy and Industrial Strategy
BESF	Battery Energy Storage Facility
BMV	Best and Most Versatile (agricultural land)
BRE	Building Research Establishment
BREF	Best Available Technique Reference documents or BREF notes
CA	Conservation Area
CAA	Civil Aviation Authority
CCGT	Combined Cycle Gas Turbine
CCR	Carbon Capture Readiness
CCS	Carbon Capture and Storage
CD&E	Construction, Demolition & Excavation
CDM	Construction, Design Management
CEMP	Construction Environmental Management Plan
CHP	Combined Heat and Power
CHP-R	Combined Heat and Power-Ready
COMAH	Control of Major Accidents and Hazards
COSHH	Control of Substances Hazardous to Health
CROW	Countryside and Rights of Way Act 2000
CRVA	Climate Risk and Vulnerability Assessment
CPP	Construction Phase Plan
CS	Selby District Core Strategy
CTMP	Construction Traffic Management Plan
CWTP	Construction Worker Travel Plan
DaBA	Design and Build Agreement
dB	Decibel
dB(A)	A-weighted Decibel
DBA	Desk-based Assessment
DBA	Design and Build Agreement
DCLG	Department for Communities and Local Government
DCO	Development Consent Order

DECC	Department for Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DIO	Defence Infrastructure Organisation
EA	Environment Agency
EC	European Commission
EcIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
ELC	European Landscape Convention
EMP	Environmental Management Plan
EMR	Electricity Market Reform
EN-1	Overarching NPS for Energy
EN-2	NPS for Fossil Fuel Electricity Generating Infrastructure
EN-4	NPS for Gas Supply Infrastructure and Gas Oil Pipelines
EN-5	NPS for Electricity Networks Infrastructure
EP	Environmental Permit
EPI	Environmental Performance Indicator
EPR	Environmental Permitting (England and Wales) Regulations 2016
EPS	European Protected Species
EPUK	Environmental Protection UK
ERoY	East Riding of Yorkshire Council
ES	Environmental Statement
ESV	Emergency Shutdown Valve
ETI	Energy Technologies Institute
EU	European Union
EU ETS	EU Emissions Trading Scheme
ExA	Examining Authority
FCO	Full Connection Offer
FEP	Flood Evacuation Plan
FRA	Flood Risk Assessment
FTE	Full-time equivalent
GCN	Great Crested Newt
GHG	Greenhouse Gas
GIS	Gas Insulated Switchgear
GJ	Giga Joule
GLVIA 3	Guidelines for Landscape and Visual Impact Assessment, Third Edition
GRF	Gas Receiving Facility
GSUT	Generator Step-Up Transformers
GW	Gigawatts (1000 MW)
GWh	Gigawatt hour (Measurement Unit for Energy)
H&S	Health and Safety
Ha	Hectare
HA	Heritage Asset
HAZID	Hazard Identification Study
HE	Highways England
HE	Historic England
HER	Historic Environment Record
HGV	Heavy Goods Vehicle

HP	High Pressure
HPI	Habitats of Principal Importance
HRA	Habitats Regulations Assessment
HRSGs	Heat Recovery Steam Generators
HSC	Hazardous Substances Consent
HSE	Health and Safety Executive
IAQM	Institute of Air Quality Management
IDB	Internal Drainage Board
IED	Industrial Emissions Directive
IEF	Important Ecological Features
IEMA	Institute of Environmental Management
ILAs	Important Landscape Areas
IPC	Infrastructure Planning Commission
IPCC	Intergovernmental Panel on Climate Change
JNCC	Joint Nature Conservation Committee
kV	Kilovolt
LAQM	Local Air Quality Management
LBAP	Local Biodiversity Action Plan
LCA	Landscape Character Areas
LCPD	Large Combustion Plant Directive
LCT	Landscape Character Type
LDF	Local Development Framework
LGV	Light Goods Vehicle
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
LOAEL	Lowest Observed Adverse Effect Level
LP	Low Pressure
LPA	Local Planning Authority
LTS	Local Transmission System
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
m	Metres
MA&D	Major Accidents and Disasters
MAFF	The Ministry of Food and Fisheries
MAGIC	Multi Agency Geographic Information for the Countryside
MAPP	Major Accident Prevention Plan
MEA	Monoethanolamine (amine solvent)
MESL	Minimum Environmental Stable Load
MOC	Minimum Offtake Connection
MOD	Ministry of Defence
MS	Method Statement
Mt	Mega tonne
MW	Megawatts
MWh	Megawatt hour (Measurement Unit for Energy)
NATS	National Air Traffic Services
NE	Natural England
NERC	Natural Environment And Rural Communities

NERP	National Emissions Reduction Plan
NEWP	Natural Environment White Paper (2012)
NG	National Grid
NGET	National Grid Electricity Transmission
NGG	National Grid Gas Plc
NGR	National Grid Reference
NH3	Ammonia
NNR	National Nature Reserve
NO_2	Nitrogen dioxide
NOEL	No Observed Effect Level
NO_X	Nitrogen oxides
NPAS	National Police Air Service
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NPSE	Noise Policy Statement for England
NSIP	Nationally Significant Infrastructure Project
NSR	Noise Sensitive Receptor
NTEM	National Trip End Model
NTM	National Traffic Forecasts
NTS	National Transmission System
NYCC	North Yorkshire County Council
NYES	North Yorkshire Ecology Service
OCGT	Open Cycle Gas Turbine
OD	Outside Diameter
OHL	Overhead Line
ONS	Office of National Statistics
OS	Ordinance Survey
PA	Principal Archaeologist
PA 2008	Planning Act 2008 (as amended)
PARCA	Planning and Advanced Reservation of Capacity Agreement
PCU	Passenger Car Units
PEA	Preliminary Ecological Appraisal
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
PES	Primary Energy Saving
PGLRA	Preliminary Ground Level Roost Assessment for trees
PIG	Pipeline Inspection Gauge
PINS	Planning Inspectorate
PLU	Primary Landscape Unit
PM10	Particulate matter with an aerodynamic diameter of less than 10 micrometres
PM2.5	Particulate matter with an aerodynamic diameter of less than 2.5 micrometres
PPE	Personal Protective Equipment
PPG	Planning Practice Guidance
PPS	Planning Policy Statement
PRA	Preliminary Risk Assessment

PRF	Potential Roost Feature
PRMS	Pressure Reduction and Metering Station
PRoW	Public Rights of Way
PTF	PIG Trap Facility
PTF-L	PIG Trap Launching station
RFC	Ratio of Flow to Capacity
RIGS	Regionally Important Geological Site
ROV	Remotely Operated Valve
RSPB	The Royal Society for the Protection of Birds
rWFD	revised Waste Framework Directive
SAC	Special Area of Conservation
SCR	Selective Catalytic Reduction
SDC	Selby District Council
SDLP	Selby District Local Plan
SINC	Site of Importance for Nature Conservation
SM	Scheduled Monument
SNCR	Selective Non-Catalytic Reduction
SOAEL	Significant Observed Adverse Effect Level
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SPL	Sound Pressure Level
SPZ	Source Protection Zone
SRES	Special Report on Emissions Scenarios
SRN	Strategic Road Network
SSG	Sherwood Sandstone Group
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
SWL	Sound Power Level
SWMP	Site Waste Management Plan
TCPA 1990	Town and Country Planning Act 1990 (as amended)
TEMPRO	Trip End Presentation Programme
t/h or t/hr	Tonnes per hour
UK	United Kingdom
VCA	Vehicle Certification Agency
WFD	Waste Framework Directive
WFD	Water Framework Directive
ZOI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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EXECUTIVE SUMMARY

1. This Planning Statement has been prepared to accompany an application (the Application) by Drax Power Limited (Drax or the Applicant) for a development consent order (DCO) in relation to the Drax Repower Project (the Proposed Scheme) in North Yorkshire. The Application has been made under section 37 of the Planning Act 2008 (as amended) (the PA 2008) (Ref. 1.1) and submitted to the Secretary of State (the SoS) for Business, Energy and Industrial Strategy (BEIS). The Order, if made by the SoS, would be known as The Drax Power (Generating Stations) Order.

2. The Applicant is proposing to repower up to two existing coal-fired units (known as Unit 5 and Unit 6) with gas – this means the existing coal-fired units would be decommissioned and replaced with newly constructed gas-fired units utilising some of the existing infrastructure. Each unit, which is a new gas fired generating station in its own right and are termed Unit X and Unit Y, would comprise combined cycle gas turbine (CCGT) and open cycle gas turbine (OCGT) technology. Each new gas generating unit would use existing infrastructure, including the cooling system and steam turbines, and would each have a new capacity of up to 1,800 MW, replacing existing units each with a capacity of up to 660 MW. Each unit would also have a battery storage capability of up to 100 MW (subject to technology and commercial considerations). Should both units be repowered, the new gas-fired units / generating stations would have a combined capacity of up to 3,600 MW and a combined battery storage capacity of up to 200 MW (totalling a capacity of up to 3,800 MW).

3. In England, under sections 14(1)(a) and 15 of the PA 2008, an onshore electricity generating station is considered to be a Nationally Significant Infrastructure Project (NSIP) if the electrical power generating capacity is more than 50 MW. As the electrical power generating capacity of the Proposed Scheme would exceed this threshold, it will be a NSIP.

4. Under section 31 of the PA 2008, a DCO is required to authorise the construction and operation of a NSIP.

5. The National Policy Statements (NPSs) (Ref. 1.2 – 1.5) produced by Government for energy infrastructure form the primary planning policy framework for NSIPs in the energy sector. Under section 104(3) of the PA 2008, the SoS must decide applications for NSIPs in accordance with the relevant NPS, except to the extent that certain circumstances apply (such as where deciding the application in accordance with the NPS would lead to the SoS being in breach of his duty under any enactment). The energy NPSs highlight that there is an urgent need for new electricity generating capacity in the UK, including gas-fired generation, to ensure the security of the UK's electricity supplies.

6. The energy NPSs emphasise that the identified need for new energy infrastructure is not open to debate or interpretation and that the SoS should give substantial weight to the contribution that all development proposals will make toward satisfying this need.

7. The energy NPSs contain policies that need to be taken into account by applicants in preparing applications and also the SoS in decision-making. An assessment of the Proposed Scheme against these policies is therefore provided in this Planning Statement (specifically in section 5 and Table 2-1 at Appendix 2 of this Planning Statement).

8. An assessment of the Proposed Scheme's compliance with other matters that may be considered important and relevant by the SoS for the purposes of decision-making (section

104(2)(d) of the PA 2008), including the National Planning Policy Framework (NPPF) 2012 (Ref. 1.6), the revised draft NPPF (2018) (Ref. 1.7), and local planning policy, is also provided at section 6, with the detailed assessment set out in Table 2-1 at Appendix 2.

9. The policy assessment at sections 5 and 6 shows that the Applicant has fully taken into account the relevant policy considerations and guidance contained within the NPSs, the NPPF, the revised draft NPPF and local planning policy.

10. Section 7 of the Planning Statement weighs up the key benefits and disbenefits of the Proposed Scheme and provides the planning balance. The key benefits of the Proposed Scheme are numerous and relate to the following:

- The NPSs, in particular the Overarching NPS for Energy EN-1, confirm the urgent need that exists in the UK for all types of nationally significant energy infrastructure, including new fossil-fuel generating stations. The Proposed Scheme would contribute to meeting this need. If both Units X and Y are constructed, the repowered units would have a new combined capacity of up to 3,600 MW in combined cycle mode, replacing two existing coal-fired units with a combined capacity to generate up to 1,320 MW (660 MW each). Each unit would, subject to technology and commercial considerations, have a battery energy storage facility with a capacity of up to 100 MW per unit. Therefore, the total combined capacity for the two gas fired units plus two battery storage facilities would be 3,800 MW, which would represent a net increase in capacity of up to 2,480 MW when both units are operating in combined cycle mode. If only Unit X was constructed, either coal-fired Unit 5 or Unit 6 would continue to operate, thus resulting in a net increase in capacity of up to 1,240 MW when Unit X is operating in combined cycle mode. Under either scenario, the Proposed Scheme would contribute significantly to meeting the UK's energy demand.
- The NPSs emphasise the need for an energy mix in the UK to maintain flexibility in supply. Electricity generation from natural gas, as proposed by the Applicant, is able to respond quickly to changes in demand on the electricity network or fluctuations in supply from renewable sources.
- Gas is more efficient and results in lower carbon dioxide emissions than other fossil fuels such as coal and oil and, as such, the Proposed Scheme would result in much lower carbon dioxide emissions per unit of electricity than the existing coal-fired units. This would support the Government's commitment to decarbonisation of the energy sector. Drax Power Station has been providing electricity in the UK since 1975, comprising originally of six coal-fired units. Since then, three units have been converted to biomass, with a further unit to be converted later in 2018. The Applicant has been a pioneer in moving the UK towards a decarbonised future, and the repowering of up to two units with natural gas would be a further step in that direction.
- The Proposed Scheme is Carbon Capture Ready (CCR), should the deployment of carbon capture technology become feasible in the future.
- The Proposed Scheme is also designed to be able to accommodate Combined Heat and Power (CHP), should there be demand for CHP in the area in the future.
- The Proposed Scheme would make use of land and existing infrastructure already developed for electricity generation, thus representing efficient land use with fewer environmental impacts during construction and operation than a new power station on previously undeveloped land, or on land that does not have an existing electricity generating use, might have. The re-utilisation of as much existing infrastructure as possible (such as the existing cooling systems, cooling towers and steam turbines at

Drax Power Station) avoids such infrastructure potentially becoming redundant despite remaining within its operating life and being capable of contributing to more efficient energy production and a lower carbon footprint (given it is already constructed).

- Whilst a limited reduction in jobs is anticipated during the operational phase, the Proposed Scheme would support the local economy by providing significant employment opportunities during the construction works, which would generate approximately direct 1,200 full-time equivalent (FTE) / jobs per year as well as approximately 600 FTE indirect and induced jobs. With regard to the reduction in jobs during the operational phase, these staff reductions are anticipated to be as a result of natural reductions (e.g. due to retirement) and where possible, there would be redeployment.
- The Proposed Scheme would result in a net gain for biodiversity for area based habitats and a net loss for biodiversity for linear habitats following implementation of a Landscape and Biodiversity Strategy, delivered pursuant to requirements in Schedule 2 to the draft DCO submitted with the Application (document reference 3.1). Following construction, measures in the Landscape and Biodiversity Strategy would aim to deliver net gain for biodiversity of linear habitats by restoring these within the footprint of the Proposed Scheme where possible.

11. As with most developments, the Proposed Scheme would result in some dis-benefits, for example associated with landscape and visual effects. However, the energy NPSs acknowledge that new energy NSIPs, specifically new generating stations, will always have a visual impact; therefore, there is no expectation that proposals for new energy NSIPs do not result in any adverse effects. The Planning Statement, in section 7, weighs up the above benefits against any dis-benefits and provides the "planning balance". The Proposed Scheme would deliver clear and substantial benefits which, on balance, are considered to outweigh any dis-benefits.

12. In conclusion, the Applicant considers that the Proposed Scheme is acceptable in planning terms and that a DCO should be made by the SoS for the Proposed Scheme.

1 INTRODUCTION

1.1 General Overview

1.1.1. This Planning Statement has been prepared by WSP UK Limited on behalf of Drax Power Limited (Drax or the Applicant) to support the application for a Development Consent Order (DCO) that has been submitted to the Secretary of State (the SoS) for Business, Energy and Industrial Strategy (BEIS) under section 37 of the Planning Act 2008 (as amended) (the PA 2008) (Ref. 1.1).

1.1.2. The Planning Statement has been submitted under regulation 5(2)(q) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) 2009 (as amended) (the APFP Regulations) (Ref. 1.8) and in accordance with the Planning Inspectorate (PINS) Advice note six: Preparation and submission of application documents (2016, version 7) (Ref. 1.9). The Planning Statement also incorporates content and consideration that would have formed part of a separate Design and Access Statement prepared in accordance with guidance on the form of Design and Access Statements. This approach was agreed with PINS on 27 March 2018.

1.1.3. The purpose of the Planning Statement is to assist the Examining Authority (ExA) and the SoS in their assessment of the Proposed Scheme by setting out how the Proposed Scheme accords with relevant planning policy, notably the National Policy Statements (the NPSs) for energy infrastructure, as well as other relevant policy at national, regional and local level.

1.1.4. The Planning Statement demonstrates why the Application should be granted development consent, having given regard to the decision-making criteria of the PA 2008, which at sections 104(2)(a) and 104(2)(d) directs the SoS to have regard to any relevant NPS and any other matters the SoS thinks are both important and relevant, and at section 104(3) requires the SoS to decide the Application in accordance with the relevant NPSs, provided, except to the extent that one or more of subsections (4) to (8) of section 104 apply (such as the adverse impact of the proposed development would outweigh its benefits or approving the proposed development would lead to the UK being in breach of any of its international obligations).

1.1.5. In this case, the relevant NPSs are the Overarching NPS for Energy (EN-1) (Ref. 1.2), the NPS for Fossil Fuel Generating Infrastructure (EN-2) (Ref. 1.3), the NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) (Ref. 1.4) and the NPS for Electricity Network Infrastructure (EN-5) (Ref. 1.5), prepared in 2011 by the Department of Energy and Climate Change (DECC), now BEIS.

1.1.6. Other matters of potential importance and relevance are considered, including national and local planning policy, the findings of the consultation carried out by the Applicant, and the findings of the Environmental Impact Assessment (EIA, as reported in the Environmental Statement (ES) (document reference 6.1, 6.2 and 6.3)).

1.1.7. The PA 2008 confirms that where NPSs are in place, they shall be the primary basis for the decisions made by the SoS. In the event of any conflict between a NPS and other documents or policy, the NPS takes precedence (paragraph 4.1.5 of EN-1).

1.1.8. This Planning Statement is structured as follows:

- The preceding section comprises the executive summary of this document.
- Section 1 provides the purpose and structure of this Planning Statement, an overview of the Application and the submitted draft DCO (document reference 3.1), and the ES submitted with the Application.
- Section 2 describes the Site and surrounding environment, and any relevant designations, summarises the relevant history and planning history of the Site and provides a description of the Proposed Scheme.
- Section 3 sets out the need for the Proposed Scheme.
- Section 4 explains the national significance of the Proposed Scheme and, therefore, the applicability of the PA 2008. It outlines the planning context for this Application, as established by the framework set out in section 104 of the PA 2008, including a description of the role of the relevant NPSs and other matters under section 104(2)(d).
- Section 5 contains the assessment of the Proposed Scheme against the primary policy framework provided by the NPSs. This section should be read in conjunction with the detailed planning policy assessment in Table 2-1 at Appendix 2.
- Section 6 contains the assessment of the Proposed Scheme against the relevant secondary policy framework, including the National Planning Policy Framework (NPPF) (Ref. 1.6), the revised draft NPPF (Ref. 1.7), the local development plan and emerging national and local policy, and other relevant policy and strategy documents. This section should be read in conjunction with the detailed policy appraisal in Table 2-1 at Appendix 2.
- Section 7 weighs up the likely benefits and dis-benefits of the Proposed Scheme relevant to decision-making, in recognition of the requirements in section 104 of the PA 2008, and provides the overall “planning balance” for the Proposed Scheme.
- Section 8 contains the overall conclusions of the Planning Statement.
- Appendix 1 lists the relevant planning applications previously made in relation to the Site and its surrounds.
- Appendix 2 contains the detailed planning policy assessment.

1.2 Overview of the Application

1.2.1. The Applicant is Drax Power Limited. Drax Power Station is owned and managed by the Applicant, who is part of the Drax Group Plc, one of the UK’s largest energy producers.

1.1.1. The Applicant is proposing to repower up to two existing coal-fired units (known as Unit 5 and Unit 6) with gas – this means the existing coal-fired units would be decommissioned and replaced with newly constructed gas-fired units utilising some of the existing infrastructure. The term "repower" is used as existing infrastructure, such as the steam turbine and cooling towers, that are currently used for the coal fired units would be reutilised for the new gas fired generating units/stations.

1.2.2. Each repowered unit, which is a new gas fired generating station in its own right and are termed Unit X and Unit Y, would comprise combined cycle gas turbine (CCGT) and open cycle gas turbine (OCGT) technology. As stated above, each new gas generating unit would use existing infrastructure, including the cooling system and steam turbines, and would each have a new capacity of up to 1,800 MW, replacing existing units each with a capacity of up to 660 MW. Each unit would also have a battery storage capability of up to 100 MW (subject to technology and commercial considerations). Should both units be repowered, the new

gas-fired units / generating stations would have a combined capacity of up to 3,600 MW and a combined battery storage capacity of up to 200 MW (totalling a capacity of up to 3,800 MW).

1.2.3. The Applicant is seeking consent for the flexibility to either repower one unit (i.e. construct a single generating station known as Unit X) (with up to 1,800 MW generating capacity and an up to 100 MW battery storage capacity) or to repower two units (two generating stations (Unit X and Unit Y) each with an up to 1,800 MW generating capacity and each with its own up to 100 MW battery storage capacity). The decision as to whether the Applicant repowers two units and constructs two gas fired generating stations as opposed to a single unit is a commercial decision that can only be taken post any consent being granted.

1.2.4. A connection to the electrical network via the existing National Grid (NG) substation on the Power Station Site would be provided. Further details of the Electrical connection are set out in the Grid Connection Statement (document reference 5.4) accompanying the Application.

1.2.5. In order to repower to gas, a new Gas Pipeline needs to be constructed from Drax Power Station to the National Transmission System (NTS). Details of the gas connection are set out in the Gas Connection Statement (document reference 5.5) submitted with the Application.

1.2.6. Each new gas generating unit and each battery storage facility is classed as a Nationally Significant Infrastructure Project (NSIP) under the PA 2008. A more detailed description of the Proposed Scheme is contained in section 2 of this Planning Statement, and a full description is contained in Chapter 3 (Site and Project Description) of the ES (document reference 6.1.3).

1.2.7. This Planning Statement accompanies the Application for the DCO and draws upon other Application documents, including the ES, to demonstrate the planning merits of the Proposed Scheme. The details of the suite of documents accompanying the Application are set out in the Application Guide (document reference 1.2).

The Draft DCO

1.2.8. In England, under sections 14(1)(a) and 15 of the PA 2008, an onshore electricity generating station is considered to be a NSIP if the electrical power generating capacity is more than 50 MW. As the electrical power generating capacity of the Proposed Scheme would exceed this threshold (each of Unit X and Unit Y without a battery facility would have an output of up to 1,800 MW and with a battery facility up to 1,900 MW. Combined, the Proposed Scheme would have an output of up to 3,800 MW).

1.2.9. As the Proposed Scheme constitutes a NSIP under sections 14 and 15 of the PA 2008 (refer to section 4 of this Planning Statement for further detail), the Applicant must make an application under the PA 2008 for a consent known as a DCO to construct, operate, maintain and eventually decommission the Proposed Scheme. This Application has been submitted to the SoS, and, if accepted, will be examined by the Examining Authority (ExA) (appointed by the SoS from PINS), who will then make a recommendation to the SoS. The SoS will then make a decision on whether or not to make a DCO.

1.2.10. The DCO, if made by the SoS, would be known as The Drax Power (Generating Stations) Order (the Order).

1.2.11. In accordance with Regulation 5(2)(b) of the APFP Regulations, a draft DCO has been submitted to the SoS as part of this Application. The draft DCO seeks powers of compulsory acquisition of interests and rights in land (including new rights and the imposition of restrictive covenants) within the Order limits as shown on the Land Plans (document reference 2.2). The provisions relating to compulsory acquisition are set out in Part 5 of the draft DCO. These and other provisions of the draft DCO are explained in the Explanatory Memorandum (document reference 3.2). Information on the interests and rights that exist in relation to the land within the Order limits is contained in the Book of Reference (document reference 4.3), and the justification for the proposed compulsory acquisition of interests and rights in land is set out in the Statement of Reasons (document reference 4.1). To demonstrate the Applicant's ability to fund the compulsory acquisition, the Applicant has submitted a Funding Statement (document reference 4.2) in accordance with regulation (5)(2)(h) of the APFP Regulations.

1.2.12. Schedule 1 of the draft DCO sets out the individual works proposed as part of the Proposed Scheme (termed in the draft DCO as the "authorised development"). A detailed description of these works is contained in Chapter 3 (Site and Project Description) of the ES.

1.2.13. Schedule 2 (Requirements) of the draft DCO contains a number of requirements that would control the detailed design of the Proposed Scheme, in addition to its construction, operation (which includes maintenance) and decommissioning, to ensure that it would remain within the scope of the EIA carried out and would not result in unacceptable impacts. These would require the submission to and approval by the local planning authority, Selby District Council (SDC) and, in respect of country matters, to North Yorkshire County Council (NYCC), of further details of the Proposed Scheme. Several of these requirements would need to be discharged prior to the commencement of the Proposed Scheme (or part thereof), while others are to be discharged prior to the date of full commissioning.

Environmental Impact Assessment

1.2.14. The Proposed Scheme is considered to be schedule 1 development under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017) (Ref. 1.10). It falls under the category of *"thermal power stations and other combustion installations with a heat output of 300 megawatts or more"*. The Proposed Scheme, therefore, requires an EIA, and there is no requirement to obtain a screening opinion on this matter from the SoS.

1.2.15. The Application therefore includes an ES) (document reference 6.1 for Volume 1 Main Text and Figures; document reference 6.2 for Volume 2 Appendices; and document reference 6.3 for Volume 3 Non-Technical Summary) that reports the findings of the EIA undertaken.

1.2.16. The EIA Regulations 2017 set out a procedure for assessing, consulting on, and coming to a decision on projects that are likely to have significant environmental effects. The EIA considers the likely significant environmental effects resulting from the construction, operation (including maintenance) and decommissioning phases of the Proposed Scheme.

1.2.17. The ES is produced so that the SoS can take account of the environmental effects of the Proposed Scheme when deciding whether or not to grant the DCO.

1.2.18. The ES identifies and sets out any likely significant environmental effects, as well as any measures needed to mitigate likely significant adverse environmental effects, taking account of the Mitigation Hierarchy to first try to avoid, then prevent and then reduce likely significant adverse effects on the environment and, if possible, offset likely significant adverse effects on the environment.

1.2.19. The ES also identifies residual effects; i.e. those effects that the Proposed Scheme is likely to have after mitigation measures are implemented.

1.2.20. The ES, in Chapter 17 (Cumulative Assessment) (document reference 6.1.17), takes account of the potential cumulative effects of the Proposed Scheme in combination with other relevant, known, proposed or consented schemes, as well as the combined effects resulting from the interrelationship of the various environmental effects caused by the Proposed Scheme.

1.2.21. The ES has been produced in accordance with regulation 14 of the EIA Regulations 2017, including all necessary information in order to satisfy regulation 14(2)(a)-(f) and schedule 4.

1.2.22. It has not been possible for the Applicant to fix all of the design details of the Proposed Scheme prior to submission of the Application. Therefore, the Applicant seeks to incorporate a degree of flexibility within the layout and design of the Proposed Scheme. In order to accommodate this flexibility and ensure a robust EIA of the Proposed Scheme, the Applicant has adopted a flexible approach and has assessed a number of maximum design parameters, as set out within the draft DCO and explained in Chapter 3 (Site and Project Description) of the ES. This is in accordance with the Rochdale Envelope.

1.2.23. The Application includes heads of terms for a development consent obligation agreement to secure the extension of Drax's current apprenticeship initiatives to the Proposed Scheme and a Local Employment Scheme (Proposed Heads of Terms for a Development Consent Obligation, document reference 7.1). The Applicant is in discussions over this agreement with SDC and NYCC.

2 THE SITE AND PROPOSED SCHEME

2.1 Site Description

Existing Drax Power Station Complex

2.1.1. Drax Power Station is a large power station, comprising originally of six coal-fired units. It was originally built, owned and operated by the Central Electricity Generating Board and had a capacity of just under 2,000 MW when Phase 1 was completed in 1975. Its current capacity is 4,000 MW after the construction of Phase 2 in 1986.

2.1.2. Three of the original six coal-fired units are now converted to biomass (Units 1-3) and this is assessed as the current baseline in the ES. By the latter half of 2018, four units (Units 1-4) will run on biomass with only two units (Units 5 and 6) running on coal. One or both of Units 5 and 6 will be repowered as part of the Proposed Scheme, this means the existing

coal-fired units would be decommissioned and replaced with newly constructed gas-fired units utilising some of the existing infrastructure. The area within the Existing Drax Power Station Complex where development is proposed is referred to as the Power Station Site and is approximately 53.4 ha.

Pipeline Area

2.1.3. The Gas Pipeline route is approximately 3 km in length and crosses agricultural land to the east of the Existing Drax Power Station Complex. The land within the Pipeline Construction Area is 25.4 ha and the land within the Pipeline Operational Area is 2.4 ha.

2.1.4. An additional area is located on Rusholme Lane (Rusholme Lane Area) to accommodate a potential passing place for traffic during construction of the Gas Pipeline. This is considered to be part of the Pipeline Area.

Site Boundary

2.1.5. The Site is approximately 78.9 ha and lies approximately 4 m Above Ordnance Datum (AOD).

2.1.6. The Site Boundary (depicted with a red line in Figure 1.1 in Chapter 1 (Introduction) of the ES (document reference 6.1.1)) represents the maximum extent of all potential permanent and temporary works required as part of the Proposed Scheme.

2.1.7. The Power Station Site, the Carbon capture readiness reserve space and the Pipeline Area (including the Rusholme Lane Area) have been divided into a number of Development Parcels shown on Chapter 1 (Introduction) Figure 1.3. of the ES.

2.1.8. The current land uses at these Development Parcels are described in Table 3-1 of the ES Chapter 3 (Site and Project Description).

Surrounding Area and Features within the Site

2.1.9. Drax Power Station is surrounded by the villages of Drax, approximately 700 m to the south; Long Drax, approximately 900 m north-east; Hemingbrough, approximately 2 km north; and Camblesforth, approximately 1 km south-west. Larger towns in the vicinity of the Existing Drax Power Station Complex are Selby, approximately 5 km north-west, and Goole, approximately 7.5 km south-east.

2.1.10. Rusholme Wind Farm is located approximately 3.8 km to the east of the Power Station Site and Drax Golf Club just across the A645 to the South. There is an industrial site immediately adjacent to the Power Station Site to the south-west. Drax Skylark Centre and Nature Reserve are adjacent to the north-west of the Power Station Site.

2.1.11. There is an area of probable Roman activity in a field immediately north of the Power Station Site where ditch remains and associated pottery were recovered. Scurff Hall Moated Site is a scheduled monument to the south of the Pipeline Area and Drax Augustinian Priory is located to the north of the Power Station Site.

2.1.12. The nearest major surface water feature is the River Ouse, located approximately 1.5 km north east of the Existing Drax Power Station Complex. Approximately 3.5 km downstream of the Power Station Site, the River Ouse forms part of the Humber Estuary Ramsar site, Special Area of Conservation (SAC), Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI). River Derwent is the closest SAC being approximately 0.7 km to

the north of the Power Station Site. There are various other sites designated for their biodiversity value within the area.

2.1.13. Public Rights of Way (PRoW) run immediately adjacent to the western and northern borders of the Power Station Site, and through Development Parcel A. A PRoW network extends across much of the surrounding area (see Figure 3.1c in Chapter 1 (Introduction) of the ES), with a high concentration between the village of Drax and the River Ouse to the north. The Trans-Pennine Trail long distance path and Sustrans Route 65 run on the eastern bank of the River Ouse. Further details can be found in Chapter 5 (Traffic and Transport) (document reference 6.1.5), Chapter 10 (Landscape and Visual Amenity) (document reference 6.1.10) and Chapter 14 (Socio-Economics) (document reference 6.1.14) of the ES.

2.1.14. The road network adjacent to the Power Station Site and within the Pipeline Area includes the A1041 and the A645, which connect the Existing Drax Power Station Complex to the wider road network including the M62 (J36) approximately 6 km south. Minor roads connect the Existing Drax Power Station Complex to the villages of Drax, Newland and isolated properties.

2.1.15. Staff and visitors access the Existing Drax Power Station Complex via the South Gate on the A645. Contractors, deliveries and all HGV traffic use site entrances off New Road. Deliveries of coal and biomass are made predominantly by rail straight to the Existing Drax Power Station Complex.

2.1.16. Existing development at the Power Station Site is mainly associated with the operation of the Existing Power Station Complex. This includes: a coal stock yard, hard standing, contractors' compounds, car parks and access/service roads.

2.1.17. Other land within the Power Station Site and the Carbon capture readiness reserve space includes open grassland, scrub and agricultural land. The Pipeline Area is mainly in agricultural use and includes land classified as Grade I Excellent and Grade II Very Good in the Agricultural Land Classification's (ALC) high level dataset (Ref. 2.1). A full description of environmental features both within the Site and in the surrounding area is given within the chapters dealing with specific environmental topics and are shown in Figures 3.1a and 3.1b in Chapter 3 (Site and Project Description) of the ES.

Planning and Environmental Designations

2.1.18. There are no world heritage sites, registered parks and gardens, historic battlefields or historic conservation areas within the Site or 5 km of the Site.

2.1.19. There are four scheduled monuments within 2 km of the Site. There are two listed buildings within 500 m of the Site, including the Grade I listed Church of St Peter and St Paul[1] and the Grade II listed Cross base and shaft in the churchyard of St Peter and St Paul[2]. There are a further 11 Grade II listed buildings within 1 km of the Site, within the villages of Newland and Barmby on the Marsh.

[1] Legacy UID 326465
[2] Legacy UID 326466

2.1.20. Non-designated heritage assets included in the Historic Environment Record (HER) (Ref. 2.2) within 300 m of the Site include monuments, buildings and find spots from various time periods, including early Iron Age, Roman, medieval, nineteenth and twentieth centuries. Drax Abbey Farm (a twelfth century priory) borders the Site to the north. The Site and its surrounding area is located in National Character Area (NCA) Profile 39 Humberhead Levels (Ref. 2.3) which is described as an area with: *"big expansive skies, and vertical elements like water towers, power stations and wind turbines are very prominent".* At county level, the Site lies within the Farmed Lowland and Valley Landscape Primary Landscape Unit (PLU) which forms a belt running north south through North Yorkshire and is divided up into 11 Landscape Character Types (LCTs); four of which are of relevance to the Site and its surrounds.

2.1.21. The Site lies approximately 6 km to the southeast of the nearest Air Quality Management Area (AQMA) designated by SDC due to exceedances of the annual mean Nitrogen Dioxide (NO_2) objective in Selby Town.

2.1.22. Internationally designated sites, such as Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), are valued as being of international importance. Nationally designated sites, including Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNR), are valued as being of national importance. Local Nature Reserves (LNRs) and locally designated non-statutory sites, such as Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (LWSs), are valued as being of county importance. This reflects the geographical basis of the designations; i.e. European sites support habitats and species that are deemed important at a European biogeographical level, whilst SSSIs are designated on the basis of supporting the best examples of particular habitats, species and eco-systems at a national level.

2.1.23. All designated sites within 15 km of the Proposed Scheme have been identified via a desk study. The designated sites identified are listed in Tables 1-2 to 1-4 in Chapter 9 (Biodiversity) of the ES (document reference 6.1.9).

2.1.24. The Site and majority of its surrounds are located within groundwater Source Protection Zone (SPZ) 3 (total catchment). There are no geological SSSIs within the study area covered by Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11). There are no known Regionally Important Geological Sites (RIGS) within the study area either. The nearest major surface water feature is the River Ouse, located approximately 1.5 km northeast of the Existing Drax Power Station Complex.

2.1.25. The Site, including the parts situated within the Existing Drax Power Station Complex, lies outside the defined development limits as shown on the Proposals Map of the Selby Local Development Framework (LDF). It is, instead, located within the open countryside.

2.1.26. In line with the above, at paragraph 4.31 the Selby District Core Strategy Local Plan (2013) (Ref. 2.4) notes that development in the countryside, outside defined development limits, will generally be resisted. The replacement or extension of existing buildings, the re-use of buildings preferably for employment purposes, well-designed buildings and proposals of an appropriate scale which will diversify the local economy or meet affordable housing need may, however, be acceptable.

2.1.27. Further, saved policy EMP10 of the Selby District Local Plan (2005) (Ref. 2.5) states that additional industrial and business development may be permitted at or close to the Existing Drax Power Station Complex, provided such proposals satisfy a number of criteria. These include that proposals are directly related to the process of generating electricity, either by making use of by-products from the existing power station or utilising a direct source of electricity, provided they are suitably linked to the highway and rail networks; will not affect residential amenity; create environmental problems; will be well screened; and will not harm nature conservation interests or archaeology.

2.1.28. Chapter 6 (Promoting Economic Prosperity) of the Selby District Core Strategy Local Plan acknowledges, in paragraph 6.32, the importance of the energy sector to the District by highlighting that Drax Power Station is a major employer, which contributes to national energy infrastructure as well as the local economy whilst having the potential for future development of renewable and local carbon energy. The Selby District Core Strategy Local Plan states that there is a need for further investment in energy infrastructure in line with national policy and that supporting the energy sector will assist in reinvigorating, expanding, and modernising the District's economy.

2.1.29. In addition, the Existing Drax Power Station Complex's private rail line system is identified as safeguarded transport infrastructure to which Selby District Core Strategy Local Plan Policy S04 (Transport infrastructure safeguarding) applies. The emerging Minerals and Waste Joint Plan (Ref. 2.6), prepared by NYCC, together with the City of York and the North York Moors National Park Authority, contains a similar safeguarding policy, covering both the rail line and the existing jetty on the River Ouse. Further, under the emerging Minerals and Waste Joint Plan, much of the Site lies within an area identified for minerals safeguarding (brick clay and sand and gravel), subject to policies S01 (Safeguarding mineral resources) and S02 (Developments proposed within Minerals Safeguarding Areas).

2.1.30. There are no other local planning designations relevant to the Site, however, the baseline sections of the environmental topic chapters of the ES Volume 1 (document reference 6.1) provide further information on sensitive receptors, heritage assets and environmental designations within the defined topic study areas, encompassing the Site and its surrounds. In addition to those already discussed above, sensitive receptors within or in close proximity to the Site include:

- Human receptors, including residential properties, users of public rights of way, national trails and cycle routes, workers at Drax Power Station and other premises, leisure users (such as Drax and Selby Golf Club), and motorised travellers.
- Habitats, including broadleaved woodland (semi-natural and plantation), parkland / scattered trees, tall ruderal, standing water, scrub, arable land, intact and defunct hedge, buildings and hardstanding, grassland, introduced shrub and reedbed and silted pond.
- Protected and notable species, including bats, badger, otter, watervole, birds, reptiles (including but potentially not limited to grass snake), and fish.
- Groundwater and surface water bodies (the closest one being the River Ouse).

2.2 Site Development and Relevant Planning History

2.2.1. Drax Power Station began generating electricity after its first 660 MW coal fired unit was commissioned in 1974. In 1975, the Power Station was officially opened, with three coal

fired units and a total generating capacity of just under 2,000 MW. Eleven years later, in 1986, the Power Station had doubled in size and was the largest power station in the UK. There are now six units at Drax Power Station, which include three units already converted to biomass (units 1-3) with a further unit to be converted later in 2018. Drax Power Station now has the capacity to meet 8% of the UK's electricity need and employs 830 people directly on an annual basis. A further 4,500 jobs depend on Drax throughout Yorkshire and the Humber.

2.2.2. The planning history for the Site generally consists of planning decisions relating to the Existing Drax Power Station Complex. For the most part, these relate to the operation of Drax Power Station and have been for ancillary buildings, structures and infrastructure.

2.2.3. The relevant planning history and planning permissions relating to the Site and its surrounds are set out in more detail within Table 1-1 in Appendix 1 of this Planning Statement. Where relevant, these permissions are also considered within the cumulative effects assessment in the ES Chapter 17 (Cumulative Assessment).

2.3 The Proposed Scheme

2.3.1. The Proposed Scheme is to repower up to two existing coal-fired units (known as Unit 5 and Unit 6) with gas – this means the existing coal-fired units would be decommissioned and replaced with newly constructed gas-fired units utilising some of the existing infrastructure. Each unit, which is a new gas fired generating station in its own right and are termed Unit X and Unit Y, would comprise combined cycle gas turbine (CCGT) and open cycle gas turbine (OCGT) technology. Each new gas generating station (or unit) would use existing infrastructure, including the cooling system and steam turbines.

2.3.2. Each gas generating station (or unit) would have up to two gas turbines, with each gas turbine powering a dedicated generator of up to 600 MW in capacity. The gas turbines in each generating station (or unit), therefore, would have a capacity of up to 1,200 MW. The gas turbines in each generating station (or unit), in combined cycle mode, would provide steam to the existing steam turbine (through Heat Recovery Steam Generators (HRSGs)) which would generate up to 600 MW per generating station (or unit). Each generating station (or unit) would have up to two HRSGs. This results in a capacity for each generating station of up to 1,800 MW and, should both Units 5 and 6 be repowered, a combined capacity of up to 3,600 MW.

2.3.3. Each of Unit X and Unit Y would have (subject to technology and commercial considerations) a battery energy storage facility with a capacity of up to 100 MW per Unit, resulting in a combined battery energy storage capacity of up to 200 MW. The battery energy storage facilities would be stored in a single building.

2.3.4. The total combined capacity of the two gas fired generating stations (or units) – Unit X and Unit Y – and two battery storage facilities (i.e. the total combined capacity of the Proposed Scheme) is therefore up to 3,800 MW. The Application seeks consent for the flexibility for either the:

- Repowering of either Unit 5 or 6 and construction of Unit X as a gas fired generating station (this would leave either Unit 5 or 6 (depending on which had been repowered) as a coal fired unit); or

- Repowering of both Units 5 and 6 and construction of Unit X and Unit Y as two gas fired generating stations.

2.3.5. In the event that only Unit X is constructed, up to two gas turbines and up to two HRSGs and (subject to technology and commercial considerations) a battery energy storage facility of up to 100 MW storage capacity would be constructed. The size of the building housing the battery storage facility would not change, as the building could house sufficient battery capacity to allow the 100 MW output to be sustained for a longer duration (which would increase the duration of the storage, but not the 100 MW storage capacity). In the event that only Unit X is constructed, the fuel gas station and gas insulated switchgear would be smaller.

2.3.6. If both Unit X and Unit Y are constructed, then construction works would be undertaken consecutively rather than concurrently. It is assumed that there would be a gap of a year between construction periods, but this could be longer depending on commercial considerations. Unit Y would mirror Unit X, with up to two gas turbines and up to two HRSGs and (subject to technology and commercial considerations) a battery energy storage facility of up to 100 MW storage capacity which would be housed in the building constructed for the battery for Unit X.

2.3.7. Each construction stage would take approximately 34 months followed by commissioning. Should both Unit Y and Unit X be constructed, the overall construction programme would be at least 83 months including commissioning. It is assumed that construction of the first unit will commence in 2019/2020 with OCGT capability by 2021/2022 and CCGT ready by 2022/2023. If two units are built, the construction of the second unit would likely commence in 2024 and be completed in 2027.

2.3.8. The gas turbine generating units have been designed to be Carbon Capture Ready (CCR) and a suitable area of land has been identified for the installation of carbon capture equipment that can accommodate both Units X and Y (the Carbon capture readiness space). It is noted that, whilst the draft DCO includes requirements to safeguard the Carbon capture readiness reserve space for future carbon capture and storage equipment, no construction works associated with CCR are proposed to be consented under the DCO. If viable in the future these works would be subject to a separate application for consent.

2.3.9. In order to repower to gas, a new Gas Pipeline would be constructed from the Existing Drax Power Station Complex to the National Transmission System (NTS) operated by National Grid (NG). It is likely to be constructed using primarily open cut construction techniques, with trenchless crossing techniques being considered where the pipeline crosses existing constraints such as roads and drainage ditches.

2.3.10. A Gas Receiving Facility (GRF) comprising Pipeline Inspection Gauge (PIG) Trap Facility (PTF), Pressure Reduction and Metering Station (PRMS) and compressor station is proposed south of woodland to the east of New Road. Should only Unit X be constructed, then the GRF would be smaller than if both Unit X and Unit Y are constructed. These parameters are secured via a requirement in Schedule 2 to the draft DCO.

2.3.11. At the connection to the NTS there would be an above ground installation (AGI) south of Rusholme Lane. The AGI involves a PIG Trap Launching station (PTF-L) which would be

operated by Drax, and a Minimum Offtake Connection (MOC), which would be operated by NG.

2.3.12. For Unit X and Unit Y the output from each generating unit would be banked using Gas Insulated Switchgear (GIS) housed in a new building close to the generating units. Connection from the GIS banking building to the existing NG 400 kV substation would be by underground cable for Unit X.

2.3.13. The connection for Unit Y from the GIS banking building to the existing NG 400 kV substation would be by either:

- An underground cable (as described above for Unit X); or
- An underground cable that terminates in a new cable sealing end compound outside of the fence line of the existing NG 400 kV substation and is connected to the existing equipment using overhead conductors.

2.3.14. The cable sealing end compound will be fenced to form either an individual compound or the existing substation fence will be extended to include the new equipment.

2.3.15. Works will be required within the existing 400 kV NG switchyard in order to accommodate the new connections. These works will include the installation of new equipment similar in scale to the existing switchgear and equipment in order to make the new connections. As these works are within the switchyard which is owned and operated by NG, they may be undertaken by NG, alternatively these works may be undertaken by the Applicant by agreement with NG and are therefore included as part of the Proposed Scheme.

2.3.16. It may be necessary for additional works to be carried out outside the limit of the DCO such as reinforcement works at remote substations and / or re-stringing of existing overhead power lines during construction. If required, these works will be led by NG.

