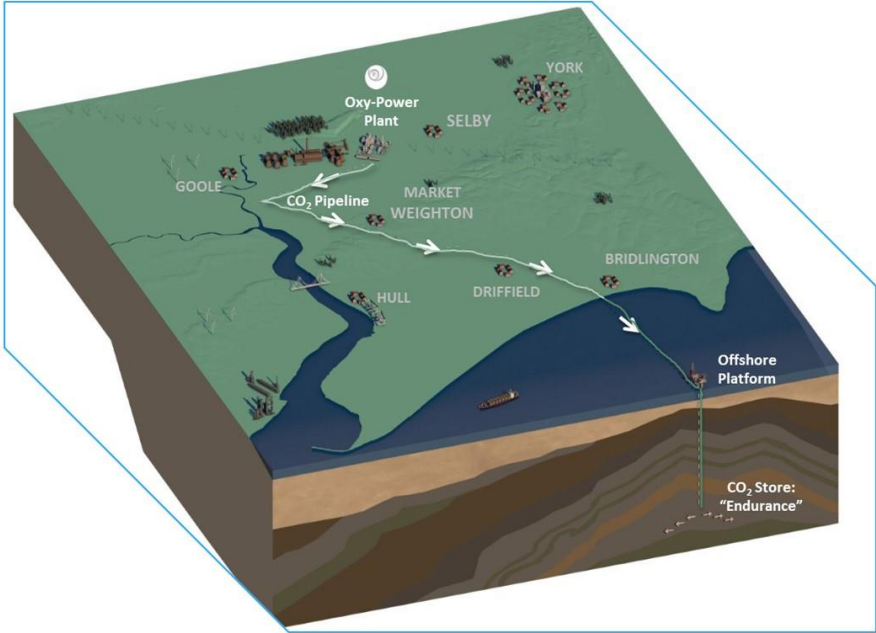




# K45: Full chain public and stakeholder engagement

*Commercial; Project Management*



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# Key Words

Key Word	Meaning or Explanation
Biomass	Wood chips used in combustion
Carbon	An element, but used as shorthand for its gaseous oxide, CO <sub>2</sub> .
Capture	Collection of CO <sub>2</sub> from power station combustion process or other facilities and its process ready for transportation.
Storage	Containment in suitable pervious rock formations located under impervious rock formations usually under the sea bed.
Transport	Removing processed CO <sub>2</sub> by pipeline from the capture and process unit to storage.
Stakeholder	Persons and organisations who/which have a vested, direct or indirect interest in or a genuine concern for all or part of the proposed project.
Engagement	Engagement describes the myriad of ways in which the planning of the proposed project might be shared with the stakeholders. Engagement is by definition a two-way process, involving interaction and listening, with the goal of generating mutual benefit and understanding.



# Executive Summary

The Full Chain Public and Stakeholder Engagement report was generated as part of the Front End Engineering Design (FEED) contract with the Department of Energy and Climate Change (DECC) for White Rose, an integrated full-chain Carbon Capture and Storage (CCS) Project. This document is one of a series of Key Knowledge Deliverables (KKD) from White Rose to be issued by DECC for public information. This report draws on work, which was undertaken by Capture Power Limited (CPL) for the Oxy Power Plant (OPP) White Rose CCS (Generating Station) Development Consent Order (DCO) and by National Grid Carbon Limited (NGC), as part of its promotion of the Yorkshire and Humber CCS Cross Country Pipeline DCO. The work undertaken by NGC is partly funded under the European Union's European Energy Programme for Recovery (EEPR).

White Rose comprises a new coal-fired ultra-supercritical OPP of up to 448 MWe (gross) and a Transport and Storage (T&S) network that will take the carbon dioxide from the OPP and transport it by pipeline for permanent storage under the southern North Sea. The OPP captures around 90% of the carbon dioxide emissions and has the option to co-fire biomass.

Delivery of the project is through CPL, an industrial consortium formed by General Electric (GE), BOC and Drax, and NGC, a wholly owned subsidiary of National Grid.

This report sets out the process by which CPL and NGC identified the key stakeholders relevant to the White Rose CCS (Generating Station) and the Yorkshire and Humber CCS Cross Country Pipeline respectively, including MPs, MEPs, county councillors, district / unitary councillors and relevant officers, parish councillors, environmental and local interest groups and community organisations. This included a comprehensive identification process in the very early stages of the development of the project, with ongoing reviews and updates to ensure that all relevant stakeholders and other interested parties were part of the consultation process.

Extensive stakeholder consultation took place throughout the development of the projects up to the submission of their DCO applications. This early and extensive consultation helped to ensure that stakeholders were able to play a role in the shaping and development of the project. The consultation programme featured two rounds of non-statutory consultations, known as the Stage 1 Consultation and the Stage 1A Consultation, followed by one round of statutory consultation, which was the Stage 2 Consultation.

Stakeholders were contacted in a number of ways, including letters, advertisements, the project website, meetings and public exhibitions. This was to ensure that CPL and NGC engaged with as many stakeholders as possible throughout the project.

In addition, the language used in these communications was accessible to all. It was important that CPL and NGC didn't just provide information on the project and the planning process, but also on CCS as a technology and the value of implementing CCS, further information can be found in a joint study by the TUC and the Carbon Capture and Storage Association (CCSA) at

<https://www.tuc.org.uk/sites/default/files/carboncapturebenefits.pdf> and in the socio-economic chapter of the Environmental Impact Assessment (EIA) at

[http://infrastructure.planninginspectorate.gov.uk/projects/yorkshire-and-the-humber/white-rose-carbon-capture-and-storage-](http://infrastructure.planninginspectorate.gov.uk/projects/yorkshire-and-the-humber/white-rose-carbon-capture-and-storage-project/?ipcsection=docs&stage=app&filter=Environmental+Statement)

[project/?ipcsection=docs&stage=app&filter=Environmental+Statement](http://infrastructure.planninginspectorate.gov.uk/projects/yorkshire-and-the-humber/white-rose-carbon-capture-and-storage-project/?ipcsection=docs&stage=app&filter=Environmental+Statement). The Yorkshire and Humber region has a large amount of power generating technology and as such is the perfect place to create a CCS network. CPL and NGC did a lot of work with stakeholders who were not directly affected by the project but could be involved in an expansion of CCS. It is worth noting that due to the infrastructure heavy economy in this area and the opinion that CCS will benefit the local economy many councils and MPs were keen to see CCS expanded.

This report outlines what CPL and NGC did to ensure its community engagement was thorough and provides further information on local stakeholders which will be of benefit to other project promoters.

Her Majesty's Government (HMG) Spending Review was set out on 25 November 2015 outlining its capital budget and priorities. A market announcement on the same day indicated that the £1 billion ring-fenced capital budget for the Carbon Capture and Storage Competition was no longer available, the Spending Review accordingly did not include such budget. This meant that the Competition could not proceed as originally envisaged. Following this decision, a notice of termination was issued on 23 December 2015 under the White Rose FEED Contract, which terminated accordingly on 25 January 2016, prior to the expected completion date of FEED. The Government and CPL are committed to sharing the knowledge from UK CCS projects, and this Key Knowledge Deliverable represents the learning achieved up to the cancellation of the CCS Competition and termination of the FEED Contract and therefore does not necessarily represent the final and completed constructible project.

# 1 Introduction

## 1.1 Background

The White Rose Carbon Capture and Storage (CCS) Project (White Rose) is an integrated full-chain CCS project comprising a new coal-fired Oxy Power Plant (OPP) and a transport and storage (T&S) network that will take the carbon dioxide (CO<sub>2</sub>) from the OPP and transport it by pipeline for permanent storage under the southern North Sea.

The OPP is a new ultra-supercritical power plant with Oxyfuel technology of up to 448 MWe gross output that will capture around 90% of CO<sub>2</sub> emissions and also have the option to co-fire biomass.

One of the first large scale demonstration plants of its type in the world, White Rose aims to prove CCS technology at commercial scale as a competitive form of low-carbon power generation and as an important technology in tackling climate change. The OPP will generate enough low carbon electricity to supply the equivalent needs of over 630,000 homes.

White Rose is being developed by CPL, a consortium of General Electric (GE), BOC and Drax. The project will also establish a CO<sub>2</sub> transportation and storage network in the region through the Yorkshire and Humber CCS pipeline being developed by National Grid Carbon Ltd (NGCL).

## 1.2 White Rose CCS (Generating Station) DCO

CPL will provide the OPP element of the project. The OPP includes all elements on a conventional coal fired power station plus additional elements necessary to achieve CCS.

The conventional power plant includes the boiler, turbine hall, power generation and transformers, Air Quality and Control Systems (AQCS). The CCS elements include an Air Separation Unit (ASU) and a Gas Processing Unit (GPU) for purification and compression of CO<sub>2</sub>. In addition to these elements the OPP includes a cooling water facility and interconnections with the existing Drax site.

## 1.3 Yorkshire and Humber Cross Country Pipeline DCO

National Grid will provide the transportation and storage element of the project. This includes the transportation pipeline and pressure boosting facilities; offshore CO<sub>2</sub> reception and processing facilities, and injection wells into an offshore storage reservoir.

The transportation and storage elements of the White Rose CCS Project comprise two elements: the “Onshore Scheme”, which includes the construction of a Cross Country Pipeline (including the Above Ground Installations (AGIs) such as Pipeline Internal Gauge Traps, a multi-junction, it’s block valve sites and an onshore pumping station) to transport CO<sub>2</sub>, in dense phase from electricity generation and industrial capture plants in the region and the “Offshore Scheme” which includes an offshore pipeline to transport the CO<sub>2</sub> to a permanent storage site beneath the North Sea. The Onshore and Offshore Schemes are located, sized and designed to accommodate CO<sub>2</sub> emissions captured from multiple sources; although an initial, direct connection which the White Rose CCS Project power station itself forms the primary focus of the Front End Engineering Design (FEED) Contract.

The Onshore Scheme requires a new buried high pressure cross country pipeline of approximately 67km in length with an external diameter of 610mm for the transportation of the dense phase CO<sub>2</sub> to a location on the Holderness coast. The Offshore Scheme requires a new high pressure 90km sub-sea pipeline to a geological storage site. The storage site presently proposed is a saline aquifer located approximately 1000m below the seabed. The Onshore and Offshore Schemes would be joined at the Mean Low Water Mark using appropriate landfall techniques. The Onshore Scheme is a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 and hence is subject to the grant of a Development Consent Order (DCO). The Offshore Scheme is subject to a separate consenting procedure under the Petroleum Act 1998 and the Energy Act 2008 and has been subject to a separate application.

