

From: [REDACTED]  
To: [DraxBECCS](#)  
Cc: [REDACTED]; [REDACTED]; [REDACTED]  
Subject: Re: EN010120-000019-210119  
Date: 17 February 2021 16:07:58  
Attachments: [image002.png](#)  
[image004.png](#)  
[image006.png](#)  
[image008.png](#)  
[image010.png](#)  
[image012.png](#)

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Dear Alison,

**Planning Act 2008 (as amended) and The Infrastructure Planning  
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)  
– Regulations 10 and 11**

**Application by Drax Power Limited (the Applicant) for an Order granting  
Development Consent for the Drax Bioenergy with Carbon Capture and  
Storage Project (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and  
duty to make available information to the Applicant if requested**

Thank you for your letter dated 19 January 2021 inviting comments from the Maritime and Coastguard Agency on the Scoping Opinion for the Drax Power carbon capture technology at the Drax Power Station in Selby. My apologies for our late submission to this consultation on this occasion.

The MCA has an interest in the works associated with the marine environment, the potential impact on the safety of navigation, and any impact on our search and rescue obligations. We would therefore like to comment as follows on the Scoping Report:

Part of the site for the proposed works falls on the River Ouse and there are plans for the upgrade of the existing Drax Jetty, which will facilitate transportation of abnormal indivisible loads (AILs), and will bring in other construction materials using this route. Capital dredging in the River Ouse would also be required and if the upgraded Drax Jetty is used for AILs only, maintenance dredging would not be required.

At this time, we have concerns that navigation risk has been scoped out of further assessment as part of the EIA process. Some of the justification for this includes aspects which are yet to be confirmed with relevant consultees and documented in the ES. We are not yet clear on the statutory functions of The Canal and Rivers Trust as there is no Harbour Order as far as we are aware, and the arrangements for pilotage as a Competent Harbour Authority.

The MCA would also expect any works in the marine environment to be subject to the appropriate consents under the Marine and Coastal Access Act (2009) before carrying out any marine licensable works.

We would welcome further discussion with the applicant with regards to the need

for a Navigation Risk Assessment on this occasion.

Kind regards

Helen

**Helen Croxson**

Space Launch Lead

Marine Licensing and Consenting

**UK Technical Services Navigation** [REDACTED]@mcga.gov.uk



**Maritime & Coastguard Agency**

Bay 2/25, Spring Place  
105 Commercial Road,  
Southampton SO15 1EG



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Please note my working days are Tuesday, Wednesday and Thursdays.