2.3.17. In order to construct the gas turbine generating units and associated facilities on the Power Station Site, it is proposed to demolish, remove and relocate existing facilities at the Power Station Site. These Site Reconfiguration Works include demolishing an existing private squash court and the learning centre, and demolishing and relocating car parking, turbine outage stores, contractor's compounds and welfare facilities. They also include the erection of a cooling water spray screen up to 10 m high between relocated facilities and the southern cooling towers.

2.3.18. The Site Reconfiguration Works (referred to as Stage 0) may be consented by either of the two options listed below:

- A Town and Country Planning Act 1990 (TCPA) (Ref. 2.7) application, applied for on 20 February 2018 (planning reference 2018/0154/FULM); decision expected May 2018 (see document reference 2.7 for the plans); or
- As part of the DCO Application.

2.3.19. For the purposes of the EIA, it is assumed these works are part of the Proposed Scheme consented by the DCO. Should the Site Reconfiguration Works be carried out under any planning permission that may be granted by the local planning authority, then Drax may carry out those works under that permission. When assessing the Work Nos 1 to 14 in

Schedule 1 to the draft DCO (see the Table 1), it is assumed that the Site Reconfiguration Works have first been completed either under the DCO or other consent.

2.3.20. Several areas within the Site have been identified for use as construction Laydown Areas. Within the Power Station Site and the Carbon capture readiness reserve space, laydown areas will be used during construction for the temporary locating of construction offices, warehouses, workshops, open air storage areas and car parking. The Carbon capture readiness reserve space would be reinstated to its original use following construction and safeguarded for carbon capture equipment as explained above.

2.3.21. The construction of Unit X would involve one existing disused sludge lagoon within the Power Station Site being brought back into operation and another being decommissioned and filled in for use as construction laydown. If Unit Y was constructed, all existing sludge lagoons to the east of the northern cooling towers would be decommissioned and filled in, and up to two new sludge lagoons would be constructed.

2.3.22. For the construction of the Gas Pipeline, a temporary contractors' compounds approximately 100 m x 100 m and a pipe storage yard approximately 150 m x 60 m is required. The locations of these are not yet confirmed; however they will be provided within the Pipeline Construction Area and are likely to be located at the start of the Gas Pipeline off Rusholme Lane. For the construction of the AGI, there will be one construction laydown for National Grid and one for Drax with a shared temporary construction access road off Rusholme Lane.

2.3.23. To construct the Gas Pipeline, as passing place is required which will be provided on land to the side of Rusholme Lane (the Rusholme Lane Area).

2.3.24. During the construction phases, it is expected that standard working hours would be Monday to Friday from 07:00 to 19:00. On Saturdays, standard working hours would be 07:00 and 13:00. It is likely that some construction activities and deliveries would be required to be undertaken outside these hours, which would be agreed in advance with SDC.

2.3.25. The Proposed Scheme is defined in Schedule 1 Authorised Development of the draft DCO (and is described in further detail within Chapter 3 (Site and Project Description) of the ES, including an overview of the key construction activities and indicative methodologies proposed.

2.3.26. A summary list of the works proposed to be authorised by the DCO is given in Table 1 below, with the corresponding work number from Schedule 1 of the draft DCO in the left column. The work numbers and their location within the Site are shown on the Works Plans (document references 2.3A, 2.3B and 2.3C).

Table 1 – Description of the Works

Work No.	Title of the works
Work No. 1	An electricity generating station (Unit X) fuelled by natural gas and with a gross electrical output capacity of up to 1,800 megawatts
Work No. 2	An electricity generating station (Unit Y) fuelled by natural gas and with a gross electrical output capacity of up to 1,800 megawatts
Work No. 3	Up to two battery storage facilities with a combined gross storage capacity of up to 200 megawatts, housed in a single building
Work No. 4	Up to two new gas insulated switchgear banking buildings
Work No. 5	A natural gas receiving facility
Work No. 6	Above ground gas installation(s)
Work No. 7	A gas pipeline
Work No. 8	Electrical connections
Work No. 9	Temporary construction laydown areas
Work No. 10	Carbon capture readiness
Work No. 11	Retained landscaping
Work No. 12	Decommissioning and demolition of sludge lagoons and construction of replacement sludge lagoons
Work No.13	Removal of existing 132 kilovolt overhead line associated pylons and foundations
Work No. 14	Passing place on Rusholme Lane
Work No. 15	Site reconfiguration works

3 THE NEED FOR THE PROPOSED SCHEME

3.1 Overview

3.1.1. This section sets out the need for the Proposed Scheme with particular reference to the energy NPSs.

3.1.2. The Applicant's objectives for the Proposed Scheme are to:

A. Reduce the reliance of Drax Power Station on coal as a source of power for electricity generation and replace that source with one that meets the Government's aims of creating a diverse energy mix that maintains security of supply as well as providing flexible back up for intermittent renewable energy.

B. Ensure that Drax Power Station maintains its position as one of the UK's main power generators, playing an important role in helping the UK transition to a low carbon economy through the re-utilisation of as much existing infrastructure as possible (such as cooling systems, cooling towers and steam turbines) which would otherwise be potentially redundant despite the infrastructure remaining within its operating life and capable of contributing to more efficient energy production and a lower carbon footprint (given it is already constructed).

C. Utilise as much existing operational land within the Existing Drax Power Station Complex as possible so as to maximise the use and efficiency of existing infrastructure.

D. Maximise the efficiency of Drax Power Station; and

E. Increase the flexible, response generating capacity of Drax Power Station to meet increasing demand across the UK by;

a) providing additional support services to manage the stability of the national grid, such as frequency response and inertia, to support weather-dependent renewables like wind and solar; and

- b) increasing reliable large scale capacity on the system (i.e. large amount of capacity that can be called on at any time).

3.1.3. These objectives are consistent with the need for new energy infrastructure and gas generation plants as identified by the relevant energy NPSs. The NPSs form the primary basis for decisions by the SoS on nationally significant energy infrastructure that require development consent under the PA 2008. The NPSs of relevance to the Proposed Scheme include EN-1, EN-2, EN-4 and EN-5.

3.1.4. The content and requirements of these NPSs are set out in more detail in section 4 of this Planning Statement.

3.2 The Need for New Energy Infrastructure

3.2.1. Energy is vital to economic prosperity and social well-being and, as such, it is important to ensure that the UK has secure and affordable energy (EN-1 paragraph 2.1.2).

3.2.2. The need for new energy infrastructure is confirmed in part 3 of EN-1. Paragraph 3.1 states that applications for development consent for the types of infrastructure covered by the energy NPSs should be assessed on the basis that the Government has demonstrated there is a need for those types of infrastructure. The scale and urgency of that need is as described for each of them in part 3 of EN-1. EN-1 paragraph 3.1.4 states that the SoS should give substantial weight to the contribution that projects would make toward satisfying this need when considering applications for development consent.

3.2.3. The Government has committed to meeting the UK's legally binding target to cut greenhouse gas emissions by at least 80% by 2050, compared to 1990 levels. The Government, through EN-1, states that analysis undertaken on possible 2050 pathways "*shows that moving to a secure, low carbon energy system is challenging, but achievable"* (paragraph 2.2.1).

3.2.4. Generating the energy the UK requires, and then supplying it, requires a significant amount of infrastructure and EN-1 part 3 explains why the Government considers that, without

significant amounts of new large-scale energy infrastructure, the objectives of its energy and climate change policy cannot be fulfilled.

3.2.5. Electricity meets a significant proportion of the UK's overall energy needs and EN-1 (paragraph 3.3.1) confirms the UK's reliance on it is likely to increase as the UK moves towards its 2050 greenhouse gas emission reduction goals. In order to secure energy supplies that enable the UK to meet its goals for 2050, EN-1 at paragraph 3.3.15, confirms that *"there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible, and certainly in the next 10 to 15 years, given the crucial role of electricity as the UK decarbonises its energy infrastructure*".

3.2.6. Approximately one quarter of the UK's generating capacity is due to close by the end of the decade and while, as at 2011, electricity margins are healthy, there is still the need for investment of over £100 billion in the electricity sector alone by the end of the decade (EN-1 at paragraphs 2.2.16 – 2.2.19)

3.2.7. It is critical that the UK continues to have secure and reliable supplies of electricity as it makes the transition to a low carbon economy (EN-1, paragraph 2.2.20). Paragraph 3.1.1 of EN-1 reiterates that the UK requires the types of energy infrastructure covered by EN-1 in order to achieve energy security.

3.2.8. To manage the risks to achieving security of supply the UK requires sufficient electricity capacity to meet demand at all times, including a *"safety margin of spare capacity*" (EN-1 at paragraph 2.2.20) to accommodate unforeseen fluctuations in supply or demand. Further, reliable associated supply chains are needed to meet demand as it rises. Finally, a diverse mix of technologies and fuels is required.

3.2.9. As illustrated by the above, it is clear that the need exists for new energy infrastructure. The Proposed Scheme would contribute to fulfilling this need.

3.3 The Need for Gas Generation Plants

3.3.1. EN-1 recognises the continuing role of fossil fuel generation in terms of complementing other types of generation, notably renewables, providing resilience in the UK's energy system and ensuring the security of electricity supplies.

3.3.2. Paragraph 3.6.1 of EN-1 highlights that fossil fuel power stations play a vital role in providing reliable and flexible electricity supplies.

3.3.3. Paragraph 3.6.2 of EN-1 further acknowledges the important role that gas will continue to play in the electricity sector, noting the vital flexibility it provides in supporting the increasing amount of low carbon generation and its role in maintaining security of supply. Paragraph 3.6.2 also recognises the diversification in gas supply sources that has occurred within the UK gas market in recent years, so that as the UK becomes more import dependent, companies supplying the market are not reliant on one source of supply. This enhances the resilience of the UK market to disruptions to supply.

3.3.4. Paragraph 3.6.3 of EN-1 recognises that, in order to maintain security of supply and to provide flexible back-up options for intermittent renewable energy, some new conventional generating capacity needed in the UK is likely to come from new fossil fuel generating capacity. It notes that fossil fuel generation produces atmospheric emission of carbon

dioxide but that the amount produced is related to the type of fuel, the design of and the age of the power station, amongst other factors. Paragraph 3.6.3 states that at present, coal typically produces approximately twice as much carbon dioxide as gas per unit of electricity generated; however it notes that new technology such as carbon capture and storage offers the prospect of reducing the carbon dioxide emissions of both fuels at a level where, whilst retaining their existing advantages, they can also be regarded as low carbon energy sources.

3.3.5. The ongoing need for fossil fuel generation is also acknowledged by paragraph 3.6.8 of EN-1, which states that fossil fuel generating capacity must provide back-up for when generation from renewable sources is low. It goes on to highlight the importance of such fossil fuel generating capacity to become low carbon. This would be through development of carbon capture and storage (CCS), which means that there is a need for CCR fossil fuel generating stations.

3.3.6. The Government's UK Low Carbon Transition Plan White Paper (2009) (Ref. 3.1) also acknowledges the vital role that gas generated power plays in providing reliable electricity supplies, maintaining the diversity in the UK's energy mix and adapting to changing demand. Gas is a reliable and clean energy source compared to other fossil fuels and is an important contributor to moving the UK to a low carbon economy, as anticipated by EN-1. Gas is also a flexible source of power that can back up intermittent renewables and underpin the security of supply and price stability within the energy market.

3.3.7. According to the Government's Gas Generation Strategy (2012) (Ref. 3.2), gas forms an integral part of the UK's generation mix and is a reliable, flexible source of electricity, providing a significant proportion of the sources for the UK's electricity generation.

3.3.8. As generation from gas is used to meet the peaks in the UK's electricity demand, gas sets the electricity price for most of the year. The Government expects that gas, alongside low-carbon technologies, will continue to play a major role in the UK's electricity mix over the decades to come.

3.3.9. The role gas plays in electricity generation will always be determined by the market, while keeping emissions within the limits set by the carbon budgets and consistent with a least-cost approach to the UK's binding 2050 carbon target. Therefore, both now and in the future, there is a need to diversify the generation mix that balances risks and uncertainties of different technology options, including uncertainty on future gas prices. However, there is an identified need for significant investment in new gas energy plants.

3.3.10. Previous modelling undertaken by the former DECC (now BEIS) suggested that up to 26 Gigawatts (GW) of new gas plant could be required by 2030 (in part to replace older coal, gas and nuclear plant as it retires from the system) (page 14 of the Gas Generation Strategy 2012). It also indicates that, in 2030, the UK could need more overall gas capacity than today, although operating at lower load factors. The modelling shows that gas could play a more extensive role, with higher load factors, should the carbon budget be revised upwards.

3.3.11. Being the cleanest fossil fuel, the use of gas is also consistent with the need to decarbonise the UK's economy. Much of the new gas capacity needed would effectively be replacing

ageing coal capacity. Gas is also important for balancing out the increasing levels of intermittent and inflexible low-carbon energy on the system.

3.3.12. The Government considers that unabated gas generation will continue to play a crucial role in the UKs generation mix for many years to come, and the amount of gas capacity the UK will need to call on at times of peak demand will remain high. In the long term, the Government considers that the development of cost-competitive carbon capture and storage should ensure gas can continue to play a full role in a decarbonised electricity sector (paragraph 6.36 of the Gas Generation Strategy 2012).

3.3.13. In its National Infrastructure Plan 2014 (HM Treasury) (Ref.3.3), the Government stated that

"[l]arge-scale investment in gas and low-carbon electricity generation is vital in order to replace ageing energy infrastructure, maintain energy supplies and meet legally-binding environmental targets". "As legacy coal, gas and nuclear power stations come off line, they will increasingly be replaced with a combination of renewable energy, new nuclear power and fossil fuel power stations fitted with Carbon Capture and Storage (CCS) technology. New gas plant is also needed as a vital backup for less flexible renewable generation and to ensure that the system can meet peak electricity demand. Demand for gas to supply heat to homes and businesses will also remain significant for some time to come".

3.3.14. On 18 November 2015, Amber Rudd (as Secretary for Energy and Climate Change) set out her vision for an energy system, her policy priorities and strategy. In her speech she stated that *"in the next 10 years, it's imperative that we get new gas-fired power stations built"* and that *"gas is central to our energy secure future".* (Ref. 3.4)

3.3.15. There is clearly a need for new gas generation plants of the type proposed by the Proposed Scheme and it is concluded that the Proposed Scheme accords with the above documents.

3.4 The Need for the Proposed Scheme in Light of the Government's Position

3.4.1. Drax Power Station is a national asset and a significant driver of economic growth in the North of England, and Drax is committed to looking at ways of reducing carbon emissions. Drax has recently announced that it is to *"pilot the first bioenergy carbon capture storage (BECCS) project of its kind in Europe, which, if successful, could make the renewable electricity produced at its North Yorkshire power station carbon negative".* (Ref. 3.5)

3.4.2. Plans for gas-fired units at Drax Power Station are part of the Applicant's strategy to play a vital role in changing the way energy is generated as the UK moves to a low carbon future. The Proposed Scheme is to repower up to two coal-fired units to gas, extending the operation of the existing infrastructure that would be re-used (such as the steam turbine) into the 2040s. The Proposed Scheme would either produce up to 1,800 MW of new gas generation or up to 3,600 MW of new gas generation capacity (depending on whether both Unit X and Unit Y were constructed) and up to 200 MW of battery storage.

3.4.3. It is noted that the Applicant seeks to retain flexibility to only repower one unit, subject to technology and commercial considerations. The existing units have a combined capacity to generate up to 1,320 MW (660 MW) each. Therefore, even if only Unit X was constructed, there would be a significant net gain of electricity generated (up to 1,140 MW of gas generation or 1,240 MW of gas generation and battery storage.

3.4.4. The Proposed Scheme would enhance Drax Power Station's flexible and responsive capability, make Yorkshire home to large scale battery technology, and increase the Applicant's ability to provide the flexible generation and grid support services that the UK's electricity system will need as coal and other large power stations are turned off.

3.4.5. Furthermore, the Proposed Scheme complements the Applicant's ongoing work to explore options for further generation from sustainable biomass. Three former coal units have already been successfully upgraded to use biomass in the form of compressed wood pellets.

3.4.6. In paragraph 3.3.4, EN-1 highlights the benefits of having a diverse mix of all types of power generation as this means that the UK will not be dependent on one type of generation or one source of fuel of power. Paragraph 3.3.4 goes on to state that fossil fuels *"…can be brought on line quickly when there is a high demand and shut down when demand is low, thus complementing generation from nuclear and the intermittent generation for renewables…"*

3.4.7. Whilst EN-1 states that until such time as fossil fuel generation can effectively operate with CCS, fossil fuel power stations will not be low carbon. However, paragraph 3.3.5 states that *"Government would like industry to bring forward many new low carbon developments (renewables, nuclear and fossil fuel generation with CCS) within the next 10 to 15 years to meet the twin challenge of energy security and climate change as we move towards 2050*." As the Proposed Scheme would be CCR and would reserve sufficient land for CCS (termed the Carbon capture readiness reserve space in this DCO Application), the Proposed Scheme clearly follows the spirit of, and is accordance with, EN-1 in that regard.

3.5 Summary

3.5.1. The need that exists for all types of nationally significant energy infrastructure, including new fossil fuel generating stations that are CCR, is explicitly confirmed by EN-1. EN-1 directs the SoS to assess applications on the basis that this need and the scale and urgency of the need has been proven, and is not open for debate or interpretation. Moreover, EN-1 directs the SoS to give substantial weight to the contribution that all developments will make toward satisfying this need. Accordingly, the need that exists for new electricity generating infrastructure, such as the Proposed Scheme, is clear.

3.5.2. EN-1 recognises that irrespective of the move towards a low carbon economy, the UK will continue to rely on fossil fuels as an integral part of its energy mix over the coming decades. Fossil fuel generating stations have a critical role to play in contributing to the diversity, security and resilience of the UK electricity supplies. Fossil fuels continue to provide resilience to the UK's electricity supplies by increasing diversity of supply and ensuring that overreliance is not placed on any one type of generation, in turn allowing the system to be operated with a degree of flexibility, providing back-up for when generation from intermittent renewable generating capacity is low, and supporting the UK's transition to low carbon electricity generation.

3.5.3. The Proposed Scheme would provide an important role in supporting the transition to a low carbon economy, particularly in light of the alternative which is the continued operation of the existing coal-fired units at the Existing Drax Power Station Complex (with abated carbon emissions after 2025). Furthermore, the new gas-fired generating stations would have

significantly lower carbon emissions per unit of electricity generated than the existing coal-fired units as is shown in the Air Quality Chapter of the ES (Chapter 6, document reference 6.1.6) (even if operating with reduced carbon emissions after 2025). The Proposed Scheme would be designed to be CCR and by its nature, will be able to respond rapidly to increases in demand on the electricity network or fluctuations in supply from renewable technologies.

3.5.4. The Proposed Scheme would contribute to addressing the urgent need that exists for new electricity generating capacity in the UK, and would improve the security, diversity and resilience of the UK electricity supplies generally, supporting the UK's transition to low carbon electricity generation.

4 THE LEGISLATIVE AND PLANNING CONTEXT

4.1 Overview of the Relevant Planning Policy and Planning Context

National Significance of the Proposed Scheme

4.1.1. For the Proposed Scheme to fall within the remit of the PA 2008 it needs to qualify as a NSIP.

4.1.2. As a first test, it needs to fall under one of the infrastructure fields set out in section 14(1) of the PA 2008. The Proposed Scheme is for the construction or extension of (a) generating station(s) in the field of energy in England and, therefore, falls under sections 14(1)(a), 14(6)(a) and 14(7)(a) of the PA 2008.

4.1.3. For generating stations to be considered nationally significant, they must also meet the thresholds set out in section 15 of the PA 2008. The Proposed Scheme is for onshore electricity generating stations in England with a capacity of more than 50 MW and, therefore, meets the thresholds set out in section 15(2) of the PA 2008.

4.1.4. The Proposed Scheme qualifies as a NSIP and, therefore, development consent from the relevant SoS is required for the construction, operation, maintenance and future decommissioning of the Proposed Scheme under section 31 of the PA 2008.

Section 104 of the Planning Act 2008

4.1.5. Under section 104 of the PA 2008, the SoS must determine NSIP applications in accordance with the relevant NPSs unless doing so will:

- Lead to the UK being in breach of its international obligations;
- Be unlawful;
- Lead to the SoS being in breach of any duty imposed on him by or under any legislation;
- Result in adverse impacts of the development outweighing its benefits; or
- Be contrary to legislation about how the decisions are to be taken.

4.1.6. Under section 104, the SoS must also have regard to:

- Any local impact report (within the meaning given by section 60(3) submitted to the SoS before the deadline specified in a notice under section 60(2);
- Any matters prescribed in relation to development of the description to which the application relates; and

- Any other matters which the SoS thinks are both important and relevant to their decision.

4.1.7. Matters of importance and relevance might include relevant policies in the National Planning Policy Framework (NPPF), relevant Marine Plans, and relevant policies in the local development plan documents as well as emerging national and local planning policy. These are set out below and are considered in section 6 and Appendix 2 of this Planning Statement.

4.1.8. In the event of a conflict between these or any other documents and an NPS, the NPS prevails for the purposes of decision making, given the national significance of the infrastructure (EN-1 paragraph 4.1.5).

4.1.9. Whilst there is a similarity between the status of NPSs under the PA 2008 regime and the statutory development plan under the TCPA regime, it is important to recognise that the requirement (as set out in the Planning and Compulsory Purchase Act 2004) (Ref. 4.1) of planning applications to be decided in accordance with the development plan unless material considerations indicate otherwise, does not apply to applications made under the PA 2008, which, therefore, means that the two regimes are not in conflict.

Primary Planning Policy Framework for NSIPs: National Policy Statements

4.1.10. NPSs are produced by the Government. They include the Government's objectives for the development of nationally significant infrastructure in a particular sector and state:

- How this will contribute to sustainable development;
- How these objectives have been integrated with other Government policies;
- How actual and projected capacity and demand have been taken into account;
- Relevant issues to be considered in relation to safety or technology;
- Circumstances where it will be particularly important to address the adverse impacts of development; and
- Specific locations, where appropriate, in order to provide a clear framework for investment and planning decisions.

4.1.11. They also include any other policies or circumstances that the ExA considers relevant and should be taken into account in decisions on infrastructure development.

4.1.12. NPSs undergo a democratic process of public consultation and parliamentary scrutiny, before being designated (i.e. published). They provide the framework within which the ExA makes its recommendations to the SoS.

4.1.13. There are 12 designated or proposed NPSs, setting out Government policy on different types of national infrastructure development. The relevant NPSs for the Proposed Scheme are set out in Table 4-1 below and were produced by the DECC, now BEIS. All six energy NPSs received designation by the then SoS for Energy and Climate Change on 19 July 2011.

Table 2 – Relevant National Policy Statements

NPS	Contents
Overarching NPS for Energy (EN-1)	This NPS has already been referred to in this Planning Statement and sets out national policy for energy infrastructure as defined by the PA 2008. It provides an umbrella document under which all other energy NPSs sit. The policies within this NPS, in combination with policies set out in relevant technology specific energy NPSs, provide the primary basis for decisions by the SoS and set out the need for new energy infrastructure.
NPS for Fossil Fuel Generating Infrastructure (EN-2)	This NPS, as well as the other relevant NPSs below, must be considered together with EN-1. EN-2 sets out policies specific to the determination of applications for fossil fuel electricity generating stations of over 50 MW generating capacity.
NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)	EN-4 provides the primary basis for decisions by the SoS on applications for gas supply infrastructure and gas and oil pipelines. The proposed Gas Pipeline in itself does not meet the thresholds in the PA 2008 to qualify as an NSIP in its own right. However, in England, gas transporter pipelines which are not NSIPs may be granted development consent as associated development by virtue of their connection with another NSIP, such as the construction or extension of a generating station. Therefore, EN-4 is a material consideration in determining the acceptability of the Gas Pipeline, the GRF and AGI.
NPS for Electricity Networks Infrastructure (EN-5)	EN-5 sets out policy specific to the determination of the electricity networks infrastructure. It covers above ground electricity lines with a voltage of 132 kV or above, and it also applies in England to any kind of electricity infrastructure if it constitutes associated development for which consent is sought along with an NSIP, such as a generating station. Draft revisedTherefore, the electricity infrastructure that forms part of the Proposed Scheme, which is classified as associated development, is subject to the policies set out in EN-5.

4.1.14. Parts 4 and 5 of EN-1 set out general policies in accordance with which applications for energy infrastructure are to be decided. These are considered in section 5 of this Planning Statement together with relevant sections of EN-2, EN-4 and EN-5

4.1.15. The ES for the Proposed Scheme has addressed the policies set out in EN-1, EN-2, EN-4 and EN-5 which are discussed in section 5 and Table 2-1 in Appendix 2 to provide information and evidence that will enable the ExA to examine and SoS to determine whether the Proposed Scheme accords with the relevant NPS policies.

4.2 Other Matters under Section 104 of the Planning Act 2008

National Planning Policy Framework

4.2.1. An analysis of the Proposed Scheme against relevant national and local planning policies has been undertaken, including the NPPF, the draft revised NPPF and Planning Practice Guidance (PPG) (Ref. 4.2). EN-1 states that consideration may be given to planning policy outside the NPSs where it is important and relevant to the SoS's decision. Paragraph 4.1.5 of EN-1 confirms that these may include development plan documents or other documents in the local development framework.

4.2.2. The NPPF was adopted in March 2012, replacing the majority of Planning Policy Statements and Planning Policy Guidance Notes. The policies contained within the NPPF are expanded upon and supported by the PPG, which was published in March 2014.

4.2.3. The NPPF sets out the Government's planning policies for England and how these are to be applied. It is a material consideration in planning decisions. Paragraph 3 of the NPPF makes it clear that the document does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision making framework set out in the PA 2008 and relevant NPSs, as well as any other matters that are considered both important and relevant. However, paragraph 3 goes on to confirm that matters that can be considered to be both important and relevant to NSIPs may include the NPPF and the policies within it.

4.2.4. Policies of particular relevance to the Proposed Scheme include promoting sustainable transport; requiring good design; promoting healthy communities; conserving and enhancing the natural and historic environment; and meeting the challenge of climate change and mitigating its effects.

4.2.5. Consultation on a draft revised NPPF commenced on 5 March 2018 and closed on 10 May 2018. The draft could still be subject to change. The revised NPPF is anticipated to be published in summer 2018. The draft revised NPPF has been considered in section 6 below and in Table 2-1 of Appendix 2, so far as relevant, whilst being aware that it might be subject to some changes.

Relevant Marine Plan

4.2.6. As the Proposed Scheme does not include development or activities within the Humber Estuary, the potential effects of the Proposed Scheme on the marine environment are limited. However, assessment of impacts on the ecology of the River Ouse have been assessed in the ES Chapter 9 (Biodiversity) and the implications for the objectives of the East Inshore and East Offshore Marine Plan (Ref. 4.3) are considered in this Planning Statement.

Local Planning Policy (Statutory Development Plan)

4.2.7. The Proposed Scheme is located largely within the Existing Drax Power Station Complex with the associated Pipeline Area extending to the east and the Carbon capture readiness reserve space adjacent to the Existing Drax Power Station Complex. The Proposed Scheme is solely within Selby District and North Yorkshire County.

4.2.8. The statutory development plan for the area currently comprises the following documents:

- The Selby District Core Strategy Local Plan – adopted October 2013. (Ref. 2.4).
- The saved policies of the Selby District Local Plan – adopted February 2005. (Ref. 2.5).
- The saved policies of the North Yorkshire Waste Local Plan – adopted 2006. (Ref. 4.4.).
- The saved policies of the North Yorkshire Minerals Local Plan – adopted 1997. (Ref. 4.5).

4.2.9. Both the Selby District Core Strategy Local Plan and the Selby District Local Plan contain a number of policies that are of relevance to the examination and determination of the Application. These include:

The Selby District Core Strategy Local Plan (2013)

- SP1 Presumption in Favour of Sustainable Development.
- SP2 Spatial Development Strategy.
- SP12 Access to Services, Community Facilities and Infrastructure.
- SP13 Scale and Distribution of Economic Growth.
- SP15 Sustainable Development and Climate Change.
- SP16 Improving Resource Efficiency.
- SP17 Low-Carbon and Renewable Energy.
- SP18 Protecting and Enhancing the Environment.
- SP19 Design Quality.

Selby District Local Plan (2005)

- ENV1 Control of Development.
- ENV2 Environmental Pollution and Contamination.
- ENV3 Light Pollution.
- ENV4 Hazardous Substances.
- ENV9 Sites of Importance for Nature Conservation Importance.
- ENV27 Scheduled Monuments and Important Archaeological Sites.
- ENV28 Other Archaeological Sites.
- EMP10 Additional Industrial Development at Drax and Eggborough Power Stations.
- RT1 Recreation Open Space.
- T1 Development in Relation to the Highway Network.
- T2 Access to Roads.
- T8 Public Rights of Way.

4.2.10. As stated in the local designations section in paragraph 2.1.25 above, the Site is identified on the Selby LDF Proposals Map as lying outside the defined development limits of the District and within the open countryside.

4.2.11. The Selby District Core Strategy Local Plan at paragraph 4.31 states that development in the countryside, outside defined development limits, will generally be resisted unless it involves the replacement or extension of existing buildings, the re-use of buildings preferably for employment purposes and well-designed buildings. Proposals of an appropriate scale which will diversify the local economy or meet affordable housing need may also be acceptable.

4.2.12. As noted in paragraph 2.1.27 above, however, saved policy EMP10 of the Selby District Local Plan does confirm that additional industrial and business development may be

permitted at or close to the Existing Drax Power Station Complex provided proposals satisfy a number of criteria. These are that the additional infrastructure / business development:

1) is directly related to the process of generating electricity, either by making use of by-products from the power station or utilising a direct source of energy;

2) would be suitably linked to the strategic highway and rail networks and would not create conditions prejudicial to highway safety;

3) would not create environmental problems associated with noise, smell or water pollution or dust emissions;

4) would not have a significant adverse effect on residential amenity in nearby settlements;

5) would be related to existing development and would be well screened, including provision for earth mounding and strategic off-site planting; and

6) would not harm nature conservation interests or sites of archaeological importance.

4.2.13. In chapter 6 (Promoting Economic Prosperity) at paragraph 6.32, the Selby District Core Strategy Local Plan acknowledges the importance of the energy sector to the District by highlighting that Drax Power Station is a major employer which contributes to national energy infrastructure as well as the local economy whilst having the potential for future development of renewable and local carbon energy. The Selby District Core Strategy Local Plan states that there is a need for further investment in energy infrastructure in line with national policy and that supporting the energy sector will assist in reinvigorating, expanding, and modernising the District's economy.

Saved Policies

4.2.14. The draft Minerals and Waste Joint Plan by NYCC, the City of York and the North Yorks Moors National Park Authority, is a collection of emerging planning policy documents which, once adopted, will replace the North Yorkshire Waste Local Plan 2006 and the North Yorkshire Minerals Local Plan 1997. Until then, the saved policies will continue to form part of the statutory development plan and provide the local policy framework.

4.2.15. The majority of the saved policies of the North Yorkshire Waste Local Plan relate to waste management facilities and are of limited relevance to the Proposed Scheme, with the exception of policy 5/1 (Waste Minimisation), which covers waste arisings from major new development proposals.

4.2.16. None of the saved policies contained in the North Yorkshire Minerals Local Plan are considered to be of direct relevance to the Proposed Scheme.

Emerging Planning Policy

4.2.17. The draft revised NPPF has already been mentioned above, and where relevant, the Proposed Scheme has been assessed against the emerging policies.

4.2.18. Further, as noted above, NYCC, together with the City of York and the North York Moors National Park Authority, is preparing a Minerals and Waste Joint Plan. A publication draft of the plan has been published. An independent examination of the draft plan is underway to determine whether the plan is sound and complies will all legal requirements. Hearing sessions were held in February, March and April 2018. Much of the Site lies within an area

identified for minerals safeguarding (brick clay and sand and gravel) on the Policies Map of the draft Plan, subject to policies S01 (Safeguarding mineral resources) and S02 (Developments proposed within Minerals Safeguarding Areas). As stated in paragraph 8.22 of the draft plan:

"the purpose of safeguarding is not to protect the minerals resource in all circumstances, but to ensure that the presence and potential significance of the resource is taken into account when other proposals in a safeguarded area are under consideration, and that sterilisation of the resource only takes place where there is appropriate justification. In some cases, it may be practicable for prior extraction of the resource to take place, where this can be done without unacceptable impacts on local communities or the environment, in line with the development management policies in the Joint Plan. In other cases, the need for the sterilising development may outweigh the need to protect the resource, or it may be possible to demonstrate that the safeguarded resource is no longer justified for safeguarding."

4.2.19. In addition, the disused rail line at the Power Station Site is safeguarded under policy S04 (Transport infrastructure safeguarding). As such, these policies are relevant to the Proposed Scheme. The plan is now at an advanced stage, and a table of proposed main modifications was published on 12 April 2018.

4.2.20. PLAN Selby is the Sites and Policies Local Plan SDC is developing to deliver the strategic vision outlined in the Selby District Core Strategy Local Plan (adopted in 2013). When PLAN Selby is adopted, it will form part of the Local Plan for the district against which planning applications will be assessed.

4.2.21. PLAN Selby will incorporate site allocations to promote the growth needs of the district and site specific designations and policies to manage other development proposals. Consultation took place in June and August 2015 to gather input as to how SDC should build up their evidence base. Consultation on sites for their Site Allocations Local Plan took place in October to November 2017, with a further consultation on additional sites in March to April 2018. These documents are still in the preparation stages with SDC analysing the results from the consultations.

4.3 Other Policy Considerations

4.3.1. Where relevant, other policy or strategy documents, such as the Department for Transport's (DfT's) advisory letter regarding water preferred policy guidelines for the movement of abnormal loads (Ref. 4.6) are referred to in this Planning Statement. The technical Chapters in the ES Volume 1 may also refer to legislation, policy or guidance specifically relevant to the respective topic areas.

4.3.2. Of particular relevance to the Proposed Scheme are a number of documents related to energy generation and carbon reduction. These documents are set out below.

The Paris Agreement

4.3.3. The Paris Agreement (Ref. 4.7) is an agreement within the United Nations Framework Convention on Climate Change that seeks to address greenhouse gas emissions mitigation, adaptation and finance. The Paris Agreement came into force on 4 November 2016 and was ratified by 174 of the 197 parties to the convention, including the UK.

4.3.4. The Paris Agreement seeks to strengthen the response to the threat of climate change at a global scale. The aim of the Paris Agreement is to maintain global temperature rise this century at no more than 2 degrees Celsius above pre-industrial levels, while seeking to limit temperature increase to an even greater extent at 1.5 degrees Celsius. In order to achieve the limit of 2 degrees Celsius, the Paris Agreement establishes a target of balancing greenhouse gas emissions associated with human activity and their removal from the atmosphere by the second half of this century (i.e. a 100 % reduction in net global emissions by 2050-2100).

4.3.5. The Paris Agreement also aims to increase the ability of nations to adapt to the adverse effects of climate change, thereby fostering climate resilience. It also provides for development with low magnitudes of greenhouse gas emissions, noting however the need to ensure that food production is not threatened by the movement toward increased adaptability and climate resilience.

4.3.6. The Paris Agreement recognises the need to make finance available consistent with the move toward low greenhouse gas emissions and climate resilient development, particularly for developing countries. It also recognises that in order to achieve the targets set out in the Paris Agreement, a new technology framework and an enhanced capacity building framework for developing countries and the most vulnerable countries is required.

4.3.7. It is noted that only elements of the Paris Agreement are legally binding; however, the Paris Agreement requires all parties to prepare and maintain nationally determined contributions that it intends to achieve and pursue mitigation measures at a domestic level with a view to achieving the targets of their established contributions. The Paris Agreement requires all parties to report regularly on their emissions and the implementation of mitigation associated with achieving their nationally determined contributions.

4.3.8. The Climate Change Act 2008 (Ref. 4.8) provides the framework for the UK to reduce its greenhouse gas emissions. This includes a limit for UK emissions in 2050, noting that they should be at least 80% below the level they were in 1990. Five-yearly legislated carbon budgets are established to reach the 2050 target.

The Industrial Emissions Directive

4.3.9. The Industrial Emissions Directive (IED) (Directive 2010/75/EU) (Ref. 4.9), which replaced the Large Combustion Plant Directive (LCPD) (2001/80/EC) (Ref. 4.10), regulates pollutant emissions from industrial installations and seeks to reduce harmful industrial emissions across the European Union (EU) to protect human health and the environment. It is based on an integrated approach, meaning that any permits under the Directive must take into account the overall environmental performance of the plant (e.g. emissions to air, land, water, noise, materials consumption). The Directive also sets EU wide emission limit values for selected pollutants for certain activities, including large combustion plants.

4.3.10. Directive 2010/75/EU uses a polluter pays approach and is based on the Best Available Technology (BAT) to help reach the goals of the Directive (i.e. BAT should form the basis of any permit conditions). It also sets out the requirement for mandatory environmental inspections and provides for public participation in the decision making process for permit applications.

Meeting the Energy Challenge a White Paper on Energy

4.3.11. In May 2007, the Government published its Meeting the Energy Challenge a White Paper on Energy (Ref. 4.11), which emphasised the need for cleaner large scale electricity generation and support for a diverse mix of power stations that over time move towards a low carbon mix. This sets out a framework of policy which new energy generation must comply with to meet European and UK standards on carbon reduction and industrial emissions.

4.4 Summary

4.4.1. The NPSs form the primary basis for decisions by the SoS on applications for NSIPs. In addition to setting out the strong need for new energy infrastructure, they provide detailed guidance on the matters to take into account when both preparing and assessing applications for NSIPs. They also confirm that the SoS must have regard to any other matters that he / she considers are both important and relevant, which can include the NPPF and local development plan policy. Both the NPS and NPPF are clear, however, that in the event of any conflict between a NPS and another document, the NPS prevails.

4.4.2. There is a long history of power generation at the Existing Drax Power Station Complex and the principle of electricity generation in this location is firmly established in local plan policy.

4.4.3. In addition, while the Site is not specifically allocated on the development plan's Proposals Map for power generation, both of the local development plan documents recognise the importance of the location for power generation and are supportive of further power generation and related development. In broad land use terms, the Proposed Scheme therefore accords with the local development plan for the District, as well as relevant emerging policy. A full policy assessment is contained in Table 2-1 at Appendix 2.

5 ASSESSMENT AGAINST NATIONAL POLICY STATEMENTS

5.1 Introduction

5.1.1. This section assesses the Proposed Scheme against part 4 of EN-1 (Assessment Principles) and, where relevant, parts 1 and 2 of EN-2 (Introduction and assessment and technology specific considerations), EN-4 and EN-5. This section should be read in conjunction with Table 2-1 in Appendix 2 which provides a paragraph by paragraph compliance assessment of the Proposed Scheme against the requirements set out in these parts of the NPSs.

5.1.2. The UK Government introduced the Electricity Market Reform (EMR) to incentivise investment in secure, low carbon electricity whilst improving the security of the UK's electricity supply and improving affordability to customers. The Proposed Scheme is an example of providing a balance between ensuring UK energy security whilst moving toward a more carbon efficient method of producing energy.

5.1.3. The reformed electricity market is intended to transform the UK electricity sector to one in which low-carbon generation can compete with conventional, fossil-fuel generation – ensuring a cleaner, more sustainable energy mix. Nevertheless, gas generation is still

required to meet demand. It also contributes to the objective of reducing national carbon dioxide (CO_2) emissions. Generating electricity from gas is more efficient and has a lower carbon intensity than coal, resulting in significantly lower CO_2 emissions per generated MW.

5.1.4. The Proposed Scheme would be part of the mix that helps the UK energy industry to move from a coal dependent energy production industry to a more efficient, lower carbon form of energy production.

5.1.5. The NPSs include an explanation of how Government takes account of policy relating to the mitigation of, and adaptation to, climate change. The NPSs set out the Government's objectives for the development of nationally significant infrastructure in the energy sector. EN-1 emphasises the importance of a diverse mix of energy generating technologies, including renewables, nuclear and fossil fuels, to avoid over-dependence on a single fuel type and thereby ensure security of supply.

5.1.6. Changes to the current mix of energy generating plant are occurring. A large number of existing oil, coal and nuclear power stations are expected to close over the next 10 to 15 years due to the requirements of LCPD (replaced by the IED) and as plants reach the end of their operational lives. EN-1 paragraph 3.6.1 states that fossil fuels *"will continue to play an important role in our energy mix as the UK makes the transition to a low carbon economy, and Government policy is that they must be constructed and operate, in line with increasingly demanding climate change goals"*.

5.1.7. EN-1 goes on to recognise that due to the importance of security of supply and providing flexible back up for new renewable technologies, conventional generating capacity from new fossil fuel generating stations is likely to form part of the energy generation mix.

5.1.8. EN-2 at paragraph 1.1.1 states that *"[f]ossil fuel generating stations play a vital role in providing reliable electricity supplies and a secure and diverse energy mix as the UK makes the transition to a low carbon economy"*, further emphasising that fossil fuel generating stations play a vital role in providing reliable electricity supplies.

5.1.9. It is, therefore, recognised in national planning policy that gas generation power stations align with the objectives of the UK Government to reduce carbon emissions and can contribute to the UK meeting its obligations set out in European Directives.

5.2 Part 4.1 of EN-1 – General Points

5.2.1. Paragraph 4.1.2 of EN-1 highlights the urgent need for the energy infrastructure covered by the energy NPSs and reiterates that there is a presumption in favour of granting development consent for energy NSIPs. The presumption applies unless any more specific and relevant policies set out in the relevant NPS clearly indicate that consent should be refused or any of the considerations referred to in section 104(4) to (8) of the PA 2008 (paragraph 4.1.5 above) apply.

5.2.2. In considering applications for energy NSIPs, and in particular when weighing their adverse impacts against their benefits, paragraph 4.1.3 of EN-1 states that the SoS should take into account both the potential benefits, including the contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and the potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

5.2.3. Within this context, paragraph 4.1.4 directs the SoS to take into account environmental, social and economic benefits and adverse impacts nationally, regionally and locally. Section 7 of this Planning Statement provides an assessment of the key benefits and dis-benefits of the Proposed Scheme, demonstrating that the Proposed Scheme would have a number of substantial benefits and that these clearly outweigh its dis-benefits.

5.2.4. Whilst paragraph 4.1.5 confirms that matters that the SoS may consider both important and relevant to decision making on energy NSIPs may include local development plan documents, the NPS as the primary policy document takes precedence in the event of a conflict between the NPS and other matters. Nonetheless, in this case section 6 and Table 2-1 at Appendix 2 of the Planning Statement provide an assessment and appraisal of the accordance of the Proposed Scheme with local planning policy. As the Proposed Scheme is considered to accord with the policies contained within EN-1, the other NPSs and other national and local policy, there is no conflict between the NPS(s) and other matters.

5.2.5. With regard to requirements, paragraph 4.1.7 of EN-1 states that the SoS should only impose any such requirements on a development consent where these satisfy relevant planning guidance (i.e. they are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise and reasonable in all other respects).

5.2.6. The Applicant has included a number of requirements within Schedule 2 of the draft DCO (in respect to the detailed design of the Proposed Scheme in order to appropriately mitigate and manage adverse effects during construction and operation. The draft requirements include:

- Timeframe in which to commence development;
- Notification to the relevant planning authority at certain stages of development;
- Approval and amendment of details pursuant to the requirements;
- Detailed design of the Proposed Scheme;
- Detailed landscaping and ecological mitigation proposals;
- Management of Public Rights of Way (PRoW) diversions;
- Design of highway accesses during construction;
- Design detail of both construction and operational phase site enclosure;
- Surface water and foul water drainage design and management;
- Flood risk mitigation;
- Management of contaminated land and groundwater risk;
- Archaeology;
- Protection of and mitigation for protected species;
- The preparation and implementation of a Construction Environmental Management Plan (CEMP);
- The preparation and implementation of a construction traffic management plan (CTMP);
- The preparation and implementation of a construction workers travel plan (CWTP);
- Construction hours;
- The requirement to undertake a CHP review;
- Safeguarding of CCR space and monitoring reports; and
- Management of the decommissioning phase.

5.2.7. Under Paragraph 4.1.8 of EN-1, the SoS may also take into account any development consent obligations under section 106 of the TCPA as amended by section 174 of the PA

2008 that an applicant agrees with local authorities. Any such obligations must meet similar tests to requirements as set out in paragraph 5.2.5 above.

5.2.8. The Applicant's EIA of the Proposed Scheme has identified some effects that would require mitigation. Mitigation measures have been designed into the Proposed Scheme or are secured through the draft Schedule 2 requirements to the draft DCO. In addition, heads of terms for a development consent obligation agreement with SDC and NYCC are included in the DCO Application (Proposed Heads of Terms for a Development Consent Obligation, document reference 7.1). Thiscovers the extension of Drax's existing apprenticeship to the operation of the Proposed Scheme and the implementation of a Local Employment Scheme.

5.2.9. Paragraph 4.1.9 of EN-1 requires applicants to have made a judgement as to the financial and technical feasibility of their proposed development, within the market framework and taking account of Government interventions. Where financial and technical feasibility have been properly assessed by the applicant, these are unlikely to be relevant to the SoS's decision-making. Any exceptions to this principle are dealt with where they arise in EN-1 or other energy NPSs and the reasons why financial viability or technical feasibility is likely to be of relevance are explained.