## 2 White Rose CCS (Generating Station) DCO

CPL (the Applicant) is seeking a DCO to authorise the construction, operation and maintenance of a new thermal generating station (an ultra-supercritical oxy-fuel coal-fired power plant of up to 448 megawatts (MWe) gross with the ability to co-fire biomass) that will be fitted with CCS technology and associated development (together the Project) on land within and adjacent to the existing Drax Power Station site, Drax, near Selby, North Yorkshire, YO8 8PH, within the administrative areas of Selby District Council (Selby DC) and NYCC.

The Project falls within the definition and thresholds for a NSIP under Sections 14 and 15(2) of the 2008 Act. It is therefore necessary for CPL to apply to the Secretary of State (SoS) for DECC for 'Development Consent' for the Project under Section 31 of the 2008 Act.

The DCO, if made, would be known as the 'White Rose CCS (Generating Station) Order' (the Order). A draft of the Order forms part of the Application and sets out the authorisations and powers that the Applicant is seeking in respect of the Project.

It is important to note that with NSIP projects that differ in type and scale, such as between CPL's Generating Station and National Grid's Yorkshire and Humber CCS Cross Country Pipeline development, differences can result between the projects in terms of the consultation exercise undertaken. With a project such as CPL's Generating Station, the location is next to an existing power station where the local population is broadly supportive of a major employer in the region on land which is owned by Drax. With National Grid's Yorkshire and Humber CCS Cross Country Pipeline, the linear nature of the project means that more people may be affected by or indeed interested in the project in terms of the project's eventual land take, compulsory or otherwise. Many more people will have been involved in the consultation process prior to submission of the application.

The DCO documents are available to view online on the PINS website: <http://infrastructure.planningportal.gov.uk/projects/yorkshire-and-the-humber/white-rose-carbon-capture-and-storage-project/?ipcsection=docs&stage=app&filter=Reports>

### 2.1 The Background to the Project

The Project would support the development of the CO<sub>2</sub> pipeline (the Yorkshire and Humber CCS cross-country CO<sub>2</sub> pipeline) currently being promoted by NGCL within the Yorkshire and Humber region, to transport CO<sub>2</sub> for permanent storage beneath the North Sea in geological structures. It is understood that the CO<sub>2</sub> pipeline would be

used by other power generators and industrial operators in the region. The CO<sub>2</sub> pipeline and associated storage are being advanced separately by NGCL (who submitted an application for a DCO to the SoS in 2014) and they do not form part of the Generating Station Project.

## 2.2 The Applicant

Since its inception in 2010, the Project has been promoted by a consortium comprising Drax and GE, with BOC joining in 2011.

CPL is an English private limited company that was incorporated in December 2011 as a fully owned subsidiary of Drax CCS Limited (a company fully owned by Drax Group plc). In December 2013 ALSTOM UK Holdings Limited (a GE company) and The BOC Group Limited (a Linde Group company) each acquired a one-third interest in CPL. CPL is therefore currently a joint venture company equally owned by Drax CCS Limited, ALSTOM UK Holdings Limited and The BOC Group Limited.

CPL is able to draw upon the significant experience that exists within the joint venture companies in relation to power generation, CCS technology and engineering, amongst other capabilities. Further information on the joint venture companies can be found on the Project website: [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)

## 2.3 The Project Site

The Project Site (the Order Limits) comprises land within and adjacent to the boundary of the existing Drax Power Station site. The River Ouse is located to the north and north-east, with the Barlow Mound (used for the long-term storage of fuel ash from Drax Power Station being situated to the north and east. The existing Power Station site is located to the south.

The Project site includes land within the operational boundary of the existing Power Station site and part of the Barlow Mound. However, the bulk is located outside and adjacent to the northern boundary of the existing Power Station site.

The entire Project site extends to just over 116 hectares (ha), of which approximately 29 ha would be a permanent operational area. The temporary laydown and construction areas extend to approximately 39 ha, with the remaining areas (required primarily for various

infrastructure connections and for the most part within the existing Power Station site) totalling approximately 49 ha.

The Project site (with the exception of areas within the existing Power Station site and at the Barlow Mound) comprises land used in connection with Drax Power Station and low-lying agricultural land, interspersed with a series of drainage ditches.

Further details of the project site can be found in the documents on the PINS website.

## 2.4 The Project

As confirmed above, the Project comprises a new thermal generating station with a nominal gross electrical output capacity of up to 448 MWe gross, fitted with CCS technology and associated development. The Project would have the capacity to provide sufficient electricity for 630,000 households, while capturing two million tonnes of CO<sub>2</sub> per annum arising from the combustion process (up to 90% of emissions).

Schedule 1 of the draft Order provides the formal description of the Project and the components for which Development Consent is sought, and identifies the individual 'Works Numbers (Works Nos.)' for these components.

The Works Plans identify the location and extent of the components of the Project within the Project site by reference to the Works Nos. set out in Schedule 1 of the draft Order.

The main components of the Project (with reference to the relevant Works Nos.) can be summarised as follows:

**Work No. 1A and 1B** - site raising and preparation works to create a development platform for the generating station to an appropriate level to mitigate flood risk, for the creation of bridges and crossings over the Carr Dyke and for site access works, site raising and hardstandings for the laydown and construction areas;

- **Work No. 1A** - a generating station (the coal-fired power plant) located in the northern part of the Project site, to the north of the existing Power Station site, primarily fuelled by coal, but with the ability to co-fire biomass, that will be capable of generating up to 448 MWe gross of electricity, including a boiler house, steam turbine, cooling water towers, flue gas treatment

systems, a flue gas emissions stack, air separation units and CO<sub>2</sub>, processing and compression facilities;

- **Work No. 1B** - laydown and construction areas for construction and maintenance;

**Work No. 2** - fuel intake, limestone and gypsum and fuel ash handling and transportation infrastructure, including connections with the existing Power Station site (located broadly along the western side of the Project site and existing Power Station site) for the delivery of fuel and limestone for the combustion and flue gas desulphurisation processes, and for the export of fuel ash for storage at the existing Barlow Mound and also for the transport of gypsum;

**Work No. 3** - fuel ash storage on part of the existing Barlow Mound forming the north-western part of the Project site located to the north-west of the existing Power Station site;

**Work No. 4** - a primarily underground connection to the electricity grid which would comprise a 400kV cable and associated infrastructure running along the eastern side of the Project site to the existing substation located in the south-eastern part of the existing Power Station site;

**Work No. 5** - connections for cooling water, potable water and sewerage, and related facilities between the Project site and the northern part of the Power Station site;

**Work No. 6** - vegetation clearance and the creation of a new hardstanding area immediately adjacent to the existing jetty on the River Ouse, located to the east of the main Project site and the existing Power Station site, for the unloading and storage of equipment and materials delivered by barge, and parking and circulation space for vehicles transporting items from the jetty to the Project site;

**Work No. 7** - the underground diversion of an existing 11kV overhead electrical cable on the north-eastern edge of the Project site; and

**Work No. 8** - works to the existing substations located in the south-eastern part of the existing Power Station site to facilitate the 400kV grid connection.

The jetty works are 'associated development' for the purposes of Section 115 of the 2008 Act.

As part of and related to the above components the Project also includes access works, lighting and landscaping, amongst other works.



It is anticipated that subject to the Order having been made by the SoS, construction work on the Project would commence in Q2 2016. The first activity carried out would be the site raising works to create the development platform for the generating station. The overall construction programme is expected to last approximately 62 months. Commissioning would take place in Q2 2021 with the Project entering operation in Q4 2021.

The engineering design and development work for the Project has continued to progress alongside (and beyond) the Applicant's pre-application consultation and as a consequence some modifications have been made to the plant design and specification. One such modification relates to the generating capacity of the coal-fired power plant (Work No. 1A), and the decision that has been made by the Applicant to refer to a capacity of up to 448 MWe gross within the Application as opposed to the 426 MWe stated earlier in the pre-application process.

At the outset of the Project, the generation capacity of the coal-fired plant was based upon the Applicant's previous experience of oxy-fuel combustion plants. The capacity was initially set at 426 MWe so as to allow pre-application consultation to commence as various elements of the design progressed through FEED and to avoid the need to have to change the generating capacity figure several times throughout pre-application consultation.

Based on the technical work completed to date, the coal-fired plant would be able to achieve a maximum capacity of up to 448 MWe gross, an increase of approximately 5% over that stated during the Applicant's Section 42 and Stage 2 - Section 47 consultation within the PEIR. However, the environmental data generated with regard to emissions, waste, noise and landscape and visual impacts, and upon which the PEIR was based (and upon which the EIA and final ES has been based), assumed a maximum capacity of up to 448 MWe gross. As such, the decision to refer to up to 448 MWe gross within the Application does not alter the likely significant environmental effects identified for the Section 42 and Stage 2 - Section 47 consultation through the PEIR or the outcome of the EIA as reported in the final ES.

In relation to the grid connection options (Work No. 4), the Applicant considered the 'Department of Communities and Local Government's' (DCLG's) 'Guidance on the pre-application process' (January 2013), which includes a section considering the inclusion of options in a draft DCO (paragraph 83 onwards). The Applicant's draft Order (Document Ref. 2.1) includes provisions allowing the grid connection to be one of three options, all of which are local to the Project site and involve land

within or adjacent to the existing Power Station site and the existing sub-stations, which was the location identified for the grid connection in the PEIR issued for the Section 42 and Stage 2 - Section 47 consultation.

The implementation of the different options would not mean that the Project became a 'different project', and post-construction there would be very little if any discernible difference to those viewing the Project site, particularly as the cable for the electrical connection would be underground for the majority of its route and wherever possible. Furthermore, the connection options all terminate at significant existing infrastructure. The environmental impacts of the options have been considered within the ES and the land required (or rights over it) for all three options are included in the Land Plans and Book of Reference which can be found in the project DCO documents on the PINS website.

## 2.5 Summary of Stakeholder Processes

The following table 2.1 provides an overview and timeline for each stage of the stakeholder processes, this summaries the processes set out in more detail in later chapters in the chapters that follow.

