

Drax Power Limited

Drax Power Station

Selby

North Yorkshire

YO8 8PH

Planning Inspectorate Reference: TR030001

For the attention of Mr Mike Harris

Dear Mr Harris,

Drax Power Limited (DPL) has been registered as an interested party with respect to the DCO application submitted by Able Humber Ports Limited (Able) for the development of the Marine Energy Park (MEP). DPL has consent under Section 36 of the Electricity Act 1989 and an Environmental Permit for the construction and operation of a 299MW biomass fuelled power station (Heron Renewable Energy Plant to Heron REP) on land adjacent to the Port of Immingham and to the South of the proposed MEP. Having reviewed the documentation submitted by Able, it is evident that, without binding requirements/conditions being imposed, the proposed MEP has the potential to impact adversely on the proposed Heron REP.

Area of land included within the DCO application

The DCO application which Able have submitted for the MEP includes land over which DPL holds an option to lease land for laydown areas during construction of the REP. [The Site Location Plan](#) (Drawing Number AME02000) shows the land which Able UK has identified for the development of the MEP; Figure 1.2, Volume 3 of the Environmental Statement shows the area indicated for laydown. Other issues such as DPL's access to specific areas of land during construction and operation of the Heron REP as well as the impacts of the MEP development on Rosper Road, Marsh Lane and Humber Road must be clearly understood and considered. DPL are in discussion with Able and are seeking resolution on these issues. However, until resolution is forthcoming, DPL must **object** to the Compulsory Purchase of the specific areas of land for which DPL has options for lease as well as the Compulsory Purchase of Rosper Road.

Flood Risk Assessment

A number of objectors have questioned various aspects and details included within the Flood Risk Assessment (FRA) submitted by Able. The response from the Environment Agency indicates that the construction of the quay would result in a reduction in the current standard of flood defences and that areas surrounding the development could theoretically suffer greater levels of flooding. The

[Agency's response](#) indicated that an additional 300mm of flooding in the surrounding areas of the development could be experienced. More severe flooding would inevitably affect the Heron REP and the associated infrastructure. DPL requests that this item is carefully considered by the Planning Inspectorate when examining the application.

Drainage Philosophy

DPL has previously agreed the overall drainage philosophy for its proposed Heron REP following discussions with the Environment Agency and the Internal Drainage Board for the Heron REP. At the time of agreement it was understood by DPL that the Killingholme Marshes Drainage Scheme (KMDS) was being delayed. It seems that Able is proposing to implement a similar scheme (13.1 - Flood Risk Assessment and Drainage Strategy). This could potentially provide an overall sustainable drainage philosophy for existing and proposed developments in the area including the Heron REP. DPL would be interested to understand the details of the scheme and whether it is intended to replicate the KMDS.

Water Quality in the Humber

Several objectors have raised concerns regarding the impact of the MEP development on the water quality in the area. These representations have referred environmental and ecological concerns as well as operational concerns for operations which abstract water from the Humber and also discharge process waters. The Heron REP has been designed to operate with a hybrid tower cooling water system and has a licensed abstraction from a specific location within the Humber (license number AN/029/0009/002). The design of the cooling water intake and treatment processes is specific to the water quality currently experienced within the Humber. Concerns raised by the Environment Agency, E.ON UK and the Marine Management Organisation regarding localised deterioration in water quality is echoed by DPL. Increased silt loads entering the cooling water system and localised changes in siltation would impact significantly on the abstraction system and the treatment processes which have been specifically designed to treat a specific water quality. DPL would be interested to understand whether specific areas of the Humber have been identified as being at risk from additional silt burdens either from construction operations, operation and activities such as dredging which will be required to maintain the required drafts for vessels accessing the quay. DPL seek reassurance that the water quality in the area from which the REP has a licensed abstraction will not be impacted by the MEP

The Heron REP maintains an Environmental Permit which allows the discharge of process water back into the Humber with the location and design of the discharge point agreed. Hydraulic and thermal modelling was undertaken to optimise the arrangement of the discharge from the Heron REP. DPL would wish to raise concerns regarding the possible deterioration in water quality and the impact on the discharge characteristics of the Heron REP. DPL seek reassurance that the hydraulic changes in the river local to the proposed REP will not impact on the discharge of purged cooling water which is currently licensed under the Environmental Permit.

Connection to Grid Planning application reference: PA/2010/1087

DPL has an existing consent for installing a 400kV cable which will connect the Heron REP to the National Grid substation which is situated close to the gas fired power station owned and operated by Centrica. The route of the 400kV cable from the Heron REP progresses northwards along Rosper Road before entering Chase Hill Road. It is imperative for DPL to understand the nature of the works

associated with the MEP which are proposed to take place along Rosper Road and Chase Hill Road and the possible impacts on infrastructure in or on the verge of the road. DPL therefore **object** to the Compulsory Purchase of Rosper Road until Able can demonstrate that there will be no significant impact on the already consented laying of the 400kV cable connecting the REP to the substation.

Future potable water supply and sewer connections

DPL has had discussions with Anglian Water regarding the supply of potable water to the Heron REP. Anglian Water indicated that they would investigate the capability of connecting the Heron REP site to a potable water supply. When referring to the Site Location Plan, it appears that infrastructure associated with Anglian Water's assets have been included within the area covered by the DCO application. It would be beneficial to understand whether Able believe that there will be an impact on Anglian Water's assets. In addition, DPL had also discussed the possibility of connecting into the existing sewerage system owned and operated by Anglian Water. Again, it would be beneficial to understand whether there is any potential impact on the ability of Anglian Water to provide services to treat domestic wastewaters.

DPL would of course be happy to discuss any of these issues further.

Yours Sincerely

Marvin Seaman