5.2.10. In this case, the Applicant has taken commercial and financial matters into consideration and decided to proceed with the Proposed Scheme. The Applicant currently owns and operates the Existing Drax Power Station Complex, which is situated on part of the Site. The decision to repower up to two coal-fired units to gas, and build battery storage, complements the Applicant's ongoing work to explore options for further generation from sustainable biomass. Three former coal units have already been successfully upgraded, on-time and on-budget, to use biomass in the form of compressed wood pellets. They account for 70 % of the electricity the Applicant produces – enough to power Leeds, Manchester, Sheffield and Liverpool and 16 % of the UK's total renewable power. This demonstrates that the Applicant is able to deliver viable power generation projects. It is considered that the Proposed Scheme, and its objectives, satisfy the policy set out in paragraph 4.1.9 of EN-1.

5.3 Part 4.2 of EN-1 – Environmental Statement

5.3.1. At paragraph 4.2.1, EN-1 states that nationally significant energy developments that are subject to the European EIA Directive 2014/52/EU (Ref. 5.1) must be accompanied by an ES describing the aspects of the environment likely to be significantly affected by the project. The European EIA Directive specifically refers to effects including those on human beings, fauna, flora, soil, water, air, climate, the landscape, material assets and cultural heritage how they are interconnected.

5.3.2. The Applicant's assessment of effects in the ES is required to cover direct and indirect effects, both permanent and temporary, cumulative effects, positive and negative effects and measures for avoiding or mitigating significant adverse effects. Paragraphs 4.2.2 - 4.2.11 of EN-1 provide further guidance on the matters the ES needs to address.

5.3.3. The Application for the Proposed Scheme is accompanied by an ES. The scope of the ES accords with the EIA Scoping Opinion from the SoS (Appendix 1.2 of the ES, document reference 6.2.1.2) and the EIA Regulations 2017. Each technical chapter of the ES Volume

1 details the assessment methodology and significance criteria that have been used for the respective assessment within the EIA.

5.3.4. In accordance with EN-1, the submitted ES assesses the likely significant effects of the Proposed Scheme, and states how effects are being avoided and mitigated. The ES Commitments Register (document reference 6.4) submitted with the Application sets out the proposed mitigation measures in detail. The ES distinguishes between the construction and operational phases of the Proposed Scheme and is therefore in accordance with the policy contained in paragraphs 4.2.1, 4.2.4 and 5.2.7 of EN-1.

5.3.5. The ES, at Chapter 3 (Site and Project Description), contains an explanation of the works and sets out the parameters for certain buildings for which the final dimensions cannot be determined at this stage. Therefore, the ES assesses the worst case scenario in terms of environmental effects, and the maximum design parameters. The level of flexibility is controlled by setting maximum dimensions and design parameters in the draft DCO.

5.3.6. In accordance with paragraph 4.2.2 of EN-1, an assessment of the likely significant socio-economic effects of the Proposed Scheme is contained at ES Volume 1, Chapter 14 (Socio-Economics) (document reference 6.1.14).

5.3.7. Further, in accordance with EN-1, the Chapter 17 (Cumulative Assessment) of the ES considers the possible cumulative effects of the Proposed Scheme and how they could interact with the effects of other planned or consented developments. The effects of the Proposed Scheme are summarised in ES Chapter 18 (Summary of Significant Effects) (document reference 6.1.18).

5.3.8. As noted above, the ES Commitments Register sets out how mitigation will be secured.

5.4 Part 4.3 of EN-1 – Habitats and Species Regulations

5.4.1. Paragraph 4.3.1 of EN-1 confirms that in their decision-making, the SoS must consider whether a project may have a significant effect on a European Site, or any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans and projects. This consideration must be made under the Conservation of Habitats and Species Regulations 2017 (Ref. 5.2). Paragraph 4.3.1 of EN-1 also requires applicants to seek the advice of Natural England (NE) and provide the SoS with such information as may be reasonably required to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment is required, the applicant must provide the SoS with such information as may reasonably be required to enable it to conduct the Appropriate Assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely adverse effects.

5.4.2. The Application includes a Habitats Regulations Assessment (HRA) Report (document reference 6.6) including HRA Screening Matrices and information to inform an Appropriate Assessment. The report concludes that the Proposed Scheme would not have adverse effects (alone or in combination with other plans or projects) on the integrity of a European Site, or any site to which the same protection is applied as a matter of policy, and is therefore in accordance with paragraph 4.3.1 of EN-1. The Applicant has held discussions with NE and the Environment Agency (EA) over the Proposed Scheme and is in active discussions

with NE and the EA in respect of the HRA Report, with the aim of setting out matters that are agreed in a Statement of Common Ground.

5.5 Part 4.4 of EN-1 – Alternatives, Part 2 of EN-4 Oil and Gas Pipelines

5.5.1. Paragraphs 4.4.1 and 4.4.2 of EN-1 states that

"[a]s in any planning case, the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to a proposed development is in the first instance a matter of law, which falls outside the scope of this NPS."

5.5.2. It goes on, however, to state that

"from a policy perspective this NPS does not contain any general requirement to consider alternatives or to establish whether a development represents the best option. However:

- *Applicants are obliged to include in their ES, as a matter of fact, information about the main alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility;*
- *In some circumstances, there are specific legislative requirements, notably under the Habitats Directive, for the [SoS] to consider alternatives. These should be identified in the ES by the applicant; and*
- *In some circumstances, the relevant energy NPSs may impose a policy requirement to consider alternatives."*

5.5.3. EN-1 does this in sections 5.3, 5.7 and 5.9 in relation to avoiding significant harm to biodiversity and geological conservation interests, flood risk and development within nationally designated landscapes, respectively.

5.5.4. Section 2.19 of EN-4 covers gas and oil pipelines; paragraph 2.19.10 states that:

"[w]hen choosing a pipeline route, applicants should seek to avoid or minimise adverse effects from usage below the surface. Where it is not considered practicable to select a route that avoids below surface usage, applicants should demonstrate in the ES that mitigating measures will be put in place to avoid adverse effects both on other below ground works and on the pipeline. Mitigating measures may include: protection or diversion of underground services; gas detection near landfill sites; horizontal direct drilling (HDD) techniques and rerouting. Contaminated material may need to be removed and disposed of."

5.5.5. The Applicant has considered the reasonable alternatives which could be considered to realistically achieve the objectives for the Proposed Scheme set out in paragraph 3.1.2 above, (including in relation to the location and route for the proposed Gas Pipeline and above ground infrastructure), which are set out within Chapter (Consideration of Alternatives) 4 of the ES (document reference 6.1.4).

5.5.6. The following alternatives have been considered for the Proposed Scheme:

- Do nothing scenario.
- Alternative development sites.
- Alternative layouts.
- Alternative technologies.

- Alternative emissions abatement.
- Alternative stack configurations.
- Alternative fuels for electricity generation.
- Alternative options for the Gas Pipeline.

5.5.7. This is in accordance with the above policy contained within EN-1, as well as regulation 14(2)(d) of the EIA Regulations 2017, which states that an ES should include:

"*A description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment".*

5.5.8. In summary, consideration of alternatives has been carried out in the context of alternatives to the Proposed Scheme that can meet the Applicant's objectives, which is considered to be in accordance with Part 4.4 of EN-1 and the relevant section of Part 2 of EN-4.

5.6 Part 4.5 of EN-1, Part 2.3 of EN-4 and Part 2.5 of EN-5 – Criteria for "Good Design" for Energy Infrastructure

Overview

5.6.1. Paragraph 4.5.4 of EN-1 requires applicants to demonstrate in their application how the design process was conducted and how the proposed design evolved. The SoS should, however, take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements, which the design has to satisfy.

5.6.2. The following paragraphs explain how the design of the Proposed Scheme has evolved in the lead up to the submission of the Application, including the design objectives of the Proposed Scheme and the mitigation embedded in its design, to minimise and mitigate impacts and respond to the existing context of the Site.

5.6.3. This section also explains the approach adopted in relation to both temporary and permanent access to the Site. The Consultation Report (document reference 5.1) submitted with the Application sets out what consultation has been undertaken in relation to the Proposed Scheme and how the key issues and comments raised have or have not been taken into account, and the reasons for doing so.

5.6.4. It is noted that this section of the Planning Statement covers the content that may otherwise be assessed in a separate Design and Access Statement.

5.6.5. The PPG "Making an application" (Ref. 5.3) states that a Design and Access Statement *"must*

- *a) explain the design principles and concepts that have been applied to the proposed development; and*
- *b) demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.*

A development's context refers to the particular characteristics of the application site and its wider setting. These will be specific to the circumstances of an individual application and a Design and Access Statement should be tailored accordingly.

Design and Access Statements must also explain the applicant's approach to access and how relevant Local Plan policies have been taken into account. They must detail any consultation undertaken in relation to access issues, and how the outcome of this consultation has informed the proposed development. Applicants must also explain how any specific issues which might affect access to the proposed development have been addressed."

5.6.6. Design and Access Statements are not a requirement for NSIPs under the APFP Regulations, and due to the nature of the Proposed Scheme and the Site, a separate Design and Access Statement is not considered to be necessary for this Application. This approach has been agreed with PINS at the pre-application stage. Therefore, the following sections cover the contents required by the PGG as set out above.

Site Context

5.6.7. As detailed in section 2 of this Planning Statement, the Site is within and adjacent to the Existing Drax Power Station Complex and is, therefore, largely within an industrialised landscape, although the surrounding environment comprises agricultural land interspersed with small settlements. Chapter 10 (Landscape and Visual Amenity) of the ES (document reference 6.1.10) contains a detailed Landscape and Visual Impact Assessment (LVIA) including an appraisal of the existing landscape character and the design of the 1960's Drax Power Station (design by A E Weddle), which gave consideration to the need to reduce visual coalescence, visual clutter and achieve a simple design and symmetry. The setting and treatment of the buildings and structures was considered to be of utmost importance.

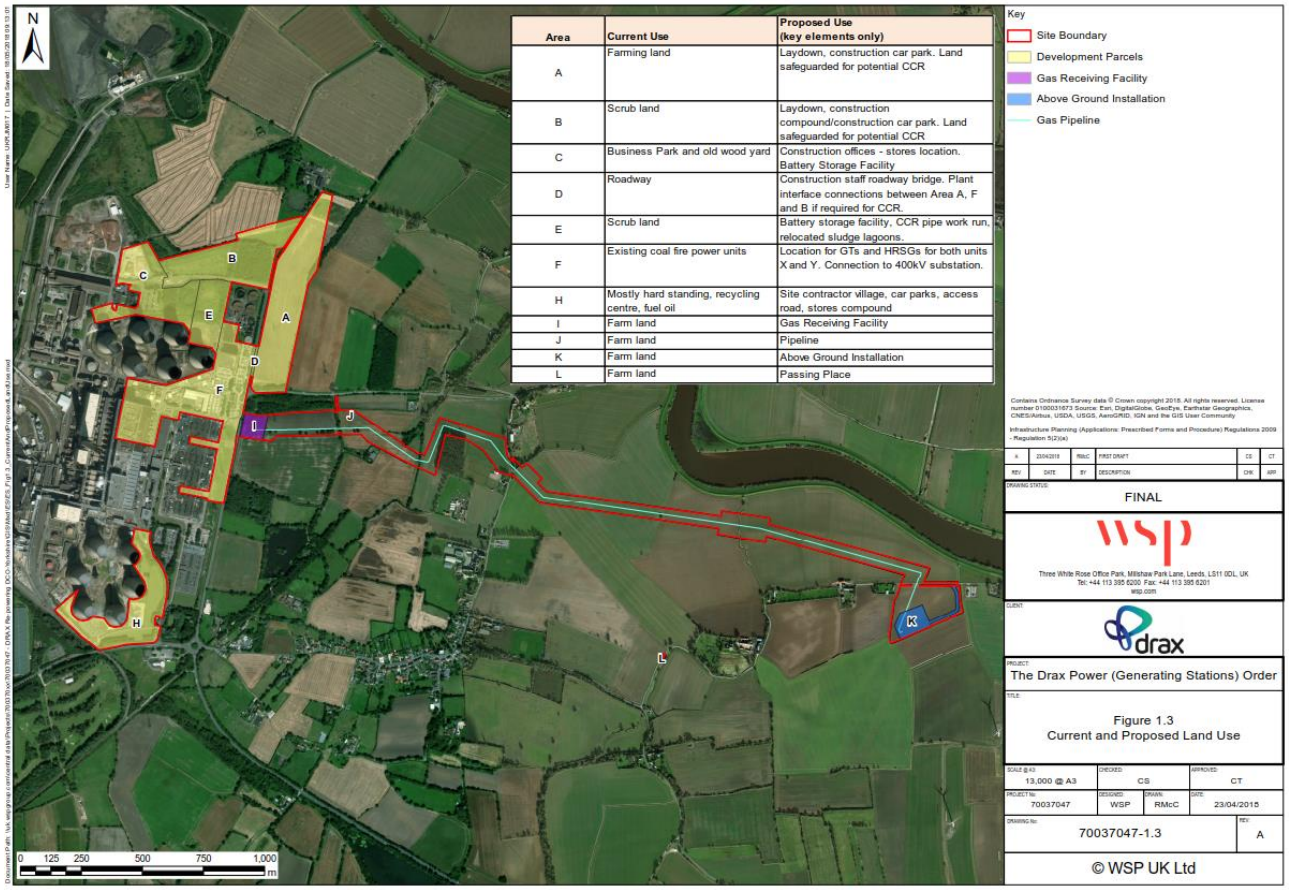
5.6.8. Appendix 10.4 (Landscape and Visual Baseline) and Appendix 10.5 (Landscape Character) of Chapter 10 (document references 6.2.10.4 and 6.2.10.5) describe the landscape characterisation at national, county and local level. This includes a detailed description of landscape features and the value of the landscape resource, as well as the level of susceptibility and sensitivity to change.

5.6.9. The Pipeline Construction Area is predominantly arable with grazing pasture, semi improved grassland and scattered trees. Fields across which the Gas Pipeline crosses are large and open bounded either by fences or ditches. Pylon towers and associated lines cut across the south eastern edge of the area in a north-east south-west direction.

5.6.10. The topography of the Existing Drax Power Station Complex is varied. Land close to the southern entranceway near the cooling towers and forming part of Development Parcel H as shown on Figure 1.3 of the ES (see Figure 1 of the Plannign Statement) sits at a lower level than the A645, whilst land to the north of the northern entrance is raised, some areas formerly a disused tip. An extensive coal storage area partially screens land to the south west whilst ash mounds partially screen land to the northwest.

5.6.11. Paragraph 1.131 of Appendix 10.1 describes the Site in terms of its landscape character and visual amenity based on the Development Parcels shown in Figure 1.3 of the ES.

Figure 1 – Current and Proposed Land Use (Figure 1.3 of the ES)



5.6.12. Development Parcel A in the north-eastern part of the Site consists of a linear arable field edged by a ditch to the north, south and west. A native species rich hedgerow runs to the east of the field whilst another unmanaged hedgerow runs to the west with occasional hedgerow trees. A broadleaved woodland forms the southern boundary of this Development Parcel, edging Carr Lane. The broadleaved woodland links visually within a group of semi mature trees to the south. As explained in Appendix 10.1 of ES Chapter 10, field boundaries form a strong visual screen to the development parcel especially during summer months. A Public Right of Way (PRoW) runs across the northern corner of the development parcel which would be diverted to accommodate the Carbon Capture and Storage (CCS) if is taken forward in the future.

5.6.13. Development Parcel B lies north of the northern entranceway into the Site and includes a mature deciduous plantation on the corner of New Road and the northern entranceway into the Site and a mixed plantation on steep banks forming part of the Drax Power Station's northern boundary. Both woodland plantations are strong landscape features that act as visual screen for receptors in close proximity to the Site. The remainder of this parcel is a mix of scrub, improved grassland used for grazing and arable land, although it is noted that the latter lies outside the Existing Drax Power Station Complex's boundaries. The PRoW mentioned in relation to Development Parcel A continues to the northern edge of Development Parcel B.

5.6.14. Development Parcel C sits to the south-west of Development Parcel B. It currently includes five buildings, a car park with areas of hardstanding and groups of ornamental shrubs and trees. The northern part of this parcel is a wood yard whilst land to the east includes a pond surrounded by dense scrub and woodland. An unmanaged hedgerow runs along the southern edge of this parcel.

5.6.15. Development Parcel D includes New Road. The planting alongside the road and to the east of the Existing Drax Power Station Complex is of mixed quality and condition and includes a mix of small deciduous trees, hedgerows and improved grassland.

5.6.16. Development Parcel E predominantly contains semi mature broadleaved woodland, scrub and semi improved grassland. It is currently used for grazing.

5.6.17. The area that forms Development Parcel F includes land to the west of the cooling towers and comprises stores, contractor compounds and car parking. Vegetation is a mix of formal planting around car parks, roads and buildings consisting of mature and semi mature deciduous trees and a large area of scrub which lies between the switchgear and security fencing running along the edge of New Road.

5.6.18. Former Development Parcel G surrounding and adjacent to Drax jetty adjacent to the River Ouse no longer forms part of the Site.

5.6.19. Development Parcel H is largely hardstanding with surfaces of concrete / gravel used for car parking and storage including fuel oil, and edged by security fencing with CCTV cameras. Along the A645 and the southern entrance into the Site (used by visitors and staff) landscaping is a mix of improved grassland, native deciduous hedgerows and trees to the rear and along the bank. Internally landscaping edging the road access and hardstanding is a mix of amenity grassland with small areas of shrubs and isolated or small groups of trees.

5.6.20. As shown in Figure 1 above, the Power Station Site (areas within the Existing Drax Power Station Complex where development is proposed) largely wraps around or is contained within an already industrialised site that has long been established for electricity generation.

5.6.21. In planning terms, the Proposed Scheme is industrial by nature and is considered to be, in principle, appropriate for the context within which it is proposed to be located. The Existing Power Station Complex is an existing brownfield site, and thus, the utilisation of its land and existing infrastructure is considered to be efficient land use. Constructing a new power station on greenfield land would potentially have much more significant environmental, including visual, impacts. However, it is acknowledged that due to the relatively flat topography of the Site and its surrounds, the Existing Drax Power Station Complex is visible for several kilometres and, therefore, careful design of the Proposed Scheme has been considered to be very important.

Consideration of Alternatives and Development of the Proposed Scheme

5.6.22. As noted above, Chapter 4 (Consideration of Alternatives) of the ES sets out the alternatives that have been considered before arriving at the Proposed Scheme design. Given the nature of the Proposed Scheme, and its objectives relating to maximising the efficiency of the existing Drax Power Station including by utilising as much existing operational land and infrastructure as possible, geographically remote power station sites were not considered

feasible and accordingly, it was decided early in the feasibility assessment and design process that the Existing Drax Power Station Complex would be utilised for the generating station equipment. Throughout the feasibility assessment and design process several routes were considered for the Gas Pipeline. Optioneering for the Gas Pipeline route was undertaken deliberately to ensure that the existing context of the Site was taken into account in the design process and that ultimately, a robust route was selected that responds to the Site context and minimises the potential for adverse effects on sensitive environmental and human receptors.

5.6.23. Chapter 4 (Consideration of Alternatives) of the ES demonstrates that robust consideration has been given to alternative design options and that ultimately, the design of the Proposed Scheme is fit-for-purpose for its proposed function. Key elements of the Proposed Scheme (being its layout within the Existing Drax Power Station Complex, the selection of gas turbines and HRSGs, stack height and configuration, and the route of the Gas Pipeline) have been through several design iterations and evolutions. This process and the key design considerations is set out in Chapter 4.

5.6.24. Environmental and technological constraints have informed the siting of the Proposed Scheme, its extent and height. Alternative solutions such as combining stacks and rechannelling emissions through the existing chimney were considered with a view to mitigating landscape and visual impacts, however, such options were not feasible. Inherent design measures have, however, considered the colour and lighting of the Proposed Scheme and the retention of existing vegetation (which serves an important screening function) where feasible, and requirements are included in Schedule 2 to the draft DCO (to secure approval and implementation of details of lighting and detailed design such as external appearance (including colour and materials). Chapter 10 (Landscape and Visual Amenity) of the ES notes in paragraph 10.4.18 that the colours for the Proposed Scheme at this stage are indicative, and details would be agreed with the LPA pursuant to a DCO requirement prior to construction. The indicative colours as set out in Table 10-6 of Chapter 10 have drawn on Drax Power Station's original colour palette.

Effects and Mitigation

5.6.25. Whilst it is acknowledged that as a consequence of environmental and engineering constraints, the Proposed Scheme would "jar" and conflict with the symmetry of the original Weddle's design from specific directions, resulting in visual coalescence, visual clutter and discordant views, it should be noted that since Weddle's original design other developments on the Existing Drax Power Station Complex have added to the visual clutter and widened the development footprint. Such developments include the biomass units (planning reference 2007/1420/FUL – see Appendix 1 of this Planning Statement for further details) and Ecostore (planning reference 2005/0115/FUL) as well as the more recent Lytag plant to the north west of the Existing Drax Power Station Complex (planning references NY/2012/0270/73, NY/2011/0491/ENV and NY/2011/0311/SCO).

5.6.26. Chapter 10 of the ES explains that the Proposed Scheme would result in significant adverse effects, including on landscape character, local landscape character and an Important Landscape Area (ILA) (the Lower Derwent ILA) during the construction and operational phases of the Proposed Scheme. These effects would largely be associated with aesthetic

and perceptual qualities of the new units, stacks and associated structures against the Existing Drax Power Station Complex, which is a dominant feature in the landscape with a strong, almost iconic “presence". The scale of the development would increase in terms of overall footprint and impact on local landscape features on and off site. Subject to appropriate climatic conditions, plumes from the existing cooling towers would mask views of the tops of the stacks in certain directions. However, it is noted that cooling towers have different properties and as a result, visible plumes from the cooling towers tilt more rapidly under the effect of the wind than plumes that would be emitted by the proposed stacks. It is therefore unlikely that visible plumes from the cooling towers and the proposed stacks would merge but it is anticipated that visible plumes, particularly from Unit X, would be partly masked by visible plume from the existing cooling towers.

5.6.27. The Proposed Scheme responds to its visual impacts by incorporating mitigation measures as inherent components embedded within its design (e.g. screen planting). Effects would vary depending on the timescale by which vegetation reaches maturity. Compensation Areas have been identified to mitigate / offset against the loss of local landscape features on and off the Power Station Site, to respond to specific localised visual effects, enhance landscape character, improve connectivity and reinforce some of Weddle’s aspirations. This planting would be both within the Site, and also outside Site on land that is within the Applicant's legal ownership. Accordingly, "off-Site" planting forms part of the Applicant's landscape and ecological mitigation strategy,. The majority of these "off-Site" planting areas are concentrated to the north and north-west of the Proposed Scheme. The Outline Landscape and Biodiversity Strategy forms part of the DCO Application (document reference 6.7) and is subject to a requirement in Schedule 2 to the draft DCO. It contains comprehensive measures that would provide both amenity and ecological benefits, including

- New broadleaved, coppice woodland / scrub and woodland carr;
- New broadleaved parkland and scattered trees (ornamental tree planting);
- New scrub planting enhancing the mosaic associated with the woodland areas;
- Enhancement of existing ornamental shrub planting;
- Infilling of existing hedgerows and the planting of new hedgerows;
- The establishment of species rich grassland habitats;
- he introduction of new ponds to replace those lost during construction; and
- Plug planting of woodland ground cover.

5.6.28. Chapter 10 (Landscape and Visual Amenity) concludes that there would inevitably be significant adverse effects on visual amenity as a consequence of the Proposed Scheme. However, it acknowledges that NPS EN-2 paragraph 2.6.5 states that

“[i]t is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impacts on visual amenity as far as reasonably practicable.”

5.6.29. A “best fit” solution should be designed to reduce the visual impacts giving consideration to the design and size, external finish and colour as far as compliance with engineering and environmental requirements permit (NPS EN-2 paragraph 2.6.6).

5.6.30. As it is not possible to eliminate the visual impact of the Proposed Scheme, mitigation is proposed, where feasible, to reduce impacts through the proposed Compensation Areas,

focusing on reducing visual intrusion at a local level, and minimising the impact on visual amenity for immediate visual receptors.

Consultation

5.6.31. The (design) details of the Proposed Scheme have been subject to comprehensive consultation with the public, stakeholders and the LPAs. Appendix 10.2 (Consultation with LPAs) to Chapter 10 of the ES (document reference 6.2.10.2) contains details of the consultation with LPAs covering preliminary and revised viewpoints and agreed representative viewpoints. Further, Table 10-1 in ES Chapter 10 sets out the responses from statutory consultees to the statutory consultation on the Preliminary Environmental Information Report (PEIR) (see document reference 6.9 for the Non-Technical Summary of the PEIR) and how comments from those consultees on the landscape and visual impacts of the Proposed Scheme have been addressed by the Applicant. This is also set out in section 8 of the Consultation Report. In particular, NYCC and SDC, in their combined consultation response, stated that

5.6.32. *"[…] the ES should refer to and demonstrate that the original ethos behind landscape and mitigation contained in the A E Weddle July 1966 Report has been considered and the scheme designed to take account of that original composition of the layout of cooling towers, turbine and boiler houses. The ES should identify the nature of and explain any operational constraints of the existing site layout as to how the proposed locations of the new gas fired turbines and Heat Recovery Steam Generators (HRSGs) have been influenced. […] Although in long range views the symmetry of the Station will be preserved, in closer locations the new stacks in the vicinity of the northern cooling towers have the tendency to jar and conflict with the symmetry. […] Due to the scale and proposed arrangement of the turbine buildings and flues, the proposal will be visible from particular directions and viewpoints. Although partly obscured by existing buildings and cooling towers, there are additional issues of coalescence and 'clutter' which the ES should consider. Thus there should be an underlying emphasis on good design and site layout to reduce the propensity for 'clutter' of structures, scale and massing of buildings, and any adverse visual effects of the development. It is important that the ES explains what efforts have been made to reduce the height and number of flue stacks. […]*

5.6.33. Paragraphs 5.6.7 to 5.6.14 above respond to these comments by acknowledging the importance of the original Drax Power Station design by Weddle and the effects of the Proposed Scheme on its symmetry as well as the effects on the surrounding landscape character and ILAs. However, since the original Weddle design, there has been an erosion of the original symmetry and a widening of the original footprint increasing visual coalescence from some elevations and increasing visual clutter through an intensification of land use. This has been through incremental development on the Existing Drax Power Station Complex prior to this Application as explained above.

Balance of Significant Landscape and Visual Effects and Benefits of the Proposed Scheme

5.6.34. In the context of landscape and visual amenity, the most significant residual negative effects associated with the Proposed Scheme, as set out in Chapter 10 (Landscape and Visual Amenity) of the ES, would be moderate to major adverse effects on the Lower Derwent ILA

as well as moderate to major adverse effects on landscape character and local landscape character during construction and operation. However, the negative effects must be balanced with the benefits of the Proposed Scheme (in particular the contribution to meeting the UK's energy need), which are summarised in section 7.2 of this Planning Statement. It is again noted that the NPSs acknowledge that *"it is not possible to eliminate the visual impacts associated with a fossil fuel generating station"* (EN-2, paragraph 2.6.5). The NPSs do not set an expectation that development proposals will be concealed from views. Accordingly, the priority in design terms is to reduce, rather than prevent, adverse landscape and visual impacts where possible. In accordance with this, the Proposed Scheme has been subject to a detailed LVIA which was informed by responses from consultees.

5.6.35. For the reasons outlined in this Planning Statement and Chapter 10 of the ES it is considered that the Proposed Scheme is sensitively designed and minimises adverse landscape and visual effects.

5.6.36. In light of the above, it is considered that the Proposed Scheme represents good design in accordance with policy set out EN-1, EN-2, EN-4 and EN-5.

5.7 Part 4.6 of EN-1 – Consideration of Combined Heat and Power (CHP)

5.7.1. At paragraph 4.6.1, EN-1 explains the principles of CHP. Where CHP cannot be provided at the time of development, paragraphs 4.6.8 and 4.6.9 of EN-1 require applicants to demonstrate how the future provision of CHP has been designed into the scheme.

5.7.2. In line with the above, paragraphs 2.3.2 – 2.3.3 of EN-2 highlights the importance that Government attaches to CHP, for the reasons set out in EN-1.

5.7.3. The Applicant has assessed the feasibility of CHP in accordance with the above policies of EN-1. The CHP Statement submitted with the Application (document reference 5.6) concludes that due to the uncertainty of future heat loads, the lack of currently available suitable heat loads, and the undefined operating scheme of the Proposed Scheme, as well as low heat demand in the surrounding area, it is currently not viable for the Proposed Scheme to include CHP from the outset. The Proposed Scheme has, however, been designed to accommodate CHP at a future date by allowing sufficient areas for future CHP infrastructure. A requirement in Schedule 2 of the draft DCO requires regular reviews of the CHP assessment to be submitted to the relevant planning authority, considering opportunities for export of heat from the main development.

5.7.4. For the reasons set out above, the Proposed Scheme is considered to accord with the above policies.

5.8 Part 4.7 of EN-1 – Carbon Capture and Storage (CCS) and Carbon Capture Readiness (CCR)

5.8.1. EN-1 supports the use of CCS and paragraph 4.7.5 states that "*[a]ll commercial scale fossil fuelled generating stations have to be carbon capture ready*." Further, paragraph 4.7.10 states that

"*[t]o ensure that no foreseeable barriers exist to retrofitting carbon capture and storage (CCS) equipment on combustion generating stations, all applications for new combustion plant which are of generating capacity at or over 300 MW and of a type covered by the EU's*

Large Combustion Plant Directive (LCPD) should demonstrate that the plant is "Carbon Capture Ready" (CCR) before consent may be given."

5.8.2. A CCR Statement has been submitted with the Application (document reference 5.7) which confirms that a sufficient area has been secured to accommodate any future CCS infrastructure in the future. The draft DCO includes a requirement in Schedule 2 to the draft DCO for the Applicant to safeguard the proposed Carbon capture readiness reserve space for the installation and operation of carbon capture equipment, should it be deemed necessary to do so in future.

5.8.3. The Applicant is also required by a requirement in Schedule 2 to the draft DCO to monitor and report to the SoS, every two years from the date of full commissioning of Unit X, on its compliance with the safeguarding requirement, whether it considers the retrofit of carbon capture technology is feasible, and whether it has decided to seek any additional regulatory clearances, or to modify any existing regulatory clearances, in respect of any CCR proposals.

5.8.4. By being CCR, the Proposed Scheme meets the requirements of EN-1 and EN-2.

5.9 Part 4.8 of EN-1, PART 2.2 of EN-4 and PART 2.4 of EN-5 – Climate Change Adaptation

5.9.1. At paragraph 4.8.5, EN-1 states that, considering the long term nature of new energy infrastructure, applicants must consider the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the impact of the Proposed Scheme on climate change. This information will support the SoS in his decision making.

5.9.2. Paragraph 2.3.13 of EN-2 requires fossil fuel generating infrastructure to be resilient to coastal changes and increased risk from tidal and storm surge; the effects of higher temperatures, including higher temperatures of cooling water, and increased risk of drought leading to a lack of available cooling water.

5.9.3. In line with this, EN-4 at paragraph 2.2.2 requires gas pipelines and other infrastructure to be resilient to the effects of climate change, such as increased risk of flooding; effects of rising sea levels and increased risk of storm surge; higher temperatures; increased risk of earth movement or subsidence from increased risk of flooding and drought; and any other increased risks identified in the applicant's assessment.

5.9.4. Paragraph 2.3.14 of EN-2 refers back to section 4.8 of EN-1 which notes that climate change adaptation should be assessed in the ES. This assessment is provided in Appendix 15.1 to the ES Volume 2 (document reference 6.2.15.1), which contains a Climate Risk and Vulnerability Assessment (CRVA). The sensitivity assessment identified a range of climate variables and climate-related hazards that the Proposed Scheme elements are likely to be sensitive to, including

- Sea (e.g. sea level rise and storm surge and storm tides);
- Precipitation (e.g. drought and extreme precipitation events;,
- Temperature (e.g. extreme events, such as heatwaves);
- Wind (e.g. gales and extreme wind events and storms, including hail and lightning);
- Relative humidity (e.g. changes in annual average); and

- Water quality and soils (e.g. surface runoff and soil stability).

5.9.5. The Proposed Scheme elements are deemed to be highly sensitive to sea level rise and storm surge / tides, as well as extreme precipitation and temperature events.

5.9.6. The Assessment has been undertaken in response to the 2014 amendment to the EIA Directive (2014/52/EU), transposed into UK law by the EIA Regulations 2017. The approach aims to assess the vulnerability of the Proposed Scheme to climate change and extreme weather events and support mainstreaming of climate risks into major projects to build resilience. Following mitigation, the Proposed Scheme was deemed to be highly resilient (i.e. a strong degree of climate resilience, remedial action or adaptation may be required but is not a priority) to the following:

- Structural stability, relating to:
  - Flooding of the Site and its assets, droughts, damage to structures, signage and foundations, overheating of equipment, lightning strike and fires.
- Weather proofing and detailing, relating to:
  - Guttering and drainage, the mobilisation of pollutants, dust and windborne materials and high diurnal temperature ranges.
- Material durability, relating to:
  - Deterioration of materials and damage to weather proofing.
- Site contents and business continuity, relating to:
  - Loss of service due to flooding, extreme rainfall causing power outages, availability of water for abstraction, working conditions, reduced opportunities for maintenance and electrical surges caused by storms.

5.9.7. The Proposed Scheme was deemed to be moderately resilient (i.e. a moderate degree of climate resilience, remedial action or adaptation is suggested) to the following:

- Structural stability, relating to*:*
  - Subsidence, failure of earthworks and shrinking/cracking of soils.

5.9.8. This is considered to be acceptable with regard to policies 4.8.5 of EN-1, 2.3.13 of EN-2, 2.2.2 of EN-4 and 2.4.1 of EN-5.

5.9.9. It is also noted that Chapter 15 (Climate Change) of the ES (document reference 6.1.15) assesses the potential effects of the Proposed Scheme upon climate change. It concludes that whilst the Proposed Scheme would result in substantial greenhouse gas emissions during construction, particularly during the ”product stage”, it would continue to utilise existing infrastructure such as the cooling towers and steam turbines, reducing the greenhouse gas emissions compared to the alternative of constructing equivalent power generation capacity at a new power station site. In terms of the greenhouse gas (GHG) emissions intensity per unit of electricity output, the Proposed Scheme would in a significant positive effect on climate.

5.9.10. Finally, paragraph 2.4.1 of EN-5 requires the consideration of the effects of flooding (particularly on substations that are vital for the electricity transmission and distribution network), winds and storms (on overhead lines), higher average temperatures (leading to increased transmission losses) and earth movement or subsidence caused by flooding or drought (on underground cables).

5.9.11. Chapter 12 (Water Resources, Quality and Hydrology) of the ES (document reference 6.1.12) and the Flood Risk Assessment (FRA) (document reference 6.8) assess the potential flooding effects associated with the Proposed Scheme. The ES and FRA conclude that the Proposed Scheme, subject to appropriate mitigation including appropriate drainage systems, would not increase the risk of flooding during the construction and operational phases. A requirement in Schedule 2 of the draft DCO requires the approval of details in relation to the management of drainage and surface water for the construction and operation of the Proposed Scheme and, where necessary, for these to be in accordance with the CEMP during construction. An Outline CEMP (document reference 6.5) has been prepared by the Applicant and submitted as part of the Application. The final CEMP would include measures to ensure that construction does not result in an unacceptable increase to flood risk within the Site and to surrounding property. The approval and implementation of the CEMP is also secured by a requirement in Schedule 2 to the draft DCO.

5.9.12. In conclusion, the Proposed Scheme is considered to be in accordance with the policies of the relevant NPSs relating to climate change adaptation.

5.10 Part 4.9 of EN-1 – Grid Connection

5.10.1. At paragraph 4.9.1, EN-1 notes that the grid connection point of a generating station to the electricity network is an important consideration for applicants. The NPS highlights that it is for the applicant to ensure that there will be the necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated. This paragraph also notes that it may be the case that an applicant has not yet received or accepted a formal grid connection offer at the time of submitting an application, although it is likely to have applied for one and discussed it with them. The SoS will want to be satisfied that there is no obvious reason why a grid connection might not be possible.

5.10.2. In relation to this, paragraphs 2.2.10 and 2.2.11 of EN-2 point out that the technical feasibility of the export of electricity from a generating station is dependent on the capacity of the grid network to accept the likely electricity output, as well as the voltage and distance of the connection. The NPS highlights the commercial risk where applicants have not sought reassurance that a viable connection exists before submitting an application for a DCO. The NPS goes on to say that even if the precise route of a connection has not been identified, in accordance with paragraph 4.9.1 of EN-1 an applicant must provide information as to how the generating station is to be connected and whether any particular environmental issues are likely to arise from that connection.

5.10.3. The Proposed Scheme would connect to the existing National Electricity Transmission System (NETS) at the existing 400 kV substation adjacent to the Existing Drax Power Station Complex. The output from each of the new generating stations is proposed to be banked using GIS housed in a new building close to the generating units. There would then be a connection from the GIS banking building to the existing 400 kV substation.

5.10.4. Connection from the GIS banking building to the existing 400 kV substation would be by underground cable for Unit X.

5.10.5. The connection for Unit Y from the GIS banking building to the existing 400 kV substation would be by either:

- An underground cable (as described above for Unit X); or
- An underground cable that terminates in a new cable sealing end compound outside of the fence line of the existing 400 kV substation and is connected to the existing equipment using overhead conductors.

5.10.6. The Grid Connection Statement submitted with the Application (document reference 5.4) demonstrates that a connection to the existing substation is technically feasible.

5.10.7. For Unit X, Drax will enter into an Agreement to Vary (ATV) its existing Bilateral Connection Agreement (BCA) A/NP/90/1-9EN(5) of 18 September 2001 (as amended from time to time), and a construction agreement (to be entered into on the same date as the ATV) and related documentation, with NGET to connect the Unit X generating station equipment to the NETS in the manner as outlined above (which has been discussed and agreed with NGET).

5.10.8. The ATV to the connection agreement will provide the Unit X generating station equipment with a connection to the NETS by the latest, September 2023.

5.10.9. For Unit Y, Drax will submit a further ATV application to NGET in relation to BAC A/NP/90/1-9EN(5) of 18 September 2001 when required to support connection of the Unit Y generating station equipment.

5.10.10. It is, therefore, considered that the Proposed Scheme accords with the relevant NPSs as the Applicant has taken all applicable matters into account to provide an appropriate grid connection.

Gas Connection

5.10.11. The Applicant has also submitted a Gas Connection Statement with the Application (document reference 5.5). This demonstrates that connecting to the NTS will be feasible, and also provides information on who will be responsible for designing, building and operating the proposed gas connection in accordance with APFP regulation 6(1)(a)(ii).

5.10.12. The Applicant submitted a Planning and Advanced Reservation of Capacity Agreement (PARCA) application to National Grid Gas plc (NGG) on 7 March 2018. The PARCA application seeks confirmation from NGG that there is sufficient gas capacity to supply the Proposed Scheme and states the intention of the Applicant to reserve such capacity.

5.10.13. The Applicant also submitted a connection application to NGG on 1 March 2018 for the MOC which facilitates the connection of the Gas Pipeline to the NTS (thereby connecting the Proposed Scheme to the NTS).

5.10.14. Upon submission of the connection application to NGG, NGG will have circa six months to provide the Applicant with a Full Connection Offer (FCO).The FCO will detail the physical construction costs, programme of works and the layout of the proposed connection of the Gas Pipeline to the NTS. The Applicant will have a further three months to decide whether to accept the terms of the offer.

5.10.15. Following acceptance of the FCO, the Applicant will enter into a Design and Build Agreement (DBA) with NGG for the construction of the new MOC. The DBA will set out the cost and timescales for delivery of the MOC ensuring full delivery (mobilisation, construction and commissioning) is prior to the target first operation date for the Proposed Scheme.

5.11 Part 4.10 of EN-1 – Pollution Control and Other Environmental Regulatory Regimes

5.11.1. Paragraph 4.10.1 of EN-1 states that discharges or emissions which affect air quality, water quality, land quality or noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes. A number of other consents and licences, including an Environmental Permit (EP), will or may be required to build and operate the Proposed Scheme, which are set out in the Other Consents and Licences Document (document reference 5.8) submitted with the Application.

5.11.2. Paragraph 4.10.3 of EN-1 goes on to state that in considering an application for development consent, the SoS should focus on whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions and discharges themselves. The SoS should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes will be properly applied and enforced by the relevant regulator. In this respect, it is noted that the construction phase environmental impacts of the Proposed Scheme would be managed through the implementation of a CEMP.

5.11.3. The Outline CEMP submitted with the Application (document reference 6.5) sets out a series of measures, based on best-practice guidance, to control the environmental effects of construction of the Proposed Scheme. This would include (for example) measures aimed at controlling noise and light impacts, measures such as the use of fencing to demarcate the construction footprint and protect adjacent ecological features, methods for managing waste and methods for addressing pollution incidents, should they occur. These measures are expected to form an important part of efforts to control construction phase impacts on habitats and protected or notable species.

5.11.4. A requirement in Schedule 2 of the draft DCO secures the preparation and implementation of a final CEMP, to be submitted to and approved by SDC, during the construction phase.

5.11.5. Paragraph 4.10.5 of EN-1 notes that many developments covered by the NPS will be subject to the EP regime. Paragraph 4.10.6 goes on to advise applicants to make early contact with relevant regulators including the EA, to discuss their requirements for EPs and other consents. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the SoS. Where possible, applicants are encouraged to submit applications for EPs and other necessary consents at the same time as applying to the SoS for development consent. As set out in the Other Consents and Licences Document referred to above, the Applicant will likely submit the EP application on 29 May 2018. There has been ongoing engagement with the EA on the Proposed Scheme, and this will continue throughout the application process.

5.11.6. Overall, it considered that the Proposed Scheme accords with the relevant NPSs as the Applicant has taken all relevant matters into account to prevent and control pollution.

5.12 Part 4.11 of EN-1 – Safety and Part 2.5 of EN-4 – Major Accident Hazards

5.12.1. Paragraph 4.11.1 of EN-1 explains that the Health and Safety Executive (HSE) is responsible for enforcing a range of occupational health and safety legislation, some of which is relevant to the construction, operation and decommissioning of energy

infrastructure. In accordance with the policy set out in this paragraph, the Applicant has consulted with the HSE on matters relating to safety, and, as set out in part 8 of the Consultation Report, no objection has been raised, and any comments made by the HSE have been addressed.

5.12.2. Chapter 16 (Major Accidents and Disasters) of the ES (document reference 6.1.16) addresses the potential vulnerability of the Proposed Scheme to major accidents and/or disasters as now required by the EIA Regulations 2017.

5.12.3. Paragraphs 4.11.2 and 4.11.3 of EN-1 state that some technology will be regulated by specific health and safety legislation, for example, some energy infrastructure will be subject to the Control of Major Accident Hazards (COMAH) Regulations 1999 (Ref. 5.4), aimed at preventing major accidents involving dangerous substances and limiting the consequences to people and the environment of any that do occur. Paragraph 2.5.1 of EN-4 reiterates that gas storage and supply infrastructure sites are specifically subject to the COMAH Regulations 1999.

5.12.4. The proposed works within the Existing Drax Power Station Complex, which comprise upgrades to existing infrastructure and associated developments, are considered unlikely to expose end users (e.g. local residents or users of adjacent land) to contaminants. The potential for any personnel at the Existing Drax Power Station Complex to be subject to contaminant exposure is (and will continue to be) mitigated through adherence to all relevant legislation, guidance and best practice (e.g. Control of Substances Hazardous to Health (COSHH) assessments).

5.12.5. The works in the Pipeline Area have a greater potential to expose end users to (e.g. local residents or users of adjacent land) to contaminants. The key potential contaminative link identified within Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11) relates to the potential for end users to ingest abstracted groundwater that has been contaminated.

5.12.6. The potential for ingestion of abstracted groundwater has been qualitatively assessed and assigned a risk category of moderate to low and the effect on end users has been assessed as unlikely to exceed neutral or slight adverse.

5.12.7. On this basis, potential effects on groundwater from the works in the study area covered by Chapter 11 (Ground Conditions) of the ES Volume 1, throughout the construction and operational phases, are unlikely to exceed minor adverse. This is considered to be acceptable in planning policy terms.

5.12.8. The proposed Gas Pipeline, AGI and GRF will be constructed to the relevant safety and industry standards, including COMAH, in accordance with the Pipeline Safety Regulations 1996 (Ref. 5.5) and the appropriate notifications will be made. The standard Gas Pipeline wall thickness would comply with the requirements of the Institute of Gas Engineers' (IGE) Recommendations on Transmission and Distribution Practice (IGE/TD/1) (Ref. 5.6), which defines the minimum safe separation distance between a high pressure gas pipeline and normally inhabited buildings / major roads / major railways. The Gas Pipeline would be buried to a depth of cover which is in accordance with recognised industry standards.

5.12.9. Construction works would be undertaken in accordance with all relevant legislation, guidance and best practice and will include, for example, COSHH assessments and the wearing of appropriate Personal Protective Equipment (PPE) and other applicable apparatus/equipment associated with the underlying ground conditions. Adherence to such documents and guidance is likely to preclude adverse effects to construction workers (in the construction phase) associated with the possibility of exposure to contaminants potentially present in the ground.

5.12.10. It would be the responsibility of the Principal Contractor, as defined in the Construction (Design and Management) Regulations 2015 (Ref.5.7), to determine and ensure compliance with the relevant legislation, guidance and best practice during the construction phase. This is likely to include the following, for example:

- Health and Safety in Construction (HSG150) (HSE, 2006) (Ref. 5.8).
- A Guide to Safe Working on Contaminated Sites, R132, CIRIA, 1996 (Ref. 5.9).