**Table 2.1: Stakeholder Summary**

STAGE	OVERVIEW OF CONSULTATION	TIMESCALES
<b>Applicant's Pre-Application Consultation Process</b>		
Statement of Community Consultation ('SoCC') - Statutory consultation	Preparation of draft SoCC and formal consultation under S.47 with Selby District Council ('Selby DC'), North Yorkshire County Council ('NYCC') and other local authorities.	April 2012 - May 2012 & December 2012 - January 2013
EIA scoping	Submission of an application for an EIA scoping opinion to PINS and receipt of Scoping Opinion.	December 2012 - January 2013 (Scoping Opinion dated 14 January 2013)
Non-statutory consultation	Non-statutory consultation of the local community within the vicinity of the Project site (including public exhibitions in July 2013) and key technical consultees.	Early 2013 to August 2013 (public exhibitions held on 15, 16 and 17 July 2013)
SoCC – non-statutory consultation	Non-statutory consultation on a revised draft SoCC with SDC and other local authorities.	December 2013 - January 2014
SoCC publication	Publication of the final SoCC and SoCC Notice in accordance with S.47.	January 2014 (SoCC Notice published in local newspapers on 30 and 31 January 2014)
Stage 1 - Section 47 consultation	Stage 1 - S.47 community consultation in accordance with the published SoCC, advertised through a newsletter, press releases, newspapers notices and posters and including public exhibitions in April 2014.	Early April - late May 2014 (consultation ran from 4 April to 26 May 2014, with public exhibitions held on 15, 16 and 17 April 2014).
Section 42 Consultation	S.42 consultation of prescribed consultees, relevant local authorities, non-prescribed consultees (who there was no statutory duty to consult) and S.44 persons by letter (generally sent by registered post) accompanied by consultation documents, including a Preliminary Environmental Information Report (PEIR).	Mid-June – early November 2014 (prescribed consultees, relevant local authorities and non-prescribed consultees consulted between 17 June and 15 July 2014; S.44 persons consulted between 22 July and 19 August 2014; letters sent to those who did not receive the original letters, and additional S.44 persons identified by standard post as well as posting site notices in respect of unknown/uncertain landownership interests with consultation period running from 4 September to 6 October 2014; and further limited S.42 consultation of potential statutory undertakers running from 10 October to 10 November 2014.
Stage 2 - Section 47 consultation	Stage 2 - S.47 community consultation in accordance with the published SoCC, advertised through a newsletter, press	Early July – early August 2014 (consultation ran from 4 July to 1 August

STAGE	OVERVIEW OF CONSULTATION	TIMESCALES
	releases, newspapers notices and posters, including public exhibitions in July 2014. Consultation documents provided to S.42 consultees made available at public exhibitions venues and also document inspection locations.	with public exhibitions held on 15, 16 and 17 July 2014).
First Section 48 Notice & EIA Reg. 11 Publicity	First Section 48 Notice published in The Independent, London Gazette and local newspapers (two consecutive weeks for local newspapers) and Environmental Impact Assessment ('EIA') Regulation 11 publicity carried at same time with EIA consultation bodies being sent a copy of the S.48 Notice as it was to be published.	S.48 Notice published on 26 June and 3 July 2014 to broadly coincide with both the start of the S.42 consultation and Stage 2 S.47 consultation (S.48 Notice stated that comments must be received to consultation by 1 August 2014 – the end of the Stage 2 - S.47 consultation). The EIA Reg. 11 publicity was carried out on 26 June 2014 when the S.48 Notice was first published.
Second Section 48 Notice & EIA Reg. 11 Publicity	Second Section 48 Notice published in the Lloyds List and Fishing News, with EIA consultation bodies being sent a copy of the S.48 Notice as it was to be published at the same time.	S.48 Notice published on 5 September 2014 to coincide with S.42 consultation carried out in September/early October 2014 (S.48 Notice stated that comments must be received by 6 October 2014 - The end of September/early October 2014 S.42 consultation). The EIA Reg. 11 publicity was carried out by sending out letters to all EIA consultation bodies on 4 September 2014.
<b>Public Exhibitions – Stage 1</b>		
	Drax Sports and Social Club, Main Road, Selby, North Yorkshire, YO8 8PF	Tuesday 15 April 2014
	Junction, Paradise Place, Goole, East Yorkshire, DN14 5DL	Wednesday 16 April 2014
	Selby Town Hall, York Street, Selby, North Yorkshire, YO8 4AJ	Thursday 17 April 2014
<b>Public Exhibitions – Stage 2</b>		
	Selby Town Hall, York Street, Selby, North Yorkshire, YO8 4AJ	Tuesday 15 July 2014
	Junction, Paradise Place, Goole, East Yorkshire, DN14 5DL	Wednesday 16 July 2014
	Drax Sports and Social Club, Main Road, Selby, North Yorkshire, YO8 8PF	Thursday 17 July 2014
<b>S.42 Consultation</b>		
Letters to prescribed consultees, relevant local authorities and non-prescribed consultees		17 June - 15 July 2014
Letters to S.44 persons (Categories 1, 2 and 3)		22 July - 19 August 2014
Letters to persons who did not receive 13 June and 18 July 2014 letters; erection of site notices in respect of unknown/uncertain land		5 September - 6 October 2014

STAGE	OVERVIEW OF CONSULTATION	TIMESCALES
ownership interests; letters to additional S.44 persons		
Letters to potential additional statutory undertakers		14 October - 10 November 2014
<b>S.46 Consultation</b>		
Letters to prescribed consultees, relevant local authorities and non-prescribed consultees		12 June 2014
Letters to S.44 persons (Categories 1, 2 and 3)		18 July 2014
Letters to persons who did not receive 13 June and 18 July 2014 letters; erection of site notices in respect of unknown/uncertain land ownership interests; letters to additional S.44 persons		3 September 2014

## 3 Legislative Context and Compliance

This section provides a summary of the legislative context for NSIPs, including the legislative requirements relating to pre-application consultation and publicity. It includes a 'checklist' based upon 'Acceptance of Applications' of PINS Advice Note 6 'Preparation and submission of application documents' in order to provide a quick reference guide as to how the Applicant's consultation has complied with the legislative requirements for pre-application consultation and publicity.

### 3.1 Legislative Context

#### 3.1.1 Overview of the DCO Regime

The Project, including an onshore generating station with an average gross electrical output in excess of 50 MWe, falls within the definition of a NSIP under Section 15(2) of the 2008 Act. It is, therefore, necessary for the Applicant to apply to the SoS (via PINS) to construct, operate and maintain the Project under Section 31 of the 2008 Act.

PINS is responsible for examining the application and making a recommendation to the relevant SoS, in this case for DECC, who then takes the decision as to whether a DCO should be made authorising the Project. A DCO removes the need to apply for a number of consents (e.g. planning permission) and can also include a range of other consents and licences subject to the prior agreement of the relevant consenting body.

Under the DCO regime, the policy framework for examining and determining applications is provided by National Policy Statements (NPSs). Section 5 of the 2008 Act allows the SoS to designate NPSs setting out national policy in relation to the types of NSIPs listed at Section 14 of the 2008 Act.

Section 104 requires the SoS to determine applications for NSIPs in accordance with the relevant NPSs unless this would:

- lead to the UK being in breach of its international obligations;
- be in breach of any statutory duty that applies to the SoS;
- be unlawful;
- result in the adverse impacts of the development outweighing the benefits; or
- be contrary to regulations about how decisions are to be taken.

In making decisions on NSIPs, the 2008 Act (Section 105) also states that the SoS must have regard to any 'local impact report' submitted by a relevant local authority, any relevant matters prescribed in regulations

and any other matters that the SoS thinks are both 'important and relevant'.

In July 2011 the SoS for DECC designated a number of NPSs relating to nationally significant energy infrastructure. These include an 'Overarching' NPS which sets out the Government's policy for the delivery of major energy infrastructure and five 'technology-specific' NPSs. The technology specific NPSs should be read in conjunction with the overarching NPS where they are relevant to an application.

The NPSs that are considered to be of most direct relevance to the Project are as follows:

- Overarching NPS for Energy (EN-1); and the
- NPS for Fossil Fuel Electricity Generating Infrastructure (EN-2).

It is also considered that the 'NPS for Electricity Networks Infrastructure' (EN-5) is of some relevance as the Project includes a new electricity grid connection.

Part 3 of EN-1 'The Need for New Nationally Significant Energy Infrastructure Projects' defines and sets out the 'need' that exists for nationally significant energy infrastructure. Notably, paragraph 3.1.3 stresses that the SoS should assess applications for DCOs for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them. Paragraph 3.1.4 continues that the SoS should give substantial weight to the contribution that all projects would make toward satisfying this need when considering applications under the 2008 Act.

### 3.1.2 Legislative Requirements for Pre-application Consultation and Publicity

The legislative requirements relating to pre-application consultation and publicity for NSIPs are set out within the following:

- The Planning Act 2008 (the 2008 Act).
- The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations).
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the EIA Regulations).

The 2008 Act and the APFP and EIA Regulations provide the legislative framework for advice and guidance on pre-application consultation and publicity to be carried out for NSIPs.

Under the 2008 Act applicants for NSIPs are required to consult widely before submitting an application for a DCO. This includes consulting the local community in the form of those living in the vicinity of the land to which the project relates; certain prescribed persons and bodies (including technical consultees and statutory undertakers), relevant local authorities and affected and potentially affected landowners; as well as the public generally.

The key requirements for applicants to follow in relation to pre-application consultation and publicity are summarised in Table 3.1 below:

**Table 3.1: Legislative Requirements for Pre-application Consultation and Publicity**

Section of 2008 Act	Legislative Requirement
Section 37: Applications for orders granting development consent	S.37(3) requires that any application for a DCO must be accompanied by a consultation report, which provides details of what has been done to comply with S.42, 47 and 48, any relevant responses received to consultation and the account taken of those responses.
Section 47: Duty to consult local community	Applicants must prepare a SoCC explaining how they intend to consult the people living within the vicinity of the land to which the project relates about the proposed application. Before preparing the SoCC the applicant must consult the relevant local authority(ies) about what is to be included within it, provide a period of at least 28 days starting with the day after the day the SoCC is received for comments and have regard to any comments received before the deadline. The applicant must make the final SoCC available for inspection by the public in a location that is reasonably convenient for people living within the vicinity of the land, publish the SoCC (a SoCC Notice) in a locally circulating newspaper and carry out the consultation in accordance with the proposals set out in the SoCC.
Section 42: Duty to consult	Applicants must consult the following about the proposed application for at least 28 days starting with the day after the day the consultation documents are received (S.45): <ul style="list-style-type: none"> <li>- S.42(a) 'persons as may be prescribed', including technical consultees and statutory undertakers;</li> <li>- S.42(b) 'each local authority that is within S.43' (e.g. 'relevant' local authorities); and</li> <li>- S.42(d) 'each person who is within one or more of the categories set out in S.44' (e.g. affected and potentially affected landowners, including occupiers, tenants, lessees and other affected persons).</li> </ul>
Section 46: Duty to notify Secretary of State of proposed application	The applicant must notify the SoS of the start of the S.42 consultation and provide the SoS with the same information as the applicant intends to send to the S.42 consultees either at the same time as or before commencing the S.42 consultation.
Section 48: Duty to publicise	The applicant must publicise the proposed application in the prescribed manner, namely in accordance with APFP Regulation 4(2), once in a national newspaper, once in the London Gazette (once in the Lloyds List and appropriate fishing journal where offshore development is involved) and for two consecutive weeks in one or more local newspapers circulating in the vicinity of the land to which the project relates. The deadline for the receipt of responses stated in the notice must not be less than 28 days following the date when the notice is last published.
EIA Regulation 11: Pre-application publicity under Section 48 (duty to publicise)	Where the proposed application is for EIA development, the applicant must send a copy of the S.48 Notice to all the 'consultation bodies' ('consultation bodies' means for the purposes of the EIA Regulations a body prescribed under S.42(a)) 'such persons as may be prescribed', each local authority within S.43 'Local authorities for the purposes of Section 42(1)(b)' and any person notified to the applicant by PINS in accordance with EIA Regulation 9(1)(c)).