5.12.11. The potential impact to construction workers at the Existing Drax Power Station Complex and in the Pipeline Area in the construction phase will, therefore, be “no change”. No impacts to construction workers are expected for the Existing Drax Power Station Complex or Pipeline Area in the operational phase (also “no change”), given construction will be complete by that time.

5.12.12. It is subsequently deemed that the significance of the effect on construction workers at the Existing Drax Power Station Complex and Pipeline Area throughout the construction, operational and decommissioning phases will be neutral.

5.12.13. It is, therefore, considered that the Proposed Scheme accords with Part 4.11 of EN-1 and Part 2.5 of EN-4 as the Applicant has taken all relevant matters into account to provide appropriate safety provisions.

5.13 Part 4.12 of EN-1 and Part 2.4 of EN-4 – Hazardous Substances

5.13.1. At paragraph 4.12.1, EN-1 states that all establishments wishing to hold stocks of certain hazardous substances above a certain threshold require Hazardous Substances Consent (HSC). EN-1 goes on to state that applicants should consult the HSE at the pre-application stage if a project is likely to need such consent. As stated in paragraph 5.12.1 above, the HSE has been consulted on the Proposed Scheme. Part 2.4 of EN-4 reiterates the policy direction established by Part 4.12 of EN-1. The Consultation Report sets out the details of HSE’s consultation response and how the Applicant has responded to it,

5.13.2. As set out in the Other Consents and Licences Document submitted with the Application, if required for the Proposed Scheme, the Applicant will prepare a HSC application for submission to the hazardous substances authority (being SDC).

5.13.3. The proposed Gas Pipeline would not require HSC, however, it would be constructed to the relevant safety and industry standards in accordance with the Pipeline Safety Regulations 1996 A notification under the Pipeline Safety Regulations 1996 would be made to the HSE.

5.13.4. Embedded mitigation for the Proposed Scheme includes the measures set out in the Outline CEMP, which has been submitted alongside the ES. The final CEMP would be implemented during the construction phase and would detail measures for the prevention of impacts to

human health and the environment from contamination and the control of hazardous substances.

5.13.5. It is considered that the Proposed Scheme accords with Part 4.12 of EN-1 and Part 2.4 of EN-4 with regard to hazardous substances as the Applicant has taken all relevant matters into account to provide appropriate hazardous substance storage and precaution.

5.14 Part 4.13 of EN-1 – Health

5.14.1. At paragraph 4.13.1, EN-1 highlights that energy production has the potential to impact on the health and well-being of the population. EN-1 goes on to state that where development has the potential to result in effects on human beings, the ES should assess those effects for each element of the project, identifying any adverse health impacts and measures to avoid, reduce or compensate the impacts as appropriate.

1.1.2. The health of construction workers, operational workers, local residents and users of adjacent land has been considered and appropriately assessed on a topic-by-topic basis within the ES Chapters as appropriate (in particular Chapters 6 (Air Quality), 7 (Noise and Vibration) and 11 (Ground Conditions). and cumulative health impacts. It is noted that in their formal consultee response, SDC and NYCC agreed that *"with the stack height set to 120 m, no exceedances of air quality objectives or limit values for the protection of human health are modelled. As such, no residual significant effects are expected on human health"* (see Table 6-4 in Chapter 6 (Air Quality) of the ES). Chapter 6 sets out that in particular, for ambient pollutant concentrations, total predicted environmental concentrations with the operation of the Proposed Scheme are well within the air quality objectives set in UK regulations for the protection of health. These levels are set to be protective and, as such, where concentrations are within the objectives no adverse effects would occur.

1.1.3. With regard to noise, Chapter 7 (Noise and Vibration) concludes that that operational noise levels as a result of the Proposed Scheme in amenity areas, such as gardens, are predicted to comfortably meet with the World Health Organisation's (WHO's) recommended values at all locations with Noise Sensitive Receptors (NSR). Noise arising from construction would be temporary and would be managed appropriately through the implementation of a CEMP.

1.1.4. Chapter 11 (Ground Conditions) of the ES demonstrates that there would be no significant adverse effects on human health associated with ground conditions (e.g. as a result of contamination), subject to appropriate mitigation such as the implementation of the CEMP, which includes specific mitigation such as requirements for the protection of vegetation and covering of soil stockpiles.

5.14.2. Chapter 17 (Cumulative Assessment) of the ES concludes that the Proposed Scheme would not result in combined effects on human health.

5.14.3. It is, therefore, considered that the Proposed Scheme accords with the Part 4.13 of EN-1 as the Applicant has taken all applicable matters into account to provide appropriate mitigation for potential impacts to human health and wellbeing.

5.15 Part 4.14 of EN-1 – Common Law Nuisance and Statutory Nuisance

5.15.1. In line with APFP Regulation 5(2)(f), paragraph 4.14.2 of EN-1 states that it is very important that, at the application stage of an energy NSIP, possible sources of nuisance under Section

79(1) of the Environmental Protection Act 1990 (Ref. 5.10), and how they may be mitigated or limited, are considered by the SoS so that appropriate requirements can be included in any subsequent order granting development consent.

1.1.5. The Applicant has prepared and submitted a Statutory Nuisance Statement (document reference 5.3) in order to satisfy the requirements of APFP Regulation 5(2)(f) and paragraph 4.14.2 of EN-1. This Statement considers whether the Proposed Development could cause a statutory nuisance.

1.1.6. The only matter addressed by the ES which has been assessed as likely to be significant for the Proposed Scheme and which may have a bearing on the Environmental Protection Act 1990 is visual amenity. However, it is demonstrated in section 3 of the Statement that the Proposed Scheme would have no significant visual nuisance effects following the implementation of the identified embedded mitigation measures.

1.1.7. Other potential nuisance aspects have been considered in section 4 and through embedded mitigation no statutory nuisance effects are considered likely to occur.

1.1.8. As noted above, the operation of the Proposed Scheme would be regulated by the EA through an EP.

5.15.2. For the reasons set out above, it is considered that the Proposed Scheme is in accordance with the relevant Part 4.14 of EN-1 as the Applicant has taken all applicable matters into account to limit nuisance and provide appropriate mitigation where necessary.

5.16 Part 4.15 of EN-1 – Security Considerations

5.16.1. Paragraph 4.15.1 of EN-1 explains that national security considerations apply across all national infrastructure sectors. Overall responsibility for security of the energy sector lies with BEIS. Paragraph 4.15.2 of EN-1 notes that Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure at an early stage in the project development. Where applications for development consent for infrastructure relate to potentially critical infrastructure, there may be national security considerations.

5.16.2. The Proposed Scheme would largely be located within the Existing Drax Power Station Complex, which is already subject to security management such as gate house control at the entrance to Drax Power Station, access control to buildings, remote monitoring (CCTV) and manned monitoring (patrolling and visibility). The works as set out in the draft DCO includes security infrastructure, including cameras, lighting (including perimeter lighting columns) and perimeter fencing as part of the authorised works in connection with the AGIs, GRF and one of the options for electrical connection from Unit Y to the substation (as it would not be within the existing fencing around the substation). The detailed design requirements in Schedule 2 of the draft DCO for work numbers 4 (GIS buildings), 5 (GRF), 6 (AGIs) also require approval of details of security infrastructure.

5.16.3. For the areas of the Proposed Scheme outside of the Existing Drax Power Station Complex, site security arrangements would be in line with the requirements set out in the Construction (Design and Management) Regulations 2015 and appropriate levels of security (personnel / CCTV) would be provided, in conjunction with NG where there is a shared asset. The proposed GRF (Work No. 5) and AGI (Work No. 6) (both located outside the Existing Drax

Power Station Complex) would be secure sites, and details of the security infrastructure for both work numbers are required (by requirement 8 to the draft DCO) to be submitted to and approved by the relevant planning authority before development can commence.

5.16.4. It is, therefore, considered that the Proposed Scheme accords with Part 4.5 of EN-1 as the Applicant has taken all applicable matters into account to provide appropriate safety provisions both within the Existing Drax Power Station Complex and externally for the above ground infrastructure.

5.17 Part 5 of EN-1 and Parts 2 of EN-2, EN-4 and EN-5 – Generic Impacts and Assessment and Technology-Specific Information

5.17.1. Part 5 of EN-1 sets out the generic impacts of energy infrastructure. Parts 2 of EN-2, EN-4 and EN-5 contain the impacts and other matters which are specifically associated with the infrastructure that each NPS covers respectively. Table 2-1 in Appendix 2 provides the detailed assessment of the Proposed Scheme against the requirements set out in these parts of the NPSs and demonstrates that the Proposed Scheme accords with the policy direction contained therein. A summary is provided on a topic-by-topic basis below.

Air Quality and Emissions (EN-1 5.2; EN-2 2.5)

5.17.2. Chapter 6 (Air Quality) of the ES contains the air quality assessment undertaken for the Proposed Scheme, which satisfies the information requirements of EN-1, 5.2 and EN-2, 2.5. There would be no permanent residual effects associated with the construction of the Proposed Scheme. The risk of impacts relating to construction works can be mitigated with the implementation of standard mitigation measures and are, in any case, all temporary.

5.17.3. There would be no significant adverse residual effects on human health anticipated from the operation of the Proposed Scheme and there is a very low risk of exceedance of air quality standards set for the protection of human health as a result of the Proposed Scheme.

5.17.4. Paragraph 2.5.3 of EN-2 states that a range of mitigation measures are required to minimise NO_X and other emissions to meet the requirements of the LCPD and the IED. These emissions would be regulated through an EP from the EA. Chapter 6 of the ES assesses the scenarios in connection with the mitigation of NO_X emissions in CCGT mode to demonstrate that emissions would be in line with IED; being low NO_X emissions through combustion control or the use of Selective Catalytic Reduction (SCR) technology with an annualised ammonia budget.

5.17.5. In summary, there would be no permanent residual air quality effects associated with the construction or decommissioning of the Proposed Scheme. The risk of impacts relating to construction works can be mitigated with the implementation of standard mitigation measures and are, in any case, all temporary.

5.17.6. No significant adverse residual effects on human health anticipated from the operation of the Proposed Scheme either. With the stack height set at 120 m, and NO_X emissions controlled either by combustion control or the use of abatement technology, the effects of the Proposed Scheme on ambient air quality are negligible in significance.

5.17.7. Chapter 9 (Biodiversity) of the ES and the HRA Report submitted with the Application discuss the significance of air quality impacts for ecological receptors. As set out in Table 2-

1 in Appendix 2 to this Planning Statement, the Proposed Scheme is considered to be in accordance with the air quality (and ecology) policies contained within the relevant NPSs.

Biodiversity and Geological Conservation (EN-1 5.3; EN-4 2.21; EN-5 2.7 – 2.9)

5.17.8. Chapters 9 (Biodiversity) and 11 (Ground Conditions) of the ES contain the biodiversity and ground conditions assessments undertaken for the Proposed Scheme.

5.17.9. Chapter 9 of the ES concludes that with or without the use of SCR, given the minimal magnitude of the predicted impacts, effects on internationally and nationally designated sites are predicted to be negligible and not significant. The HRA Report concludes that there would be no adverse effects on the integrity of any European sites. The Applicant has held discussions with NE and the EA over the Proposed Scheme and is in active discussions with NE and the EA in respect of the HRA Report submitted with the Application, with the aim of setting out matters that are agreed in a Statement of Common Ground.

5.17.10. In conclusion, for the reasons set out above, it is considered that the Proposed Scheme meets the policy requirements set out in EN-1, EN-4 and EN-5 with regard to Biodiversity.

5.17.11. Chapter 11 (Ground Condition) explains that there are no RIGS within the study area covered by this chapter, therefore there would be no effects associated with geological conservation.

Civil and Military Aviation and Defence Interests (EN-1 5.4)

5.17.12. No civil and military aviation and defence interests are expected to be affected, which has been confirmed by the Ministry of Defence (MOD) and Civil Aviation Authority (CAA) in their consultation responses as explained in the Consultation Report (document reference 5.1). Therefore, it is considered that the Proposed Scheme fully accords with the policy requirements set out in section 5.4 of EN-1.

Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation (EN-1 5.6; EN-2 2.8)

5.17.13. As noted above, Chapter 6 of the ES contains the air quality assessment undertaken for the Proposed Scheme. Chapter 10 (Landscape and Visual Amenity) of the ES contains the LVIA for the Proposed Scheme, including an assessment of artificial lighting effects on visual amenity.

5.17.14. Potential dust impacts during construction would be managed appropriately through the implementation of measures set out in the final CEMP.

5.17.15. It is not anticipated that there would be any effects associated with odour, or insect and vermin infestation as a result of the Proposed Scheme.

5.17.16. Operational lighting would be controlled through the implementation of approval of lighting details, as required by requirements in Schedule 2 of the draft DCO. Neither construction nor operational lighting are expected to result in significant adverse effects on visual amenity (Chapter 10 of the ES).

5.17.17. In terms of smoke effects on visual amenity, it is noted that the proposed stacks would result in visible plumes, however the cooling towers at the Existing Drax Power Station

Complex also create plumes and it is expected that these would partially mask plumes arising from the Proposed Scheme.

5.17.18. Overall, the Proposed Scheme is considered to be in accordance with the abovementioned policies.

Flood Risk (EN-1, 5.7; EN-5, 2.4.1)

5.17.19. Chapter 12 of the ES Volume 1 contains the water resources, quality and hydrology assessment for the Proposed Scheme, informed by the Flood Risk Assessment (FRA). Flood risk during construction would be managed through the implementation of appropriate measures and methods of working detailed within the final CEMP. Further, a requirement in Schedule 2 of the draft DCO secures the submission, approval and implementation of a surface water drainage strategy, which would include measures to mitigate flood risk during operation of the AGI, GRF, Unit X, battery storage, Unit Y and in connection with the Site Reconfiguration Works.

5.17.20. As set out in Table 2-1 of Appendix 2, the proposed Scheme is considered to be in accordance with NPS policies related to flood risk, and therefore acceptable in planning policy terms.

Historic Environment (EN-1 5.8)

5.17.21. Chapter 8 (Historic Environment) of the ES contains the historic environment assessment undertaken for the Proposed Scheme.

5.17.22. Following mitigation, there would be negligible effects on below-ground archaeological remains associated with ground moving construction activities along the Pipeline Area.

5.17.23. With mitigation, there is likely to be a direct, permanent, long-term residual effect of minor significance on the setting of the Drax Augustinian Priory. In planning terms, this effect is considered to cause less than substantial harm. Less than substantial harm would also be caused to Scurff Hall Moated Site. The Proposed Scheme would however result in significant public benefits, notably by contributing to meeting the UK's urgent energy need. The benefits are considered to outweigh the less than substantial harm to the setting of the heritage asset, which is considered to be acceptable.

5.17.24. It is noted that the Applicant proposes that enhancement mitigation for the Proposed Scheme would include an interpretation panel on the Public Right of Way (PRoW) passing between the Drax Augustinian Priory and the boundary of Development Parcel B. This would improve the degree to which the setting's relationship with the asset can be appreciated by the public. This mitigation measure would be secured by a development obligation (see Proposed Heads of Terms for a Development Consent Obligation, document reference 7.1).

5.17.25. No residual effects are anticipated on any other heritage assets or their settings as a result of the construction works. A requirement in Schedule 2 to the draft DCO secures the submission and approval of a written scheme of investigation, which would detail areas where further investigations are required and would provide details of mitigation measures to be implemented to protect, record or preserve features.

Landscape and Visual (EN-1 5.9; EN-2 2.6; EN-4; 2.21; EN-5, 2.8)

5.17.26. Chapter 10 of the ES Volume 1 contains the LVIA for the Proposed Scheme. Some residual significant effects are expected to result on the landscape character and sensitive views as a result of the Proposed Scheme, however, as set out above, the Proposed Scheme has been carefully designed to minimise these as far as practicable including through the proposed layout and the inclusion of mitigation measures such as screen planting.

5.17.27. The residual effects are considered to be typical of landscape and visual impacts associated with energy development, and in the context of the Site and in light of the Proposed Scheme's significant benefits (set out in section 7.2 below), are considered to be acceptable. Therefore, the Proposed Scheme is considered to be in accordance with EN-1, 5.9, EN-2, 2.6, EN-4, 2.21 and EN-5, 2.8.

Land Use including Open Space, Green Infrastructure and Green Belt (EN-1 5.10)

5.17.28. The design of the Proposed Scheme has sought to minimise impacts to soil, agricultural land and businesses, and PRoW. Some significant adverse effects are expected during construction of the Proposed Scheme. The ES has assessed these effects further and has provided specific mitigation to reduce these effects. Subject to those mitigation measures, which are set out in detail in the ES Commitment Register submitted with the Application and Schedule 2 to the draft DCO, the Proposed Scheme would be acceptable in terms of land use effects.

Noise and Vibration (EN-1 5.11; EN-2 2.7; EN-4 2.20; EN-5 2.9)

5.17.29. Chapter 7 of the ES contains the noise and vibration assessment for the Proposed Scheme. With suitable mitigation, no significant noise or vibration impacts are expected during construction or operation of the Proposed Scheme. Noise would be controlled during construction by appropriate measures included in the Outline CEMP, by limits on construction hours, and by limits of operational noise, all of which are secured by requirements in Schedule 2 to the draft DCO. The Proposed Scheme is therefore considered to be acceptable with regard to noise and vibration.

Socio-Economic (EN-1 5.12)

5.17.30. Chapter 14 (Socio-Economics) of the ES contains the socio-economic assessment for the Proposed Scheme.

5.17.31. With regard to socio-economic impacts on local infrastructure, which would include PRoW, potential disruption during construction is expected to be of minor adverse significance. With appropriate mitigation measures, such as clear signage for diverted routes (which are secured by requirements in Schedule 2 to the draft DCO) this is considered to be acceptable.

5.17.32. The Proposed Scheme would have an overall positive impact on both the local and regional economy during construction as a result of the creation of jobs. Whilst during the operational phase, jobs are expected to be reduced, it is expected that this would occur as a result of natural reduction, e.g. retirement, or redeployment where possible. In terms of EN-1 5.12, this is considered to be acceptable.

Traffic and Transport (EN-1 5.13; EN-2, 2.2.5 – 2.2.6)

5.17.33. Chapter 5 of the ES contains the traffic and transport assessment for the Proposed Scheme. No significant impacts are predicted on motorised or non-motorised users of the road network as a result of the Proposed Scheme. Requirements in Schedule 2 to the draft DCO secure the approval and implementation of the CTMP and CWTP in order to manage the effects of traffic during construction. In particular, the proposed closure of the M62 is considered to be acceptable in planning terms, as it would be temporary only.

5.17.34. Paragraph 2.2.6 of EN-2 states that *"applicants should locate new fossil fuel generating station in the vicinity of existing transport routes wherever possible."* The impacts on the existing transport infrastructure are assessed in the ES. As set out in Chapter 4 (Consideration of Alternatives) of the ES, one of the advantages of locating the Proposed Scheme at the Existing Drax Power Station Complex (as opposed to alternate sites) is that the site is well connected to the highway network and existing transport connections can be utilised.

Waste Management (EN-1 5.14)

5.17.35. Chapter 13 (Waste) of the ES contains the waste assessment for the Proposed Scheme. No significant effects are predicted in relation to waste as a result of the Proposed Scheme during construction and operation, which is considered to be acceptable.

Water Quality and Resources (EN-1 5.15; EN-2 2.10; EN-4, 2.22)

5.17.36. As set out above, Chapter 12 of the ES contains the assessment of effects on water quality and resources. There are not expected to be any significant impacts to receptors within the water resources study area once appropriate mitigation measures are in place. A surface water drainage strategy would be devised and implemented for the operation of the AGI, GRF, Unit X, battery storage, Unit Y and in connection with the Site Reconfiguration Works, as required by a requirement in Schedule 2 of the draft DCO. Phase 2 ground investigation works would be required to be undertaken prior to construction in order to inform the mitigation measures in the CEMP. As a result, measures would be in place to deal with the contamination of land, including groundwater, which has the potential to cause significant harm to persons or pollution of controlled waters or the environment.

5.17.37. Following the implementation of mitigation measures, the Proposed Scheme is considered to be in accordance with the abovementioned policies.

5.18 Summary

5.18.1. This section along with Table 2-1 to Appendix 2, has considered the conformity of the Proposed Scheme against the assessment principles, generic impacts and assessment and technology specific considerations of the relevant NPSs (EN-1, EN-2, EN-4 and EN-5). It is considered to have been demonstrated that there is no conflict with the NPS policy and that the Applicant has fully taken into account the guidance contained within the NPSs.

6 ASSESSMENT AGAINST OTHER RELEVANT PLANNING POLICY

6.1 Introduction

6.1.1. This section sets out how the Proposed Scheme accords with relevant policy considerations from other relevant planning policy. It should be read in conjunction with Table 2-1 to Appendix 2 of this Planning Statement.

6.1.2. The relevant NPSs provide the primary decision-making framework for the SoS, under section 104 of the PA 2008. However, the SoS must also have regard to any other matters which the SoS thinks are both important and relevant to their decision and, therefore, policies set out in the NPPF and local development plan documents may also be material considerations. In the event of a conflict between policies of the NPSs and NPPF, the NPS prevails for the purposes of decision making, given the national significance of the infrastructure (EN-1 paragraph 4.1.5).

6.2 Marine Policy Statement and Relevant Marine Plan

6.2.1. The River Ouse is covered by the East inshore part of the East Inshore and East Offshore Marine Plan and therefore the Marine Policy Statement (Ref. 6.1). The East Inshore and East Offshore Marine Plan contains two policies which are potentially relevant to the Proposed Scheme. Policy ECO1 requires that cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) be addressed in decision-making and plan implementation. Policy BIO1 requires that appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).

6.2.2. The River Ouse borders the northern edge of the Pipeline Area. The river and various ditches and watercourses within and adjacent to the Site (primarily the Pipeline Area) provide suitable habitat for otter and other species. Chapter 9 (Biodiversity) of the ES concludes that the Proposed Scheme, following mitigation in particular through the implementation of the CEMP, would not result in significant effects on the River Ouse. There would be no effects as a result of the operation of the Gas Pipeline on the River Ouse. No significant cumulative effects are expected to affect the river either.

6.2.3. The Proposed Scheme is, therefore, considered to accord with the relevant policies of the East Inshore and East Offshore Marine Plan.

6.3 National Planning Policy Framework

6.3.1. The NPPF was adopted in March 2012 by the former Department for Communities and Local Government (DCLG) and replaced the majority of Planning Policy Statements and Planning Policy Guidance Notes. The policies contained within the NPPF are expanded upon and supported by the PPG, which was published in March 2014 (also by the former DCLG).

6.3.2. In March 2018 the Ministry of Housing, Communities and Local Government (MHCLG) (formerly DCLG) published a draft revised NPPF for consultation. The consultation closed on 10 May 2018 and it is anticipated that the revised NPPF will be published in mid-2018.

There are likely to be changes arising out of the consultation, however as the policies in the revised NPPF will take effect as material considerations in decision making from the date of publication, consideration has been given to the draft and comment is made on it below where relevant.

6.3.3. The NPPF sets out the Government's planning policies for England and how these are to be applied. It is a material consideration in planning decisions. Paragraph 3 of the NPPF makes it clear that the document does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision making framework set out in the Act and relevant NPSs, as well as any other matters that are considered both important and relevant. However, paragraph 3 goes on to confirm that the NPPF may be considered to be a matter that is both important and relevant for the purposes of assessing DCO applications. The EIA undertaken for the Proposed Scheme would therefore have regard to the relevant policies of the NPPF as part of the overall framework of national policy.

6.3.4. Paragraph 6 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. The policies that are set out in the NPPF paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice.

6.3.5. Paragraph 7 outlines the three dimensions to sustainable development, giving rise to the need for the planning system to perform a number of key roles as follows:

- **An economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development, including the provision of infrastructure;
- **A social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generation and by creating a high quality built environment, with accessible local services that reflect community's needs and support their health, social and cultural well-being; and
- **An environmental role** – contributing to protecting and enhancing our natural, built and historic environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low carbon economy.

6.3.6. Paragraph 8 of the NPPF highlights that the above roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

6.3.7. In the revised draft of the NPPF these three dimensions are described as "objectives" which should be delivered through the preparation and implementation of plans and the policies in the NPPF not as criteria against which every decision can or should be judged.

6.3.8. The Proposed Scheme would support the achievement of sustainable development by improving the security, diversity and resilience of the UK electricity supplies generally, and supporting the UK's transition to low carbon electricity generation. It would generate employment opportunities in North Yorkshire during construction and would, therefore, contribute positively to socio-economic wellbeing of people in North Yorkshire and beyond. Whilst there would be a reduction in jobs during the operational phase, this is expected to be a natural reduction through retirement, and, where possible, redeployment. As a whole, the Proposed Scheme is also considered to significantly contribute to the social and economic wellbeing of the UK more generally through improved security of supply and resilience which in turn, would continue to support the wellbeing of people and businesses in the UK.

6.3.9. The accompanying ES demonstrates that adverse environmental effects associated with the construction and operation of the Proposed Scheme would be appropriately managed and mitigated.

6.3.10. The Outline Landscape and Biodiversity Strategy submitted with the Application sets out the proposed habitat reinstatement (and additional creation of habitats) to be undertaken as part of the Proposed Scheme. The Proposed Scheme would result in a net gain for biodiversity for area based habitats and a net loss for biodiversity for linear habitats following implementation of a Landscape and Biodiversity Strategy, delivered pursuant to requirements in Schedule 2 to the draft DCO. Following construction, measures in the Landscape and Biodiversity Strategy would aim to deliver net gain for biodiversity of linear habitats also, by restoring these within the footprint of the Proposed Scheme where possible.

6.3.11. Given the existing use of the Site, it is considered to represent an appropriate location for further energy development. Overall, the Proposed Scheme is considered to facilitate more efficient and prudent use of natural resources than the Existing Drax Power Station Complex, as it will improve security, diversity and resilience of electricity supply while also using a lower carbon fuel source.

6.3.12. The implementation of a CEMP during construction, as required by a requirement to Schedule 2 of the draft DCO, will avoid, mitigate and manage potential pollution to the surrounding environment during construction. A site waste management plan would form part of the final CEMP, which would set out measures to be implemented during construction to minimise and manage waste and support re-use on-site where practicable, alongside a suite of appropriate monitoring measures. No significant adverse waste impacts are expected (Chapter 13 of the ES Volume 1).

6.3.13. The Proposed Scheme would increase generation capacity of Drax Power Station by up to 173 % (from existing generating capacity of 1,320 MW of Units 5 and 6 to 3,600 MW with both Units X and Y operational) and would, therefore, inevitably significantly increase direct greenhouse gas emissions associated with the generation of electricity from Drax Power Station. However, notably, it would result in a significant reduction in greenhouse gas emissions per unit of electricity output. It would, therefore, contribute to achieving a major increase in electricity generation capacity (as mandated by EN-1), while achieving lower greenhouse gas emissions per unit of electricity generated than would otherwise be achieved by coal-fired units. In terms of climate adaptation and resilience, as set out in

paragraphs 5.9.1. – 5.9.11 above, it is noted that the design of the Proposed Scheme has accounted for predicted variations in climate (e.g. through drainage design).

6.3.14. Paragraph 17 of the NPPF lists the 12 core land use planning principles that should underpin decision making. Those of particular relevance to the Proposed Scheme include:

- The principle to proactively drive and support sustainable economic development to deliver the infrastructure that the country needs;
- The principle to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- The principle to support the transition to a low carbon future in a changing climate, taking full account of flood risk and encouraging the reuse of existing resources and the use of renewable energy sources;
- The principle to contribute to conserving and enhancing the natural environment and reducing pollution;
- The principle to encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value; and
- The principle to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

6.3.15. The Proposed Scheme would satisfy the above principles by contributing toward sustainable economic development; and by providing new electricity generating capacity for which there is a confirmed urgent need, thereby contributing to the security and diversity of energy supplies. Further, the Proposed Scheme is considered to be appropriate in terms of its design within its context and setting while not resulting in unacceptable amenity impacts. With appropriate mitigation, the Proposed Scheme would not unacceptably increase the risk of flooding. The ES demonstrates that the Proposed Scheme would conserve the natural environment and would not result in significant effects in terms of pollution. Much of the Proposed Scheme (excluding the Pipeline Area and associated above ground infrastructure) is located within the Existing Drax Power Station Complex and utilises existing infrastructure (such as cooling systems, cooling towers and steam turbines) which would otherwise be potentially redundant post 2025, thus making efficient use of land and infrastructure. Finally, the ES Volume 1 at Chapter 5 demonstrates that transport effects during construction and operation would be acceptable, and re-using operational land at the Existing Drax Power Station Complex has the benefit of allowing existing transport connections to be utilised.

6.3.16. Specific NPPF policies of particular relevance to the Proposed Scheme include promoting sustainable transport; requiring good design; promoting healthy communities; conserving and enhancing the natural and historic environment; and meeting the challenge of climate change and mitigating its effects. Table 2-1 to Appendix 2 assesses the Proposed Scheme against these policies.

6.3.17. The revised draft NPPF is structured differently to the current NPPF and the 12 core land use planning principles are not set out separately but are incorporated into the body of the draft within separate sections on plan-making and decision-making, each containing strategic policies. The revised draft has sections on specific topic areas including delivering a sufficient supply of homes and ensuring the vitality of town centres. The specific topic areas that are relevant to the Proposed Scheme include:

- **Building a strong, competitive economy** – this includes supporting a prosperous rural economy recommending that planning policies and decisions should enable *"the sustainable growth and expansion of all types of business in rural areas both through conversion of existing buildings and well-designed new buildings."*
- **Promoting sustainable transport** – this states that in assessing specific applications for development it should be ensured that: (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; (b) safe and suitable access to the site can be achieved for all users; and (c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Development should only be prevented or refused on highways grounds if the residual cumulative impacts on the road network or road safety would be severe.
- **Meeting the challenge of climate change, flooding and coastal change** – this includes supporting the transition to a low carbon future in a changing climate including low carbon energy and associated infrastructure, avoiding inappropriate development in areas at highest risk of flooding and only allowing development where it is appropriately flood resilient and resistant, and incorporates sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- **Conserving and enhancing the natural environment** – this includes protecting and enhancing valued landscapes, sites of geological value and soils; minimising impacts and providing net gains for biodiversity; preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating contaminated land where appropriate. It states that development should, wherever possible, help to improve local environmental conditions such as air quality.
- **Conserving and enhancing the historic environment** – this states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to its conservation, irrespective of the degree of potential harm to its significance. Any harm or loss to a designated heritage asset should require clear and convincing justification.

6.3.18. Table 2-1 to Appendix 2 sets out the compliance of the Proposed Scheme with draft policies in respect of the above in detail where the policy direction differs from the existing policy direction under the NPPF. Where it is considered to be the same, this is stated.

6.3.19. In addition to the draft revised NPPF, draft Planning Practice Guidance has also been published. This sets out additional guidance in terms of viability, housing delivery, local housing need assessment, neighbourhood plans, plan-making and build to rent. It is therefore not considered to be of relevance to the Proposed Scheme.

6.4 Local Planning Policy

6.4.1. Table 2-1 to Appendix 2 sets out the compliance of the Proposed Scheme with the relevant local development plan policies. These include the saved policies from the Selby District Local Plan (2005), policies from the Selby District Core Strategy Local Plan (2013), the saved policies of the North Yorkshire Waste (2006) and Minerals (1997) Local Plans and relevant policies from the emerging Minerals and Waste Joint Plan.

6.4.2. As the NPSs provide the primary basis upon which any decision on the Application should be made, combined with the fact the matters covered by these local planning policies have for the most part already been considered in detail above in relation to the NPSs, a summarised response has been made to each policy, except where a more detailed response is considered necessary.

6.5 Summary

6.5.1. This section along with Table 2-1 to Appendix 2, has demonstrated how the Proposed Scheme's satisfies the assessment principles and policies of the NPSs, as well as with the NPPF, draft revised NPPF and relevant local development plan policy.

7 LIKELY BENEFITS AND DIS-BENEFITS

7.1 Considerations of Benefits and Dis-benefits

7.1.1. A consideration of the balance of benefits and dis-benefits of the Proposed Scheme is set out in this section of the Planning Statement. This is in recognition of the decision-making framework set out in section 104 of the PA 2008. Section 104 requires that the scheme be in accordance with the relevant NPS, which has been demonstrated in section 5 of this document. Under section 104, the SoS must also have regard to other matters, such as any local impact report, any matters prescribed in relation to development of the description to which the application relates, and any other matters which the SoS thinks are both important and relevant to their decision. Where relevant, these have been addressed in section 6.

7.1.2. Compliance of the Proposed Scheme with the NPS is required except to the extent that one or more of subsections (4) to (8) of section 104 of the PA 2008 applies. In the case of the Proposed Scheme, there are no circumstances which would require the application for development consent to be determined otherwise than in accordance with the relevant NPSs.

7.1.3. Deciding the application in accordance with the relevant NPSs would not lead to the UK being in breach of any of its international obligations (section 104(4)), or any statutory duty (section 104(5)). The Applicant has also fulfilled its legal obligations in relation to provision of an ES and HRA Report.

7.1.4. It would not be unlawful by virtue of any enactment to decide the application in accordance with the relevant NPSs (section 104(6)).

7.1.5. Section 104(7) applies if the SoS is satisfied that the adverse impact of the Proposed Scheme would outweigh its benefits. It is considered that there are no relevant adverse impacts or dis-benefits sufficient to outweigh the likely benefits of the Proposed Scheme (such benefits and dis-benefits are discussed further below).

7.1.6. Finally, subsection 8 of section 104 applies if the SoS is satisfied that any condition prescribed for deciding an application otherwise than in accordance with a NPS is met. It is not considered that any condition will require the Application to be decided otherwise than in accordance with the relevant NPSs.

7.2 Likely Benefits of the Proposed Scheme

7.2.1. NPS EN-1 clearly confirms the urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible and certainly in the next 10 to 15 years, given the crucial role of electricity as the UK decarbonises its energy sector. It is clear that the SoS should assess applications on the basis that this need and its scale and urgency has been proven.

7.2.2. The new generating units, comprising part of the Proposed Scheme, with a new combined capacity of up to 3,600 MW (1,800 MW each) in combined cycle mode, would replace existing units with a combined capacity to generate up to 1,320 MW (660 MW each). The Proposed Scheme would respond to an urgent energy need, in a timely manner, as it is assumed that with construction of the first unit anticipated to commence in late 2019 with OCGT capability by 2021/2022 and CCGT ready by 2022/2023. If two units are built, the construction of the second unit would be expected to commence in 2024 and be completed in 2027. The total combined capacity for the two gas fired units plus two battery storage facilities would be up to 3,800 MW, which would represent a net increase in capacity of up to 2,480 MW when both units are operating in combined cycle mode (together with battery storage). If only Unit X was constructed, either coal-fired Unit 5 or Unit 6 would continue to operate, thus resulting in a net increase in capacity of up to 1,240 MW when Unit X is operating in combined cycle mode (together with battery storage). Under either scenario, the Proposed Scheme would contribute significantly to meeting the UK's energy demand, and the electricity generating capacity of each of the new generating units will more than compensate for the closure and repowering of each of the existing coal-fired Units 5 and 6.

7.2.3. The Proposed Scheme would support the transition of the country towards a low carbon economy. As noted in paragraph 3.6.1, NPS EN-1 recognises that in the energy mix, fossil fuel generating stations have a vital role to play in adding to the security, diversity and resilience of the UK's electricity supplies. EN-1 seeks to ensure that the country is not overly reliant on any one type of generation and can be operated flexibly, providing back-up for when generation from intermittent renewable generating capacity is low. The proposed plant technology would enable operation in either combined cycle or open cycle mode which is able to respond quickly to changes in demand and supply.

7.2.4. Gas results in lower carbon dioxide emissions than other fossil fuels such as coal. The Proposed Scheme would therefore result in much lower carbon dioxide emissions per unit of energy generated than the existing coal-fired units. As detailed above, burning natural gas, for instance, produces nearly half as much carbon dioxide per unit of energy compared with coal. Natural gas is therefore considered to be a "bridge fuel" that can assist the UK's transition to a low carbon economy. The Proposed Scheme would support the Government's commitment to decarbonisation of the energy sector. Drax Power Station has been providing electricity in the UK since 1975, comprising originally of six coal-fired units. Since then, three units have been converted to biomass, with a further unit to be converted later in 2018. The Applicant has been a pioneer in moving the UK towards a decarbonised future, and the repowering of up to two units with natural gas would be a further step in that direction.

7.2.5. The Proposed Scheme has been designed to be CCR and thus has the potential to lower its carbon dioxide emissions even further should CCS become viable. The Proposed

Scheme would make use of previously developed land at the Existing Drax Power Station Complex including utilising existing electrical and cooling water connections and other infrastructure such as steam turbines. This would assist in reducing the impact of the Proposed Scheme on the environment and its carbon footprint.

7.2.6. The Proposed Scheme would provide benefits for the regional and local economy. It is anticipated that during the demolition phase, there will be approximately 200 jobs per year generated by the Site Reconfiguration Works. In addition, there are likely to be an additional 100 FTE indirect and induced jobs associated with this phase as a result of an increase in spending on goods, suppliers and services associated with the Proposed Scheme and employees of those firms. During the construction phases (Stages 1 and 2), it is assumed that approximately 1,200 construction jobs would be generated by the Proposed Scheme each year. Furthermore, there are likely to be an additional 600 FTE indirect and induced jobs associated with these stages due to spending in the local economy by employees and contracts placed with suppliers and contractors.

7.2.7. Additionally, the Proposed Scheme would result in a net gain for biodiversity for area based habitats and a net loss for biodiversity for linear habitats following implementation of a Landscape and Biodiversity Strategy, delivered pursuant to requirements in Schedule 2 to the draft DCO. Following construction, measures in the Landscape and Biodiversity Strategy would aim to deliver net gain for biodiversity of linear habitats by restoring these within the footprint of the Proposed Scheme where possible.

7.2.8. The local development plan recognises the importance of the Existing Drax Power Station Complex for electricity generation and the economy of Selby District.

7.3 Likely Dis-Benefits of the Proposed Scheme

7.3.1. ES Chapter 18 (Summary of Significant Effects) summarises the likely significant effects of the Proposed Scheme. The ES Commitments Register submitted with the Application identifies appropriate mitigation measures.

7.3.2. Taking account of mitigation, the residual effects identified are in the most part either negligible (not significant) or minor adverse.

7.3.3. Likely significant effects are predicted on the landscape character and a local landscape designation. These effects are associated with new structures associated with the Proposed Scheme which would contrast with the overall mass of the Existing Drax Power Station Complex. Further, significant visual effects are associated with new above ground structures required for the Gas Pipeline. The measures set out in the Outline Landscape and Biodiversity Strategy submitted with the Application would reduce the significance of some of these effects, once planting has matured. This mitigation is secured by a requirement in Schedule 2 to the draft DCO, which provides for the submission by the Applicant, and approval by the relevant planning authority, of the Landscape and Biodiversity Strategy.

7.3.4. Whilst there would be residual moderate to major effects on landscape character, paragraphs 5.9.8 and 5.9.18 of EN-1 recognise that energy infrastructure projects usually will have effects on the landscape and are likely to have visual effects for many of the receptors.

7.3.5. In line with this, paragraph 2.6.2 of EN-2 recognises that the main structures for fossil fuel generating stations, such as the turbine and boiler halls, exhaust gas stacks, storage facilities, cooling towers, and water processing plant, are large and that they will have an impact on the surrounding landscape and visual amenity. Paragraph 2.6.5 of EN-2 also states that it is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable, and in light of this, the residual landscape effects of the Proposed Scheme are considered to be acceptable.

7.3.6. In terms of heritage effects, with mitigation, there is likely to be a direct, permanent, long-term residual effect of minor significance on the setting of the Drax Augustinian Priory. In planning terms, this effect is considered to cause less than substantial harm. Less than substantial harm would also be caused to Scurff Hall Moated Site. The Proposed Scheme would however result in significant public benefits, notably by contributing to meeting the UK's urgent energy need. The benefits are considered to outweigh the less than substantial harm to the setting of the heritage asset, which is considered to be acceptable.

7.3.7. The Proposed Scheme would result in a net loss for biodiversity for linear habitats. However, following construction, measures in the Landscape and Biodiversity Strategy would aim to deliver net gain for biodiversity of linear habitats by restoring these within the footprint of the Proposed Scheme where possible. Further, the Proposed Scheme would result in a net gain for biodiversity for area based habitats.

7.3.8. As detailed above, the Proposed Scheme would have some negative impacts, however with appropriate mitigation, as detailed within the ES, these would be minimised and are considered to be acceptable in planning terms.

7.4 The Planning Balance

7.4.1. The Proposed Scheme has to be assessed in terms of its compliance with relevant policy and weigh the benefits and dis-benefits against each other (planning balance).

7.4.2. This Planning Statement has assessed the Proposed Scheme against the assessment principles, generic impacts and assessment and technology specific considerations of the relevant NPSs and, where relevant, the NPPF, the revised draft NPPF, local development plan policy and other relevant planning policy.

7.4.3. Due regard has been given to all relevant and important considerations. These include the findings of non-statutory and statutory consultation processes which, as documented in the Consultation Report, have influenced the detailed design and siting of the Proposed Scheme.

7.4.4. Most notably, the Proposed Scheme would achieve the objectives of the relevant NPSs, in particular the significant contribution to the UK's energy need and the UK's efforts towards a decarbonised future.

7.4.5. It is considered that, on balance, the likely benefits of the Proposed Scheme significantly outweigh any potential adverse impacts of the Proposed Scheme. These benefits include (amongst others), the considerable public benefit to meeting the urgent national need for

additional and flexible electricity generation as well as net gain of habitats and economic benefits.

7.4.6. It is considered that the Proposed Scheme is in accordance with the relevant NPSs and other relevant planning policy. The Proposed Scheme has appropriately addressed all relevant matters in section 104 of the PA 2008 to assist the SoS in his decision making, and it is considered that there are no planning reasons why a DCO should not be made by the SoS.

8 CONCLUSION

8.1.1. The Applicant has ensured that the design of the Proposed Scheme avoids, reduces or mitigates environmental effects on receptors where possible. A number of measures have been incorporated into the concept design to avoid or minimise environmental impacts. These measures include those required for legal compliance and also include current industry best practice guidance which will be adopted during construction and operation of the Proposed Scheme.

8.1.2. These in-built types of mitigation measures are called 'embedded mitigation' and the assessment presented in each technical chapter of the ES has identified and quantified, where possible, the embedded mitigation measures proposed to minimise the environmental effects of the Proposed Scheme. In addition, further consideration has also been given to mitigate any potentially significant adverse effects that have been identified. The residual effects have then been assessed and presented in each chapter.

8.1.3. The construction mitigation measures recommended during the EIA process are reflected in the Outline CEMP, and a final CEMP which would be prepared and implemented during the construction of the Proposed Scheme by the construction contractor.

8.1.4. The draft DCO includes appropriate requirements that would control the detailed design of the Proposed Scheme and its construction and operation in order to ensure that it accords with the EIA undertaken and does not result in unacceptable effects.

8.1.5. The Proposed Scheme supports the UK's urgent need for new electricity generating infrastructure, as confirmed by NPS EN-1 whilst complying with the technology specific considerations of NPSs EN-1, EN-2, EN-4 and EN-5, as well as the relevant policies of the NPPF and local development plan.

8.1.6. The Proposed Scheme would deliver a number of very clear benefits, including the timely delivery of new electricity generating capacity that would contribute to the security, diversity and resilience of UK energy supplies and support the increased deployment of renewable energy. The Proposed Scheme would support the UK's transition to a low carbon economy and deliver benefits for the regional and local economy. The Proposed Scheme utilises existing operational land, infrastructure, transport and electrical connections, and as a result, the delivery of the above benefits is achieved in a way that is efficient and has a lower carbon footprint (as the need for undeveloped land and new infrastructure and connections is minimised).

8.1.7. The significant adverse effects are confined to those set out in section 7.3 above. However, with regard to the landscape and visual effects, NPSs EN-1 and EN-2 recognise that virtually all fossil fuel generating stations will have an impact on landscape and visual amenity.

8.1.8. It is therefore considered that the benefits of the Proposed Scheme substantially outweigh the limited harm that would result; and the Applicant considers the Proposed Scheme to be technically and economically viable and there is no reason why any of the other consents and licences will not be forthcoming.

8.1.9. In light of the above, the Applicant considers that the Proposed Scheme is acceptable in planning terms and that a DCO should therefore be made.