Section of 2008 Act	Legislative Requirement
Section 49: Duty to take account of responses to consultation and publicity	The applicant must have regard to any 'relevant responses' received to the S.42, S.47 and S.48 consultation and publicity. A 'relevant response' means a response received to S.42, S.47 and S.48 consultation and publicity before any deadline imposed in accordance with the relevant section of the 2008 Act (S.45).

## 4 The Applicants approach to Consultation

Early in pre-application process CPL developed a Pre-application Consultation Strategy for the Project. The purpose of developing the Consultation Strategy was to provide a framework for the Applicant's proposed pre-application consultation, including the stages of consultation, the areas and people to be consulted and the consultation activities and methods to be employed.

In preparing the Consultation Strategy the Applicant recognised the need for the pre-application consultation to be meaningful, provide clear and concise information on the Project and ultimately, provide the local community and other consultees with adequate opportunity to consider the emerging proposals and provide feedback.

### 4.1 Consultation objectives

The preparation of the Consultation Strategy was based upon a number of principles, as follows:

- to ensure that the local community and other consultees were aware of the Project,
- to provide clear and concise information on the Project so that people would understand its purpose and what would be involved in its construction and operation,
- to consult widely within the area surrounding the Project site using a range of consultation methods and tools,
- to provide a number of different opportunities for people to comment on the proposals, and
- to facilitate feedback by making it possible for people to submit comments by a variety of methods.

### 4.2 Consultation best practice Advice and Guidance

In preparing the Consultation Strategy the Applicant had regard to the following advice and guidance on pre-application consultation:

- DCLG guidance 'Planning Act 2008: Guidance on the pre-application process' (January 2013),
- PINS Advice Note 2 'Working together on nationally significant infrastructure projects' (April 2012),
- PINS Advice Note 3 'EIA consultation and notification' (July 2013),
- PINS Advice Note 6 'How to submit your application (June 2012),
- PINS Advice Note 7 'Environmental Impact Assessment: screening, scoping and preliminary environmental information (July 2013),

- PINS Advice Note 8 ‘How to get involved in the planning process’ (April 2012),
- PINS Advice Note 11 ‘Working with public bodies in the infrastructure planning process’ (April 2012),
- PINS Advice Note 14 ‘Compiling the consultation report’ (April 2012), and
- PINS Advice Note 16 ‘The developer’s pre-application consultation, publicity and notification duties’ (April 2012).

In addition, to the above, the Applicant also had regard to Selby DC’s Statement of Community Involvement (SCI) (adopted December 2007). In particular, regard was had to the recommended consultation methods set out in the SCI.

#### 4.3 Definition of the Consultation area

Integral to the Applicant’s Consultation Strategy was the definition of an appropriate consultation area. The primary purpose of defining a consultation area was to ensure that the geographical extent of the local community consultation would be adequate given that Section 47 of the 2008 Act requires applicants to consult “people living in the vicinity of the land” of a proposed application for a DCO. It is notable, however, that the term “in the vicinity” is not defined by the Act or the related guidance on pre-application consultation.

The DCLG guidance on pre-application consultation (Planning Act 2008: Guidance on the pre-application process - January 2013) provides some guidance as to the extent of consultation areas for community consultation at paragraph 25. Here the suggestion is that where a project would affect people living within the “wider area” (e.g. through visual or other environmental effects) they should be consulted. Furthermore, at paragraph 39 the guidance in referring to the requirement to consult those living in the vicinity of the land, states that applicants are “*encouraged to consider consulting beyond this where they think doing so may provide more information on the impacts of their proposals (e.g. through visual impacts or increased traffic flow)*”.

In view of the above, the consultation area defined by the Applicant for the purposes of the community consultation (known as the Public Consultation Zone) extended to 10km in all directions (a 10km radius) from the Project site. The Public Consultation Zone was intended to cover not only those communities within the immediate vicinity of the Project site but also those, who although not in close proximity, may be potentially affected by the Project or who may be interested in it. In addition, the extent of the Zone was informed by the initial environmental impact assessment work undertaken on the Project.

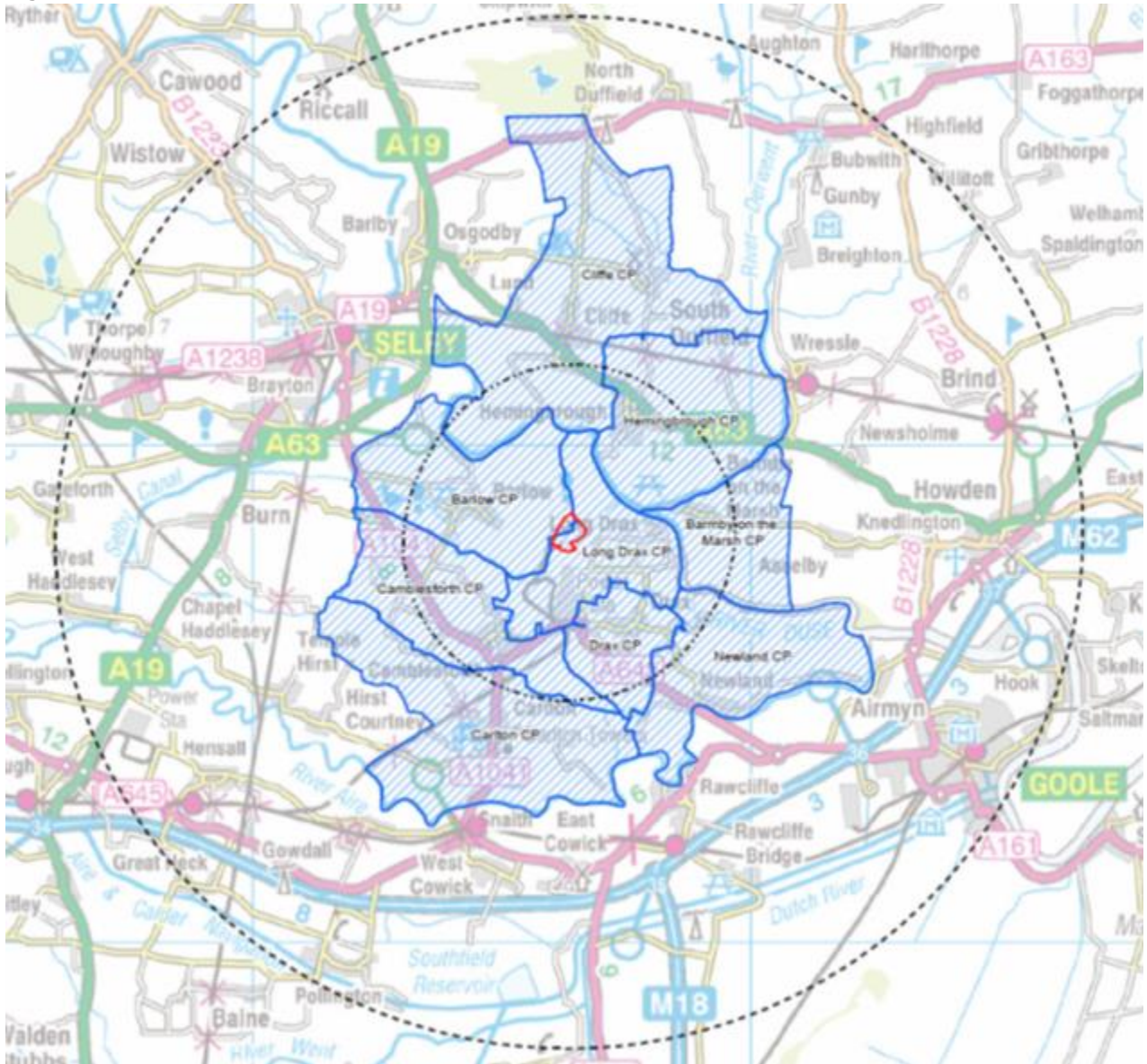
This work indicated that the main environmental effects of the Project (e.g. landscape and visual) would for the most part be confined to this area.

Within the 10km Public Consultation Zone, the decision was taken to define an 'Inner Consultation Zone' extending to a 3km radius from the Project site. This Inner Consultation Zone was considered to represent the area that would be most directly affected by the Project. Within this area therefore, the Consultation Strategy proposed a number of more focused consultation activities, for instance, the distribution of newsletters to businesses and households within the area. This approach was considered appropriate given that this area would be most affected by the construction and operation of the Project.

It was considered that the extent of the Public Consultation Zones set for the community consultation would ensure that people living in the vicinity of the Project site would be adequately consulted in accordance with Section 47. Notwithstanding this, the consultation activities and methods that were employed for the community consultation (e.g. advertising in the regional and local press) ensured that people living well beyond the Public Consultation Zone were made aware of the Project.

The extent of the Public Consultation Zone (10km) and the Inner Consultation Zone (3km) are shown in Figure 4.1 on the following page.