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5.2 Planning Statement

Appendix 1: Relevant Planning History of Drax Power Station and Surrounds

Appendix 1: Relevant Planning History of Drax Power Station and Surrounds

Table 1-1 – Relevant Planning History of Drax Power Station and Surrounds

Planning Reference	Address	Proposal	Decision
Selby District Council – Drax Power Station and Surrounds			
2018/0551/GOV	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Consultation in accordance with Section 37 of the Planning Act 2008 - Application by Drax Power Ltd for an Order Granting Development Consent for the Drax Re-Power Project	Decision pending
2018/0154/FULM	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Proposed site reconfiguration works comprising the demolition and relocation of the existing contractor's welfare compound with new access road and associated works and the construction of a new turbine outage office block, new mitigant ash delivery facility and new distribution pump house [the Site Reconfiguration Works]	Decision pending
2018/0064/GOV	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Consultation in accordance with section 42 of the Planning Act 2008 (as amended) - proposed repower of up to two coal fired units to gas together with battery storage	27 February 2018 No objection
2018/0015/SCN	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	EIA Screening opinion request for the proposed relocation of the existing contractors compound [the Site Reconfiguration Works]	2 February 2018 EIA not required

2017/1074/GOV	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Consultation in accordance with Section 47 of the Planning Act 2008 - Duty to Consult for the proposed upgrade up to two of the six generating units at the Drax Power Station Site from coal-fired to gas generating plant(s) [the Proposed Scheme]	16 October 2017 No objection
2015/0965/FUL	Street Record Redhouse Lane Drax Selby North Yorkshire	Proposed works in connection with the use of the existing Drax Power Station jetty	25 January 2018 Withdrawn
2015/0299/EIA	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Proposed carrying out of site raising and preparation works, new and altered accesses and roads, footbridge and road bridge and ancillary works	15 June 2015 Permitted
2014/1023/DEM	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Prior notification for proposed demolition of single storey brick and concrete storage building measuring 23m x 26m	30 October 2014 Prior approval not required
2014/0595/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Proposed erection of a steel ash silo	5 November 2014 Permitted
2014/0247/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Application to widen an existing vehicle crossing 100 metres from the North Entrance	30 April 2014 Permitted
2013/1186/HAZ	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Application for consent under the Planning (Hazardous Substances) Act 1990 for the storage and use of substances at the White Rose Carbon Capture Plant	7 May 2014 Permitted
2012/0543/HAZ	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Application for consent under the Planning (Hazardous Substances) Act 1990 for the storage and use of substances	4 January 2013 Permitted
2012/0459/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Retention of two concrete pads used to support pedestrian footbridge serving temporary car park approved under planning permission 2010/0183/FUL	3 July 2017 Permitted
2012/0009/DEM	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Prior notification for the demolition of Biomass Buffer Store	8 February 2012 Prior approval not required

2011/1039/HAZ	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Application for consent under the Planning (Hazardous Substances) Act 1990 for the storage of substances (following reclassification) already in use on the site	21 March 2012 Withdrawn
2011/0801/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Development of biomass rail receipt, handling and storage facility within current external storage and handling of coal area, including associated conveyors to the power station and distribution to the fuel bunkers	16 January 2012 Permitted
2010/0463/FUL	Drax Power Station Sports And Social Club Drax Road Drax Selby North Yorkshire	Office and changing room extensions	22 July 2010 Permitted
2010/0183/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Change of use from agricultural land to a temporary car park to provide replacement car parking, the erection of 2.5m Heras security fence around the perimeter of car park and the erection of 10m high lighting columns and erection of a temporary pedestrian footbridge	23 April 2010 Permitted
2009/0997/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Erection of a 2500 tonne ash storage silo with associated over ground pipework	18 January 2009 Permitted
2009/0694/GOV	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Notification from the Department of Energy and Climate Change under section 36 of the Electricity Act 1989, to develop a 290 mw biomass fuelled electricity generating station	10 August 2011 Permitted
2009/0603/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Erection of a screen house facility incorporating bin feed, conveyors and sampling system in connection with approved biomass rail unloading and storage facility	9 October 2009 Permitted
2009/0337/FUL	Drax Power Station Sports And Social Club Drax Road Drax Selby North Yorkshire YO8 8JW	Erection of a single storey extension to the rear	28 July 2009 Permitted

2009/0103/FUL	Drax Power Station Sports And Social Club Drax Road Drax Selby North Yorkshire YO8 8JW	Construction of a children's play area with metal railing boundary fence	2 April 2009 Permitted
2008/0138/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Erection of a single storey warehouse link extension for storage of strategic parts following demolition of existing garage, small store and workshop	26 March 2008 Permitted
2007/1420/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Application to expand the use of cofiring with biomass fuels, by the installation of new biomass reception handling, processing, storage and direct injection/firing facilities, incorporating a drive through offloading facilities for HGVs with pneumatic train offloading arrangements from a modified existing rail siding	15 February 2008 Permitted
2007/0176/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Erection of ash handling facility	03 May 2007 Permitted
2005/0115/FUL	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Proposed erection of a store for bio-fuel plant	12 May 2005 Permitted
CO/2003/1308	A645 South Of Drax Power Station To Newland Bridge Drax SELBY	Installation of 66000 volt overhead line stretching from south of A645 Drax Power Station to Newland Bridge	9 June 2004 Permitted
CO/2002/1351	Land adjacent to Drax Power Station, Drax (Long Drax Parish), Selby YO8 8PJ	Proposed erection of a 66KV switch station including substation building	24 February 2003 Permitted
CO/1993/0617	Drax (Long Drax Parish)	Proposed retention of a portakabin containing atmospheric monitoring equipment on land adjacent to jetty access road	16 December 1993 Permitted

CO/1993/0022	Barlow Ash Disposal Site Long Drax. (Also Barlow Parish)	Proposed change of use from agricultural to operational use in connection with adjacent ash disposal site, erection of a security fence 2.6 metres high to enclose	29 April 1993 Permitted
CO/1991/0655	Jetty Access Road Drax (Long Drax Parish)	Proposed erection of a portakabin to contain atmospheric monitoring equipment on land adjacent	26 July 1991 Permitted
CO/1989/0825	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Erection of double storey building to provide site services accommodation in relation to the proposed f.g.d. plant	27 June 1989 Permitted
CO/1989/0034	Drax Long Drax And Newland	Proposed construction of the drax-airmyn, single carriage way link road in the parishes	15 August 1989 Permitted
CO/1988/0037	Barlow Ash Disposal Site Barlow Common Road Barlow	Proposed disposal of construction waste arising from the Drax Power Station flue gas desulphurisation project and to form an access road	5 August 1988 Permitted
CO/1986/0683	The Sewage Pumping Station Selby Road Camblesforth	Renewal of temporary permission for proposed garden hut to house instruments for atmospheric survey in relation to Drax Power Station	25 July 1986 Permitted
CO/1986/0682	Drax Power Station New Road Drax Selby North Yorkshire YO8 8PQ	Proposed use of land as a golf course and sports hall	26 June 1986 Permitted

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NY/2013/0035/A30	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Application for the approval of details reserved by condition No. 18 of Planning Permission C8/2012/0796/CPO which relates to the habitat creation plan	8 May 2013 Permitted
NY/2012/0282/A30	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Application for the approval of details reserved by condition No. 7 of Planning Permission C8/2012/0005/CPO which relates to contamination	20 August 2012 Permitted

NY/2012/0276/A30	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Application for the approval of details reserved by condition No.15 of Planning Permission C8/2012/0005/CPO which relates to the Construction Environmental Management Plan	20 September 2012 Permitted
NY/2012/0270/73	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Variation of conditions 2 and 5 of planning permission reference C8/2012/0005/CPO for the construction of a lightweight aggregate manufacturing plant and ancillary development, to allow a minor material amendment to the approved scheme (Layout and form of buildings, ancillary development and parking and circulation areas)	19 October 2012 Permitted
NY/2012/0262/A30	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Application for the approval of details reserved by condition No. 10 and 14 of Planning Permission Reference No. C8/2012/0005/CPO which relates to piling and site drainage	20 August 2012 Permitted
NY/2012/0254/A30	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Application for the approval of details reserved by condition No. 3 of Planning Permission Reference No. C8/2012/0005/CPO	8 August 2012 Permitted
NY/2012/0253/A30	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Application for the approval of details reserved by condition No. 6 of Planning Permission Reference No. C8/2012/0005/CPO	8 August 2012 Permitted
NY/2012/0239/A30	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Application for approval of details reserved by condition No. 4 of Planning Permission Ref. No. C8/2012/0005/CPO	8 August 2012 Permitted
NY/2011/0491/ENV	Drax Power Station, Selby, North Yorkshire, YO8 8PQ	Development of a lightweight aggregate manufacturing plant and ancillary development	11 June 2012 Permitted
NY/2011/0311/SCO	Drax Power Station, Drax, Selby, North Yorkshire	Request for EIA Scoping Opinion for proposed construction and operation of a Lytag lightweight aggregate (LWA) production plant and ancillary development	18 November 2011 Scoping opinion received

MIN1869	Barlow Ash Disposal Site	Change of use of land from agricultural to ancillary operational land	2 August 1993 Permitted
MIN2780	Barlow Ash Disposal Site	Extension to deposition of ash, gypsum and FGD waste treatment plant residues and ancillary work	28 April 1993 Permitted
MIN1867	Drax Power Station	Continuation of disposal of surplus spoil & civil engineering waste at Site A	14 October 1980 Permitted
MIN1860	Drax Power Station	Continuation of disposal of surplus spoil & civil engineering waste at Sites C & D	14 October 1980 Permitted

5.2 Planning Statement

Appendix 2: Planning Policy Assessment

Planning Policy Assessment

1. National Policy Statements (NPSs) are the primary policy framework on which the Secretary of State (SoS) makes decisions on whether Nationally Significant Infrastructure Projects (NSIPs) should be consented. Compliance of the Proposed Development with the applicable policies within the relevant NPSs is assessed along with local planning policy considerations in the policy appraisal table below. It is noted that references to the Infrastructure Planning Commission (IPC) in the NPS policies referenced below have been replaced with reference to the SoS.

2. It is further noted that the technical assessments of significant effects contained in the Environmental Statement (ES) Volume 1 (document reference 6.1) distinguish between significant effects during the following stages of the Proposed Scheme:

- Stage 0 – Site Reconfiguration Works.
- Stage 1 – Construction of Unit X.
- Stage 2 – Operation of Unit X and Construction of Unit Y.
- Stage 3 – Operation of Units X and Y.
- Stage 4 – Decommissioning.

3. It has not been considered necessary to repeat the significance of each significant effect identified for each Stage in the assessment contained in Table 2-1 below. The purpose of the planning policy assessment is instead to determine whether the Proposed Scheme as a whole would accord with the relevant planning policy framework and would therefore be acceptable in planning terms.

Table 2-1 – Planning Policy Assessment

NATIONAL POLICY STATEMENTS

GENERIC IMPACTS

The generic impacts set out in Part 5 of EN-1 are considered below. Where the same types of impacts appear in the assessment and technology-specific information parts of EN-2, EN-4 and EN-5 these are also assessed below and the relevant part of the NPS is referenced.

POLICY	POLICY TEXT	ASSESSMENT
Air Quality and Emissions **(EN-1, 5.2 and EN-2, 2.5)**	Paragraph 5.2.4 of NPS EN-1 states: Emissions from combustion plants are generally released through exhaust stacks. Design of exhaust stacks, particularly height, is the primary driver for the delivery of optimal dispersion of emissions and is often determined by statutory requirements. Paragraphs 5.2.6 and 5.2.7 of EN-1 state: Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the Environmental Statement (ES). The ES should describe: • Any significant air emissions, their mitigation and any residual effects distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; • The predicted absolute emission levels of the proposed project, after mitigation methods have been applied; • Existing air quality levels and the relative change in air quality from existing levels; and • Any potential eutrophication impacts.	In accordance with paragraphs 5.2.6 and 5.2.7 of EN-1, Chapter 6 (Air Quality) of the ES (document reference 6.1.6) provides an assessment of the impacts of the Proposed Scheme in terms of air quality. It includes a summary of potential air quality impacts, sets out the mitigation proposed and provides an assessment of residual air quality impacts to human health in both a construction and operational phase context. It also sets out the air quality baseline and relative changes in concentrations as a result of the Proposed Scheme, as well as the absolute emission levels of the Proposed Scheme with primary mitigation in place (an appropriate stack height and the inclusion of Nitrogen oxides (NO_X) emissions control). The ES describes any significant air emissions, their mitigation and any residual effects and distinguishes between the Proposed Scheme Stages (described in full in the Glossary): • The Site Reconfiguration Works or Stage 0 refers to the works that are necessary to prepare the Power Station Site for the construction of the generating station equipment and the Electrical connection; • Stage 1 refers to the construction of Unit X, along with the construction of the Gas Pipeline, the GRF, the AGI, the

	Paragraph 5.2.9 of EN-1 states: The SoS should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. However air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits. Paragraph 5.2.10 of EN-1 states: In all cases the SoS must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the developers should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed. In the event that a project will lead to non-compliance with a statutory limit the SoS should refuse consent. Paragraph 5.2.11 of EN-1 states: The SoS should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. Paragraph 2.5.5 of EN-2 states:	battery storage facility for Unit X, and the building to house the battery storage (for both Units X and Y) • Stage 2 refers to the operation and maintenance of Unit X, the Gas Pipeline, the GRF, the AGI and the battery storage facility and the construction of Unit Y (including the installation of 100MW storage capability into the battery storage building constructed under Stage 1); • Stage 3 refers to the operation and maintenance of Unit X, Unit Y, the Gas Pipeline, the AGI, the GRF and the battery storage facility. The Chapter's main focus is the assessment of stack emissions from the operation of the Power Station Site, both in isolation and in combination with stack emissions from neighbouring power stations. The air quality assessment considers the full range of operational scenarios and the use of SCR and without SCR. The ES concludes: There would be no permanent residual effects associated with the construction of the Proposed Scheme. The risks of impacts relating to construction works can be mitigated with the implementation of mitigation measures, through implementation of a Construction Environmental Management Plan (CEMP), developed from the Outline CEMP submitted (document reference 6.5) in conjunction with the ES (the approval and implementation of which would be secured by a requirement to Schedule 2 of the draft DCO (document reference 3.1). Due to the anticipated number of trips generated it is unlikely that operational traffic would result in significant changes in ambient pollutant concentrations and this has been scoped out of the detailed assessment. This has been agreed by the Planning Inspectorate (PINS) in their Scoping Opinion

	The applicant should carry out an assessment as required in EN-1, consulting the EA and other statutory authorities at the initial stages of developing their proposals, as set out in EN-1 Section 4.2. If the applicant requests a scoping opinion from the SoS before an application is submitted, any views received from the EA should be made known to the SoS so that they can take account of the EA's advice on potential emissions. Paragraph 2.5.6 of EN-2 states: In considering whether to grant consent, the SoS should take account of likely environmental impacts resulting from air emissions and that in the case of SOx, NOx or particulates in particular, it follows the advice in EN-1 on interaction with the EA's regulatory processes.	(document reference 6.2.1.2). Similarly, construction traffic is not expected to result in significant air quality effects and has therefore been scoped out of the assessment. A Construction Dust Assessment (document reference 6.2.6.2) was undertaken and concluded that with the implementation of a CEMP and Construction Traffic Management Plan (CTMP), dust effects would be negligible (both secured by requirements in Schedule 2 to the draft DCO (document reference 3.1). An Outline CTMP has been submitted with the Application (document reference 6.2.5.2) as an Appendix to the ES in Volume 2. An Outline Construction Worker Travel Plan (CWTP) to promote sustainable ways of travel has also been submitted with the Application (document reference 6.2.5.5), which would be secured by a requirement in Schedule 2 to the draft DCO. When assessed against relevant policies contained within EN-1 and EN-2, the Proposed Scheme is considered to be acceptable with regard to air quality effects during the construction stages. With regard to the operational stage, with the stack height set at 120 m and NO_X emissions controlled either by combustion control or the use of abatement technology, the effects of the Proposed Scheme on human health would not be significant. In particular, paragraph 6.9.4 of Chapter 6 of the ES states that for ambient pollutant concentrations, total predicted environmental concentrations with the operation of the Proposed Scheme would be well within the air quality objectives set in UK regulations for the protection of health. In addition, changes in concentrations are not predicted to be substantial, with a maximum process contribution from the Proposed Scheme to Nitrogen dioxide (NO_2) concentrations of

		3.9 % of the annual mean objective and 11.3 % of the hourly mean objective. These objectives are set to be protective and, as such, where concentrations are within the objectives no adverse effects will occur. The impact of the Proposed Scheme on pollutant concentrations in the nearest Air Quality Management Area (AQMA) (Selby) would be less than 0.5% of the objective for annual mean NO_2 (the measure for which the AQMA was declared) and is, therefore, considered negligible and acceptable in planning terms. For nitrogen and acid deposition, and ammonia concentrations, existing deposition/pollution levels widely exceed the critical loads / critical levels set for the most sensitive habitats within designated sites in the vicinity of the Site. For the Proposed Scheme operating without additional NO_X abatement (Selective Catalytic Reduction) (SCR) the contribution of the Proposed Scheme to total nitrogen and acid deposition is ≤1% of the relevant critical load for all habitats and designated sites. If the Proposed Scheme would operate with NO_X abatement technology, the impact of ammonia emissions from the abatement technology results in an overall increase in deposition that is only partially offset by the decrease in nitrogen deposition from nitrogen dioxide. Notwithstanding this, the impacts of the Proposed Scheme on deposition remain ≤1% (paragraph 6.5.38 of Chapter 6 of the ES). For both acid and nitrogen deposition, the deposition of nitrogen resulting from the Proposed Scheme is a small proportion of the existing deposition. That is to say that the risk of exceedance of critical loads or the level of exceedance of

		the critical load is wholly dependent on the existing deposition levels and would not be affected by the Proposed Scheme. As stated in paragraph 6.9.9 of Chapter 6 of the ES, taking into account the conservatism built into the assessment including • Continuous full load operation for the year; • 70 % conversion of NO_X to NO_2; • Assessment of maximum impacts anywhere in a designated site, irrespective of area represented by the maximum and the presence of particular habitats; • Assessment against minimum recommended critical loads; • Assessment of maximum impacts across five modelled years; • Emissions continually at the limit set in the Industrial Emissions Directive (IED) / BREF (Best Available Technique Reference documents or BREF notes) conclusions and or recommended emissions ceiling; the impacts both in isolation and cumulatively with other relevant development proposals would be small overall and likely imperceptible. This is considered to be acceptable in planning policy terms. With regard to paragraphs 5.2.9 and 5.2.10 of EN-1, it is noted that there is a very low risk of exceedance of air quality standards set for the protection of human health as a result of the Proposed Scheme (Chapter 6 of the ES). Further, in relation to paragraph 5.2.9 of EN-1 specifically, it is noted that the air quality assessment has concluded that the effects of the operation of the Proposed Scheme would be negligible and impacts at the Selby AQMA would be imperceptible in magnitude.

		A detailed list of mitigation measures are included within the ES Commitments Register (document reference 6.4) submitted with the Application. With reference to paragraph 2.5.5 of EN-2, it is noted that the Environment Agency (EA), Natural England and Selby District Council (SDC) have been consulted, including on items recommended by the Secretary of State (SoS) in his Scoping Opinion of October 2017 (document reference 6.2.1.2) which included responses from statutory consultees. Stack height sensitivity testing was undertaken to determine an appropriate stack height for the new Units (Appendix 6.2.6.3 of the ES Volume 2). This, in combination with the structural limitations of the vertical Heat Recovery Steam Generators (HRSGs) proposed and the fact that horizontal HRSGs are not feasible due to space constraints, informed the stack height selected (120 m). Potential impacts on residential properties from emissions of NO_2 and NO_X with a stack of 120 m are considered negligible (Table 6-28 of Chapter 6 of the ES). With regard to paragraph 2.5.6 of EN-2, it is noted that an Environmental Permit (EP) application has been prepared and will likely be submitted on 29 May 2018, in line with the process established in EN-1 (see document reference 5.8 Other Consents and Licences). Emissions to air associated with the Proposed Scheme would be regulated via the environmental permitting regime administered in England by the EA. With regard to effects on air quality during the operational phase, for the reasons set out above, the Proposed Scheme is considered to be acceptable. Chapter 9 (Biodiversity) of the ES provides the assessment of residual impacts to ecological receptors as a result of air emissions, including any potential eutrophication impacts. The

		assessment concluded that these effects would not be significant. The ES, therefore, satisfies the requirements of paragraphs 5.2.6 and 5.2.7 of EN-1. Further information on ecological effects can be found further below and in Chapter 9 (Biodiversity) of the ES (document reference 6.1.9). The findings of the Habitats Regulations Assessment (HRA) Report (document reference 6.6) submitted with the Application and accordance with NPS policy relating to biodiversity impacts are also considered below.
Biodiversity and Geological Conservation **(EN-1, 5.3, EN-4, 2.21 and EN-5, 2.7)**	Paragraph 5.3.3 of EN-1 states: Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the SoS consider thoroughly the potential effects of a proposed project. Paragraph 5.3.4 of EN-1 states: The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. Paragraphs 5.3.6 to 5.3.11 of EN-1 state: In having regard to the aim of the Government's biodiversity strategy the SoS should take account of the context of the challenge of climate change: failure to address this challenge	Chapter 9 (Biodiversity) of the ES (document reference 6.1.9) provides an assessment of the impacts of the Proposed Scheme in terms of biodiversity. The following potentially significant effects have been identified associated with the construction phases of the Proposed Scheme: • Alteration or degradation of habitats within designated sites as a result of emissions to air and accidental release of hazardous materials. • Permanent or temporary removal or disturbance of habitats within and adjacent to the Proposed Scheme leading to the destruction or damage of Habitats of Principal Importance (HPI) or habitats otherwise of ecological importance. • Loss and / or disturbance of protected species and their habitats due to demolition and construction activities, including construction traffic. • Disruption of ecological networks provided by habitats that will be lost, altered or disturbed by construction. The following potentially significant effects have been identified associated with the operation phase of the Proposed Scheme: • Alteration or degradation of habitats within designated sites as a result of emissions to air and accidental release of hazardous materials.

	will result in significant adverse impacts to biodiversity. The policy set out in the following sections recognises the need to protect the most important biodiversity and geological conservation interests. The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The SoS may take account of any such net benefit in cases where it can be demonstrated. As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4 above); where significant harm cannot be avoided, then appropriate compensation measures should be sought. In taking decisions, the SoS should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment. The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for these sites but do not provide statutory protection for potential Special Protection Areas (pSPAs) before they have been classified as a Special Protection Area. For the purposes of considering development proposals affecting them, as a matter of policy the Government wishes pSPAs to be considered in the same way as if they had already been classified. Listed	• Loss and / or disturbance of protected species and their habitats due to operation of the Proposed Scheme. • Disruption of ecological networks supported by habitats that will be lost to the operational footprint or experience long-term changes as a result of the Proposed Scheme. The Proposed Scheme has been designed to reduce its impact on biodiversity as follows, where possible: • To minimise land take of designated habitats. • To minimise loss and disturbance of habitats, for example for, bat foraging and roosting, breeding and wintering birds, reptiles and amphibians. • To avoid the spread of Non-Native Invasive Species. The location of the Gas Pipeline Area and the design of the GRF and AGI have been chosen to minimise impacts on assets such as trees, hedgerows and heritage features identified during the assessment where possible, in a process known as micro-siting. HPI within the Site would be permanently lost by site clearance during construction. However, there are no predicted significant effects resulting from the loss of this habitat, as compensation habitat is proposed to be provided. The Proposed Scheme would result in a net gain for biodiversity for area based habitats (such as grasslands and woodlands) and a net loss for biodiversity for linear habitats (such as hedgerows and ditches) following implementation of a Landscape and Biodiversity Strategy. Following construction, measures in the Landscape and Biodiversity Strategy would however aim to deliver net gain for biodiversity of linear habitats also, by restoring these within the footprint of the Proposed Scheme where possible. This is set out in the Biodiversity net gain Report attached to Chapter 9 of the ES

	Ramsar sites should, also as a matter of policy, receive the same protection. Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of protection. All National Nature Reserves are notified as SSSIs. Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The SoS should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest. Paragraph 5.3.15 of EN-1 states: Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, the SoS should maximise such opportunities in and around developments, using requirements or planning obligations where appropriate. Paragraph 5.3.17 of EN-1 states:	(document reference 6.2.9.10). This report would be revisited in consultation with North Yorkshire Council Ecology Services (NYCES) prior to examination, in order to explore opportunities to deliver no net loss or net gain for linear habitats. The proposed mitigation measures are detailed within the Outline Landscape and Biodiversity Strategy (document reference 6.7) which is secured by a requirement in Schedule 2 to the draft DCO, which requires the submission, approval and implementation of a final strategy. There would be no predicted significant effects on protected species during construction. There would be some disturbance of habitats for protected species including bats, otters, reptiles and amphibians. However, the effects of these impacts on the species can be adequately reduced through measures including provision of replacement foraging habitat and specifically for bats through the provision of roosts if required. There would be no predicted significant effects resulting from the accidental spread of Invasive Non-Native Species, Indian balsam and ornamental Cotoneaster, during construction. Measures to prevent the accidental spread of Invasive Non-Native Species would be detailed within an invasive species strategy as referred to in section 4.4 of the Outline CEMP (document reference 6.5) that has been submitted with this Application, and in section 1.6.9 of the Outline Landscape and Biodiversity Strategy. During construction, best practice measures to control the effects of the Proposed Scheme on biodiversity would be implemented through the CEMP. These measures would include, for example, the use of fencing to identify the area for use during construction and to protect adjacent habitats. The implementation of these embedded mitigation measures has been considered as part of the Proposed Scheme. The final

	Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action. The SoS should ensure that these species and habitats are protected from the adverse effects of development by using requirements or planning obligations. The SoS should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. In this context the SoS should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development. Paragraph 5.3.18 of EN-1 states: The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; • habitats will, where practicable, be restored after construction works have finished; and • opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.	CEMP would be secured by a requirement in Schedule 2 to the draft DCO (document reference 3.1), to be submitted to and approved by the relevant local planning authority (LPA), and construction would be required to be carried out in accordance with the approved CEMP. Due to the best practice measures applied through the final CEMP, no significant effects on sites designated for their biodiversity importance are predicted during construction, which is considered to be acceptable in planning terms, having regard to the relevant policies in EN-1, EN-4 and EN-5. No residual significant effects are predicted on protected species due to the operation of the Proposed Scheme. As noted above, operational air quality impacts and effects of the Proposed Scheme on designated sites are a key ecological consideration. Chapter 9 draws on the findings of the air quality assessment presented in Chapter 6 (Air Quality) of the ES (document reference 6.1.6). The air quality assessment considers the full range of operational scenarios and the use of additional Nitrogen oxide (NO_X) abatement (Selective Catalytic Reduction) (SCR) technology and without SCR. Nitrogen species (NO_X and ammonia) have the potential to be deposited on sites designated for the importance of their biodiversity. This can raise nutrient nitrogen levels in the soil/water (a process known as eutrophication) leading to excessive growth of undesirable plants at the expense of rare or otherwise important plant and animal species. Operational emissions may also lead to acidification of designated sites' habitats, which can affect the condition of the habitats and the species they support. Chapter 6 of the ES considers only the worst-case operational scenario for air quality impacts and effects on ecological

	Paragraph 2.21.1 of EN-4 states: Sections 4.3 and 5.9 of EN-1 sets out the general principles that should be applied in the assessment of biodiversity and landscape and visual impacts. Additional considerations apply during the construction of a pipeline (which, without mitigation, can affect both landscape and ecology). These comprise the effect upon specific landscape elements within and adjacent to the pipeline route, such as grasslands, field boundaries (hedgerows, hedgebanks, drystone walls, fences), trees, woodlands, and watercourses. There will also be temporary visual impacts caused by the need to access the working corridor and to remove flora and soil. The working width of the pipeline will vary depending on the surrounding terrain. Temporary impacts could include large excavations where deep pits are needed for boring beneath rivers, roads and sensitive features. Paragraph 2.7.1 of EN-5 states: Generic biodiversity effects are covered in Section 5.3 of EN-1. However, large birds such as swans and geese may collide with overhead lines associated with power infrastructure, particularly in poor visibility. Large birds in particular may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts. Paragraph 2.7.2 of EN-5 states: The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take	receptors – i.e. the operation of both Units X and Y in combined cycle and open cycle operation with SCR. NO_X abatement through SCR would result in emissions of ammonia (ammonia slip) that may, in terms of ecological impacts, offset the benefits of any NO_X reduction. For the purpose of the assessment, this scenario (referred to as "scenario B" in Chapter 6 of the ES) has been modelled as Units X and Y operating for 1,500 hours in open cycle (without requirement for SCR) and the remainder of the year (~7,260 hours) in combined cycle (with SCR), resulting in an annual ammonia cap of 120 t per year. This scenario represents a likely worst-case for the proposed ammonia cap in terms of air quality impacts since it maximises potential NO_X emissions whilst meeting the ammonia cap. Chapter 9 of the ES concludes that with or without the use of SCR, given the minimal magnitude of the predicted impacts, effects on internationally and nationally designated sites are predicted to be negligible and not significant. In addition to the assessments contained within Chapters 6 and 9 of the ES, a Habitats Regulations Assessment (HRA) Report has been submitted with the Application (document reference 6.6). The HRA Report concludes that there would be no adverse effects on the integrity of any European sites. In conclusion, for the reasons set out above, it is considered that the Proposed Scheme meets the policy requirements set out in EN-1, EN-4 and EN-5 with regard to Biodiversity.

	this into consideration in the preparation of the Environmental Impact Assessment (EIA) and ES (see Section 4.2 of EN-1). Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds.	
Civil and Military Aviation and Defence Interests **(EN-1, 5.4)**	Paragraph 5.4.1 of EN-1 states: Civil and military aerodromes, aviation technical sites, and other types of defence interests (both onshore and offshore) can be affected by new energy development. Paragraph 5.4.2 of EN-1 states: UK airspace is important for both civilian and military aviation interests. It is essential that the safety of UK aerodromes, aircraft and airspace is not adversely affected by new energy infrastructure. […] Paragraph 5.4.10 of EN-1 states: Where the proposed development may have an effect on civil or military aviation and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.2). Paragraph 5.4.11 of EN-1 states: The applicant should consult the MoD, CAA, NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation or other defence interests.	No civil and military aviation and defence interests that would be affected by the Proposed Scheme have been identified through the EIA Scoping and non-statutory and statutory consultation processes, and therefore there is anticipated to be no impact upon their operations. As set out in the Consultation Report (document reference 5.1), the Defence Infrastructure Organisation (DIO) on behalf of the Ministry of Defence (MOD) has raised no concerns over the Proposed Scheme and has confirmed that no aviation warning lighting would be required on the proposed stacks. The DIO has raised no safeguarding objections to the Proposed Scheme. Further, the Civil Aviation Authority (CAA) have also confirmed that the proposed stacks would not require aviation warning lighting on the basis that the existing chimney at the Existing Drax Power Station Complex is already lit for aviation security purposes. Therefore, no aviation warning lighting is proposed. The CAA has raised no other concerns over the Proposed Scheme either. The National Air Traffic Services (NATS) and nearby aerodromes, airports, airfields and gliding clubs have also been consulted, and where responses have been received, no concerns were raised by the consultee. Further, as requested by the CAA, the Applicant has notified the Association of Air Ambulances (AAA) and the National Police Air Service (NPAS) of the Proposed Scheme. No responses were received.

	Paragraph 5.4.14 of EN-1 states: The SoS should be satisfied that the effects on civil and military aerodromes, aviation technical sites and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation or defence interests has been carried out. In particular, it should be satisfied that the proposal has been designed to minimise adverse impacts on the operation and safety of aerodromes and that reasonable mitigation is carried out. It may also be appropriate to expect operators of the aerodrome to consider making reasonable changes to operational procedures. […] Paragraph 5.4.16 of EN-1 states: There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that goes beyond statutory requirements by any of the relevant aviation and defence consultees, the SoS should satisfy itself of the necessity of such lighting taking into account the case put forward by the consultees. The effect of such lighting on the landscape and ecology may be a relevant consideration.	As no civil and military aviation and defence interests are expected to be affected, it is considered that the Proposed Scheme fully accords with the policy requirements set out in section 5.4 of EN-1.
Dust, Odour, Artificial Light, Smoke, Steam and Insect and Vermin Infestation **(EN-1, 5.6 and EN-2, 2.8)**	Paragraphs 5.6.4 to 5.6.7 of EN-1 state: The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke and artificial light to have a detrimental impact on amenity, as part of the Environmental Statement. In particular, the assessment provided by the applicant should describe: • the type, quantity and timing of emissions; • aspects of the development which may give rise to emissions;	The technical assessments in Volume 1 of the ES have been carried out in accordance with the requirements of paragraphs 5.6.5 to 5.6.6 of EN-1 and paragraph 2.8.3 of EN-2. As noted above, Chapter 6 Air Quality of the ES (document reference 6.1.6) includes an assessment of the impacts of the Proposed Scheme in terms of air emissions. It includes a summary of potential air quality impacts, sets out the mitigation proposed and provides an assessment of residual air quality impacts to human health in both a construction and operational phase context. It also sets out the air quality baseline and relative changes in levels as a result of the Proposed Scheme,

	• premises or locations that may be affected by the emissions; • effects of the emission on identified premises or locations; and • measures to be employed in preventing or mitigating the emissions. The applicant is advised to consult the relevant local planning authority and, where appropriate, the EA about the scope and methodology of the assessment. The SoS should satisfy itself that: • an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out; and • that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts. Paragraphs 2.8.3 to 2.8.5 of EN-2 state: As specified in EN-1, Section 5.6, the applicant should set out in the ES the estimated potential for release of dust and measures proposed to mitigate any potential amenity impacts. The assessment should cover potential impacts arising specifically from the operation of a coal-fired generating station in addition to those identified in Section 5.6 of EN-1. The SoS should ensure that the EA is satisfied either that there are no unacceptable dust effects, or, where there is a potential for unacceptable effects, releases of dust can be adequately regulated under the pollution control framework, or other regulatory controls, including requirements attached to a development consent, before it grants any consent.	as well as the absolute emission levels of the Proposed Scheme with primary mitigation in place (an appropriate stack height and the inclusion of NO_X and ammonia emissions control). In accordance with paragraph 5.6.6 of EN-1, the relevant LPAs as well as the EA have been consulted about the scope and methodology of the assessment. A qualitative Construction Dust Assessment has been conducted for the construction phase (document reference 6.2.6.2) and this takes into account predicted numbers of plants and vehicles, duration of activities and proximity of sensitive receptors. During construction, it is anticipated that dust and particulate matter may arise from a range of on-site construction activities, including demolition (should the Site Reconfiguration Works be undertaken as part of the Proposed Scheme), earthworks, general construction activities and building of temporary access to the Site. For almost all construction activities, including dust and air emissions, the application of effective mitigation measures as set out in the Outline CEMP (document reference 6.5) are expected to prevent any significant dust effects occurring to sensitive receptors. Approval and implementation of the final CEMP is secured by a requirement to Schedule 2 of the draft DCO (document reference 3.1). Effects from dust and air emissions, associated with activities during the construction phase after mitigation is applied, would be negligible. In accordance with paragraph 5.6.5 of EN-1 and paragraph 2.8.3 of EN-2, a detailed list of proposed mitigation measures is set out in the ES Commitments Register (document reference 6.4).

	It is possible that the application for the relevant operational permit from the EA may not be determined until after the SoS has decided the related major infrastructure application, since, for commercial reasons, many developers are not in a position to finalise details of the operational equipment until after a generating station development consent is received and the generating plant supplier selected. Whilst the SoS should not duplicate the regulatory controls that are separately exercised by the EA, neither should it consent a generating station where it has good reason to believe the relevant operational permits will not subsequently be granted. (See Section 4.10 of EN-1.)	It is not anticipated that there would be any effects associated with odour, or insect and vermin infestation as a result of the Proposed Scheme. With regard to lighting, the Applicant has carried out a baseline lighting survey, and the findings of this survey are set out in Appendix 3.1 to the ES Volume 2 (document reference 6.2.3.1). The Baseline Lighting Survey Report, in section 4, states that the survey area was largely dominated by the lighting installations associated with the Existing Drax Power Station Complex and street lighting installations. Chapter 10 (Landscape and Visual Amenity) of the ES (document reference 6.1.10) assesses significant effects listed in section 5.6 of EN-1 and 2.8 of EN-2 in terms of visual amenity. Artificial light arising from the Proposed Scheme in the operational phase is not expected to result in significant adverse effects on visual amenity. Artificial lighting during construction would be controlled through the CEMP secured by a requirement in Schedule 2 of the draft DCO. In terms of effects associated with steam or smoke, the assessment in Chapter 10 explains that whilst the proposed stacks would create visible plumes, the cooling towers at the Existing Power Station Complex also create plumes. These would, subject to appropriate climatic conditions, mask views of the tops of the proposed stacks in certain directions. However, it is noted that cooling towers have different properties and as a result, visible plumes from the cooling towers tilt more rapidly under the effect of the wind than plumes that would be emitted by the proposed stacks. It is therefore unlikely that visible plumes from the cooling towers and the proposed stacks would merge but it is anticipated that visible plumes, particularly from Unit X, would be partly masked by visible plume from the existing cooling towers.

		It is considered that, subject to appropriate mitigation measures referred to above, which would be secured by DCO requirements, the Proposed Scheme fully accords with the policy requirements set out in EN-1, 5.6 and EN-2, 2.8. It is noted that the Environmental Permit (EP) application referred to in paragraph 2.8.5 of EN-2 is expected to be submitted to the EA on 29 May 2018. The Applicant has engaged with the EA throughout the pre-application process and considers that there are no reasons why an EP would not be granted.
Flood Risk **(EN-1, 5.7 and EN-5, 2.4.1)**	Paragraph 5.7.4 of EN-1 states: Applications for energy projects of 1 hectare or greater in Flood Zone 1 in England or Zone A in Wales and all proposals for energy projects located in Flood Zones 2 and 3 in England or Zones B and C in Wales should be accompanied by a flood risk assessment (FRA). An FRA will also be required where an energy project less than 1 hectare may be subject to sources of flooding other than rivers and the sea (for example surface water), or where the EA, Internal Drainage Board or other body have indicated that there may be drainage problems. This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account. Paragraph 5.7.5 of EN-1 states: The minimum requirements for FRAs are that they should: • be proportionate to the risk and appropriate to the scale, nature and location of the project; • consider the risk of flooding arising from the project in addition to the risk of flooding to the project;	Chapter 12 (Water Resources, Quality and Hydrology) of the ES (document reference 6.1.12) assesses likely significant effects arising from the Proposed Scheme upon water resources, quality and hydrology. The EA's Flood Map for Planning shows that the area of the Proposed Scheme is located partially in Flood Zone 2 and partially in Flood Zone 3. During consultation the EA confirmed that the area of the Proposed Scheme and its surroundings are protected up to the 1 in 200 year event by the flood defences located along the banks of the River Ouse. The River Ouse at the location of the Proposed Scheme is tidally influenced. The risk of flooding in this area is therefore a combination of fluvial and tidal flooding, with tidal being the dominant source. The EA flood risk from surface water mapping shows localised areas along the pipeline route and within the boundary of the Power Station Site to be susceptible to flooding from surface water. The indicated areas at risk of flooding are likely to be associated with the localised lower ground levels where water would pond during or after prolonged and heavy rainfall events.

	• take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made; • be undertaken by competent people, as early as possible in the process of preparing the proposal; • consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure; • consider the vulnerability of those using the site, including arrangements for safe access; • consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and identify flood risk reduction measures, so that assessments are fit for the purpose of the decisions being made; • consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project; • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems; • consider if there is a need to be safe and remain operational during a worst case flood event over the development's lifetime; and • be supported by appropriate data and information, including historical information on previous events.	The area of the Proposed Scheme is considered to be at low risk of flooding from groundwater, sewers and reservoirs. Potentially significant effects associated with flooding that have been assessed for the construction phase as part of the EIA include the potentially increased risk of flooding to construction workers, residential properties, people and agricultural land caused by temporary works within the area of the existing floodplain. The likely significant effects associated with flooding that have been assessed for the operational phase include: • Increased flood risk associated with an increase in the rate and volume of surface water runoff from increase in impermeable areas at the Power Station Site, and Above Ground Installation (AGI) and Gas Receiving Facility (GRF) associated with the new Gas Pipeline. • Increased flood risk to the Proposed Scheme associated with the potential breach or overtopping of defences along the River Ouse. • Increased flood risk to the Proposed Scheme associated with the diversion of North Perimeter Ditch. • Increased risk of flooding to the Proposed Scheme, people and properties elsewhere caused by loss of the existing floodplain storage associated with Proposed Scheme. In accordance with the policy requirement in paragraph 5.7.4 of EN-1, the DCO Application includes a Flood Risk Assessment (FRA) (document reference 6.8). The FRA meets the requirements set out in paragraph 5.7.5 of EN-1. The Proposed Scheme utilising existing infrastructure at the Existing Drax Power Station Complex and therefore must be located within a certain distance of that infrastructure, particularly the steam turbines of Units 5 and 6. As set out in

	Paragraphs 5.7.7 to 5.7.10 of EN-1 state: Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions with the EA, and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the SoS to reach a decision on the application when it is submitted. The SoS should advise applicants to undertake these steps where they appear necessary, but have not yet been addressed. If the EA has concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns. In determining an application for development consent, the SoS should be satisfied that where relevant: • the application is supported by an appropriate FRA; • the Sequential Test has been applied as part of site selection; • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk; • the proposal is in line with any relevant national and local flood risk management strategy114;	paragraph 7.2 of the FRA, Selby District Council (SDC) confirmed that as the Proposed Scheme could not be located somewhere else, the Sequential Test does not need to be carried out. The sequential approach was considered during the design of the Proposed Scheme, in accordance with paragraph 5.7.12 of EN-1. The Proposed Scheme would be constructed as part of the existing power plant, therefore appropriate flood emergency procedures are already in place. In addition, the finished floor levels of the proposed structures would be 600 mm above the flood levels that may occur during the 1 in 200 year breach scenario with climate change allowance to ensure that these elements would remain operational during the unlikely breach scenario. The results of the hydraulic modelling of the post-development scenario with the proposed flood relief channel shows that construction of the proposed structures is unlikely to increase the risk of flooding elsewhere. Considering the information provided in the paragraphs above, the Proposed Scheme fulfils the requirements of the Exception Test in accordance with paragraph 5.7.15 of EN-1. Chapter 12 of the ES concludes that the construction works would be temporary and would be highly unlikely to increase the risk of flooding to the Power Station Site, construction workers, or people and properties elsewhere. In the event of a breach in the flood defences, the existing Drax Flood Evacuation Plan would be followed that includes measures for securing and evacuating the site. During the operational phase, the Proposed Scheme is not expected to increase flood risk to the Power Station Site or people and properties elsewhere as a result of an increase in the rate and volume of surface water runoff from an increase

	• priority has been given to the use of sustainable drainage systems (SuDs) (as required in the next paragraph on National Standards); and • in flood risk areas the project is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed over the lifetime of the development. For construction work which has drainage implications, approval for the project's drainage system will form part of the development consent issued by the SoS. The SoS will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010. In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any SuDS, including any necessary access rights to property. The SoS should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body, such as an Internal Drainage Board. Paragraphs 5.7.12 to 5.7.18 of EN-1 state: The SoS should not consent development in Flood Zone 2 in England or Zone B in Wales unless it is satisfied that the sequential test requirements have been met. It should not consent development in Flood Zone 3 or Zone C unless it is satisfied that the Sequential and Exception Test requirements	in impermeable areas at the Power Station Site, and AGI and GRF associated with the new Gas Pipeline. The FRA also assesses the potential for an increased risk of flooding caused by a loss of floodplain. The works would be undertaken in areas that are protected by flood defences up to the 1 in 200 annual probability flood event. Breach of the existing flood defences is very unlikely to happen as the flood defences are regularly checked and maintained by the EA to ensure they provide appropriate protection, however the potential impacts of the Proposed Scheme on flood risk elsewhere in the event of a breach have been considered. Hydraulic modelling of a potential breach scenario was undertaken for the baseline and post-development scenario as part of the FRA. The post-development modelling has considered a flood relief channel that would be built immediately to the north of Drax Power Station as an in-design mitigation measure. The results of the hydraulic modelling exercise show localised minor increases in flood depth of less than 10 mm in Drax village. In EIA-terms, this is considered to be an impact magnitude of negligible adverse. The sensitivity of people and properties in Drax village is considered to be very high. Therefore, there would likely be an effect on people and properties of minor adverse significance prior to the implementation of mitigation measures such as the flood relief channel mentioned above. In case of unlikely breach of the flood defences or overtopping, the existing Drax Flood Evacuation Plan would be followed. Considering this, no residual effects are envisaged.

	have been met. The technology-specific NPSs set out some exceptions to the application of the sequential test. However, when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, but should apply the sequential approach to locating development within the site. Preference should be given to locating projects in Flood Zone 1 in England or Zone A in Wales. If there is no reasonably available site in Flood Zone 1 or Zone A, then projects can be located in Flood Zone 2 or Zone B. If there is no reasonably available site in Flood Zones 1 or 2 or Zones A & B, then nationally significant energy infrastructure projects can be located in Flood Zone 3 or Zone C subject to the Exception Test. Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.4 above. If, following application of the sequential test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3 or Zone C, the Exception Test can be applied. The test provides a method of managing flood risk while still allowing necessary development to occur. The Exception Test is only appropriate for use where the sequential test alone cannot deliver an acceptable site, taking into account the need for energy infrastructure to remain operational during floods. It may also be appropriate to use it where as a result of the alternative site(s) at lower risk of flooding being subject to national designations	The FRA considers the potential for an increased risk of flooding to the Proposed Scheme as a result of a potential breach or overtopping of defences along the River Ouse. Hydraulic modelling of a potential breach scenario was undertaken for the 1 in 200 annual probability tidal flood event (with climate change allowance) and the 1 in 5 annual probability fluvial flood event. The predicted flood levels were used to establish appropriate finished floor levels for all new infrastructure. Floor levels would be set 600 mm above the predicted flood levels to ensure that the new infrastructure would remain operational during this potential flood event. In the event of a breach in the flood defences, the existing Drax Flood Evacuation Plan would be followed that includes measures for securing and evacuating the site. The potential significance of the effect is considered to be of negligible significance. Increased Risk to the Existing Drax Power Station Complex due to potential localised culverting of the Existing Drainage Ditches in the southern area of the Power Station Site is not considered to be an issue, as it is proposed that surface water runoff from the contractor village continues to drain to the eastern and western drainage systems in a similar manner to the existing drainage in this area. Finally, the North Perimeter Ditch is part of the existing drainage system serving the Existing Drax Power Station Complex. The ditch would be diverted to allow for the construction of the battery storage building. The diversion channel would be designed to ensure no reduction in the existing capacity of the North Perimeter Ditch.

	such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), Sites of Special Scientific Interest (SSSIs) and World Heritage Sites (WHS) it would not be appropriate to require the development to be located on the alternative site(s). All three elements of the test will have to be passed for development to be consented. For the Exception Test to be passed: • it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk; • the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any • exceptions set out in the technology-specific NPSs; and • a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere subject to the exception below and, where possible, will reduce flood risk overall. Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the SoS may grant consent if it is satisfied that the increase in present and future flood risk can be mitigated to an acceptable level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the SoS should make clear how, in reaching its decision, it has weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree	Schedule 2 to the draft DCO (document reference 3.1) secures the submission, approval and implementation of a surface water strategy for the mitigation of flood risk during construction and operation of the Proposed Scheme. With regard to cumulative effects, it is noted that Chapter 17 (Cumulative Assessment) of the ES confirms that the distance considered for the cumulative assessment of the surface water, groundwater and flood risk has been agreed with the EA and the Selby Area Internal Drainage Board (IDB) who is responsible for the management of flood risk and ordinary watercourses in the area of the Proposed Scheme. The assessment looked at the following aspect when considering the potential for cumulative effects: • Whether developments are hydraulically linked. • Potential downstream receptors. • Construction happening at the same time / period. • Any loss of floodplain storage. Following the construction of a flood relief channel, no residual cumulative effects have been identified. With regard to paragraph 2.4.1 of EN-5, which states that climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, it is noted that the ES Volume 2 contains a Climate Risk and Vulnerability Assessment (CRVA) (document reference 6.2.15.1) which concludes that the Proposed Scheme would be highly resilient to impacts on structural stability and site contents / business continuity arising from flooding of the Site. This would be in accordance with paragraph 2.4.1 of EN-5.

	of the risk, the future impacts on climate change, and advice provided by the EA and other relevant bodies. To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property. Paragraphs 5.7.20 to 5.7.25 of EN-1 state: Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts. The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect. It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation. The sequential approach should be applied to the layout and design of the project. More vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat	Overall, it is considered that the Proposed Scheme is in accordance with the policies contained in EN-1, 5.7 and EN-5, 2.4.1 and therefore acceptable with regard to flood risk.

	and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS. Essential energy infrastructure which has to be located in flood risk areas should be designed to remain operational when floods occur. In addition, any energy projects proposed in Flood Zone 3b the Functional Floodplain (where water has to flow or be stored in times of flood), or Zone C2 in Wales, should only be permitted if the development will not result in a net loss of floodplain storage, and will not impede water flows. The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding. The applicant should take advice from the emergency services when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA. Paragraph 2.4.1 of EN-5 states: Part 2 of EN-1 provides information regarding the Government's energy and climate change strategy including policies for mitigating climate change. Section 4.8 of EN-1 sets out the generic considerations that applicants and the SoS should take into account to help ensure that electricity networks infrastructure is resilient to climate change. As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where	

	it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it would be resilient to: • flooding, particularly for substations that are vital for the electricity transmission and distribution network; • effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; and • earth movement or subsidence caused by flooding or drought (for underground cables).	
Historic Environment **(EN-1, 5.8)**	Paragraphs 5.8.8 to 5.8.15 of EN-1 state: As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact. Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the	In accordance with paragraph 5.8.8 of EN-1, Chapter 8 (Historic Environment) of the ES (document reference 6.1.8) provides a description and assessment of the significance of heritage assets and their settings affected by the Proposed Scheme. The Chapter then assesses the impacts of the Proposed Scheme in terms of the historic environment. Non-intrusive geophysical surveys as well as an intrusive archaeological evaluation investigation in the field that will contain the AGI have been completed. The Chapter assesses potential harm to hitherto unknown below ground non-designated heritage assets within the footprint of the GRF, AGI, the Rusholme Lane Area and carpark / compound area on the Carbon capture readiness reserve space. There are no known buried assets on the Power Station Site and the land has been subject to previous ground disturbance associated with the construction of the facilities on the Existing Drax Power Station Complex. Chapter 8 also assesses effects on one field boundary likely protected under the Hedgerows Regulations Act 1997 (Ref. Appendix 2-1). It is noted that the hedge would not be disturbed during the instalment of the pipe trench. Further, a

	setting of a heritage asset, representative visualisations may be necessary to explain the impact. The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. In considering applications, the SoS should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset, taking account of: • evidence provided with the application; • any designation records; • the Historic Environment Record, and similar sources of information; • the heritage assets themselves; • the outcome of consultations with interested parties; and • where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice. In considering the impact of a proposed development on any heritage assets, the SoS should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between conservation of that significance and proposals for development. The SoS should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive	setting assessment was undertaken for all designated heritage assets including conservation areas within a 10 km radius of the Proposed Scheme. In accordance with paragraph 5.8.8 of EN-1, the relevant Historic Environment Record (HER) (Ref. 2.2) has been consulted (in this case, the North Yorkshire Historic Environment Record, NYHER) (Ref. Appendix 2-2), as well as the National Heritage List for England (NHLE) as maintained by Historic England (Ref. Appendix 2-3), historic maps including Ordnance Survey (Ref. Appendix 2-4) and other online sources (Ref. Appendix 2-5). The assessment has concluded that following mitigation, there would be negligible effects on below-ground archaeological remains associated with ground moving construction activities along the Gas Pipeline, the Rusholme Lane Area and carpark / compound area on the Carbon capture readiness reserve space. The mitigation proposed, and as discussed with the relevant consultees, is a requirement in Schedule 2 to the draft DCO that secures the submission and approval of a written scheme of investigation. The sensitivity of the setting of heritage assets to change and impact that the Proposed Scheme would have on that setting has been appropriately considered. In terms of effects during the operation of Unit X and the construction of Unit Y, and later during the operational phase of both Units X and Y, there is likely going to be a direct, permanent, long-term residual effect of minor significance on the setting of the Drax Augustinian Priory following the implementation of mitigation measures, which is considered to cause less than substantial harm. Similarly, the setting of Scurff Hall Moated Site would be subject to less than substantial harm. Under paragraph 5.8.15 of EN-1, this less than substantial harm has to be weighed against the public benefit associated with the Proposed

	contribution they can make to sustainable communities and economic vitality. The SoS should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use. The SoS should have regard to any relevant local authority development plans or local impact report on the proposed development in respect of the factors set out in footnote 122. There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. […] Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the SoS should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.	Scheme, which are set out in section 7.2 of the Planning Statement. The benefits of the Proposed Scheme are numerous and include • A significant contribution to meeting the UK's urgent energy need; • A contribution to the Government's desired energy mix by adding electricity generation from natural gas to the mix at Drax Power Station; • A contribution to moving the UK towards a decarbonised future; • Carbon Capture Readiness (CCR), should the deployment of CCR become feasible in the future; • Combined Heat and Power (CHP) readiness, should there be demand for CHP in the area in the future; • The efficient use of a brownfield site and infrastructure that is already used for electricity generation (thus the term "repower"); • Job generation during the construction phases (see Chapter 14 (Socio-Economics) of the ES for details); • Net gain in area based habitats, as described above. In light of these benefits, the less than substantial harm to the abovementioned settings of designated heritage assets is considered to be acceptable. It is noted that the Applicant proposes that enhancement mitigation for the Proposed Scheme would include an interpretation panel on the Public Right of Way (PRoW) passing between the Drax Augustinian Priory t and the boundary of Development Parcel B. This would improve the degree to which the setting's relationship with the asset can be appreciated by the public. This mitigation measure would be secured by a development obligation (see

	Paragraph 5.8.17 to 5.8.22 state: Where loss of significance of any heritage asset is justified on the merits of the new development, the SoS should consider imposing a condition on the consent or requiring the applicant to enter into an obligation that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed. When considering applications for development affecting the setting of a designated heritage asset, the SoS should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the SoS should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval. A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given. Where the loss of the whole or a material part of a heritage asset's significance is justified, the SoS should require the developer to record and advance understanding of the significance of the heritage asset before it is lost. The extent of the requirement should be proportionate to the nature and level of the asset's significance. Developers should be required to publish this evidence and deposit copies of the reports with the	Proposed Heads of Terms for a Development Consent Obligation, document reference 7.1). No residual significant effects are anticipated on any other heritage assets or their settings as a result of the construction works. Overall, the Proposed Scheme is considered to be in accordance with the policies contained within EN-1, 5.8 and therefore acceptable with regard to its effects on the historic environment.

	relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it. Where appropriate, the SoS should impose requirements on a consent that such work is carried out in a timely manner in accordance with a written scheme of investigation that meets the requirements of this Section and has been agreed in writing with the relevant Local Authority (where the development is in English waters, the Marine Management Organisation and English Heritage, or where it is in Welsh waters, the MMO and Cadw) and that the completion of the exercise is properly secured. Where the SoS considers there to be a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the SoS should consider requirements to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	
Landscape and Visual **(EN-1, 5.9, EN-2, 2.6, EN-4, 2.21 and EN-5, 2.8)**	Paragraphs 5.9.5 to 5.9.8 of EN-1 state: The applicant should carry out a landscape and visual assessment and report it in the ES. (See Section 4.2) A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local	In accordance with paragraphs 5.9.5 to 5.9.7 of EN-1 and paragraphs 2.6.3 and 2.6.8 of EN-2, Chapter 10 (Landscape and Visual Amenity) of the ES (document reference 6.1.10) provides an assessment of the impacts of the Proposed Scheme in terms of effects on landscape and visual amenity. The assessment identifies potentially significant effects during construction and operation on landscape character and the visual amenity of surrounding visual receptors. Paragraphs 5.9.8 and 5.9.18 of EN-1 acknowledge that all proposed nationally significant energy infrastructure is likely to have visual effects for many receptors around proposed sites, therefore, there is no expectation that all proposed energy

	development documents in England and local development plans in Wales. The applicant's assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character. The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on local amenity, and nature conservation. Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. Paragraph 5.9.15 of EN-1 states: The scale of such projects means that they will often be visible within many miles of the site of the proposed infrastructure. The SoS should judge whether any adverse impact on the	NSIPs will be completely concealed from views. This is reiterated by paragraph 2.6.5 of EN-2 In accordance with paragraph 5.8.17 of EN-1, the Proposed Scheme has been designed to protect the landscape and views where possible, as follows: • Through the use of suitable materials to reduce reflection and glare; • Through careful siting of the AGI away from Rusholme Lane to reduce impacts on immediate residential receptors and recreational users; • By retention of specific areas of planting within and outside of the Power Station Site to provide a visual screen where feasible; • Through planting of an additional 20 m wide woodland buffer within and close to the north eastern edge of the Site Boundary and within the Power Station Site to screen views of the Power Station Site. This mitigation planting would only be required if CCS goes ahead at some future date (which would be sufficient for screening and relocation of Public Right of Way (PRoW) 35.47/6/1 to the north of the new planting); and • A lighting design to reduce light pollution during construction (which would be secured by the CEMP). Measures to mitigate the effects of the Proposed Scheme on the landscape and views would be implemented through a Landscape and Biodiversity Strategy. An Outline Landscape and Biodiversity Strategy (document reference 6.7) has been submitted with the Application. These measures, set out in section 1.7 of the Outline Strategy, include for example tree retention and protection proposals to screen views of construction activity, but also:

	landscape would be so damaging that it is not offset by the benefits (including need) of the project. Paragraph 5.9.17 of EN-1 states: The SoS should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation. Paragraph 5.9.18 of EN-1 states: All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The SoS will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast. Paragraph 2.6.3 of EN-2 states: The applicant should include a landscape and visual impact assessment as part of the ES, as set out in Section 4.2 of EN-1.	• New broadleaved, coppice woodland / scrub and woodland carr; • New broadleaved parkland and scattered trees (ornamental tree planting); • New scrub planting enhancing the mosaic associated with the woodland areas; • Enhancement of existing ornamental shrub planting; • Infilling of existing hedgerows and the planting of new hedgerows; • The establishment of species rich grassland habitats; • the introduction of new ponds to replace those lost during construction; and • Plug planting of woodland ground cover. The implementation of these mitigation measures has been considered as part of the Proposed Scheme. The strategy for landscaping works and ecological mitigation measures (to be in accordance with the Outline Landscape and Biodiversity Strategy) would be secured by a requirement in Schedule 2 to the draft DCO, which requires the submission, approval and implementation of such a strategy. Slight impacts during construction are predicted on the landscape character and views within the study area covered by Chapter 10 of the ES. These would be the result of the movement of construction vehicles and plant and associated noise disturbing the landscape's tranquillity, as well as the introduction of temporary structures into the landscape such as cranes and temporary hoardings. In addition there would be a temporary (and permanent) change in land use resulting in the loss of arable land and vegetation (woodland, scrub, grassland and hedgerows) to accommodate the proposed infrastructure.

	Paragraphs 2.6.4 to 2.6.8 of EN-2 state: The applicant should also consider the design of the plant, including the materials to be used, and the visual impact of the stack, as set out in Section 5.9 of EN-1 in the context of the local landscape. It is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable. Applicants should design fossil fuel generating stations with the aim of providing the best fit with the existing local landscape so as to reduce visual impacts. This may include design of buildings to minimise negative aspects of their appearance through decisions in areas such as size, external finish and colour of the plant as far as compliance with engineering and environmental requirements permit. The precise architectural treatment will need to be site-specific. Reduction of visual impacts may often involve enclosing buildings at low level as seen from surrounding external viewpoints. This makes the scale of the plant less apparent, and helps conceal the lower level, smaller scale features of the plant. Earth bunds and mounds, tree planting, or both may be used for softening the visual intrusion and may also help to attenuate noise from site activities. Where the existing landscape is more industrial, design may involve other forms of visual impact mitigation. As stated in EN-1, the applicant should have undertaken an appropriate landscape and visual assessment using	The construction of the Gas Pipeline would affect vegetation and farm patterns in the study area covered by Chapter 10. However, as this disturbance would be temporary, this is considered to be acceptable in planning terms. Having regard to paragraph 2.21.1 of EN-4, it is noted that the Gas Pipeline has been routed to avoid key areas of woodland. This is considered to be acceptable in planning terms The LVIA acknowledges that the proposed construction activities need to be considered in the context of an already active operational site which experiences low levels of tranquillity, the movement of vehicles and variations in air flows associated with the plumes from the cooling towers and main chimney and the Pipeline Area which in contrast is relatively tranquil. Many of the effects during construction that may impact on visual amenity (such as dust) can however be managed through the CEMP. On balance, considering their temporary nature, the construction effects associated with the Proposed Scheme are considered to be acceptable. The LVIA acknowledges the careful consideration that the original Drax Power Station design by A E Weddle in the 1960s has been given to landscape effects, and that effects associated with the new structures required in conjunction with the Proposed Scheme which would contrast with the overall mass of the Existing Drax Power Station Complex and “jar” its symmetry from certain views. Significant effects of up to moderate to major significance are predicted on landscape character, local landscape character and a local landscape designation (Lower Derwent ILA) during construction, operation and decommissioning. Those who experience significant effects on views would include local residents

	recognised methodologies and have taken measures to minimise the effects of the fossil fuel generating station on landscape and visual amenity as far as reasonably practicable. In considering whether the measures proposed are sufficient to achieve these objectives the SoS should take advice from the relevant statutory consultees. Paragraph 2.21.1 of EN-4 states: Sections 4.3 and 5.9 of EN-1 sets out the general principles that should be applied in the assessment of biodiversity and landscape and visual impacts. Additional considerations apply during the construction of a pipeline (which, without mitigation, can affect both landscape and ecology). These comprise the effect upon specific landscape elements within and adjacent to the pipeline route, such as grasslands, field boundaries (hedgerows, hedgebanks, drystone walls, fences), trees, woodlands, and watercourses. There will also be temporary visual impacts caused by the need to access the working corridor and to remove flora and soil. The working width of the pipeline will vary depending on the surrounding terrain. Temporary impacts could include large excavations where deep pits are needed for boring beneath rivers, roads and sensitive features. Paragraph 2.8.4 of EN-5 states: Where possible, applicants should follow the principles below in designing the route of their overhead line proposals and it will be for applicants to offer constructive proposals for additional mitigation of the proposed overhead line. While	(particularly in Drax, Long Drax and Barmby on the Marsh), users of local footpaths and the local road network. However, it should be noted that since the Weddle's original design there have been other developments on the Existing Drax Power Station Complex which have already eroded the original symmetry and widened the footprint of development. Such developments include the biomass co-firing facilities (planning ref. 2007/1420/FUL,), the biomass store (planning ref. 2005/0115/FUL) as well as the more recent Lytag plant to the north west of the Existing Drax Power Station Complex (planning ref. NY/2011/0311/SCO, NY/2011/0491/ENV and NY/2012/0270/73) Further, significant visual effects are associated with new above ground structures required for the Gas Pipeline. However, new tree and hedgerow planting would tie the Proposed Scheme into its surrounding and reduce the significance of some of these effects on local landscape character so that, once planting has matured, they would be minor rather than moderate. Operational effects of the Gas Pipeline itself on landscape character or visual amenity are not predicted to be significant. The connection would have an impact on features in the landscape such as hedgerows and trees. However, where possible these would be replanted following construction and the land the farmland pipeline crosses would be reinstated. In summary, following mitigation, there would be some moderate to major significant effects predicted on the Lower Derwent ILA and moderate effects on landscape character and local landscape character during construction, operation and

	proposed underground lines do not require development consent under the Planning Act 2008, wherever the nature or proposed route of an overhead line proposal makes it likely that its visual impact will be particularly significant, the applicant should have given appropriate consideration to the potential costs and benefits of other feasible meansof connection or reinforcement, including underground and sub-sea cables where appropriate. The ES should set out details of how consideration has been given to undergrounding or sub-sea cables as a way of mitigating such impacts, including, where these have not been adopted on grounds of additional cost, how the costs of mitigation have been calculated.	decommissioning of the Proposed Scheme., However, the policies contained within the relevant NPSs acknowledge that it is not possible to eliminate the visual impacts associated with a fossil fuel generating station. In assessing the adverse effects of the Proposed Scheme, it needs to be acknowledged that the Applicant is proposing to repower infrastructure at an existing power station. The majority of the Site is brownfield land, and the majority of the proposed infrastructure would be perceived in the context of the already industrialised Existing Power Station Complex. Having regard to paragraph 5.9.15 of EN-1, on balance it is not considered that the predicted adverse impact on the landscape would be so damaging that it would not be offset by the benefits (including need) of the Proposed Scheme, given that the urgent need for new electricity generating infrastructure has been set out in the relevant NPSs and is not subject to debate.
Land use including open space, green infrastructure and Green Belt **(EN-1, 5.10)**	Paragraph 5.10.5 of EN-1 states: The ES (see Section 4.2) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. Paragraph 5.10.6 of EN-1 states: Applicants will need to consult the local community on their proposals to build on open space, sports or recreational buildings and land. Taking account of the consultations,	Existing land uses near the Proposed Scheme are largely residential, agricultural and recreational. With regard to land use effects covered by part 5.10 of EN-1, Chapter 14 (Socio-Economics) of the ES (document reference 6.1.14) assesses likely significant effects on the access and amenity value of Public Rights of Way (PRoWs) used for recreational purposes, as well as impacts on agricultural land, largely associated with the proposed Gas Pipeline, GRF and AGI. The Chapter also assesses the generation of direct and indirect and induced employment opportunities – these effects are assessed against policies contained in part 5.12 of EN-1 further below. The anticipated demand for educational and healthcare services, community facilities (including recreational/open

	applicants should consider providing new or additional open space including green infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements. Paragraph 5.10.8 of EN-1 states: Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination. Paragraph 5.10.9 of EN-1 states: Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	space) and accommodation local to the Site is not considered significant and (in line with the Scoping Opinion, document reference 6.2.1.2) has been scoped out of further consideration within the ES. With regard to PRoW, these run immediately adjacent to the western and northern borders of the Power Station Site, and through development parcel A (see Figure 1.3 of the ES as well as Table 14-11 in Chapter 14 (Socio-Economics) of the ES (document reference 6.1.14)). The PRoW network extends across much of the surrounding area with a high concentration between the village of Drax and the River Ouse to the north. The Trans-Pennine Trail long distance path and Sustrans Route 65 run on the eastern bank of the River Ouse. There are also some non-designated public routes in the vicinity of the Site. The existing PRoW infrastructure and amenity for pedestrian / cyclist movements to / from the Site is considered to be of mixed quality and amenity value, depending on a number of factors, including the condition of the routes (e.g. surfaced or unsurfaced). The majority of the Site (excluding the Pipeline Area and the Rusholme Lane Area) lies within the Existing Drax Power Station Complex, thus limiting the effects on land use. However, there would be effects on users of a small number of PRoWs in relation to views during construction and operation. Those who experience significant effects on views would include local residents (particularly in Drax, Long Drax and Barmby on the Marsh), users of local footpaths and the local road network. These effects are associated with new structures associated with the Proposed Scheme which would contrast with the overall mass of the Existing Drax Power Station

		Complex. Chapter 14 of the ES states that the Proposed Scheme may change the accessibility and amenity value of the PRoWs located near the Site during construction. Specific mitigation measures would be incorporated into the CEMP to mitigate the effect of temporary closure of PRoWs (e.g. temporary signage and diversion of public right of ways). Article 12 to the draft DCO (document reference 3.1) applies to the temporary closure of PRoWs, and requires that reasonable access must be provided during any closure. A requirement in Schedule 2 to the draft DCO requires a PRoWs management plan in order to manage and minimise the effects of temporary PRoWs closures during construction, including requirements in relation to alternate routes, signage and advance publicity. Therefore, temporary disruption associated with the construction works is not expected to result in significant effect and is considered to be acceptable in planning terms. During Stage 3 (operation), no significant effects in terms of accessibility and amenity value are anticipated on PRoW, as they would be reopened along their existing alignment. There is the potential for the diversion of one PRoW, however this would only be required in the event carbon capture storage equipment would be required In the future. The effects associated with accessibility and amenity value would not be significant, which is considered to be acceptable. As noted above, Chapter 14 of the ES also refers to the temporary and permanent loss of land suitable for agriculture in the Pipeline Area during the construction and the operation phases of the Proposed Scheme. Following the construction of the Gas Pipeline, agricultural activities can continue above the Gas Pipeline. However, there

		would be some restrictions surrounding activities including deep ploughing and the planting of trees. The land within and surrounding the Power Station Site and the Pipeline Area is classified as Best and Most Versatile agricultural land (defined as Grade 1, 2 and 3a) identified in post-1988 detailed surveys carried out to the north of the Existing Drax Power Station Complex and to the south of the Pipeline Area. The permanent loss of agricultural land due to the Proposed Scheme during Stage 1 would be 6.03 ha (associated with the GRF and AGI). The area of temporary disturbance would cover an area of approximately 26.57 ha. Given the relatively small area of agricultural land to be permanently affected by the Proposed Scheme, the effect is considered to be of negligible significance. Effects during construction of the Proposed Scheme on soil quality and agricultural land have been deemed insignificant. Following construction of the Gas Pipeline, the temporarily disturbed agricultural land would be reinstated to the existing Agricultural Land Classification (ALC) Grade. The ES, in Chapter 14 and, in accordance with paragraph 5.10.8 of EN-1, Chapter 11 (Ground Conditions), provides specific mitigation to reduce any effects, including the implementation of a Soil Management Plan which would be implemented during the construction phases as part of the CEMP. A Soil Management Plan is attached at Appendix B to the Outline CEMP (document reference 6.5). Overall, the effects on agricultural land are considered to be acceptable and in accordance with paragraph 5.10.8 of EN-1 With regard to paragraph 5.10.9 of EN-1, it is noted that whilst the Coal Authority has made no comments on the statutory consultation, much of the Site lies within an area identified for minerals safeguarding (brick clay and sand and gravel) on the

		Policies Map of the Minerals and Waste Joint Plan being prepared by North Yorkshire County Council (NYCC), the City of York and the North York Moors National Park Authority (relevant policies being policies S01 (Safeguarding mineral resources) and S02 (Developments proposed within Minerals Safeguarding Areas)). These policies are assessed further below in this table. However, it is noted that much of the Proposed Scheme lies within the Existing Drax Power Station Complex, which already makes any minerals inaccessible. The Pipeline Area runs through the safeguarded area, however, as most of the area between the Drax Power Station and the River Ouse is safeguarded for mineral resources, an alternative pipeline route would not have avoided the permanent loss of some of that safeguarded area. Therefore, the Proposed Scheme is not considered to be in conflict with paragraph 5.10.9 of EN-1. Overall, the Proposed Scheme is considered to be acceptable with regard to effects associated with land use including open space, green infrastructure and Green Belt.
Noise and Vibration **(EN-1, 5.11, EN-2, 2.7, EN-4, 2.20 and EN-5, 2.9)**	Paragraph 5.11.8 of EN-1 States: The project should demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. Paragraph 5.11.9 of EN-1 states: The SoS should not grant development consent unless it is satisfied that the proposals will meet the following aims:	Chapter 7 (Noise and Vibration) of the ES (document reference 6.1.7) provides an assessment of the impacts of the Proposed Scheme in terms of noise and vibration effects which has been prepared in accordance with the relevant requirements of the NPSs. Construction activity could lead to some degree of noise disturbance at receptors located close to the construction works and within the surrounding road network used by construction traffic. A range of measures are expected to be implemented during construction to minimise noise impacts, such as

	• avoid significant adverse impacts on health and quality of life from noise; • mitigate and minimise other adverse impacts on health and quality of life from noise; and • where possible, contribute to improvements to health and quality of life through the effective management and control of noise. Paragraph 2.7.2 of EN-2 states: The ES should include a noise assessment as described in Section 5.11 in EN-1. Paragraph 2.7.3 of EN-2 states: The SoS should consider the noise impacts according to Section 5.11 in EN-1. It should be satisfied that noise will be adequately mitigated through requirements attached to the consent. The SoS will need to take into consideration the extent to which operational noise will be separately controlled by the EA. Paragraphs 20.20.1 to 20.20.5 of EN-4 state: Section 5.11 of EN-1 sets out the generic considerations to be given to the impacts of noise and vibration. In addition there are specific noise and vibration considerations which apply to gas and oil pipelines during the preconstruction and construction phases. The applicant will need to identify all the noise and vibration sensitive receptors likely to be affected during these phases.	• Hoarding along the boundary of the Gas Pipeline routenear particularly Noise Sensitive Receptors (NSRs) where appropriate; • Appropriate maintenance of plant items to avoid tonal or impulsive noises which are considered more annoying than continuous noise sources; • The selection of inherently quiet plant items where practicable; • High performance acoustic enclosures for plant where practicable; and • Close and timely liaison with the local authority and residents when non-normal and emergency operations would lead to noise levels in excess of the agreed limits. Such measures would be incorporated into the final CEMP. As a result, negligible noise effects during the construction phases of State 0, Stage 1 and Stage 2 are predicted on NSR, which is considered to be acceptable. During decommissioning, similar mitigation measures to those described above would be implemented. Vibration is likely to occur for a short period of the construction works due to the use of construction plant and equipment. Section 7.4 of Chapter 6 of the ES states that vibration from construction activities may impact on adjacent buildings. The criteria used in the ES relate to the potential for cosmetic damage, not structural damage. The principal concern would be generally transient vibration due to impact piling. Cosmetic damage is most likely to occur within the first 20 m of piling activities; damage is less likely to occur at greater distance. Due to the distances involved between the Site and NSR locations vibration from construction activities is unlikely to be

	During the pre-construction phase there could be vibration effects from seismic surveys. During construction, tasks may include site clearance, soil movement, ground excavation, tunnelling, trenching, pipe laying and welding, and ground reinstatement. In addition, increased HGV traffic will be generated on local roads for the movement of materials. These types of noise and vibration impacts will need to be assessed. The commissioning of a new pipeline can involve extensive periods of drying after hydrotesting, using air compressors, and noise mitigation may be required for this type of activity. A new gas pipeline may require an above ground installation such as a gas compression station on the route of the pipeline to boost transmission line pressure. A new oil pipeline may require pumping stations. These may be located in quiet rural areas, and therefore the control of noise from these facilities is likely to be an important consideration. The ES should include an assessment of noise and vibration effects (see Section 5.11 of EN-1) including the specific issues outlined above, where they are relevant. Paragraphs 2.9.10 – 2.9.13 of EN-5 state: The SoS should ensure that relevant assessment methodologies have been used in the evidence presented to them, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant. Consequently, noise from overhead lines is unlikely to lead to the SoS refusing an application, but it may need to consider	subjectively noticeable, and would not approach the threshold limits where structural damage to buildings may occur. With the implementation of standard mitigation measures, the predicted vibration effects on sensitive receptors are not considered to be significant, which would be acceptable with regard to the relevant policies contained within the NPSs. The operational noise assessment has identified potential effects at different NSR locations during both the day and night time during the operation of Unit X alone and Units X and Y together. A review of the noise model has shown that the dominant noise levels would be located at the stack terminations. The design of the Proposed Scheme includes embedded mitigation to address potential noise impacts during operation from the outset, including housing gas turbines, major compressors and unit / generator transformers within acoustic enclosures, and fitting turbine filters, ventilation apertures and outlet ducts between gas turbines with silencers. The details of this mitigation are set out in section 7.4 of Chapter 7 of the ES. The operational noise assessment identified that medium effects would arise at some NSR locations during daytime and high noise effects would arise at some NSR locations during night time. In response, secondary mitigation to achieve noise limits of 98 dB(A) for noise emitted from the top of the gas turbine exhaust gas emissions stack, for example in the form of acoustic attenuators within the four open cycle stacks, is proposed. With the implementation of these measures, the operational noise impact associated with the operational phase would not be significant at any of the NSR identified. The noise assessment identifies that noise impacts from the operation of the Gas Pipeline and AGI would be negligible.

	the use of appropriate requirements to ensure noise is minimised as far as possible. Applicants should have considered the following measures: • the positioning of lines (see Section 2.8 (landscape/visual impact)) to help mitigate noise; • ensuring that the appropriately sized conductor arrangement is used to minimise potential noise; • quality assurance through manufacturing and transportation to avoid damage to overhead line conductors which can increase potential noise effects; and • ensuring that conductors are kept clean and free of surface contaminants • during stringing/installation. The ES should include information on planned maintenance arrangements. Where this is not the case, the SoS should consider including these by way of requirements attached to any grant of development consent.	With regard to paragraph 5.11.9 of EN-1, it is noted that with embedded and secondary mitigation in place, operational noise levels at eight out of the 10 NSRs assessed are predicted to be below the Lowest Observed Adverse Effect Level (LOAEL) threshold, the remaining two NSRs are predicted to be above the LOAEL threshold but below the SOAEL threshold during both day and night time. On this basis, no significant adverse health effects are expected. The noise mitigation measures referred to above are secured through a requirement in Schedule 2 to the draft DCO (document reference 3.1). The requirement would ensure that the noise output from the stacks is at an acceptable noise level, as required under the ES. With regard to vibration during the operation phase, vibration sources would include balanced rotating equipment, such as turbines, and induced vibrations in the stacks to be transmitted to the foundations. All fixed reciprocating and rotating plant items would be seated on anti-vibration mounts to isolate mechanical vibration at source. Over the distances involved between the Power Station Site and the NSR locations, it is anticipated that the level of induced vibration would be imperceptible at the nearest sensitive receptor. As such, vibration impacts as a result of the operation of the Proposed Scheme, including the Gas Pipeline, GRF and AGI have scoped out of the ES in agreement with PINS in the Scoping Opinion (document reference 6.2.1.2). For the reasons set out above, the Proposed Scheme is considered to accord with the relevant NPS policies related to noise and vibration.
Socio-economics	Paragraph 5.12.1 of EN-1 states: The construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and	Chapter 14 (Socio-Economics) of the ES (document reference 6.1.14) provides an assessment of the impacts of the Proposed Scheme in terms of socio-economic effects. The effects

(EN-1, 5.12)	regional levels. Parts 2 and 3 of this NPS set out some of the national level socio-economic impacts. Paragraph 5.12.3 of EN-1 states: This assessment should consider all relevant socio-economic impacts, which may include: • the creation of jobs and training opportunities; • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; • effects on tourism; • the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and • cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.	considered relate to employment opportunities as well as the access and amenity value of Public Rights of Way (PRoW), which have already been assessed above. The demolition works and the general construction works would generate direct and indirect employment opportunities at the local level and regional level. The Proposed Scheme is anticipated to create an average of 200 demolition jobs each year during the Site Reconfiguration Works, which equates to an effect of minor to moderate positive significance at the local level and of negligible to minor positive significance at regional level. In addition, there are likely to be an additional 100 Full-time Equivalent (FTE) indirect and induced jobs associated with this stage (Stage 0) as a result of an increase in spending on goods, suppliers and services in connection with the Proposed Scheme and employees of those firms. During Stages 1 and 2 (construction of Unit X and operation of Unit X and construction of Unit Y) of the Proposed Scheme, it is anticipated that approximately 1,200 FTEs / jobs would be generated each year over the construction period. In EIA-terms, this is considered to represent an effect of minor to moderate positive significance at the local level and negligible to minor positive significance. Furthermore, there are likely to be an additional 600 FTE indirect and induced jobs associated with these stages due to spending in the local economy by employees and contracts placed with suppliers and contractors. The Applicant would seek to enter into an agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) (TCPA 1990) (Ref. 2.7) with SDC and NYCC to secure the preparation of a Local Employment Scheme. Details of the proposed heads of terms are set out the document Proposed Heads of Terms for a

	Paragraph 5.12.6 of EN-1 states: The SoS should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the SoS considers to be both relevant and important to its decision. Paragraph 5.12.9 of EN-1 states: The SoS should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	Development Consent Obligation (document reference 7.1) submitted with the Application. During Stage 3 (operation), there is anticipated to be a limited reduction in the direct number of jobs. This is considered to be of minor negative significance at the local level and negligible to minor negative at the regional level. These staff reductions are anticipated to be as a result of natural reductions (e.g. due to retirement) and where possible there would be redeployment. The sensitivity of economic receptors at both the local and regional level is considered to be low due to the levels of unemployment (which is below the national average) and levels of relative deprivation. In addition, it is noted that if Drax would not implement the Proposed Scheme and cannot make unabated coal work in viability terms, there would likely be a marked reduction in jobs at Drax Power Station. Therefore, the reduction in jobs is considered to be acceptable in planning terms. Chapter 17 (Cumulative Assessment) of the ES (document reference 6.1.17) assesses the potential effects of all assessed committed developments and the Proposed Scheme being constructed concurrently. It concludes that is a potential effect of greater negative significance than that concluded for the Proposed Scheme in isolation in relation to constraints on the resource of the construction workforce at the local and regional level. Whilst there is the possibility for this to occur, this cannot be quantified at this stage, and in any event such effects would only be short-term. This is therefore not considered to be unacceptable and in direct conflict with paragraph 5.12.3 of EN-1. The DCO Application includes heads of terms for a proposed development consent obligation agreement under s106 of the Town and Country Planning Act 1990. The agreement would

		include obligations on the Applicant to extend its current apprenticeship programme to the Proposed Scheme and to submit for approval, and comply with, a Local Employment Scheme. With regard to socio-economic impacts on local infrastructure, which would include PRoWs, the ES concludes that the potential disruption during construction will be of minor negative significance, subject to appropriate mitigation measures, such as clear signage for diverted routes. The need for PRoW management is secured via a requirement in Schedule 2 of the draft DCO. In summary, it is anticipated that the Proposed Scheme would be acceptable in socio-economic terms.
Traffic and Transport **(EN-1, 5.13 and EN-2, 2.2.5-2.2.6)**	Paragraph 5.13.3 of EN-1 states: If a project is likely to have significant transport implications, the applicant's ES (see Section 4.2) should include a transport assessment, using the NATA/WebTAG methodology stipulated in Department for Transport guidance, or any successor to such methodology. Applicants should consult the Highways Agency and Highways Authorities as appropriate on the assessment and mitigation. Paragraph 5.13.4 of EN-1 states: Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.	Chapter 5 (Transport) of the ES (document reference 6.1.5) provides an assessment of the impacts of the Proposed Scheme in terms of transport effects. The scope of the Chapter includes the phases of the construction of Unit X, and the operation of Unit X and construction of Unit Y. Effects during the Site Reconfiguration Works / Stage 0 have been deemed insignificant as the traffic impact on the local transport network is expected to be minimal for this stage. During operation (Stage 3) there would be little change in existing workforce levels with staff being redeployed from existing operations within the Existing Drax Power Station Complex. Therefore, the operation of the Proposed Scheme would have fewer worker vehicle and Heavy Goods Vehicle (HGV) movements than during construction. HGV movements would reduce from current levels with fuel being provided by pipeline rather than HGV deliveries. The effects of the Proposed Scheme during operation of Unit X or Unit X and Unit Y are therefore not considered to be significant.

	Paragraph 5.13.6 of EN-1 states: A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the SoS should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the SoS should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below. Applicants may also be willing to enter into planning obligations for funding infrastructure and otherwise mitigating adverse impacts. Paragraph 5.13.10 of EN-1 states: Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective. Paragraph 5.13.11 of EN-1 states: The SoS may attach requirements to a consent where there is likely to be substantial HGV traffic that: • control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements; • make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and	The assessment of Stages 1 and 2 identifies the likely significant effects of the Proposed Scheme on motorised and non-motorised users of the road network. The following data sources have been used to establish the baseline: • Traffic Data Collected on Site. • Public Transport Scheduling Information and Timetables. • Multiple map sources including Public Rights of Way and Cycle Routes. • WebTris Traffic Count Data. • Personal Injury Accident (PIA) data for 2014-16 (most recent years available). The methodology for calculating trips for the Proposed Scheme during construction was agreed with Highways England. This methodology is set out in Appendix 5.6 to the ES (document reference 6.2.5.6). In addition, NYCC and East Riding of Yorkshire Council (ERoY) agreed the scope and junctions to be assessed within their respective administrative areas. Therefore, the transport assessment within the ES is considered to accord with paragraph 5.13.3 of EN-1. Transportation of construction materials would be via the road network from Junction 36 of the M62. Abnormal Indivisable Loads (AILs) would arrive via the Port of Goole, along the Goole Bypass, the M62 and then the A645 to Drax. A recent Department for Transport's (DfT's) advisory letter (Ref. 4.6) underlines *"the importance of the Water Preferred Policy when examining planning material for major power generation projects"* as set out in Highways England's Water preferred policy guidelines for the movement of abnormal

	• ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force. Paragraph 2.2.5 of EN-2 (paragraph 2.2.5) states: New fossil fuel generating stations need to be accessible for the delivery and removal of construction materials, fuel, waste and equipment, and for employees.	indivisible loads (Ref. Appendix 2-6). The guidelines, in paragraph 3.6.1, state: *"Loads that cause the most traffic congestion and impact adversely on journey time reliability are generally heavy (loads over 150 tonnes gross vehicle weight which are subject to a speed restriction of between 12 – 25 mph dependent on vehicle type) and wide (loads over 5m in width). Primarily such loads are moved by the power industry, as well as heavy manufacturing industries. These businesses should undertake a strategic review of their operations in collaboration with the AIL team. The aim would be to agree individual strategies on whether a road or a water route is to be used for abnormal load movements on a site-by-site basis. Shipping to the nearest coastal port is expected to be the minimum requirement but the use of inland waterways should also be considered for each operational site."* The use of the existing jetty on the River Ouse has been considered by the Applicant for the delivery of AILs, however, this construction transport route was discounted following the Preliminary Environmental Information Report (PEIR) (see document reference 6.9 for the Non-Technical Summary of the PEIR) and consultation. Works including the location of at least one mobile crane landside of the jetty, associated security lighting, fencing, storage and welfare facilities, laydown areas and dredging would have been required to make the jetty suitable for use. These works would have given rise to significant environmental effects, particularly resulting from the dredging activity. Further, the works would have been cost prohibitive and had limited benefit as a result of tidal restrictions.

		AILs would therefore instead be routed via the M62, A614 and A645. The routes of AILs would be subject to final agreement between the haulage company responsible for transporting large loads, and the local highway authority and Highways England. Therefore, the Proposed Scheme is not considered to be in conflict with paragraph 5.1.310 of EN-1. Chapter 5 of the ES assesses the potentially significant effects during construction of Unit X following mitigation (residual effects) as follows: • Increased vehicular delay at junctions A614 / A645 and A614 / Airmyn Road. • Worsening of junction performance at A614 / A645 and A645 / New Road / Main Road. However, these effects would be temporary (two months) only and, in light of this and the benefits associated with the Proposed Scheme, considered to be acceptable. There would be no likely significant effects during Stage 1 resulting from traffic flow, road safety, fear and intimidation, severance and pedestrian amenity. The likely significant effects during the operation of Unit X and the construction of Unit Y would be: • Increased vehicular delay at junctions A614 / A645 and A614 / Airmyn Road. • Worsening of junction performance at A614 / A645; A645 / New Road / Main Road; A1041 / A645; A614 / Airmyn Road and M62 / A614. Again, these effects would be temporary (two months) only and are considered to be acceptable.

		Effects associated with traffic flow, road safety, fear and intimidation, severance and pedestrian amenity would not likely be significant. Temporary road closures and diversions as well as temporary and permanent closures of PRoW would be required in order to construct the Gas Pipeline. These would be mitigated through route diversions or temporary road signals. As a mitigation measure, the Applicant has also prepared and submitted aConstruction Traffic Management Plan (CTMP) (document reference 6.2.5.2) with the Application, which would be secured by a requirement in Schedule 2 to the draft DCO. Section 5 of the Outline CTMP sets out how the delivery of AILs would be managed. At this stage of the Proposed Scheme, it assumed that some AILs will be delivered by road from origins within the UK, or shipped into Goole Inland Port and transferred via road to Drax. For deliveries of AILs from Goole Inland Port two route options can be taken: • A161 > M62 > A614 > A645 • A161 > Booth Ferry Road > A614 > M62 > A614 > A645 Given the early stage of the Proposed Scheme, and the required consultation needed to prepare for the delivery of an AIL, the Outline CTMP sets out an indicative process only. The final route and logistics required for delivery, especially for road closures, would be resolved prior to the delivery of AILs and subject to a final, updated, CTMP. The Applicant has also prepared and submitted an Outline Construction Worker Travel Plan (CWTP) (document reference 6.2.5.5), in accordance with paragraph 5.13.4 of EN-1. This would be secured by a requirement in Schedule 2 to the draft DCO.