Figure 4.1: Public Consultation Zones



Notes:  
 Outer dotted line denotes Public Consultation Zone (10km)  
 Inner dotted line denotes Inner Consultation Zone (3km)

#### 4.4 Consultation process and methods

The Consultation Strategy set out the broad consultation process for the Project, including the proposed consultation methods to be employed. The following consultation process was outlined:

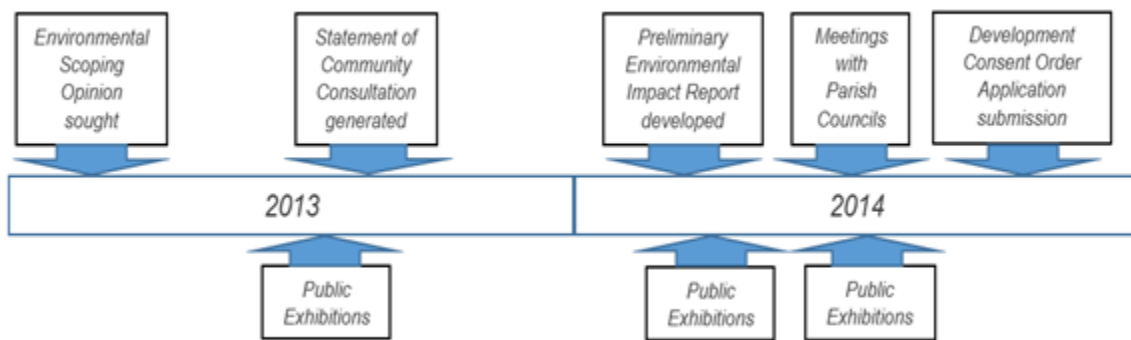
- a first stage of Section 47 community consultation (following EIA scoping), including a number of public exhibitions to introduce the Project,
- a second stage of Section 47 community consultation during which Preliminary Environmental Information (PEI) on the Project would be made available to the community, providing an assessment of the potential environmental effect and mitigation at that point, and then
- around the same time as the second stage of Section 47 consultation, Section 42 consultation of prescribed persons, relevant local authorities and affected and potentially affect persons and landownership interest, with the PEI being made available to these consultees.

Table 4.1 sets out the methods of consultation that were proposed in the Consultation Strategy and a timeline is used to show when these activities took place.

**Table 4.1: Consultation Methods and Activities**

Consultation Methods	Detail of Activities
Dedicated project website	Detailed information about the project and all consultation material will be available on our project website at <a href="http://www.whiteroseccs.co.uk">www.whiteroseccs.co.uk</a> . The website will be updated as the project progresses to ensure that the information included on the site remains up to date. A copy of this SOCC background document and the published SOCC will be available on the website along with all display panels used for public exhibitions (the public exhibition display stands are shown in Appendix A) Stakeholder and public consultation feedback will also be captured via the website.
Adverts and posters to promote exhibitions	Notifies and provides details of the exhibitions. Posters to be placed in public areas, including libraries and other agreed public locations. Adverts will be placed in the local media including the Selby Times, Selby Post, Goole Times, Goole Courier and Yorkshire Post.
Public exhibitions	A series of public exhibitions will be held to present the project and invite feedback. Proposed venues: Drax Sports & Social Club, near Drax Power Station Selby Town Hall Other locations outside Selby, including Goole, will be identified for events. These will be discussed and agreed with the relevant councils at later stages in the planning process.
Media relations	Dialogue with key local publications to issue press releases at key milestones or notify of project progress, including publication of the SOCC.
Community and business briefings	Contact with elected representatives (MPs, Councillors etc.) and community and business groups to offer briefing meetings and increase awareness of the public exhibitions. Established forums and meetings will be used, where possible. These are likely to include the Selby Community Engagement Forums established by Selby DC.

Consultation Methods	Detail of Activities
Stakeholder workshops	Targeted workshops and presentations on particular topics relating to the application (Appendix B). Requests for meetings from identified communities, leisure and interest groups will be accommodated where possible.
Public accessibility to project documents	Consultation and other pre-application project documents will be made available to view free of charge at locations within the consultation zone. Proposed locations: Access Selby, 8-10 Market Cross, Selby YO84JS Selby Civic Centre Selby Library
Link with National Grid Carbon Limited CO <sub>2</sub> pipeline consultation	Public exhibitions promoting the White Rose CCS will also be attended by members of NGCL (and vice versa) to provide an opportunity to discuss the linkages between the two projects. The consultation programmes for the two projects, however, remain distinct and separate, and will be managed by their respective promoters.



#### 4.5 Recording, Analysing and Responding to Consultation

The Consultation Strategy confirmed that at all stages of the relevant consultation period people would be provided with a number of options for providing written feedback on the Project. This would include the opportunity to complete feedback forms/questionnaires at the consultation events, return these to a Freepost address or complete an online form on the Project website.

The Consultation Strategy also confirmed that the responses received to consultation would be recorded and considered by the Applicant.

Furthermore, how responses have shaped the Project would be reported and where suggested changes could not be accommodated, reasons would be provided. This would be set out in a Consultation Report that would form part of the application submitted to the SoS for a DCO. In addition, email replies were made to queries and questions raised.



## 5 Non-Statutory Consultation

The non-statutory consultation on the Project was carried out by the Applicant from the early part of 2013, with a number of community consultation events and briefing/meetings with key consultees in June and July 2013. The primary purpose of this consultation was to introduce the Project and initial proposals to the local community and key consultees and raise awareness of the Project generally.

The responses to this non-statutory consultation were reviewed by the Applicant, however, due to the early stage of the Project; and the fact that this consultations was aimed at informing people of the proposals and what was proposed in terms of statutory consultation (in accordance with Sections 42, 47 and 48) later in the pre-application process; the responses were not therefore taken into account in the same manner as the statutory consultation undertaken.

### 5.1 Who was consulted?

Local residents living within the vicinity of the Project site were consulted, in addition to a number of local political representatives (e.g. parish, district and county councillors). In addition, the following key consultees were consulted:

- Selby DC;
- NYCC;
- ERYC;
- The Environment Agency (EA); and
- Natural England.

### 5.2 How were they consulted?

The local community were consulted by a number of methods, including a newsletter that was sent to approximately 4,000 businesses and households within the vicinity of the Project site on 4 July 2013.

In addition, the Applicant issued a press release on 8 July 2013 to the Yorkshire Post, Yorkshire Evening Post, The Press, Selby Times, Selby Courier, Goole Times and Goole and Howden Courier and placed adverts in a number of these papers to publicise the dates and times of a number of public exhibitions. Posters were also used to publicise the exhibitions. Posters were located at the Access Selby Office, Goole Junction, Selby Library, Goole Library, Howden Library, Snaith Library and Drax Sports and Social Club. On the day of the public exhibitions posters were placed at high footfall and visible locations at and close to the venues.

As referred to above, the local community were also consulted on the Project through a number of public exhibitions that were held in July 2013.

Meetings took place with the key consultees to introduce the Project. These consultees were identified as those who would be most likely to be interested in the Project and involved throughout the pre-application process.

### 5.3 What were they consulted upon/what information was provided?

The local community and local political representatives were provided with information on the background to the Project and the initial proposals. Much of this information was provided through the public exhibitions.

The meetings with the key consultees generally followed a similar format based on the PowerPoint presentation and covered the following:

- Project update, including the position with regard to DECC's CCS commercialisation programme:
  - overview of the technology and plant layout
  - programme for moving forward
- Outline of the proposed statutory consultation, including:
  - the development of the PEIR and the process for consulting upon this
  - Selby DC and NYCC involvement
  - approach to technical engagement
- The DCO:
  - the DCO and its mechanisms
  - Selby DC and NYCC involvement
  - wrapping up other consents in the DCO

Discussions regarding the Project were of a general nature, although those with the EA focused upon a number of specific topics, including water abstraction, geology and hydrogeology and ecology. In addition, there has been discussion from the outset regarding the methodology and route for meeting the Environmental Permitting (EP) Regulations and the timescales associated with this.

### 5.4 When did the consultation take place

The main consultation activities took place as follows:

- newsletter and press releases/adverts publicising the Project to the local community and also the public exhibitions - early July 2013,
- public exhibitions at Drax Sports and Social Club on 15 July 2013, Selby Town Hall on 16 July 2013 and the Junction, Goole on 17 July 2013, and
- meetings at Drax Power Station with East Riding of Yorkshire Council on 23 March 2013, Selby DC and NYCC on 18 July 2013, Natural England on 5 August 2013 and the EA on 6 August 2013.

As the consultation was non-statutory consultation, no deadline was set for the receipt of comments.

### 5.5 How could feedback be provided

The consultation materials (e.g. newsletter, press releases, adverts, poster and exhibition brochure) informed the local community and local political representatives that feedback on the Project could be provided by the following means:

- requesting a Freepost feedback form/questionnaire by calling Freephone: 0800 169 5290,
- providing feedback via the project website: [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk),
- sending an email to: [info@whiteroseccs.co.uk](mailto:info@whiteroseccs.co.uk), and
- providing feedback at the public exhibitions.

The feedback form/questionnaire was made available on the website and also at the public exhibitions. Consultees were invited to provide feedback.

### 5.6 Response to the consultation

A total of 112 people signed into the public exhibitions held in July 2013. Of those who signed into the exhibitions, 81 returned completed feedback forms/questionnaires. Of these, 76% were in favour of the proposals, while only 5% were opposed. A further 18% expressed a neutral view.

## 6 Statutory consultation: identifying consultees

This section explains how the Applicant has identified those persons and bodies who there was a statutory duty to consult and confirms who was consulted. It also lists those other persons who there was no statutory duty to consult (referred to as non-prescribed consultees), but who the Applicant considered should be consulted as they may be interested in the Project.

### 6.1 Section 42 “Duty to consult”

Section 42 of the 2008 Act confirms that the applicant must consult the following about a proposed application for a DCO:

- S.42(a) - such persons as may be prescribed,
- S.42(aa) - the Marine Management Organisation, in any case where the project would affect, or would be likely to affect, any of the areas specified in subsection (e.g. tidal or offshore areas),
- S.42(b) - each local authority that is within S.43,
- S.42(c) - the Greater London Authority if the land is in Greater London, and
- S.42(d) - each person who is within one or more of the categories set out in S.44.

### 6.2 Section 42(a) – Such persons as may be prescribed

‘Such persons as may be prescribed’ (hereafter referred to as prescribed consultees) were initially identified by reference to Schedule 1 of the APPF Regulations, which lists all prescribed consultees and the circumstances where they must be consulted about a proposed application for a DCO. In doing so, the Applicant took into account the changes made to Schedule 1 as a result of ‘The Infrastructure Planning (Prescribed Consultees and Interested Parties etc.) (Amendment) Regulations 2013’.

In addition, the Applicant had regard PINS Advice Note 3 ‘EIA consultation and notification’ (July 2013), which provides advice and guidance on the identification of prescribed consultees. In identifying those to consult, the Applicant applied the ‘Circumstances Test’ set out in Annex 1 of Advice Note 3. Where there was any uncertainty or doubt as whether or not to include a consultee, the Applicant erred on the side of caution and included that consultee on the list of those to be consulted.

In identifying prescribed consultees, the Applicant also reviewed bodies notified by PINS under EIA Regulation 9(1)(a) which PINS confirmed with the Scoping Opinion in January 2013.

Entry No. 48 on Schedule 1 refers to the need to consult 'Relevant statutory undertakers' where applications are likely to affect their functions as statutory undertakers. Statutory undertakers were identified with reference to Annex 1 of PINS Advice Note 3. In addition, the Applicant's land agents, TerraQuest, were instructed to identify statutory undertakers who may have apparatus and/or land interests either within or adjoining the Order Limits.

### 6.3 Section 42(b) – Each local authority that is within S.43

The relevant local authorities to consult were identified by applying Section 43, subsections (1), (2) and (2A).

Section 43(1) confirms that a local authority is within Section 43 if the land (to which the application relates) is in that authority's area.

Section 43(2) goes on to state that a local authority (the 'A' authority) is within this section if:

- (a) the land is in the area of another authority (the 'B' authority);
- (aa) 'B' is a unitary council or a lower tier district council; and
- (b) any part of the boundary of 'A's' area is also part of the boundary of B's area.

Subsection (2A) states that if the land is within the area of an upper-tier county council (a 'C' authority), a local authority (a 'D' authority) is within this section if:

- (a) 'D' is not a lower-tier district council; and
- (b) any part of the boundary of 'D's' area is also part of the boundary of 'C's' area

### 6.4 Section 42(d) – Each person in one or more of the categories set out in Section 44

Section 44 defines the categories of persons to be consulted for the purposes of Section 42(d). These are as follows:

- Category 1 - an owner, lessee, tenant (whatever the tenancy period) or occupier of the land;
- Category 2 - a person interested in the land, or who has the power to sell and convey the land, or to release the land; and
- Category 3 - if the applicant thinks that, if the DCO were to be made and fully implemented, the person would or might be entitled (a) as a result of the implementing of the order, (b) as a result of the order having been implemented, or (c) as a result

of use of the land once the order has been implemented, to make a relevant claim.

A 'relevant claim' is defined by Section 44 subsection (6) as meaning:

- (a) a claim under Section 10 of the Compulsory Purchase Act 1965 (c.56) (compensation where satisfaction not made for the taking, or injurious affection, of land subject to compulsory purchase);
- (b) a claim under Part 1 of the Land Compensation Act 1973 (c.26) (compensation for depreciation of land value by physical factors cause by use of public works); and
- (c) a claim under Section 152(3) of the 2008 Act (compensation in case where no right to claim in nuisance).

Section 44 places a duty on the applicant to make 'diligent inquiry' as to the identification of any Category 1, 2, or 3 persons (from now on referred to as Section 44 persons). The term 'diligent inquiry' is not defined for the purposes of the 2008 Act. It sets a threshold of inquiry to allow the termination of that inquiry when all reasonable and recognised avenues of research have been exhausted. Where an unknown interest exists, searches at the Land Registry, searches for registered correspondence to the address (where appropriate), site visits and electoral searches are required. If an interest is identified as 'unknown' and reasonable inquiry has been carried out a notice must be posted on or adjacent the land in question.

TerraQuest were instructed by the Applicant to assist in the identification of Section 44 persons through land referencing work. Initially a large number of potential Section 44 persons were identified, including those people living in the nearby village of Barlow, who it was initially considered may be affected by noise from the Project. As a result of this, all those persons were consulted pursuant to Section 42 in July and August 2014.

Following further enquiries made by TerraQuest and the completion of the noise modelling work (which confirmed that the majority of residents of Barlow would not be adversely affected by noise) it became possible to more accurately define the list of Section 44 persons. The first step of this exercise involved making an official search of the Land Registry and acquiring title information from land registry documents. Using this data, all registered titles in the land, all registered proprietors and relevant land interests were recorded. Also, enquires were sent to the local councils with regards to planning, property and highways land. Finally, land interest questionnaires were issued to all parties identified as being within Category 1 to ascertain any incomplete title information.

Site notices were also erected around the Project site in areas close to landownership interests where the owner/beneficiary of the land was not known or where an owner/beneficiary had been identified but it was not certain that they were the only relevant person. The final list of Section 44 persons is shown in the Book of Reference which was submitted as part of the DCO.

### 6.5 Non-prescribed consultees

As confirmed above, the Applicant took the decision to consult a number of 'non-prescribed' consultees, who although there was no statutory duty to consult, it was considered may be interested in the Project. These non-prescribed consultees were consulted at the start of the Section 42 consultation in June 2014 and were consulted in the same manner and provided with the same information as if they had been Section 42 consultees.

The non-prescribed consultees were identified through a variety of means, including stakeholder mapping carried out by Pendragon PR (Appendix C), discussions with relevant local authorities and through dialogue with community, business and other groups. The non-prescribed consultees encompass a range of national, regional and local organisations and groups, including government departments and agencies with responsibilities for energy, business organisations, environmental, wildlife and access groups, farming industry representatives and parish councils that are not relevant parish councils for the purposes of Section 42 but which lie within the Public Consultation Zone.

Responses received from non-prescribed consultees have been treated in the same manner as those received from the Section 42 consultees.

### 6.6 Section 47 "Duty to consult local community"

Section 47 of the 2008 Act places a duty on the applicant to consult the local community, that is, the people living within the vicinity of the land to which the application for a DCO relates. What is meant by "within the vicinity of the land" is not defined by the Act. Before consulting with the local community, the applicant must prepare a SoCC setting out how they intend to consult the local community. The relevant local authorities must be consulted on the SoCC and once it has been finalised it must be made available for public inspection and publicised in a local newspaper. The community consultation must then take place in accordance with the SoCC.

In terms of who to consult within the local community, a consultation area was defined within the SoCC for the community consultation pursuant to Section 47. The extent of this 'Public Consultation Zone' was defined to ensure that those communities within the immediate vicinity of the Project site, as well as those further away, which may be potentially affected by or who may be interested in the Project, were included in the community consultation. The extent of the Public Consultation Zone was also informed by the initial environmental impact assessment work on the Project. The resulting Public Consultation Zone extended 10km from the Project site in all directions and the consultation activities set out in the SoCC focused upon the residents living within this area, as well as local businesses, groups and organisations.

In addition, a stakeholder mapping exercise was undertaken by the Applicant's public relations consultants, Pendragon PR, to identify local community, business and other groups and organisations within the Public Consultation Zone, so that these could also be included in the community consultation. In some cases these groups and organisations were the subject of targeted consultation, such as briefing meetings and workshops.

It is considered that the extent of the Public Consultation Zone set for the community consultation ensured that "people living within the vicinity of the land" were adequately consulted. In many cases, the consultation activities and methods employed for the community consultation (e.g. advertising in the regional and local press) actually resulted in the Project being publicised well beyond the 10km Zone.

#### **6.7 Section 48 "Duty to publicise"**

Section 48 of the 2008 Act places a duty on the applicant to publicise a proposed application for a DCO in the 'prescribed manner'. The prescribed manner for publicising an application is set out in the APFP Regulations (Regulation 4). This requires the applicant to publish a Section 48 notice providing details of the application in national and local newspapers and other specified publications.

The Applicant has publicised the Project in accordance with Section 48 and this is described at Section 10. However, no responses were received to the Applicant's Section 48 publicity and therefore no consultees were identified as a result of this publicity.



## 7 Section 47: Preparation of the Statement of Community Consultation

Section 47 of the 2008 Act places a duty upon applicants for a DCO to consult the ‘local community’. Subsection (1) requires the applicant to prepare a statement (a Statement of Community Consultation) setting out how it proposes to consult people living within the vicinity of the land to which the application relates.

Subsection (2) goes on to state that in preparing the Statement of Community Consultation (the SoCC) the applicant must consult each local authority that is within Section 43(1) about what is to be in the statement. Section 43(1) states that a local authority is within this section if the land (to which the application relates) is in the authority’s area. The Project site lies within the administrative area of Selby DC, which is a lower tier local authority lying within the administrative area of NYCC. As such, the Applicant was required to consult both Selby DC and NYCC on the preparation of its SoCC.

Under subsection (3) the applicant must provide the Section 43(1) authority(ies) with a period of 28 days (beginning with the day after the authority receives the draft SoCC) to respond to the consultation, while subsection (5) requires the applicant to have regard to any response received before this deadline. The applicant must then make the SoCC available for inspection by the public and publish a notice in a newspaper circulating within the vicinity of the land to which the application relates, stating where and when the SoCC can be inspected (subsection (6)). Subsection (7) requires the consultation to be carried out in accordance with the proposals set out in the SoCC.

This section sets out the approach that has been taken by the Applicant to the preparation of its SoCC, the consultation that has taken place with the Section 43(1) authorities and others authorities, the feedback received, the changes made to the SoCC and finally, how it was publicised and made available to the local community.

### 7.1 Background to the preparation of the SoCC

The draft SoCC was based upon an early draft SoCC, which had been appended to the Applicant’s ‘Pre-application Consultation Strategy’ (the Consultation Strategy).

The draft SoCC adopted the ‘Public Consultation Zone’ defined in the Consultation Strategy with a radius of 10km from the Project site, with an ‘Inner Public Consultation Zone’ of 3km radius from the site. Section 47 requires the applicant to consult people “living within the vicinity” of the land to which the application relates. It does not, however, define by what is meant by “vicinity”.

The 10km Zone was defined to cover those communities within the immediate vicinity of the Project site but also to capture those, who although not in close proximity, may be potentially affected by or who may be interested in the Project. The extent of the 10km Zone was also informed by the initial environmental impact assessment work on the Project, which indicated that its likely significant environmental effects in relation to matters such as air quality, landscape and visual would be confined to this area.

The 3km Zone was considered to represent the area that would be most directly affected by the Project and which should be subject to more targeted consultation activities, such as the distribution of newsletters.

The draft SoCC set out a range of methods that it was proposed would be used to consult the local community. These included providing updates on the Project website; holding exhibitions, presentations and workshops; advertising consultation events through the local press; displaying notices and posters throughout the Public Consultation Zone; distributing newsletters/information leaflets to all businesses and households within the Inner Public Consultation Zone; displaying consultation documents at accessible venues within the Public Consultation Zone; and engaging with community groups, local business interests and local political representatives.

## 7.2 Statutory consultation on the Draft SoCC

The Applicant first issued a draft of the SoCC for consultation pursuant to Section 47 of the 2008 Act on the 3 April 2012. The draft SoCC issued to Selby DC and NYCC. Officers at NYCC subsequently verbally confirmed that they would be content for Selby DC to provide comments on the draft SoCC.

Selby DC responded in a letter dated the 17 May 2012 confirming that the draft SoCC was clear and understandable, provided adequate coverage across the areas concerned, identified the correct communities, correct media to place adverts within, with effectively reaching and engaged with hard to reach groups and accorded with the authority's expectations in terms of its own Statement of Community Involvement (SCI) and the 2008 Act and related guidance on pre-application consultation.