		Overall, the Proposed Scheme is considered to be acceptable in transport terms, subject to the proposed mitigation measures which would be in accordance with paragraph 5.13.6 of EN-1.
Waste Management **(EN-1, 5.14)**	Paragraph 5.14.6 of EN-1 states: The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. The arrangements described and Management Plan should include information on the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome. Paragraph 5.14.7 of EN-1 states: The SoS should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development. It should be satisfied that: • any such waste will be properly managed, both on-site and off-site; • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste	Chapter 13 (Waste) of the ES (document reference 6.1.13) provides an assessment of the impacts of the Proposed Scheme in terms of effects associated with waste generation from the Site Reconfiguration Works (Stage 0) in terms of demolition activities, and waste generation from construction materials from Stages 1 and 2 and increase in demand for local waste treatment and disposal facilities. Waste generated by the construction of the Gas Pipeline was scoped out of the assessment on the basis that there would be no demolition of above ground features and excavated soil would be reinstated on top of the Gas Pipeline. This was agreed with the SoS via the Scoping Opinion (see Appendix 1.2 of the ES Volume 2 (document reference 6.2.1.2)). Waste volumes from demolition of buildings and structures have not been determined at this stage as a pre-demolition audit would not be carried out until the buildings are unoccupied. The assessment in Chapter 1 has therefore assumed that the intention is to reuse as much clean excavated material onsite as possible (earthworks only, excluding demolition works). There would be sufficient capacity on Site to reuse clean excavated material, therefore, waste associated with that material would expected to be insignificant. No significant effects are predicted on local waste treatment and disposal facilities as a result of waste generated by construction of the Power Station Site. The volumes of hazardous and inert waste generated by construction are not considered to be significant volumes and there are more than

	management facilities to deal with other waste arisings in the area; and • adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where that is the best overall environmental outcome.	20 facilities in the study area. Additionally, there is capacity onsite to reuse clean, excavated material. As mentioned in previous sections, a final CEMP would be prepared and implemented for the demolition and construction works associated with the Proposed Scheme. This would include a Site Waste Management Plan and set out best practice measures for waste minimisation and management throughout the construction period. Operational waste is currently generated at the Existing Drax Power Station Complex. The specific volumes of this waste is not anticipated to be significant. Waste generated during operation of the Proposed Scheme was scoped out of the EIA and this was accepted by the SoS in their Scoping Opinion. The potential effects of the Proposed Scheme during decommissioning have not been assessed due to limited information available at this stage (e.g. type of waste, phasing of the works and availability of waste infrastructure in the long term). Decommissioning waste would be managed using a decommissioning and demolition strategy will optimise the recovery of machinery and plant. This strategy would be part of the decommissioning environmental management plan. In summary, no significant effects are predicted in relation to waste as a result of the Proposed Scheme during demolition, construction and operation, which is considered to be in accordance with relevant NPS policies and acceptable in planning terms.
Water Quality and Resources **(EN-1, 5.15, EN-2, 2.2.7 –**	Paragraph 5.15.6 of EN-1 states: The SoS should satisfy itself that a proposal has regard to the River Basin Management Plans and meets the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and	Chapter 12 (Water Resources, Quality and Hydrology) of the ES (document reference 6.1.12) provides an assessment of the impacts of the Proposed Scheme in terms of effects on the water environment. With regard to paragraph 5.15.6 of EN-1, information regarding the baseline water environment and

2.2.9 and EN-4, 2.22)	groundwater. The specific objectives for particular river basins are set out in River Basin Management Plans. The SoS should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline/Estuary Management Plans. Paragraph 5.15.9 of EN-1 states: The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be clearly marked. Paragraphs 2.2.7 to 2.2.9 of EN-2 state: Some fossil fuel generating stations have very high water demands, for example coal-fired and combined cycle gas turbine (CCGT) generating stations. Other technologies, for example open cycle gas turbines, have little water demand. In coal-fired and CCGT generating stations, purified water is needed to produce the steam to drive the generating turbines and additional large volumes of water are needed to condense this steam back to water for reuse. A supply of water will also be needed for CCS processes. The amount of water abstraction required and whether discharge is necessary will depend on the applicant's choice of technology, particularly the cooling system, in the proposed design. The volumes required and availability will depend on a number of factors including: • the extent of the water resource; • the likely flow rate within the body of water; • water supply company management plans;	flood risk has been obtained from a number of sources, including the EA Humber River Basin Management Plan (Ref. Appendix 2-7). With regard to paragraphs 2.2.7 to 2.2.9 of EN-2, the assessment assumes that there would be no change in abstractions (or discharges). Therefore, the Proposed Scheme is considered to be fully in accordance with the policies set out in these paragraphs. Table 12-1 of Chapter 12 sets out the summary of consultation undertaken with regard to water resources, quality and flood risk. It confirms that the EA has, following a screening exercise undertaken by the Applicant, confirmed that no Water Framework Directive (WFD) assessment is required for the Proposed Scheme, as the Proposed Scheme would not have any adverse impacts on hydromorphology or groundwater from the perspective of the WFD. In addition to Chapter 12, Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11) provides an assessment of the impacts of the Proposed Scheme on groundwater and surface water flow and quality associated with land contamination. Chapter 12 explains that during construction, it is anticipated that water run-off from construction activities could result in increased sedimentation in surface water features. There is also a risk of pollution from spillages of harmful substances such as fuel, which may filter through into surface and groundwater features, or disturbance of contaminated land that can have direct effects to groundwater quality and indirect effects to surface water quality. There is potential for demolition and construction activities to cause deterioration to the status

	• the visual impact of the chosen system; and • the power consumption of the cooling system. High water demands will mean that developers' preferred sites are likely to be coastal, beside estuaries or alongside large rivers. If sufficient quantities of water from natural sources are not available at a site then some use of mains supplies may be necessary, although it should be noted that a water company has no duty to supply water. If a sufficient supply of water is not available, an alternative means of cooling such as air-cooled condensers would be required. The regulation of water abstraction and discharge is described in Section 5.15 of EN-1. The applicant should have investigated the availability of such a supply at an early stage. Any proposals for alternative sites proposed during the application process should demonstrate that an adequate supply of water would be available. Paragraphs 2.22.3 to 2.22.7 of EN-4 state: Where the project is likely to have effects on water resources or water quality, for example impacts on groundwater recharge or on existing surface water or groundwater abstraction points, or on associated ecological receptors, the applicant should provide an assessment of the impacts in line with Section 5.15 of EN-1 as part of the ES. Where the project is likely to give rise to effects on water quality, for example through siltation or spillages, discharges from maintenance activities or the discharge of disposals such as wastewater or solvents, the applicant should provide an assessment of the impacts. The SoS should be satisfied that the impacts on water quality and resources are acceptable in accordance with Section 5.15	of surface and groundwater features, habitats, or impact upon water quality. There is also potential for the construction of the Gas Pipeline to cause disturbance to the subsurface water flows in the area. During the operational phase, there may be impacts to catchment hydrology caused by changes to subsurface flows within the superficial deposits and aquifer due to the Gas Pipeline and deterioration of the quality of surface water features caused by potential pollutants contained in the routine runoff generated in the Drax Power Station and the above ground facilities associated with the Gas Pipeline. However, a number of mitigation measures would be implemented as part of a CEMP to address potential impacts during the construction of the Proposed Scheme. A detailed list of mitigation measures has been included in the ES Commitments Register (document reference 6.4). For almost all construction activities, the application of effective mitigation is expected to prevent any significant effects occurring to sensitive receptors. Chapter 12 of the ES indicates that the residual impacts of the construction of the Proposed Scheme with the implementation of specific mitigation measures are not expected to be significant. Chapter 11 (Ground Conditions) of the ES states that with the implementation of a CEMP detailing appropriate mitigation (e.g. procedures such as sediment and pollution management), contamination impacts to groundwater and surface water during construction would be negligible and of slight adverse significance. It has also been identified that the Gas Pipeline may have an adverse effect on the base flow of surface and groundwater features within the study area caused by changes to

	of EN-1. The SoS should liaise with the EA over the potential for the new development to result in loss or reduction of supply to any licensed abstraction or unlicensed groundwater abstraction, or any potential interference with current legitimate uses of groundwater or surface waters, taking account of the terms of any relevant environmental permits or any negative effect on a groundwater dependent ecosystem. Mitigation measures to protect the water environment may include techniques for crossing rivers and managing surface water before and after construction, including restoring vegetation and using sustainable drainage systems to control run-off. Mitigation measures to protect water quality may include: • the avoidance of vulnerable groundwater areas or appropriate use of above ground pipeline facilities; • use of the highest specification pipework and best practice in the storage and handling of pollutants to prevent spillage; • careful storage of excavated material away from watercourses and facilities for the disposal of sewage and waste; • use of sustainable drainage systems; and careful reinstatement of riverbanks and reed beds.	subsurface flows. However, the assessment predicts that these effects would not be significant. In summary, there are not expected to be any impacts of significance on receptors within the water resources study area once appropriate mitigation measures are in place. Therefore, the Proposed Scheme accords with the policies related to water quality and resources (EN-1, 5.15, EN-2, 2.2.7 – 2.2.9 and EN-4, 2.22).

ASSESSMENT AND TECHNOLOGY SPECIFIC CONSIDERATIONS

The technology specific considerations of relevance to the Proposed Scheme that are contained within EN-2, EN-4 and EN-5 (and that have not already been addressed above) are considered below.

POLICY	POLICY TEXT	ASSESSMENT
Factors Influencing Site Selection	Paragraphs 2.2.2 – 2.2.9 of EN-2 state: Fossil fuel generating stations have large land footprints and will therefore only be possible where the applicant is able to	Given the Applicant's objectives as stated in paragraph 3.1.2 of the Planning Statement, the re-utilisation of existing infrastructure and utilising existing operational land, which already has a power station designated use, were key drivers

by Developers **(EN-2, 2.2, EN-4, 19.7.10 - 19 and EN-5, 2.2)**	acquire a suitably-sized site. The site will also need to be big enough to conform to Government policy on CCR and CCS, set out in Section 4.7 of EN-1 and in Section 2.3 below. Depending on the processes adopted, CCR, CCS and mitigation measures for emissions by fossil fuel generating stations may require storage and use of hazardous chemicals regulated under the Control of Major Accident Hazards (COMAH) Regulations 1999, which may have an impact on potential land-use in the vicinity. This in turn may affect the applicant's choice of site. Development of a CHP generating station may also have an effect on the size of site required and land-use. Details of land-use impacts are set out in Section 5.10 of EN-1. New fossil fuel generating stations need to be accessible for the delivery and removal of construction materials, fuel, waste and equipment, and for employees. Government policy encourages multi-modal transport and materials (fuel and residues) may be transported by water or rail routes where possible. (See Section 5.13 of EN-1 on transport impacts). Applicants should locate new fossil fuel generating stations in the vicinity of existing transport routes wherever possible. Although there may in some instances be environmental advantages to rail or water transport, whether or not such methods are viable is likely to be determined by the economics of the scheme. Road transport may be required to connect the site to the rail network, waterway or port. Any application should therefore incorporate suitable access leading off from the main highway network. If the existing access is inadequate and the applicant has proposed new infrastructure, the SoS should satisfy itself that the impacts of	in determining the Proposed Scheme. Accordingly, geographically distant alternative power station sites were not considered viable. A full alternatives assessment has taken place and the results of these are included within ES Chapter 4 (Consideration of Alternatives) (document reference 6.1.4). The Applicant has previously considered developments adjacent to the Existing Drax Power Station Complex, for example the White Rose Carbon Capture Project to the north of the Existing Drax Power Station Complex and a new gas-fired power station on land to the east of the Existing Drax Power Station Complex, for which no application was submitted. These sites were not considered appropriate for the Proposed Scheme given the need to be in close proximity to the steam turbines that are located at Units 5 and 6. Distance affects efficiency, and so the closer the new gas turbines are to the steam turbines, the more efficient the Proposed Scheme would be. The Site was therefore selected by the Applicant on the basis of the following: The majority of the Site (excluding the Pipeline Area and the Rusholme Lane Area) is currently in the ownership of the Applicant; • There is a long history of power generation at Drax Power Station, and the Existing Drax Power Station Complex is currently used for this purpose, meaning there would be little material change to the land use; • The majority of the Site is brownfield, meaning permanent loss of currently agricultural land would be minimised; • The Power Station Site already has existing electrical connections, and the Proposed Scheme is technically feasible; • The Site is already well connected to the transport network;

	the new infrastructure are acceptable as set out in Section 5.13 of EN-1. Some fossil fuel generating stations have very high water demands, for example coal-fired and combined cycle gas turbine (CCGT) generating stations. Other technologies, for example open cycle gas turbines, have little water demand. In coal-fired and CCGT generating stations, purified water is needed to produce the steam to drive the generating turbines and additional large volumes of water are needed to condense this steam back to water for reuse. A supply of water will also be needed for CCS processes. The amount of water abstraction required and whether discharge is necessary will depend on the applicant's choice of technology, particularly the cooling system, in the proposed design. The volumes required and availability will depend on a number of factors including: • the extent of the water resource; • the likely flow rate within the body of water; • water supply company management plans; • the visual impact of the chosen system; and • the power consumption of the cooling system. High water demands will mean that developers' preferred sites are likely to be coastal, beside estuaries or alongside large rivers. If sufficient quantities of water from natural sources are not available at a site then some use of mains supplies may be necessary, although it should be noted that a water company has no duty to supply water. If a sufficient supply of water is not available, an alternative means of cooling such as air-cooled condensers would be required. The regulation of water abstraction and discharge is described in Section 5.15 of EN-1. The applicant should have investigated the availability of such a supply at an early stage. Any proposals for alternative sites proposed during the application process should	• It allows for the reuse of existing infrastructure, such as steam turbines and cooling infrastructure, therefore reducing the cost and environmental impacts of the Proposed Scheme; • The Site is big enough to conform to Government policy on CCR and CCS, as well as CHP; • Water supply would not be an issue, as there would be no change to the existing abstraction (and discharge) volumes (see Chapter 12 Water Resources, Quality and Hydrology) of the ES (document reference 6.1.12); • The Site is in close proximity to the NTS; and • Utilising the existing 400 kV substation, which has two spare bays, would avoid the need for a new substation. The Proposed Scheme would in the most part (excluding the Pipeline Area and Rusholme Lane Area) be situated within the development boundary of the Existing Drax Power Station Complex. The Power Station Site is fully accessible for the delivery of construction material. It lies close to the junction of the A1041/A645 near Camblesforth and is accessed from the A645 to the south of the site. This access is primarily used by staff and visitors. Site contractors, deliveries and heavy goods vehicle traffic make use of another entrance to the site which is located on New Road on the eastern boundary of the Existing Drax Power Station Complex. The Existing Drax Power Station Complex is currently served by a railway line which connects with the Pontefract line to the south for deliveries of fuel and there is also an access to the River Ouse via a jetty located off Redhouse Lane. Construction transport would be via road. As set out further above, transport via the River Ouse has been considered and deemed unfeasible; therefore, transport via the road network is

	demonstrate that an adequate supply of water would be available. Paragraphs 2.19.7 – 2.19.10 of EN-4 state: The sections below include references to factors influencing site/route selection by applicants for gas and oil pipeline NSIPs. These are not a statement of Government policy, but are included to provide the SoS and others with background information on the criteria that applicants should consider when choosing a site or route. When designing the route of new pipelines applicants should research relevant constraints including proximity of existing and planned residential properties, schools and hospitals, railway crossings, major road crossings, below surface usage and proximity to environmentally sensitive areas, main river and watercourse crossings. These can be undertaken by means of desk top studies in the first instance, followed up by consulting the appropriate authority, operator, or conservation body if necessary. Undetected underground cavities from mine workings, abandoned industrial sites and other activities, such as waste disposal, or other utilities' services (water, telecommunication, etc.) could have an effect on the integrity and safety of a pipeline. The effects might include collapse of underground tunnels, damage to utility services and pollution of water courses. Applicants should undertake desktop surveys to identify historic or current mine workings, underground cavities serving industrial usage, the nature of any made ground, waste sites, unexploded ordnance, utility services and any other below surface usage when assessing routes for a pipeline.	considered to be acceptable. An Outline CTMP (document reference 6.2.5.2) has been submitted with the Application which sets out measures to reduce the impacts of construction traffic. A detailed assessment of alternative routes for the Gas Pipeline has been undertaken. Six pipeline routes were originally considered (shown on Figure 4.1 in Chapter 4 (Consideration of Alternatives) of the ES). Two options were dismissed early on as they were not considered to be feasible, and two further options were discounted later on due to construction risks associated with existing overhead lines. The preferred route for the Gas Pipeline and the location of the AGI have been chosen as a result of fewer environmental constraints compared to other options that were considered. In particular, the results of the geophysical surveys indicated that the chosen route was likely going to have less significant effects on buried heritage assets than a route slightly further to the south that was assessed as one of the two final options. With regard to paragraph 2.19.10 of EN-4 it is noted that great consideration has been given to nearby residential properties, with the aim to minimise land take of agricultural land or disturbance of residential amenity. No schools, hospitals or rail crossings would be affected by the Proposed Scheme, and impacts on roads and water bodies has been minimised where possible. Where land or rights over land has to be acquired, the Applicant is having ongoing discussions with affected land owners. Details of these discussions, and a detailed justification for areas where compulsory acquisition rights are sought, are set out in the Statement of Reasons (document reference 4.1) submitted with the Application. The Applicant has, as part of the land referencing and public consultation exercises, liaised with utilities companies and

	When choosing a pipeline route, applicants should seek to avoid or minimise adverse effects from usage below the surface. Where it is not considered practicable to select a route that avoids below surface usage, applicants should demonstrate in the ES that mitigating measures will be put in place to avoid adverse effects both on other below ground works and on the pipeline. Mitigating measures may include: protection or diversion of underground services; gas detection near landfill sites; horizontal direct drilling (HDD) techniques and rerouting. Contaminated material may need to be removed and disposed of. Paragraphs 2.2.1 – 2.2.7 of EN-5 state: The sections below include references to factors influencing site/route selection by applicants for electricity networks NSIPs. These are not a statement of Government policy, but are included to provide the SoS and others with background information on the criteria that applicants consider when choosing a site or route. The specific criteria considered by applicants, and the weight they give to them, will vary from project to project. The choices which energy companies make in selecting sites reflect their assessment of the risk that the SoS, following the principles set out in paragraph 4.1.1 of EN-1, will not grant consent in any given case. In the market-based GB system, electricity network companies are regulated monopolies which must respond to demand from generators and consumers of electricity by developing and maintaining economical and efficient networks whilst having regard to various non-financial considerations. It is for electricity network companies, responding to actual and anticipated changes in the patterns of supply and demand within the framework of regulation of new investment administered by Ofgem, to decide	statutory undertakers including National Grid Gas plc (NGG) and National Grid Electricity Transmission (NGET) to ensure that underground utilities would be avoided and that utilities would not affect the integrity and safety of the Gas Pipeline. Discussions with NGG and NGET are also being held with regard to the gas and electrical connections that would be required. Details of consents and licences that are or may be required, for example the Planning and Advanced Reservation of Capacity (PARCA) and the application to connect to the National Transmission System (NTS), can be found in the Other Consents and Licences document (document reference 5.8). Details of the land referencing exercise are set out in the Book of Reference (document reference 4.3) and details of the consultation are set out in the Consultation Report (document reference 5.1). In summary, the Applicant has considered all relevant factors for the selection of the Site, in accordance with the policies set out in EN-2, 2.2, EN-4, 19.7.10 - 19 and EN-5, 2.2.

	what applications for new electricity networks infrastructure to bring forward and the Government does not seek to direct applicants to particular sites or routes for electricity networks infrastructure. The general location of electricity network projects is often determined by the location, or anticipated location, of a particular generating station and the existing network infrastructure taking electricity to centres of energy use. This gives a locationally specific beginning and end to a line. On other occasions the requirement for a line may not be directly associated with a specific power station but rather the result of the need for more strategic reinforcement of the network. In neither circumstance is it necessarily the case that the connection between the beginning and end points should be via the most direct route (indeed this may be practically impossible), as the applicant will need to take a number of factors, including engineering and environmental aspects, into account. In order to be able lawfully to install, inspect, maintain, repair, adjust, alter, replace or remove an electric line (above or below ground) and any related equipment such as poles, pylons/transmission towers, transformers and cables, network companies need either to own the land on, over or under which construction is to take place or to hold sufficient rights over, or interest in that land (typically in the form of an easement), or to have permission from the current owner or occupier to install their electric lines and associated equipment and carry out related works (usually referred to as a “wayleave”). Where the network company does not own (or wish to own) the relevant land itself, it may reach a voluntary agreement that gives it either an easement over the land or at least a wayleave permission to use it during the tenure of the current owner or	

	occupier. Where it does not succeed in reaching the agreement it wants, the company may, as part of its application to the SoS, seek to acquire rights compulsorily over the relevant land by means of a provision in the DCO. The applicant may also apply for the compulsory purchase of land: this is not normally sought where lines and cables are installed, but may occur where other electricity network infrastructure, such as a new substation, is required. The above issues may be relevant considerations when the electricity company is considering various potential routes. There will usually be some flexibility around the location of the associated substations and applicants will give consideration to how they are placed in the local landscape taking account of such things as local topography and the possibility of screening. See Section 2.8 below and Section 5.9 in EN-1. As well as having duties under section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), developers will be influenced by Schedule 9 to the Electricity Act 19897, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and … do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects." Depending on the location of the proposed development, statutory duties under section 85 of the Countryside and Rights of Way Act 2000 and section 11A of	

	the National Parks and Access to the Countryside Act 1949 may be relevant. Transmission and distribution licence holders are also required under Schedule 9 of the Act to produce and publish a statement setting out how they propose to perform this duty generally.	
Pipeline Safety **(EN-4, 2.19)**	Paragraphs 2.19.4 – 2.19.6 of EN-4 state: The principal legislation governing the safety of pipelines (Pipelines Safety Regulations 1996) requires that pipelines are designed, constructed and operated so that the risks are as low as is reasonably practicable (ALARP). The HSE enforces these regulations, which place general duties on all pipeline operators and additional duties on the operators of Major Accident Hazard Pipelines. The additional duties require the pipeline operator to provide certain information to HSE at various stages in the lifecycle of a pipeline. In determining compliance, HSE expects pipeline operators to apply relevant good practice as a minimum. The SoS should seek advice from HSE about safety issues when considering an application. In the pipeline industry there are well established standards, covering design, operation and maintenance of UK sector major accident hazard pipelines which can be used to demonstrate risks are ALARP. If a pipeline operator wishes to use other standards, recommendations or guidance then this should be discussed with the HSE and may be acceptable to the HSE, provided that the pipeline operator can demonstrate that they achieve at least the equivalent levels of safety. A gap analysis should be undertaken to confirm this.	Chapter 16 (Major Accidents and Disasters) of the ES (document reference 6.1.16) provides an assessment of the impacts of the Proposed Scheme in terms of effects associated with those matters, including pipeline safety. As far as is reasonably practicable, the route of the Gas Pipeline avoids existing features that have the potential to present a hazard to the construction or operation of the Proposed Scheme. There are no sites within three miles of the Proposed Scheme (other than the Existing Drax Power Station Complex) where hazardous materials and / or substances are stored, used or made in types or quantities to trigger registration under the Control of Major Accidents Hazards (COMAH) Regulations 1999 (Ref. 5.4). Chapter 16 concludes that given the processes that are already in place, and the resulting measures that will be introduced to avoid and/or reduce the vulnerability of the Proposed Scheme in general and the Gas Pipeline in particular to major accidents and/or disasters (set out in Appendix 16.3 to Chapter 16 (document reference 6.2.16.3), it is considered that the risks of any such event occurring would be managed to be as low as reasonably practicable (ALARP). The application of the ALARP principle for the management of safety risks has been accepted by the Health and Safety Executive (HSE).

		As a result it is considered that there would not be any likely significant environmental effects arising from the vulnerability of the Proposed Scheme to major accidents and disasters. The HSE would only authorise construction of the Gas Pipeline on the basis of their assessment of a Pipeline Pre-construction Safety Report and then operation following their assessment of an Operational Safety Report (which therefore must ensure that all risks are mitigated to be ALARP). Without their authorisation, the Proposed Scheme would not be granted a licence to operate. The Other Consents and Licences Document (document reference 5.8) submitted with the Application sets out any other consents and licences that are or may be required to build and operate the Proposed Scheme. Details of notifications and / or consents or licences required from the HSE are included. Further, in relation to safety during construction in general, it is noted that the construction contractor would be required to prepare and implement a CEMP. The purpose of the CEMP is to: • Provide a mechanism for ensuring that measures to prevent, reduce and, where possible, offset potentially adverse environmental impacts identified in the ES are implemented; • Ensure that good construction practices are adopted and maintained throughout the construction of the Proposed Scheme; • Provide a framework for mitigating unexpected impacts during construction; • Provide assurance to third parties that their requirements with respect to environmental performance will be met;

		• Provide a mechanism for ensuring compliance with environmental legislation and statutory consents; and • Provide a framework against which to monitor and audit environmental performance. As such, the CEMP would ensure work is completed in accordance with: • The requirements of the DCO for the Proposed Scheme (the DCO would require the Applicant to carry out the construction work in accordance with certain mitigation measures); • The Applicant's contractual requirements; • Any environmental or other codes of conduct the Applicant is required to comply with; • Relevant site-specific mitigation measures; and • Current/prevailing best practices. The implementation of the CEMP is a form of tertiary mitigation and has therefore been assumed as an inherent part of the Proposed Scheme in the assessment of environmental effects. An Outline CEMP has been submitted with the Application (document reference 6.5). In addition to the above, it is noted that the Proposed Scheme would be expected to comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for health protection (Ref. Appendix 2-8). As works require alterations to an existing substation, limited works to existing overhead lines and a new underground connection, the impact of the change to electric and magnetic fields is likely to be minimal. In conclusion, the Proposed Scheme is considered to accord with EN-4, 2.19.

Soil and Geology **(EN-4, 2.23)**	Paragraphs 2.23.2 to 2.23.4 of EN-4 state: Applicants should assess the stability of the ground conditions associated with the pipeline route and incorporate the findings of that assessment in the ES (see Section 4.2 of EN-1) as appropriate. Desktop studies, which include known geology and previous borehole data, can form the basis of the applicant's assessment. The applicant may find it necessary to sink new boreholes along the preferred route to better understand the ground conditions present. The assessment should cover the options considered for installing the pipeline and weigh up the impacts of the means of installation. Where the applicant proposes to use horizontal directional drilling (HDD) as the means of installing a pipeline under a National or European Site and mitigating the impacts, the assessment should cover whether the geological conditions are suitable for HDD. When considering any application where the pipeline goes under a designated area of geological or geomorphological interest, the applicant should submit details of alternative routes, which either bypass the designated area or reduce the length of pipeline through the designated area to the minimum possible, and the reasons why they were discounted. Applicants should consult with the relevant statutory consultees at an early stage.	The route for the Gas Pipeline has been chosen as, amongst other reason, it is technically feasible for a pipeline to be constructed within this route corridor, with no concerns over soil stability. It is noted that the Coal Authority has been consulted and confirmed that they have no concerns over risks to land stability to Development High Risk Areas. The final CEMP would contain measures to manage erosion, which may result in sediment loading of nearby surface water. This was agreed by the SoS in the Scoping Opinion issued in October 2017 (document reference 6.2.1.2). Further, Chapter 11 (Ground Conditions) of the ES (document reference 6.1.11) provides an assessment of the impacts of the Proposed Scheme in terms of effects associated with ground conditions including contamination and protection of soil quality. The history of the study area covered by Chapter 11 indicates the presence of possible ground contamination. During construction, the assessment identified potential likely significant effects on the existing environment (for e.g. contamination of soils, surface water and aquifers) and these might affect the health of workers during construction and operation of the Proposed Scheme. The findings of the assessment indicate that the construction works are not predicted to have significant effects on geology and geomorphology receptors and soil within the Site. Potential effects to surface water and groundwater have been identified such as the transfer of contaminants into surface water and underlying aquifers, and these have been assessed further in Chapter 11 of the ES, however they are not considered to be significant with the implementation of the CEMP detailing appropriate mitigation. Similarly, no significant effects associated with physical damage to soil, or on human health or

		the built environment are anticipated with the implementation of embedded mitigation measures detailed within the CEMP. During operation, there is the potential for contamination of surface water and groundwater resources which may affect the health of the local community following the completion of construction works. However, these effects during the operation of the Proposed Scheme are not anticipated to be significant and would be avoided or minimised through a combination of design measures and mitigation measures as detailed within the ES Commitments Register (document reference 6.4). Good management practices would be also implemented during the operational phase of the Proposed Scheme and form part of embedded mitigation proposed to avoid risks of soil and groundwater pollution in line with relevant legislation, guidance and best practice. It is noted that there are no geological SSSIs or RIGS within the study area for the Ground Conditions assessment in Chapter 11. In summary, no potential significant effects have been identified after the implementation of mitigation measures during construction, operation and decommissioning of the Proposed Scheme.
Electric and Magnetic Fields (EMFs) **(EN-5, 2.10)**	Paragraph 2.10.13 of EN-5 states: In order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on aviation, the IPC should take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/03, or any successor when considering applications. More detail on this issue can be found in Section 5.4 of EN-1. Where a statutory consultee	As noted above, the Proposed Scheme would be expected to comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for health protection (Ref. Appendix 2-8). As works require alterations to an existing substation, limited works to existing overhead lines and a new underground connection, the impact of the change to electric and magnetic fields is likely to be minimal.

	on the safeguarding of technical facilities identifies a risk that the EMF effect of electricity network infrastructure would compromise the effective and safe operation of such facilities, the potential impact and siting and design alternatives will need to have been fully considered as part of the application.	

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (REF. 1.6) AND REVISED DRAFT NPPF (REF. 1.7)

A summary of the NPPF policies of most relevance to the Proposed Scheme and how it complies with these is provided below. Where relevant, policies of the revised draft NPPF have also been assessed.

POLICY	POLICY TEXT	ASSESSMENT
Part 1 **Building a strong and competitive economy**	18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. 19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. 20. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century. 21. Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment	It is considered that the Proposed Scheme would support sustainable economic growth by providing much needed electricity generating capacity, thus providing for security, diversity and resilience of UK energy supplies. This is vital for homes and businesses and to economic growth. As set out in Chapter 14 (Socio-Economics) of the ES (document reference 6.1.14), and in the assessment against the policies in EN-1 section 5.12 above, the Proposed Scheme would generate negligible to minor positive effects associated with employment opportunities during construction. The Proposed Scheme is anticipated to create an average of 200 demolition jobs each year during Stage 0, as well as an additional 100 FTE of indirect jobs, and approximately 1,200 FTE jobs plus 600 indirect FTE jobs each year during the construction phase in Stages 1 and 2, creating both direct and indirect benefits for the local and regional economy. It is noted that the local development plan confirms the suitability of the Power Station Site for further power generation development and thus, the location of the Proposed Scheme is

	or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should: • set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; • set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; • support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; • plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; • identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and • facilitate flexible working practices such as the integration of residential and commercial uses within the same unit. […]	in line with NPPF policies requiring local authorities to identify priority areas for infrastructure provision. The revised draft NPPF also seeks to support a prosperous rural economy, recommending that planning policies and decisions should enable *"the sustainable growth and expansion of all types of business in rural areas both through conversion of existing buildings and well-designed new buildings."* Whilst the Proposed Scheme is for industrial development, it would clearly support the local economy. The Proposed Scheme is considered to accord with the NPPF's and revised draft NPPF's policies related to building a strong and competitive economy.
Part 4 **Promoting sustainable transport**	29. Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and	The Applicant has submitted an Outline Construction Worker Travel Plan (CWTP) (Appendix 5.5 of the ES Volume 2 (document reference 6.2.5.5) and Outline Construction Traffic Management Plan (CTMP) (Appendix 5.2 of the ES Volume 2 (document reference 6.2.5.2) which would be secured by requirements in Schedule 2 to the draft DCO. These plans

	opportunities to maximise sustainable transport solutions will vary from urban to rural areas. 30. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. 31. Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas. The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user. 32. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether: • the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure; • safe and suitable access to the site can be achieved for all people; and • improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented	would promote sustainable transport choices during construction and minimise transport effects. The revised draft NPPF states that in assessing specific applications for development it should be ensured that: (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; (b) safe and suitable access to the site can be achieved for all users; and (c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Development should only be prevented or refused on highways grounds if the residual cumulative impacts on the road network or road safety would be severe. Use of the River Ouse and the existing Drax Jetty was considered as a sustainable mode of transport. However, the Applicant weighed the environmental harm that would be caused by potentially having to dredge the River and constructing the necessary infrastructure at the Jetty against the impact of utilising the existing road network for the temporary construction period. The impact outweighed the benefit in the Applicant's consideration, and hence the Jetty has been considered, assessed and then dismissed as part of the Applicant's iterative process in designing the Proposed Scheme. As set out in Chapters 5 (Transport) (document reference 6.1.5) of the ES, the Proposed Scheme would result in significant effects associated with increased vehicular delay and worsening junction performance in Stages 1 and Stages

	or refused on transport grounds where the residual cumulative impacts of development are severe. […] 34. Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas. 35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to; • accommodate the efficient delivery of goods and supplies; • give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; • create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; • incorporate facilities for charging plug-in and other ultra-low emission vehicles; and • consider the needs of people with disabilities by all modes of transport. […]	2, however, these effects would be temporary and limited to during construction. Subject to appropriate mitigation, the Proposed Scheme is considered to be in accordance with the NPPF and the revised draft NPPF with regard to sustainable transport.
Part 7 **Requiring good design**	56. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning,	Section 5.6 of this Planning Statement demonstrates that the Applicant has taken an iterative design process, taking account of and appraising the Site's context.

	and should contribute positively to making places better for people. 57. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. […] 66. Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.	As noted above, the location of the Pipeline Area and the design and location of the AGI and stacks have been informed by a detailed LVIA and the feedback obtained during non-statutory and statutory consultation. A requirement in Schedule 2 to the draft DCO contains provisions to control and approve the detailed design of the Proposed Scheme, to ensure that visual impacts would be minimised where possible. This would, for example, include appropriate colours and textures of infrastructure where possible. The indicative colours as set out in Table 10-6 of Chapter 10 (Landscape and Visual Amenity) of the ES have drawn on Drax Power Station's original colour palette. Where possible, opportunities have been taken to incorporate landscaping and biodiversity enhancement. A requirement in Schedule 2 to the draft DCO secures the submission and approval of a final Landscape and Biodiversity Strategy. A comprehensive Outline Landscape and Biodiversity Strategy (document reference 6.7) has been submitted with the Application. Whilst the Proposed Scheme would have some impacts on landscape character, local landscape designations and visual amenity, these should be considered acknowledging the existing context and industrial nature of Drax Power Station. The Proposed Scheme is, on balance, considered to be in accordance with part 7 of the NPPF. The draft revised NPPF seeks to protect and enhance valued landscapes, sites of geological value and soils; minimise impacts and provide net gains for biodiversity; prevent new and existing development from contributing to, being put at

		unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediate and mitigate contaminated land where appropriate. It states that development should, wherever possible, help to improve local environmental conditions such as air quality. The Proposed Scheme would result some impacts on the environment, including landscape character, however, the primary policy framework provided by the NPSs acknowledge that energy NSIPs will always result in visual effects, and there is no expectation that they would not do so. The Proposed Scheme would not result in significant effects on sites of geological value and soils, or unacceptable effects on water, ground conditions or noise levels. Where the Proposed Scheme can help improve local environmental conditions, it has done so, such as through the comprehensive measures set out in the Outline Landscape and Biodiversity Strategy (document reference 6.7) which would result in a net gain of area based habitats, clearly in line with the above policy of the revised draft NPPF. In addition, the repowering from coal to gas would represent a reduction in carbon emissions per unit of electricity generated. The Proposed Scheme is therefore considered to be in accordance with the relevant policies of the revised draft NPPF.
Part 10 **Meeting the challenge of climate change,**	93. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low	The FRA submitted with the Application (document reference 6.8) concludes that the Proposed Scheme would not increase the risk of flooding off-site, as the drainage and landscape design would follow appropriate guidance to attenuate and

flooding and coastal change	carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development. 99. Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. 100. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by: • applying the Sequential Test; • if necessary, applying the Exception Test; • safeguarding land from development that is required for current and future flood management;	control run-off rates from the Site. Section 7 of the FRA explains that Selby District Council (SDC) confirmed that as the Proposed Scheme could not be located somewhere else, the Sequential Test does not need to be carried out. However the sequential approach should be considered in the design process. As explained further above, the FRA has been prepared in accordance with policy requirements for the Exception Test. It follows that no significant effects are predicted due to the proposed use of best practice measures during construction, operation and decommissioning, and the design of the drainage system for the Proposed Scheme. The majority of the Proposed Scheme would be constructed at the Existing Power Station Complex, therefore appropriate flood emergency procedures are already in place. In addition, the finished floor levels of the proposed structures would be 600 mm above the flood levels that may occur during the 1 in 200 year breach scenario with climate change allowance to ensure that these elements would remain operational during the unlikely breach scenario. The Climate Risk and Vulnerability Assessment (CRVA) contained in Appendix 15.1 of the ES Volume 2 concludes that the Proposed Scheme would be moderately to highly resilient to the potential impacts from climate change. The results of the hydraulic modelling of the post-development scenario with the proposed flood relief channel shows that construction of the proposed structures is unlikely to increase the risk of flooding elsewhere.

	• using opportunities offered by new development to reduce the causes and impacts of flooding; and • where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations. 101. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding. 102. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed: • it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and • a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Both elements of the test will have to be passed for development to be allocated or permitted.	Considering the information provided in the paragraphs above, the Proposed Scheme fulfils the requirements of the Exception Test in accordance with paragraph 5.7.15 of EN-1. Requirements in Schedule 2 to the draft DCO control surface water drainage during construction and operation, and ensure management of flood risk. A climate change assessment has been undertaken that evaluates the potential increase and / or decrease of greenhouse gas in the atmosphere as a result of the Proposed Scheme. The detailed assessment is included within the ES in Chapter 15 (Climate Change) (document reference 6.1.15). Whilst the Proposed Scheme would result in substantial greenhouse gas emissions during construction, particularly during the “product stage”, it would continue to utilise existing infrastructure such as the cooling towers and steam turbines, reducing the greenhouse gas emissions compared to the alternative of constructing equivalent power generation capacity at a new power station site. In terms of the greenhouse gas emissions intensity per unit of electricity output, the Proposed Scheme would result in a significant positive effect on climate. Whilst it would increase generation capacity by up to 173%, resulting in up to 90% increase in direct greenhouse gas emissions, when comparing "like with like" (i.e. greenhouse gas emissions per KWh), the Proposed Scheme represents 55% less than the emissions intensity for current coal-fired units. Therefore, the Proposed Scheme would also be in accordance with the draft revised NPPF, which supports the transition to a low carbon future in a changing climate including low carbon

	103. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that: • within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and • development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems. […]	energy and associated infrastructure, while seeking to avoid inappropriate development in areas at highest risk of flooding and only allowing development where it is appropriately flood resilient and resistant, and incorporates sustainable drainage systems unless there is clear evidence that this would be inappropriate. The Proposed Scheme would meet all of these requirements.
Part 11 **Conserving and enhancing the natural environment**	110. In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. 111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. 112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural	Apart from the Gas Pipeline and the Rusholme Lane Area, the Proposed Scheme would be located on land that is already used for electricity generation. It is therefore considered that the Site represents an appropriate location for the Proposed Scheme in principle, in accordance with paragraph 111 of the NPPF. The technical Chapters of the ES include an assessment of the potential effects of the Proposed Scheme upon the natural environment as set out in Part 11 of the NPPF. In addition, a HRA Report (document reference 6.6) has been submitted with the Application, assessing impacts on European sites and Ramsar sites. Chapter 9 of the ES concludes that following the application of appropriate mitigation measures such as the implementation of

	land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. 113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks. 114. Local planning authorities should: • set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and • maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast. 115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important 24 Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.	a Landscape and Biodiversity Strategy, there would be no significant effects on biodiversity. In particular, effects on internationally and nationally designated sites are predicted to be negligible and not significant. The Landscape and Biodiversity Strategy would also mitigate effects on landscape character and visual amenity where possible. In addition to the assessments contained within Chapters 6 and 9 of the ES, a Habitats Regulations Assessment (HRA) Report has been submitted with the Application (document reference 6.6). The HRA Report concludes that there would be no adverse effects on the integrity of any European Sites. With appropriate mitigation, the Proposed Scheme would not result in unacceptable impacts upon the natural environment or result in significant effects upon the health or amenity of nearby residents. With respect to paragraph 123, it is noted that with embedded and secondary design mitigation (including the installation of acoustic attenuators within the open cycle stacks), noise levels associated with the operation of the Proposed Scheme would be minimised. With embedded and secondary mitigation in place, operational noise levels at eight out of the 10 Noise Sensitive Receptors (NSR) assessed are predicted to be below the Lowest Observed Adverse Effects Level (LOAEL) threshold, the remaining two NSR are predicted to be above the LOAEL threshold but below the Significant Observed Adverse Effects Level (SOAEL) threshold during both day and night time. . Therefore, no significant effects on health and quality of life are expected as a result of noise impacts from the Proposed Scheme. The noise assessment states that with the proposed

	116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of: • the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; • the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. 117. To minimise impacts on biodiversity and geodiversity, planning policies should: • plan for biodiversity at a landscape-scale across local authority boundaries; • identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation; • promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; • aim to prevent harm to geological conservation interests; and	mitigation, noise effects would be either of negligible or low adverse significance at all NSR locations operationally. Noise effects associated with Site Reconfiguration Works and construction activities are considered negligible. As demonstrated by Chapter 6 (Air Quality) of the ES, there is a low risk of exceedance of air quality standards set for the protection of human health, therefore the effects of the operation of the Proposed Scheme on residential receptors are not predicted to be significant. This applies whether the Proposed Scheme is considered alone or in-combination with other projects. This would be in accordance with paragraph 124 of the NPPF.The ground conditions assessment in Chapter 11 (Ground Conditions) of the ES identifies that no significant effects to surface or ground water quality are expected from contamination during either construction or operation of the Proposed Scheme. There are no geological Sites of Special Scientific Interest (SSSIs) or Regionally Important Geological Sites (RIGS) within the defined study area for the ground conditions assessment. Overall, the Proposed Scheme is considered to accord with part 11 of the NPPF. As already stated above, it would also accord with the revised draft NPPF, which includes policies relating to: • protecting and enhancing valued landscapes, sites of geological value and soils; • minimising impacts and providing net gains for biodiversity; • preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;

	• where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas. 118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: • if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; • proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest; • development proposals where the primary objective is to conserve or enhance biodiversity should be permitted; • opportunities to incorporate biodiversity in and around developments should be encouraged; • planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and	• and remediating and mitigating contaminated land where appropriate. • improving local environmental conditions such as air quality.

	• the following wildlife sites should be given the same protection as European sites: – potential Special Protection Areas and possible Special Areas of Conservation; – listed or proposed Ramsar sites; and – sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. 119. The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. 120. To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. 121. Planning policies and decisions should also ensure that: • the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation;	

	• after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and 26 Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site; • adequate site investigation information, prepared by a competent person, is presented. 122. In doing so, local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities. 123. Planning policies and decisions should aim to: • avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; • mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions; • recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and	

	• identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. 124. Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. 125. By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. […]	
Part 12 **Conserving and enhancing the historic environment**	126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account: • the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;	Chapter 8 (Historic Environment) of the ES (document reference 6.1.8) assesses the significance of any heritage assets in the study area, having consulted the relevant Historic Environment Record (HRE) in accordance with paragraph 128 of the NPPF (see Appendix 8.1 of the ES for the historic environment desk-based assessment). Field evaluation of below ground heritage assets has also been carried out (see Appendices 8.2 and 8.3 of the ES for the geophysical survey results and the archaeological evaluation report). Chapter 8 of the ES does not anticipate any significant residual effects on archaeological heritage assets following the implementation of appropriate mitigation measures secured in the draft DCO in the form of a written scheme of investigation

	• the desirability of new development making a positive contribution to local character and distinctiveness; and • opportunities to draw on the contribution made by the historic environment to the character of a place. 127. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest. 128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. 129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict	and further requirements in order to protect, record or preserve any significant archaeological features. No designated heritage asset would be lost as a result of the Proposed Scheme, and whilst there would be minor harm to the settings of the Drax Augustinian Priory a Scheduled Monuments) during the operation phases of Units X and Y (Stages 2 and 3), and Scurff Hall Moated Site (another Scheduled Monument) during Stage 1, this harm is considered to be "less than substantial harm". The harm identified has then been balanced in section 7 of the Planning Statement with the benefits of the Proposed Scheme. It is considered that the benefits, most notably the Proposed Scheme's significant contribution to meeting the UK's urgent energy need and moving the UK towards a decarbonised future, outweigh the less than substantial harm identified. This would be in accordance with paragraph 134 of the NPPF. It is noted that the Proposed Scheme would not result in any effects on any conservation areas. Overall, the Proposed Scheme is considered to be in accordance with part 12 of the NPPF and the relevant policies in the revised draft NPPF, which state that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to its conservation, irrespective of the degree of potential harm to its significance.

between the heritage asset's conservation and any aspect of the proposal.

130. Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision. The principles and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-taking.

131. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden

	should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. 133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: • the nature of the heritage asset prevents all reasonable uses of the site; and • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and • conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and • the harm or loss is outweighed by the benefit of bringing the site back into use. 134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. 135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a	

	balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. 136. Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred. 137. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. 138. Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole. 139. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.	

	140. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. 141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.	

LOCAL PLANNING POLICY

The table below considers the compliance of the Proposed Scheme with the relevant local development plan policies. These include the saved policies from the Selby District Local Plan (2005) (Ref. 2.5), policies from the Selby District Core Strategy Local Plan (2013) (Ref. 2.4), the saved policies of the North Yorkshire Waste Local Plan (2006) (Ref. 4.4) and relevant policies from the emerging Minerals and Waste Joint Plan (Ref. 2.6).

Given that EN-5.1101, EN-2, EN-4 and EN-5 provide the primary basis upon which any decision on the Application should be made, combined with the fact the matters covered by these local planning policies have for the most part already been considered in detail above in relation to the NPSs, a summarised response has been made to each policy, except where a more detailed response is considered necessary.