The Applicant issued a further draft SoCC for consultation pursuant to Section 47 on 13 December 2012 to Selby DC, NYCC and the North York Moors National Park Authority. The correspondence advised that

the further draft SoCC had been prepared following consultation on the draft of the SoCC issued in April 2012.

The correspondence sent to the local authorities confirmed that any comments on the draft SoCC should be received by the Applicant within 28 days of the date of receipt of the SoCC (a deadline of 11 January 2013 was stated). The statement in the correspondence that referred to the need for responses to be made “within 28 days of the date of receipt of the SoCC” was incorrect, as Section 47 requires applicants to provide at least 28 days starting with the day after the receipt of the draft SoCC for the receipt of responses. However, in giving a deadline of 11 January 2013, the Applicant did provide the authorities within sufficient time to respond (11 January 2013 gave 29 days from the day after the receipt of the draft SoCC, which was 14 December 2012).

### 7.3 Non-statutory consultation on a revised Draft SoCC

Following statutory consultation on the draft SoCC in April/May 2012 and in December 2013/January 2013, it was not possible to publish the final SoCC until January 2014. This was a consequence of DECC requiring the Applicant to go through a further bid evaluation process (at this stage four projects were still being considered by DECC for financial support) with the aim being to select two preferred projects that would potentially receive funding for consenting and engineering design. At the time of preparing the Consultation Strategy and the draft SoCC, the Applicant had not known it would be necessary for the Project to go through this process.

As a result of the bid evaluation, the decision was taken to place the publication of the final SoCC and the statutory S.47 community consultation (in addition to the S.42 consultation and S.48 publicity) on hold as there was not sufficient certainty that the Project would proceed to the consenting and detailed design stage. However, during this period, the Applicant did carry out non-statutory consultation on the Project. This took place in summer 2013 alongside EIA scoping.

Following DECC’s decision to select the Project as one of the two preferred projects to potentially receive funding, there was a period of negotiation relating to the FEED contract. Agreement was subsequently reached with DECC and the FEED contract was awarded in December 2013, at which point the decision was taken to review the draft SoCC, and subject to this, publish it and move forward with the statutory consultation. As a result of this review the following changes were made to the draft SoCC:

- reference to the NGCL CO<sub>2</sub> pipeline being a separate project for clarity;
- inclusion of reference to the non-statutory public consultation and public exhibitions that had taken place in July 2013;
- updated text on EIA scoping to refer to the fact that PINS had issued an EIA Scoping Opinion; and
- updated text explaining the stages of S.47 community consultation.

No changes were made in terms of the Public Consultation Zones or the proposed methods of consultation. Due to the minor nature of the changes made to the draft SoCC, it was not considered necessary by the Applicant to carry out another stage of statutory consultation on the document. However, the decision was taken to informally consult (this was non-statutory consultation) Selby DC, NYCC and East Riding of Yorkshire Council on the revised draft SoCC. A copy of the revised draft SoCC was sent to these authorities on 3 January 2014 by email. The email confirmed that the Applicant was intending to publish the SoCC in the relevant newspapers in the third week of January 2014.

#### 7.4 Publication of the SoCC Notice and final SoCC

The SoCC was finalised following the receipt of the responses from the local authorities to the non-statutory consultation on the revised draft SoCC. The SoCC Notice advised that the full SoCC was available to inspect, free of charge, from 30 January 2014 on the Project website and at various local venues. The finalised SoCC is shown in Appendix D.

The SoCC Notice also confirmed that requests for a copy of the final SoCC could be made by writing to the Project Freepost address, using the email address or telephoning the Freephone number.

The final SoCC confirmed that the Project is EIA development and that PEI would be made available as part of the second stage of statutory Section 47 consultation.

## 8 Section 47: Duty to Consult Local Community

This section sets out the local community consultation that has taken place in respect of the Project in accordance with Section 47 'Duty to consult local community' of the 2008 Act. This consultation was undertaken in accordance with the consultation approach and methods set out in the final SoCC. The compliance of the consultation with the SoCC is considered further below.

Two stages of Section 47 consultation were undertaken by the Applicant, referred to as 'Stage 1' and 'Stage 2' consultation.

The Stage 1 - Section 47 consultation took place in Spring 2014 and provided an update on the Project following the non-statutory consultation carried out in summer 2013. It also included a number of public exhibitions within the vicinity of the Project site to provide people with the opportunity to view the latest proposals for the Project and comment upon these.

The Stage 2 - Section 47 consultation took place in Summer 2014. It broadly coincided with the publication of the first Section 48 Notice and also the Section 42 consultation. The Stage 2 consultation was used to seek views of the final proposals for the Project. Again, a number of public exhibitions were held within the vicinity of the Project site.

### 8.1 Who was consulted?

#### 8.1.1 Stage 1

A 'Spring 2014 Update' newsletter was sent out on 4 April 2014 to approximately 4,000 businesses and households living within the 3km Inner Public Consultation Zone. The newsletter was also sent to other community stakeholders and local political representatives within the remainder of the consultation area.

A number of adverts were placed in regional and local newspapers advertising the Stage 1 consultation.

These newspapers are circulated across the Public Consultation Zone (10km zone) and these ensured that people beyond the 3km Zone were made aware of the consultation. A number of other methods were employed to advertise the consultation. These are explained further below.

#### 8.1.2 Stage 2

A 'Summer 2014 Update' newsletter was sent out on 4 July 2014. Again, this was sent to approximately 4,000 businesses and

households within the 3km Zone in addition to other community stakeholders and local political representatives.

As with the Stage 1 consultation, adverts were placed in local newspapers to ensure publicity across the 10km Public Consultation Zone. Additional publicity was also provided across the Public Consultation Zone by the first Section 48 Notice, which was published in a national newspaper and local newspapers, with an additional notice (providing the same information as the Section 48 Notice) being published in the main run of the Yorkshire Post at the same time. A number of other methods were employed to advertise the consultation. Again these are explained below.

## 8.2 How were they consulted?

### 8.2.1 Stage 1

As confirmed above, a 'Spring 2014 Update' newsletter was sent to businesses and households within the 3km Zone and also to other community stakeholders and local political representatives within the 10km Public Consultation Zone on 4 April 2014.

A press release was issued on 8 April 2014 to the Yorkshire Post, Yorkshire Evening Post, The Press, Selby Times, Selby Courier, Goole Times and Goole and Howden Courier advising people of the consultation and the venues and times for the public exhibitions. Adverts were placed in local newspapers advising people of the consultation, the venues for the public exhibitions, inviting feedback and also providing details of how feedback could be provided.

Press articles also appeared in the Yorkshire Post First and Selby Times, both on 17 April 2014, relating to the consultation and the proposals.

In addition to the above, posters were erected at a number of publically accessible venues within the 10km Public Consultation Zone publicising the consultation. Posters were located at the Access Selby Office, Goole Junction, Selby Library, Goole Library, Howden Library, Snaith Library and Drax Sports and Social Club. This is the complete list of locations where posters were erected. On the day of the public exhibitions posters were placed at high footfall and visibility locations at and close to the venues. At the Selby Town Hall exhibition, A1 sized posters displayed at the front of the building were clearly visible to passing motorists and pedestrians. A3 sized posters were attached to lampposts along the length of Gowthorpe, Selby's high street. At the Goole Junction exhibition, A1 sized posters displayed at the front of the

building were clearly visible to passing pedestrians. A3 sized posters were attached to lampposts in nearby shopping areas including Boothferry Road and Edinburgh Street. At the Drax Sports and Social Club exhibition, A1 sized posters displayed at the club entrance were clearly visible to passing motorists.

The Project website was utilised to promote the consultation, both as a home page headline article and on the dedicated public consultation page.

### 8.2.2 Stage 2

A 'Summer 2014 Update' newsletter was sent to over 4,000 businesses and households within the 3km Zone and also to other community stakeholders and local political representatives on 4 July 2014. The newsletter was accompanied by Freepost postcards. Only four returned postcards were received.

As with the Stage 1 consultation, a press release was issued on 10 July 2014 to the Yorkshire Post, Yorkshire Evening Post, The Press, Selby Times, Selby Courier, Goole Times and Goole and Howden Courier advising people of the consultation and the venues and times for the public exhibitions. Adverts were also placed in a number of local newspapers advising people of the consultation, the venues for the public exhibitions, inviting feedback and also providing details of how feedback could be provided.

The first Section 48 Notice was also published in late June/early July 2014 in a national paper and regional and local papers, providing wider publicity of the consultation to the local community and general public. This included a notice in the Yorkshire Post on 26 June 2014. It was not therefore considered necessary to advertise the consultation further in the Yorkshire Post. Further information on the Section 48 Notices that have been published in respect of the Project is provided at Section 10.

Press articles also appeared in the Selby Times on 10 July 2014, relating to the consultation and the proposals.

Again, as with the Stage 1 consultation, posters were erected at a number of publically accessible venues within the Consultation Area publicising the consultation. Again, posters were located at the Access Selby Office, Goole Junction, Selby Library, Goole Library, Howden Library, Snaith Library and Drax Sports and Social Club. On the day of the public exhibitions posters were placed at high footfall and visibility locations at and close to the venues.

The project website was utilised to promote the consultation, both as a home page headline article and on the dedicated public consultation page. This was also used to promote the Stage 1 consultation.

Project presentations were given to Selby DC on 24 June 2014, Goole Town Council on 3 July 2014 and were also made to a number of parish councils located within the 3km Zone and along the identified construction transport route.

### 8.3 What were they consulted upon/what information was provided?

#### 8.3.1 Stage 1

The 'Spring 2014 Update' newsletter provided a reminder of what the Project comprises, who the Applicant is, a description of what CCS is and information on national CCS policy and how the DCO process works. In addition it provided an update on the responses received to the non-statutory consultation carried out in Summer 2013 and information on the latest proposals, the EIA work being undertaken to inform the final design of the Project, the dates and venues for the public exhibitions and how to comment on the proposals.

Further information on the above matters was provided at the public exhibitions held in April 2014 through the exhibition panels and a published guide to the Project was also made available to visitors. The exhibition boards also provided details on the appearance of the Project, its construction and operation and anticipated community benefits.

The newsletter, press adverts, public exhibition panel boards and published information guide referred to further information on the Project being available on the Project website and gave the website address.

Large scale maps of the Project site and diagrammatic images of the Project and CCS technology processes were also provided at the exhibitions.

#### 8.3.2 Stage 2

The 'Summer 2014 Update' newsletter provided a further update to the community on the Project, including the progress being made with the EIA work. The newsletter, along with the information provided at the July 2014 public exhibitions (which included a Project guide and the information that was provided to the Section 42 consultees) presented



the final consultation stage proposals for the Project and sort people's view upon these.