Selby District Core Strategy Local Plan (2013) (Ref. 2.4)

POLICY	POLICY TEXT	ASSESSMENT
SP1	When considering development proposals the Council will take a positive approach that reflects the presumption in favour of	It is demonstrated in this Table and the main body of the Planning Statement that the Proposed Scheme would mitigate

Presumption in Favour of Sustainable Development	sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date (as defined by the NPPF) at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted.	environmental effects where appropriate, and would be in accordance with relevant development plan policy. The Proposed Scheme is therefore considered to represent sustainable development.
SP2 **Spatial Development Strategy**	A. The location of future development within Selby District will be based on the following principles: a) The majority of new development will be directed to the towns and more sustainable villages depending on their future role as employment, retail and service centres, the level of local housing need, and particular environmental, flood risk and infrastructure constraints	Whilst the Proposed Scheme would be located in the area defined as countryside under the Selby District Core Strategy Local Plan, the Local Plan accepts that the Existing Drax Power Station Complex is already established and provides opportunities for further energy-related development. In paragraph 2.24, it notes that *"the economy of the District remains varied, although with two major coal-fired power stations at Drax and Eggborough, the*

	• Selby as the Principal Town will be the focus for new housing, employment, retail, commercial, and leisure facilities. […] (c) Development in the countryside (outside Development Limits) will be limited to the replacement or extension of existing buildings, the re-use of buildings preferably for employment purposes, and well-designed new buildings of an appropriate scale, which would contribute towards and improve the local economy and where it will enhance or maintain the vitality of rural communities, in accordance with Policy SP13; or meet rural affordable housing need (which meets the provisions of Policy SP10), or other special circumstances. […]	*energy sector is especially prominent and this is expected to continue in the light of national policy statements."* Further, paragraph 6.32 states that *"it is recognised that there is a need for further investment in energy infrastructure in line with national policy as a prominent contributor to economic prosperity. Supporting the energy sector will assist in reinvigorating, expanding, and modernising the District's economy."* The Proposed Scheme would make use of an existing brownfield site that has long been established for electricity generation. This is considered to represent an efficient use of land (and existing infrastructure), despite the Site being located in the countryside. Therefore the Proposed Scheme is considered to be in accordance with policy SP 2.
SP12 **Access to Services, Community Facilities and Infrastructure**	Where infrastructure and community facilities are to be implemented in connection with new development, it should be in place or provided in phase with development and scheme viability. Infrastructure and community facilities should be provided on site, but where this is technically unachievable or not appropriate for other justified reasons, off-site provision or a financial contribution towards infrastructure and community facilities will be sought. In all circumstances opportunities to protect, enhance and better join up existing Green Infrastructure, as well as creating new Green Infrastructure will be strongly encouraged, in	Whilst the existing squash court at the Site would be demolished and not be replaced, this is only currently available for private use (i.e. by the Applicant's employees) and is therefore not considered to be a loss of community facilities. Due to the nature of the Proposed Scheme, being a Nationally Significant Infrastructure Project (NSIP), the policy requirement for provision of new community facilities is considered to be of limited relevance. Overall, the Proposed Scheme is not considered to be in conflict with policy SP12.

	addition to the incorporation of other measures to mitigate or minimise the consequences of development. These provisions will be secured through conditions attached to the grant of planning permission or through planning obligations, including those set out in an up to date charging mechanism.	
SP13 **Scale and Distribution of Economic Growth**	Support will be given to developing and revitalising the local economy in all areas by: A. Scale and Distribution […] B. Strategic Development Management 1. Supporting the more efficient use of existing employment sites and premises within defined Development Limits through modernisation of existing premises, expansion, redevelopment, re-use, and intensification. […] C. Rural Economy In rural areas, sustainable development (on both Greenfield and Previously Developed Sites) which brings sustainable economic growth through local employment opportunities or expansion of businesses and enterprise will be supported, including for example 1. The re-use of existing buildings and infrastructure and the development of well-designed new buildings.	Drax Power Station is one of the largest employers in the area. The supporting text to policy SP13, in paragraph 6.32, states that *"[t]he energy sector will continue to be important to the economy of the District. Drax and Eggborough Power Stations are both major employers which contribute to national energy infrastructure as well as the local economy. They also have the potential for future development of renewable and low carbon energy, and Drax is pioneering co-firing technologies and energy generation from biomass. Both locations have the advantage of a direct connection to the National Grid. It is recognised that there is a need for further investment in energy infrastructure in line with national policy as a prominent contributor to economic prosperity. Supporting the energy sector will assist in reinvigorating, expanding, and modernising the District's economy."* The supporting text in the Selby District Core Strategy Local Plan quoted above clearly highlights the importance of Drax to the economy of the District and Drax' role as a pioneer in the energy sector. Whilst it is expected that there would be a reduction in jobs during operation, these would likely occur as a result of natural reduction (e.g. retirement) or redeployment where possible. Further, there would be some positive

	2. The redevelopment of existing and former employment sites and commercial premises. 3. The diversification of agriculture and other land based rural businesses. 4. Rural tourism and leisure developments, small scale rural offices or other small scale rural development. 5. The retention of local services and supporting development and expansion of local services and facilities in accordance with Policy SP14. D. In all cases, development should be sustainable and be appropriate in scale and type to its location, not harm the character of the area, and seek a good standard of amenity.	economic benefits in terms of job creation associated with the Proposed Scheme during construction, and the additional generation of electricity at Drax Power Station would support the economy UK-wide, given that businesses are highly dependent on the secure supply of electricity . In terms of amenity, it is noted that the Site predominantly comprises industrial land within the Existing Drax Power Station Complex (excluding the land required for the Pipeline Area and Rusholme Lane Area). Therefore, the Proposed Scheme would make good use of an existing industrial site, in accordance with policy SP13C.1). The Proposed Scheme seeks to maintain a good standard of amenity. Whilst there would be some effects on landscape character, local landscape designations and visual amenity, these are considered to be acceptable in light of the policies contained within the primary policy framework of the NPSs. The Proposed Scheme is therefore considered to accord with policy SP13 of the Selby District Core Strategy Local Plan.
SP15 **Sustainable Development and Climate Change**	A. Promoting Sustainable Development In preparing its Site Allocations and Development Management Local Plans, to achieve sustainable development, the Council will: a) Direct development to sustainable locations in accordance with Policy SP2; b) Give preference to the re-use, best-use and adaption of existing buildings and the use of previously developed land	The Proposed Scheme has been designed to be sustainable and address the challenges of climate change in accordance with policy SP15 as follows: • The Proposed Scheme would utilise the Existing Drax Power Station Complex and repower existing infrastructure, thus representing efficient use of land and resources. • The FRA submitted with the Application (document reference 6.8) demonstrates that, subject to appropriate mitigation such as the installation of a drainage channel, the Proposed Scheme would not result in an unacceptable increase in flood risk.

	where this is sustainably located and provided that it is not of high environmental value; c) Achieve the most efficient use of land without compromising the quality of the local environment; d) Ensure that development in areas of flood risk is avoided wherever possible through the application of the sequential test and exception test; and ensure that where development must be located within areas of flood risk that it can be made safe without increasing flood risk elsewhere; e) Support sustainable flood management measures such as water storage areas and schemes promoted through local surface water management plans to provide protection from flooding; and biodiversity and amenity improvements. f) Ensure development proposals respond to land characteristics to minimise risks of erosion, subsidence and instability, and to exploit opportunities for reclamation and reinstatement of contaminated land. B. Design and Layout of Development In order to ensure development contributes toward reducing carbon emissions and are resilient to the effects of climate change, schemes should where necessary or appropriate: a) Improve energy efficiency and minimise energy consumption through the orientation, layout and design of buildings and incorporation of facilities to support recycling; b) Incorporate sustainable design and construction techniques, including for example, solar water heating storage, green roofs	• Chapter 11 (Ground Conditions) of the ES demonstrates that, subject to the implementation of a CEMP, the Proposed Scheme would not result in unacceptable levels of erosion, subsidence, instability or result in significant effects associated with contamination. • The Proposed Scheme would be CCR and a suitable area of land has been identified for the installation of carbon capture equipment for future development (development parcels A and B as shown in Figure 1.3 of the ES). A CCR Statement has been submitted with the Application (document reference 5.7) which provides further details. Requirements in the draft DCO ensure the safeguarding of land for CCS, and ongoing monitoring and reporting. • In terms of CHP, a CHP Statement (document reference 5.6) has been completed to assess the viability of CHP at this site and the presence of an existing suitable heat demand. A requirement to the draft DCO requires the ongoing monitoring and reporting of opportunities to export heat from the Proposed Scheme should it become feasible. • The Climate Risk and Vulnerability Assessment (CRVA) (document reference 6.2.15.1) demonstrates that the Proposed Scheme would be moderately to highly resilient to impacts resulting from climate change. • Chapter 15 (Climate) of the ES sets out that the Proposed Scheme would result in substantial greenhouse gas emissions during construction, particularly during the “product stage”. However, the Proposed Scheme would continue to utilise existing infrastructure such as the cooling towers and steam turbines, reducing the greenhouse gas emissions compared to the alternative of constructing equivalent power generation capacity at a new power station site. In terms of the greenhouse gas emissions intensity per unit of electricity output, the Proposed Scheme would result in a significant positive effect on climate.

	and re-use and recycling of secondary aggregates and other building materials, and use of locally sourced materials; c) Incorporate water-efficient design and sustainable drainage systems which promote groundwater recharge; d) Protect, enhance and create habitats to both improve biodiversity resilience to climate change and utilise biodiversity to contribute to climate change mitigation and adaptation; e) Include tree planting, and new woodlands and hedgerows in landscaping schemes to create habitats, reduce the 'urban heat island effect' and to offset carbon loss; f) Minimise traffic growth by providing a range of sustainable travel options (including walking, cycling and public transport) through Travel Plans and Transport Assessments and facilitate advances in travel technology such as Electric Vehicle charging points;	• Chapter 9 (Biodiversity) of the ES shows that the Proposed Scheme would result in a net gain of area based habitats. An Outline Landscape and Biodiversity Strategy has been submitted with the Application (document reference 6.7). • An Outline CTMP (document reference 6.2.5.2) and CWMP (document reference 6.2.5.5) have been submitted, ensuring that traffic would be managed appropriately and sustainable modes of transport would be promoted during the construction phases. The Proposed Scheme is therefore considered to be fully in accordance with policy SP15.
SP16 **Improving Resource Efficiency**	In order to promote increased resource efficiency unless a particular scheme would be demonstrably unviable or not feasible, the Council will require: a) New residential developments […] b) Strategic Development Sites identified in the Core Strategy and key sites identified in future Local Plan documents to derive the majority of their total energy needs from renewable, low carbon or decentralised energy sources. Developers to investigate particular opportunities to take advantage of any or a combination of the following for example: i) Local biomass technologies,	The Proposed Scheme would be Carbon Capture Ready (CCR) and a suitable area of land has been identified for the installation of carbon capture equipment for future development (development parcels A and B as shown in Figure 1.3 of the ES). A CCR Statement has been submitted with the Application (document reference 5.7). Requirements in the draft DCO ensure the safeguarding of land for CCS, and ongoing monitoring and reporting In terms of Combined Heat and Power (CHP), a CHP Statement (document reference 5.6) has been completed to assess the viability of CHP at this site and the presence of an existing suitable heat demand. As CHP is currently not a viable option, a requirement to the draft DCO requires the ongoing

	ii) Energy from waste (in accordance with the County Waste Policies), iii) Combined Heat and Power schemes, and iv) Community Heating Projects. […]	monitoring and reporting of opportunities to export heat from the Proposed Scheme. The Proposed Scheme is considered to be fully supported by policy SP16, and the assessment against policy SP17 below provides further detail with regard to improving resource efficiency.
SP17 **Low-Carbon and Renewable Energy**	A. In future Local Plan documents, the Council will: • seek to identify opportunities where development can draw its energy from renewable, low carbon or decentralised energy • supply systems and for co-locating potential heat customers and suppliers; and • consider identifying 'suitable areas' for renewable and low carbon energy sources and supporting infrastructure. B. The Council will support community-led initiatives for renewable and low carbon energy developments being taken forward through neighbourhood plans including those outside any identified suitable areas. C. All development proposals for new sources of renewable energy and low-carbon energy generation and supporting infrastructure must meet the following criteria: i. are designed and located to protect the environment and local amenity or ii. can demonstrate that the wider environmental, economic and social benefits outweigh any harm caused to the environment and local amenity, and iii. impacts on local communities are minimised.	The Applicant is a pioneer moving the UK energy industry towards a low carbon future. Drax Power Station has been providing electricity in the UK since 1975, comprising originally of six coal-fired units. Since then, three units have already been converted to biomass, with a further unit to be converted later in 2018, and Drax is committed to looking at further ways of reducing carbon emissions, one of which is the introduction of electricity generation with natural gas at Drax Power Station. The gas turbine generating units would be designed to be Carbon Capture Ready (CCR) and a suitable area of land has been identified for the installation of carbon capture equipment (Development Parcels A and B as shown in Figure 1.3 of the ES) in the future if required. In addition, suitable connection corridors for exhaust gas ductwork from the gas turbine generating units have been identified if necessary. If viable in the future, the Applicant would need to apply for a separate consent for a carbon capture facility on Development Parcels A and B. However, the DCO Application for the Proposed Scheme includes a CCR Statement (document reference 5.7), which sets out the feasibility of the technology, along with high level effects.

	Schemes may utilise the full range of available technology including; a) Renewable energy schemes, which contribute to meeting or exceeding current local targets of 32 megawatts by 2021 or prevailing sub-regional or local targets; b) Micro-generation schemes, which are not necessarily grid connected but which nevertheless, reduce reliance on scarce, non-renewable energy resources; c) Clean Coal Bed Methane extraction, clean coal energy generation and Carbon Capture and Storage technologies (in accordance with County Minerals Policies); and d) Improvements at existing fossil fuel energy generating plants to reduce carbon emissions, within the national energy strategy for a balanced mix of energy sources to meet demands. D. In areas designated as Green Belt, elements of many renewable energy projects will comprise inappropriate development and in such cases applicants must demonstrate very special circumstances if projects are to proceed and proposals must meet the requirements of Policy SP3 and national Green Belt policies.	Further, a CHP Statement (document reference 5.6) has been submitted with the Application. Efficient Combined Heat and Power (CHP) plants are usually designed to meet the demands of an identified heat load. Electrical power generation is utilised, where applicable, for local process plant, and the balance exported to the grid. The heat demands of industrial processes are usually continuous, and district heating demands are also usually continuous (albeit on a seasonal basis). Whilst CHP is currently not viable as part of the Proposed Scheme, due to the uncertainty of future heat loads, the lack of currently available suitable heat loads, and the undefined operating scheme of the Proposed Scheme, as well as low heat demand in the surrounding area, the Proposed Scheme is CHP ready. A requirement in Schedule 2 of the draft DCO (document reference 3.1) requires regular reviews of the CHP assessment to be submitted to the relevant planning authority, considering opportunities for export of heat from the main development. Requirements to the draft DCO also safeguard land for carbon capture and storage. The policy assessment in this Table has demonstrated that the Proposed Scheme has been designed to protect the environment and local amenity, and that where there are significant residual effects, these would be outweighed by the substantial benefits of the Proposed Scheme as set out in section 7.2 of this Planning Statement. The Proposed Scheme is therefore considered to be in accordance with the relevant parts of policy SP17.

SP18 **Protecting and Enhancing the Environment**	The high quality and local distinctiveness of the natural and manmade environment will be sustained by: 1. Safeguarding and, where possible, enhancing the historic and natural environment including the landscape character and setting of areas of acknowledged importance. 2. Conserving those historic assets which contribute most to the distinct character of the District and realising the potential contribution that they can make towards economic regeneration, tourism, education and quality of life. 3. Promoting effective stewardship of the District's wildlife by: a) Safeguarding international, national and locally protected sites for nature conservation, including SINCs, from inappropriate development. b) Ensuring developments retain, protect and enhance features of biological and geological interest and provide appropriate management of these features and that unavoidable impacts are appropriately mitigated and compensated for, on or off-site. c) Ensuring development seeks to produce a net gain in biodiversity by designing-in wildlife and retaining the natural interest of a site where appropriate. d) Supporting the identification, mapping, creation and restoration of habitats that contribute to habitat targets in the National and Regional biodiversity strategies and the local Biodiversity Action Plan. 4. Wherever possible a strategic approach will be taken to increasing connectivity to the District's Green Infrastructure	The ES has assessed significant effects on the environment, including historic assets, biodiversity, landscape character and visual amenity, PRoW, soil, air and water, in accordance with the requirements of policy SP18. Whilst there would be some effects on the setting of Scheduled Monuments (the Drax Augustinian Priory and Scurff Hall Moated Site), landscape character, local landscape designations and visual amenity, as well as the tranquillity of PRoW (see Chapters 8 (Historic Environment), 10 (Landscape and Visual Amenity) and 14 (Socio-Economics) of the ES), the benefits of the Proposed Scheme (in particular the provision of significant additional electricity generating capacity) are considered to outweigh these effects. The Proposed Scheme would therefore be in accordance with policy SP18(1), (2) and (5). As demonstrated in Chapter 9 (Biodiversity) of the ES the Proposed Scheme would result in a net gain of area based habitats (and, if possible following further assessment, linear habitats), which is considered to be a significant benefit. Chapter 9 concludes that following the application of appropriate mitigation measures such as the implementation of a Landscape and Biodiversity Strategy, there would be no significant effects on biodiversity. In particular, effects on internationally and nationally designated sites are predicted to be negligible and not significant. In addition to the assessments contained within Chapters 6 and 9 of the ES, a Habitats Regulations Assessment (HRA) Report has been submitted with the Application (document reference 6.6). The HRA Report concludes that there would be no adverse effects on the integrity of any European Sites. No features of geological interest would be affected by the Proposed Scheme, which

	including improving the network of linked open spaces and green corridors and promoting opportunities to increase its multi-functionality. This will be informed by the Leeds City Region Infrastructure Strategy. 5. Identifying, protecting and enhancing locally distinctive landscapes, areas of tranquillity, public rights of way and access, open spaces and playing fields through Development Plan Documents. 6. Encouraging incorporation of positive biodiversity actions, as defined in the local Biodiversity Action Plan, at the design stage of new developments or land uses. 7. Ensuring that new development protects soil, air and water quality from all types of pollution. 8. Ensuring developments minimise energy and water consumption, the use of non-renewable resources, and the amount of waste material. 9. Steering development to areas of least environmental and agricultural quality.	would, for these reasons, be in accordance with policy SP18(3), (4) and (6). As identified in the ground conditions assessment in Chapter 11 of the ES and the assessment in Chapter 12 (Water Resources, Quality and Hydrology), neither construction nor operation of the Proposed Scheme would result in significant effects to geology and geomorphology, physical effects on soil, effects on groundwater, surface water quality or the built environment from contamination, or human health of construction workers or end users from exposure to hazardous substances. Chapter 6 (Air Quality) has demonstrated that any the effects of dust and particulate matter (PM10) generated by construction activities following the application of the mitigation measures and good site practice would not be significant. There is a low risk of exceedance of air quality standards set for the protection of human health, therefore the effects of the operation of the Proposed Scheme on residential receptors are not predicted to be significant. The Proposed Scheme would therefore be in accordance with policy SP18(7). Chapter 13 (Waste) of the ES demonstrates that there would be negligible effects associated with waste generation during construction. Operational waste has been scoped out from the assessment with agreement from PINS in the Scoping Opinion (document reference 6.2.1.2). The Proposed Scheme is considered to be in accordance with policy SP18(8). In accordance with policy SP18(9), the route for the Gas Pipeline, GRF and AGI have been chosen to minimise impacts on the environment and agricultural land where possible.

		Overall, the Proposed Scheme is considered to be in accordance with policy SP18.
SP19 **Design Quality**	Proposals for all new development will be expected to contribute to enhancing community cohesion by achieving high quality design and have regard to the local character, identity and context of its surroundings including historic townscapes, settlement patterns and the open countryside. Where appropriate schemes should take account of design codes and Neighbourhood Plans to inform good design. Both residential and non-residential development should meet the following key requirements: a) Make the best, most efficient use of land without compromising local distinctiveness, character and form. b) Positively contribute to an area's identity and heritage in terms of scale, density and layout; c) Be accessible to all users and easy to get to and move through; d) Create rights of way or improve them to make them more attractive to users, and facilitate sustainable access modes, including public transport, cycling and walking which minimise conflicts; e) Incorporate new and existing landscaping as an integral part of the design of schemes, including off-site landscaping for large sites and sites on the edge of settlements where appropriate; f) Promote access to open spaces and green infrastructure to support community gatherings and active lifestyles which	Section 5.6 of this Planning Statement sets out how the Applicant has had regard to the design of the Proposed Scheme. The Proposed Scheme would largely be contained within the Existing Drax Power Station Complex, which is an already industrialised site, thus representing an efficient use of land in accordance with policy SP19a). It is noted that the primary planning policy framework contained within the NPSs recognise that there is a limit to the *"extent to which [energy infrastructure] can contribute to the enhancement of the quality of an area".* Thus, the Proposed Scheme is not considered to be in conflict with policy SP19b). However, to mitigate effects on the Drax Augustinian Priory, the Applicant is proposing to install an interpretation panel on the PRoW passing between the heritage asset and the boundary of Development Parcel B to improve the degree to which the setting's relationship with the asset can be appreciated by the public. As set out in these sections, the Proposed Scheme would have some significant effects on landscape character, local landscape designations and visual amenity. However, measures to mitigate landscape and visual effects have been designed into the scheme and would be secured by a requirement in Schedule 2 to the draft DCO, including external materials, are secured by requirement to the draft DCO. The Proposed Scheme is considered to have sufficiently addressed the requirements of policy SP19e), j) and l).

	contribute to the health and social well-being of the local community; g) Have public and private spaces that are clearly distinguished, safe and secure, attractive and which complement the built form; h) Minimise the risk of crime or fear of crime, particularly through active frontages and natural surveillance; i) Create mixed use places with variety and choice that compliment one another to encourage integrated living, and j) Adopt sustainable construction principles in accordance with Policies SP15 and SP16. k) Preventing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water, light or noise pollution or land instability. l) Development schemes should seek to reflect the principles of nationally recognised design benchmarks to ensure that the best quality of design is achieved.	Due to the nature of the Proposed Scheme, policies SP19c), d), f), g), h), and i) are considered to be of limited relevance, and the Proposed Scheme is not considered to be in conflict with any of these policies. On balance, it is considered that the benefits of the Proposed Scheme would outweigh the adverse landscape effects, and overall, the Proposed Scheme is considered to be acceptable with regard to the relevant requirements of policy SP19.

Selby District Local Plan (2005) (Ref. 2.5)

POLICY	POLICY TEXT	ASSESSMENT
ENV1 **Control of Development**	Proposals for development will be permitted provided a good quality of development would be achieved. In considering proposals the District Council will take account of: 1) The effect upon the character of the area or the amenity of adjoining occupiers;	The ES submitted with the Application has assessed the effect upon character of the area and the amenity of adjoining occupiers; the effect on the highway network; and the capacity of local services and infrastructure. It is considered that all

	2) The relationship of the proposal to the highway network, the proposed means of access, the need for road/junction improvements in the vicinity of the site, and the arrangements to be made for car parking; 3) The capacity of local services and infrastructure to serve the proposal, or the arrangements to be made for upgrading, or providing services and infrastructure; 4) The standard of layout, design and materials in relation to the site and its surroundings and associated landscaping; 5) The potential loss, or adverse effect upon, significant buildings, related spaces, trees, wildlife habitats, archaeological or other features important to the character of the area; 6) The extent to which the needs of disabled and other inconvenienced persons have been taken into account; 7) The need to maximise opportunities for energy conservation through design, orientation and construction; and 8) Any other material considerations.	effects would either be acceptable from the outset due to their insignificance, or can be mitigated appropriately. Whilst the Proposed Scheme would result in impacts on landscape character, local landscape designations and visual amenity, extensive mitigation measures are proposed in the Outline Landscape and Biodiversity Strategy (document reference 6.7) to mitigate these effects associated as well as effects on biodiversity. The net gain of area based habitats as a result of the implementation of this Strategy would be a great benefit of the Proposed Scheme. In light of this and other benefits, the effects would be acceptable. The Proposed Scheme is not considered to compromise the needs of disabled and other inconvenienced persons. The Proposed Scheme is considered to meet the requirements of policy ENV1.
ENV2 **Environmental Pollution and Contamination**	A) Proposals for development which would give rise to, or would be affected by, unacceptable levels of noise, nuisance, contamination or other environmental pollution including groundwater pollution will not be permitted unless satisfactory remedial or preventative measures are incorporated as an integral element in the scheme. Such measures should be carried out before the use of the site commences. B) Where there is a suspicion that the site might be contaminated, planning permission may be granted subject to	The noise and vibration effects of the Proposed Scheme are assessed at Chapter 7 of the ES (document reference 6.1.7). Contamination has been assessed at Chapter 11 Ground Conditions (document reference 6.1.11). The noise assessment concludes that with embedded design mitigation and secondary mitigation (including acoustic attenuators), noise and vibration impacts associated with the

	conditions to prevent the commencement of development until a site investigation and assessment has been carried out and development has incorporated all measures shown in the assessment to be necessary.	construction and operation of the Proposed Scheme would be not significant. The ground conditions assessment in Chapter 11 of the ES) concludes that residual effects on groundwater and surface water quality from contamination would be slight adverse during construction, operation and decommissioning and would not be significant. The Statutory Nuisance Statement states that the only matter addressed by the ES which has been assessed as likely to be significant for the Proposed Scheme and which may have a bearing on the Environmental Protection Act 1990 (Ref. 5.10) is visual amenity. However, it is demonstrated in section 3 of the Statement that the Proposed Scheme would have no significant visual nuisance effects following the implementation of the identified embedded mitigation measures. Other potential nuisance aspects have been considered in section 4 and through embedded mitigation no statutory nuisance effects are considered likely to occur. For the reasons set out above, it is considered that the Proposed Scheme would not result in unacceptable levels of noise, nuisance, contamination or other environmental pollution including groundwater pollution is considered to be in accordance with policy ENV2.
ENV3 **Light Pollution**	Proposals involving outdoor lighting will only be permitted where lighting schemes: 1) Represent the minimum level required for security and/or operational purposes;	The Baseline Lighting Survey Report (document reference 6.2.3.1) submitted with the Application states that the lighting environment across the area surveyed was largely dominated by the lighting associated with the Existing Drax Power Station Complex and street lighting installations.

	2) Are designed to minimise glare and spillage; 3) Would not create conditions prejudicial to highway safety or which would have a significant adverse effect on local amenity; and 4) Would not detract significantly from the character of a rural area. Proposals for development involving outdoor lighting should incorporate details of lighting schemes as part of applications for development.	There would be additional lighting associated with the Proposed Scheme during construction, the potentially significant effects of which have been assessed in Chapter 10 (Landscape and Visual Amenity) of the ES. As part of the CEMP, the Principal Contractor would be required to implement measures to minimise the level of artificial light during construction. Operational lighting associated with the Proposed Scheme are not considered to be significant. Therefore, the Proposed Scheme is considered to be in accordance with policy ENV3.
ENV4 **Hazardous Substances**	Proposals involving the storage or use of hazardous substances, or developments in the vicinity of sites where hazardous substances are being stored or used, will only be permitted where the District Council is satisfied that: 1) There is no unacceptable risk to the public or the natural environment; and 2) Opportunities for the development of land in the vicinity will not be severely restricted.	The proposed Gas Pipeline and connection would not require Hazardous Substance Consent (HSC) as it would not involve the storage of hazardous substances, however, it would need to be constructed to the relevant safety and industry standards in accordance with the Pipeline Safety Regulations 1996 (Ref. 5.5) and the appropriate notifications would be made, which would include notifying the Health and Safety Executive (HSE). If HSC would be required for the AGI and storage of hazardous materials in relation to Unit X and Unit Y, an application would be made to Selby District Council as the consenting authority. Drax Power Station is already regulated under the COMAH Regulations 2015 (Ref. 5.4) as a lower tier site. As such, the Applicant has a duty to take all measures necessary to prevent major accidents and to limit their consequences for human health and the environment. The ES, in Chapter 16 (Major Accidents and Disasters), has addressed the risk of major accidents and / or disasters relevant to the Proposed Scheme. Where risks are identified that have the potential to result in a likely significant

		environmental effect, these have been assessed and detailed within the ES, taking into account existing procedures and the measures required under legislation to prevent and control such matters. The risk of major accidents and / or disasters occurring has been assessed to be as low as reasonably practicable (ALARP). In conclusion, the Proposed Scheme is not considered to pose unacceptable risk to the public or natural environment, or restrict opportunities for the development of land in the vicinity of the Site, as a result of the storage or use of hazardous substances. The Proposed Scheme is therefore considered to be in accordance with policy ENV4.
ENV9 **Sites of Importance for Nature Conservation Importance**	Proposals for development which would harm a local nature reserve, a site of local importance for nature conservation or a regionally important geological/geomorphological site, will not be permitted unless there are no reasonable alternative means of meeting the development need and it can be demonstrated that there are reasons for the proposal which outweigh the need to safeguard the intrinsic local nature conservation value of the site or feature.	Chapter 9 (Biodiversity) of the ES provides an assessment of the potential effects of the Proposed Scheme upon biodiversity including designated sites. In addition, a HRA Report (document reference 6.6) has been submitted with the Application. Chapter 9 of the ES concludes that following the application of appropriate mitigation measures such as the implementation of a Landscape and Biodiversity Strategy, there would be no significant effects on biodiversity. In particular, effects on internationally and nationally designated sites are predicted to be negligible and not significant. In addition to the assessments contained within Chapters 6 and 9 of the ES, a Habitats Regulations Assessment (HRA) Report has been submitted with the Application (document reference 6.6). The HRA Report concludes that there would be no adverse effects on the integrity of any European Sites.

		Therefore, the Proposed Scheme is considered to be in accordance with policy ENV9.
ENV27 **Scheduled Monuments and Important Archaeolo-gical Sites**	Where scheduled monuments or other nationally important archaeological sites or their settings are affected by proposed development, there will be a presumption in favour of their physical preservation. In exceptional circumstances where the need for the development is clearly demonstrated, development will only be permitted where archaeological remains are preserved in situ through sympathetic layout or design of the development.	Chapter 8 (Historic Environment) of the ES provides an assessment of the effects of the Proposed Scheme on designated heritage assets. Within the 10 km wider study area covered by the Chapter, 19 Scheduled Monuments have been identified, including the Drax Augustinian Priory and Scurff Hall Moated Site. The extent of these study areas was set out in the Applicant's EIA Scoping Report (document reference 6.2.1.1) and have been accepted by Historic England and NYCC through various consultations, as set out in the (Consultation Report, document reference 5.1). No Scheduled Monuments would be lost as a result of the Proposed Scheme. However, during the operation of Unit X, the additional stacks that form part of the Proposed Scheme would create visual distraction from the Drax Augustinian Priory. However, the North Station Wood and connecting woodland belt would provide some screening. Whilst there would be harm to the setting of the Priory, this harm would be "less than substantial" and, therefore, not significant. Similarly, there would be less than substantial harm to the setting of Scurff Hall Moated Site. As set out in the assessment against the National Policy Statements further above, the benefits associated with the Proposed Scheme are considered to outweigh this less than substantial harm. The draft DCO (document reference 3.1) would secure mitigation measures in relation to the investigation, recording

		and protection of any significant archaeological features (see below for further details). In summary the Proposed Scheme, is considered to be acceptable with regard to policy ENV27.
ENV28 **Other Archaeological Sites**	(A) Where development proposals affect sites of known or possible archaeological interest, the District Council will require an archaeological assessment/evaluation to be submitted as part of the planning application. (B) Where development affecting archaeological remains is acceptable in principle, the Council will require that archaeological remains are preserved in situ through careful design and layout of new development. (C) Where preservation in situ is not justified, the Council will require that arrangements are made by the developer to ensure that adequate time and resources are available to allow archaeological investigation and recording by a competent archaeological organisation prior to or during development.	Archaeological evaluation trenching has been carried out at the location of the Above Ground Installation (at the start of the Gas Pipeline). This identified potentially significant below ground archaeological remains. It is anticipated that ground disturbance from the construction of the Gas Pipeline, Gas Receiving Facility and Above Ground Installation would disturb similar assets of the same significance. Mitigation including a strip, map and record exercise has been proposed to prevent effects on buried heritage assets. This would be secured by requirements in Schedule 2 to the draft DCO (document reference 3.1). Following the application of mitigation, no significant effects are predicted on buried heritage assets, and therefore, the Proposed Scheme is considered to be in accordance with policy ENV28.
EMP10 **Additional Industrial Development at Drax and Eggborough Power Stations**	Additional industrial/business development may be permitted at or close to Drax and Eggborough power stations provided the proposal: 1) Is directly related to the process of generating electricity, either by making use of by-products from the power station or utilising a direct source of electricity; 2) Would be suitably linked to the strategic highway and rail networks and would not create conditions prejudicial to highway safety;	The Proposed Scheme is located predominantly (excluding the Pipeline Area and Rusholme Lane Area) within the Existing Drax Power Station Complex and is directly related to the process of generating electricity, in accordance with policy EMP10(1). It would be linked via existing connections to the strategic transport network and would not result in adverse impacts to highway safety. Mitigation is proposed to minimise nuisance (including noise and dust) and water pollution operationally and during

	3) Would not create environmental problems associated with noise, smell or water pollution or dust emissions; 4) Would not have a significant adverse effect on residential amenity in nearby settlements; 5) Would be related to existing development and would be well screened, including provision for earth mounding and strategic off-site planting; and 6) Would not harm nature conservation interests or sites of archaeological importance.	construction. Odour is not considered a potential issue for the Proposed Scheme. No significant adverse noise impacts are predicted during construction or operationally. While permanent significant adverse visual impacts are predicted for some residential receptors in close proximity to the Site, the Proposed Scheme is considered to be consistent with existing industrial context of the Site generally, and in light of the significant benefits associated with the Proposed Scheme, the overall effect on residential amenity of nearby settlements is considered to be acceptable. The Proposed Scheme would retain existing blocks of vegetation on and off Site, which serve as an important screening function in local views. The Proposed Scheme has sought to avoid and otherwise reduce nature conservation impacts or sites of archaeological importance. With mitigation, no significant adverse impacts to archaeological interests are expected. Chapter 9 of the ES concludes that following the application of appropriate mitigation measures such as the implementation of a Landscape and Biodiversity Strategy, there would be no significant effects on biodiversity. In particular, effects on internationally and nationally designated sites are predicted to be negligible and not significant. In addition to the assessments contained within Chapters 6 and 9 of the ES, a Habitats Regulations Assessment (HRA) Report has been submitted with the Application (document reference 6.6). The HRA Report concludes that there would be no adverse effects on the integrity of any European Sites.

		The Proposed Scheme is considered to be in accordance with policy EMP 10 of the Selby District Local Plan.
RT1 **Recreation Open Space**	Proposals which would result in the loss of existing recreation open space and allotments will not be permitted unless: 1) The use has been abandoned and the site is not required to remedy an existing deficiency for recreation or allotment use elsewhere in the locality; or 2) Alternative provision of at least the equivalent size, accessibility and quality is made within the locality to serve the needs of the existing community; or 3) Sports and recreation facilities can best be retained and enhanced through the redevelopment of a small part of the site.	The Proposed Scheme would not result in the loss of existing public recreation open space or allotments. However, the existing private squash court at the Site would be demolished and not replaced, and the learning centre would be demolished and its functions consolidated into existing facilities which is required in order to construct the gas turbine generating units and associated facilities on the Power Station Site. This is considered to be acceptable, given the private nature of the squash court, and the re-provision of the learning centre facilities. No allotments would be affected by the Proposed Scheme.
T1 **Development in Relation to the Highway Network**	Development proposals should be well related to the existing highways network and will only be permitted where existing roads have adequate capacity and can safely serve the development, unless appropriate off-site highway improvements are undertaken by the developer.	The Existing Power Station Complex is well located to the existing highway network lying close to the junction of the A1041/A645 near Camblesforth and is accessed from the A645 to the south of the Site. This access is primarily used by staff and visitors. Site contractors, deliveries and heavy goods vehicle traffic make use of another entrance to the site which is located on New Road on the eastern boundary of the Existing Drax Power Station Complex. The Pipeline Area is also safely accessible. Transport effects would be managed through the Construction Traffic Management Plan and Construction Workers Travel Plan. The Proposed Scheme is considered to be acceptable in transport terms.
T2 **Access to Roads**	Development proposals which would result in the creation of a new access or the intensification of the use of an existing	No new access would be required to the Power Station Site, however, new permanent accesses from New Road would be provided to the GRF and from Rusholme Lane to the AGI. It is

	access will be permitted provided: 1) There would be no detriment to highway safety; and 2) The access can be created in a location and to a standard acceptable to the highway authority. Proposals which would result in the creation of a new access onto a primary road or district distributor road will not be permitted unless there is no feasible access onto a secondary road and the highway authority is satisfied that the proposal would not create conditions prejudicial to highway safety.	expected that the detailed design of the new accesses would be in compliance with appropriate standards. Therefore, these are not considered to be detrimental to highway safety.
T8 **Public Rights of Way**	Development which would have a significant adverse effect on any route in the district's public rights of way network will not be permitted unless the following can be achieved: 1) Satisfactory and attractive alternative routes are provided; and 2) Adequate sign posting is provided; and 3) As far as is reasonable, the new route can make provision for walkers, horse riders, cyclists and people with sight or mobility problems; and 4) In the case of new reasonable development, such development must replace extinguished rights of way with attractive highway infrastructure which is equally capable of accommodating appropriate users of the original right of way. The District Council will work with the highway authority and other interested parties to extend and improve the public rights of way network for amenity as well as highway reasons.	As noted above, The surrounding PRoW network extends across much of the surrounding area with a high concentration between the village of Drax and the River Ouse to the north. New tree and hedgerow planting would tie the Proposed Scheme into its surrounding and reduce the significance of some of the visual effects on amenity of the PRoWs and non-designated routes, once planting has matured. This is considered to be acceptable. There would also be some disruption to PRoWs including closure and diversion during construction. Provisions such as clear signage for alternative routes secured in the draft DCO (document reference 3.1) are proposed to manage the temporary closure or diversion of PRoWs, in order to minimise the effects on users of these paths. During Stage 3 (operation), no significant effects in terms of accessibility and amenity value are anticipated on PRoW, as they would be reopened along their existing alignment. There is the potential for the diversion of one PRoW, however this would only be required in the event carbon capture storage equipment would be required In the future. The effects

		associated with accessibility and amenity value would not be significant, which is considered to be acceptable. For the reasons set out above, the Proposed Scheme is considered to be in accordance with policy T8.

North Yorkshire Waste Local Plan (2006) (Ref. 4.4)

POLICY	POLICY TEXT	ASSESSMENT
Policy 5/1 **Waste Minimisation**	Proposals for major development should include a statement identifying the waste implications of the development and measures taken to minimise and manage the waste generated. Permission will not be granted where this has not been adequately addressed.	As stated further above, Chapter 13 (Waste) of the ES (document reference 6.1.13) provides an assessment of the impacts of the Proposed Scheme in terms of effects associated with waste Waste volumes from demolition of buildings and structures have not been determined at this stage as a pre-demolition audit would not be carried out until the buildings are unoccupied. The assessment in Chapter 1 has therefore assumed that the intention is to reuse as much clean excavated material onsite as possible (earthworks only, excluding demolition works). There would be sufficient capacity on Site to reuse clean excavated material, therefore, waste associated with that material would expected to be insignificant. No significant effects are predicted on local waste treatment and disposal facilities as a result of waste generated by construction of the Power Station Site. As mentioned in previous sections, a final CEMP would be prepared and implemented for the demolition and construction works associated with the Proposed Scheme. This would include a Site Waste Management Plan and set out best practice measures for waste minimisation and management throughout the construction period.

		Operational waste is currently generated at the Existing Drax Power Station Complex. The specific volumes of this waste is not currently known, however it is not anticipated to be significant. Waste generated during operation of the Proposed Scheme was scoped out of the EIA and this was accepted by the SoS in their Scoping Opinion. Decommissioning waste would be managed using a decommissioning and demolition strategy. This strategy would be part of the decommissioning environmental management plan. In summary, no significant effects are predicted in relation to waste as a result of the Proposed Scheme during demolition, construction and operation, which is considered to be in accordance with policy 5/1.

Emerging Minerals and Waste Joint Plan (Ref. 2.6)

POLICY	POLICY TEXT	ASSESSMENT
Policy S02 **Develop-ments proposed within Minerals Safeguarding Areas**	Part 1) - Surface mineral resources: Within Surface Minerals Safeguarding Areas shown on the Policies Map, permission for development other than minerals extraction will be granted where: i) It would not sterilise the mineral or prejudice future extraction; or ii) The mineral will be extracted prior to the development (where this can be achieved without unacceptable impact on the environment or local communities), or	Paragraph 8.47 of the Minerals and Waste Joint Plan lists types of development that are exempt from consideration under the safeguarding policies of the Plan. Notably, exempt development includes the redevelopment of previously developed land that will not increase the footprint of the former development. Much of the Site lies within an area identified for minerals safeguarding (brick clay and sand and gravel) on the Policies map of the draft plan, subject to emerging policies S01 (Safeguarding mineral resources) and S02 (Developments proposed within Minerals Safeguarding Areas). The Existing Power Station Complex is largely on previously developed land. However, the Proposed Scheme would

	iii) The need for the non-mineral development can be demonstrated to outweigh the need to safeguard the mineral; or iv) It can be demonstrated that the mineral in the location concerned is no longer of any potential value as it does not represent an economically viable and therefore exploitable resource; or v) The non-mineral development is of a temporary nature that does not inhibit extraction within the timescale that the mineral is likely to be needed; or vi) It constitutes 'exempt' development (as defined in the Safeguarding Exemption Criteria list). Applications for development other than mineral extraction in Minerals Safeguarding Areas should include an assessment of the effect of the proposed development on the mineral resource beneath or adjacent to the site of the proposed development. Part 2) - Deep minerals resources: In areas identified as Underground Mineral Safeguarding Areas on the Policies Map, proposals for the following types of development should be accompanied by information about the effect of the proposed development on the potential future extraction of the safeguarded underground resource, as well as on the potential for the proposed surface development to be impacted by subsidence arising from working of the underlying minerals resource: […]	involve the construction of the Gas Pipeline and the GRF and AGI on agricultural land. It is however noted that most of the area between the Existing Drax Power Station Complex and the Feeders considered for the connection to the NTS is subject to minerals safeguarding. Thus, an alternative pipeline route would not have resulted in a reduced impact on safeguarded areas. As stated in paragraph 8.22 of the draft plan, *"the purpose of safeguarding is not to protect the minerals resource in all circumstances, but to ensure that the presence and potential significance of the resource is taken into account when other proposals in a safeguarded area are under consideration, and that sterilisation of the resource only takes place where there is appropriate justification. In some cases, it may be practicable for prior extraction of the resource to take place, where this can be done without unacceptable impacts on local communities or the environment, in line with the development management policies in the Joint Plan. In other cases, the need for the sterilising development may outweigh the need to protect the resource, or it may be possible to demonstrate that the safeguarded resource is no longer justified for safeguarding."* The need for new nationally significant energy infrastructure is set out in the energy NPSs. In light of this need, it is considered that the benefits of additional energy generating capacity associated with the Proposed Scheme would outweigh the small loss of the area safeguarded for mineral extraction.

	Permission will be granted where the assessment demonstrates that a significant risk of adverse impact on the development from mining subsidence will not arise or that the criteria in Part 1) of the Policy (other than the final criterion) are met. Part 3) – Protecting potash and polyhalite resources from other underground minerals development: Where proposals for deep drilling or development of underground gas resources or the underground storage of gas or carbon are located within the area safeguarded for potash, salt and polyhalite shown on the Policies Map, permission for development will only be granted where it can be demonstrated that the proposed development will not adversely affect the potential future extraction of the protected mineral.	
Policy S04 **Transport infrastructure safeguarding**	Railheads, rail links and wharves identified on the Policies Map, with a 100m buffer zone, will be safeguarded against development which would prevent or frustrate the use of the infrastructure for minerals or waste transport purposes, unless: The need for the alternative development outweighs the benefits of retaining the facility; and Where the minerals or waste transport infrastructure is in active use on the land, a suitable alternative location can be provided for the displaced infrastructure; or The infrastructure is not in use and there is no reasonable prospect of it being used for minerals or waste transport in the foreseeable future.	As noted above and in section 4.2 of the Planning Statement, the draft Minerals and Waste Joint Plan states that the purpose of safeguarding is not to prevent other forms of development on or near to a safeguarded resource or infrastructure, but primarily to ensure that the presence of the resource or infrastructure is taken into account when other development proposals are under consideration. The Existing Drax Power Station Complex is currently served by a railway line which connects with the Pontefract line to the south for deliveries of fuel. The rail line, and a 100 m buffer zone around it, is safeguarded as this is located on the Policies map. The jetty on the River Ouse is also safeguarded under this policy. This policy is therefore relevant to the Proposed Scheme.

	Where development, other than exempt development as defined in the Safeguarding Exemption Criteria list, is proposed within an identified buffer zone permission will be granted where adequate mitigation can, if necessary, be provided to reduce any impacts from the existing or proposed adjacent minerals or waste transport infrastructure uses to an acceptable level, and the benefits of the proposed use outweigh any safeguarding considerations.	The Proposed Scheme would not prevent or frustrate the use of the jetty or the rail line for minerals or waste transport and is therefore considered to be in accordance with emerging policy S04.
Policy D12 **Protection of agricultural land and soils**	Best and Most Versatile agricultural land will be protected from unnecessary and irreversible loss. Where development of best and most versatile agricultural land is justified proposals should prioritise the protection and enhancement of soils and the long term potential to recreate areas of best and most versatile land. Where relevant, development will be subject to aftercare requirements to ensure that a high standard of agricultural restoration can be achieved. Development proposals will be required to demonstrate that all practicable steps will be taken to conserve and manage on-site soil resources, including soils with environmental value, in a sustainable way. Development which would disturb or damage soils of high environmental value such as peat or other soil contributing to ecological connectivity or carbon storage will not be permitted.	As set out in Chapter 14 (Socio-Economics) of the ES, the temporary and permanent loss of Best and Most Versatile agricultural land is not considered to be significant, given the comparatively small area of agricultural land (circa 6.03 ha, associated with the GRF and AGI) to be permanently affected by the Proposed Scheme. However, particularly during construction of the Gas Pipeline, there is the potential for physical changes to the soil resources to occur. The area of temporary disturbance would cover an area of approximately 26.57 ha (including the Gas Pipeline and passing spaces at the Rusholme Lane Area). This includes compaction, sealing, smearing, and covering with hardstanding. During the construction phase (Stage 0, 1 and 2) a Soil Management Plan, part of the Outline CEMP, would be implemented to manage these impacts. In addition, following construction of the Gas Pipeline, agricultural land would be reinstated to its existing grade and condition. Overall, the Proposed Scheme is considered to be acceptable with regard to emerging policy D12.
Policy D13	Where development is proposed within Development High Risk Areas identified by the Coal Authority, proposals should	The Coal Authority has been consulted and confirmed that, whilst the Site falls within the coalfield, it is located outside of

Consider-ation of applications in Development High Risk Areas	be accompanied by a Coal Mining Risk Assessment and where necessary incorporate suitable mitigation measures in relation to land stability. Permission will be granted where it can be demonstrated that the development will not be at unacceptable risk.	the defined Development High Risk Area, meaning that there are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability. The Coal Authority therefore had no comments or observations to make on the consultation, and it is considered that the Proposed Scheme is not in conflict with emerging policy D13. As the northernmost part of Development Parcel A as shown on Figure 1.3 of the ES appears to be in the Development High Risk Area, the Applicant will continue to engage with the Coal Authority post submission of the Application to confirm that no further assessments would be required.