As confirmed above, the documents sent to the Section 42 consultees were made available to the public at the public exhibitions and were also made available at a number of inspection locations within the 10km Public Consultation Zone and on the Project website. These documents made available included:

- a Site Location Plan;
- a plan showing the extent of the Project site outlined in red; and
- a PEIR, comprising a number of technical reports relating to the key environmental topics being assessed as part of the EIA for the Project and a Non-Technical Summary of the PEIR.

As with Stage 1, the Stage 2 newsletter, press adverts and public exhibition panel boards and published information guide referred to further information on the Project being available on the Project website.

Large scale maps of the Project site and diagrammatic images of the Project and CCS technology processes were also provided at the exhibitions.

#### 8.4 When did the consultation take place/deadlines for responses

##### 8.4.1 Stage 1

The Stage 1 consultation was launched by the 'Spring 2014 Update' newsletter that was sent out on 4 April 2014 and the adverts published in the regional and local newspapers on 10 and 11 April 2014. During the Stage 1 consultation the following public exhibitions took place:

**Table 8.1: Stage 1 Public Exhibitions**

Venue	Date & Times
Drax Sports and Social Club, Main Road, Selby, North Yorkshire, YO8 8PF	Tuesday 15 April 2014 - 2pm to 8pm
Junction, Paradise Place, Goole, East Yorkshire, DN14 5DL	Wednesday 16 April 2014 - 2pm to 8pm
Selby Town Hall, York Street, Selby, North Yorkshire, YO8 4AJ	Thursday 17 April 2014 - 2pm to 8pm

The Stage 1 newsletter, posters, public exhibition panel boards and Project website (people were directed to the latter through the newsletter, press adverts and exhibition boards) stated that the consultation period was to end on 26 May 2014.

8.4.2

Project documents could also be viewed and downloaded at the Project website.

Stage 2

The Stage 2 consultation was launched by the ‘Summer 2014 Update’ newsletter that was sent out on 4 July 2014 and the adverts published in the local newspapers on 3 July 2014. During the Stage 2 consultation the following public exhibitions took place:

**Table 8.2: Stage 2 Public Exhibitions**

Venue	Date & Times
Selby Town Hall, York Street, Selby, North Yorkshire, YO8 4AJ	Tuesday 15 July 2014 - 2pm to 8pm
Junction, Paradise Place, Goole, East Yorkshire, DN14 5DL	Wednesday 16 July 2014 - 2pm to 8pm
Drax Sports and Social Club, Main Road, Selby, North Yorkshire, YO8 8PF	Thursday 17 July 2014 - 2pm to 8pm

The Stage 2 newsletter, press adverts and posters advised that the consultation period was to run from 4 July to 1 August 2014. The public exhibition panel boards and Project website (people were directed to the website by the newsletter, press adverts and exhibition boards) clearly stated that the end date for the consultation was 1 August 2014. It was also made clear that consultation responses should be received by 1 August 2014.

Furthermore, the first Section 48 Notice was published in late June/early July 2014 (along with the notice in the main run of the Yorkshire Post), so as to broadly coincide with the Stage 2 Section 47 consultation and provide wider publicity for the Project within the local community and to the public generally.

The Section 48 (and Yorkshire Post) notices provided details of a number of inspection locations within the Public Consultation Zone where information on the Project, including the documents sent to the Section 42 consultees, could be inspected. It confirmed that the documents would be available to inspect at these venues until 1 August 2014 and that any consultation responses must be received by 5pm on the same day.

## 8.5 How could feedback be provided

### 8.5.1 Stage 1

The Stage 1 newsletter confirmed that feedback on the Project could be provided by the following means:

- requesting a Freepost feedback form by calling Freephone: 0800 169 5290,
- providing feedback via the project website: [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk),
- sending an email to: [info@whiteroseccs.co.uk](mailto:info@whiteroseccs.co.uk), and
- providing feedback at the public exhibitions.

The newsletter, press adverts and posters also directed people to the Project website, which provided guidance on how to respond to the consultation.

### 8.5.2 Stage 2

The Stage 2 newsletter advised that feedback could be provided by the same methods as set out in section 8.5.1 above, as did the press adverts. The newsletter, adverts and posters also directed people to the Project website.

In addition, the notice placed in the main run of the Yorkshire Post confirmed that comments could be submitted via the Project website, email and Freepost addresses and Freephone telephone number.

## 8.6 Response to the consultation

### 8.6.1 Stage 1

A total of 71 people attended the public exhibitions held on 15-17 April 2014. All were given the opportunity to view exhibition panels and members of the Project team were available to answer questions. All visitors were asked to complete a feedback form.

A total of 57 completed feedback forms were received in response to the Stage 1 consultation, the majority of which were received by the end of the final exhibition.

Question 10 on the feedback form asked people what their views were on the Project. The breakdown of the response to this question is reproduced below:

- very positive - 13 (22.8%),
- positive - 31 (54.4%),
- neutral - 9 (15.8%),
- negative - 0 (0%),
- very Negative - 0 (0%), and
- no response - 4 (7%).

Question 12 asked if the information provided on the Project had helped people to understand it better. The overwhelming response to this was 'Yes' (49 of 57 respondents or 86%).

### 8.6.2 Stage 2

A total of 62 people attended the public exhibitions held on 15-17 July 2014. Again, all were given the opportunity to view exhibition panels and speak to members of the Project team. A total of 45 completed feedback forms were received in response to the Stage 2 consultation.

Question 10 on the feedback form asked people what their views were on the Project. The breakdown of the response to this question is reproduced below:

- very positive - 19 (42.2%),
- positive - 16 (35.6%),
- neutral - 3 (6.7%),
- negative - 1 (2.2%),
- very Negative - 0 (0%), and
- no response - 6 (13.3%).

The July 2014 survey report therefore confirms that the overwhelming majority of people still had positive or very positive views on the Project. In fact, the combined percentage of people stating that they had a 'Positive' or 'Very Positive' view had increased significantly, with a greater percentage expressing a 'Very Positive' view. This is arguably indicative of the greater level of awareness of the Project amongst the local community since the non-statutory and Stage 1 Section 47 consultation and its benefits in terms of carbon dioxide emissions reduction and community benefits. Again, there was a very positive response to Question 12, with 84.4% conforming that the information provided had aided better understanding of the Project. The Stage 2 newsletter was accompanied by Freepost postcards for people to return comments. Only four of these were returned. A summary of the issues raised by the local community, is provided in Table 12.1 at Section 12, along with an account as to how the Applicant has had regard to these.

## 8.7 Compliance with the SoCC

Table 8.3 demonstrates how the Section 47 consultation undertaken by the Applicant has complied with what the Applicant set out and committed to in the SoCC.

**Table 8.3: Compliance with the SoCC**

SoCC Commitment	What was done
Consulting within an area of 10km around the Project site with a focus on the areas closest to the site	The consultation activities and methods set out in the SoCC have taken place within the 10km Public Consultation Zone, with a focus on the areas (the 3km Zone) closest to the site. Consultation activities within the 10km Public Consultation Zone have included adverts and press releases in local newspapers and posters advertising the S.47 community consultations and public exhibitions. In addition, newsletters were sent to properties within the 3km Zone, parish council areas wholly or partly within this Zone and along the proposed construction transport route as part of focusing on areas closest to the site/most likely to be affected.
Providing Project updates on the website	The Project website was updated ahead of community consultations on both the home page and the dedicated public consultation page
Holding exhibitions, presentations and workshops at venues in Selby and Goole	Six public exhibitions were held at Selby, Goole and Drax for both the Stage 1 and Stage 2 - S.47 consultation. Workshops were advertised as part of the Stage 2 - S.47 public exhibitions held in July 2014 (held daily at 3pm and 7pm) and presentations were given to Selby DC, Goole Town Council and parish councils located within the 3km Zone or along the proposed construction transport route.
Advertising exhibitions and workshops and providing information on the Project via media outlets including the Selby Times and Post, Goole Times and Yorkshire Post	Exhibition advertising was booked in the Yorkshire Post, Selby Times, Selby Courier, Goole Times and Goole Courier for the S.47 consultation and press releases were distributed to the same media outlets.
Distributing notices and posters through the area, including at Access Selby, Selby Library and Goole Library, providing information on the Project and advertising exhibitions and workshops	Notice and posters were distributed at Access Selby Office, Goole Junction, Selby Library, Goole Library, Howden Library, Snaith Library and Drax Sports and Social Club for both stages of S.47 consultation. On the day of the public exhibitions posters were located at places of high footfall and visibility at or near the exhibition venues.
Distributing newsletters prior to public events to all properties within an inner 3km consultation zone, including all properties that lie entirely, or in part, within this zone. This includes Cliffe, Barlow, Camblesforth, Carlton, Long Drax, Newland, Barmby on the Marsh and Hemingbrough Parish Councils	Approximately 4,000 information leaflets were distributed to businesses and households within the 3km Zone and properties within the parish council areas wholly or partly within this Zone.
Distributing newsletters to properties which lies alongside the existing road haulage route for Drax Power Station (the A614 and the A645 to Junction 36 of the M62), which is likely to be the main road haulage route for the Project	Additional newsletters were distributed to all properties beyond 3km along the existing haulage route between Drax Power Station and Junction 36 of the M62 (the proposed construction transport corridor).
Engaging with community groups including community engagement forums	Presentations were given to parish councils within the 3km Zone and to the Central and Eastern Selby Community Engagement Forums.
Engaging with local business interests	A meeting was held with the chairman of the Selby Chamber of Commerce to explain Project details. Newsletters were distributed to businesses located within the 3km Zone.

SoCC Commitment	What was done
Engaging with special interest and leisure groups	Newsletters were distributed to identified special interest and leisure groups located within the 3km Zone.
Displaying Project documents at Access Selby, Selby Library and Goole Library	Consultation documents were displayed at Access Selby, Selby Library and Goole Library as well as at Goole Junction, Howden Library, Snaith Library and Drax Sports and Social Club for inspection during both stages of S.47 consultation.
Writing directly to people who have asked to be kept informed, including local community groups, councillors, MPs and local businesses	A comprehensive stakeholder database has been maintained that has ensured that all stakeholders that have requested on going information are kept informed.
Two statutory stages of consultation	Two stages of S.47 consultation have been undertaken.
Providing information on next steps in the process and details of exhibition events and workshops as the Project progresses	Next steps information was provided in all newsletters distributed and also on exhibition panels that were displayed at public exhibitions in April and July 2014. The same information has also been published on the Project website.
Providing the opportunity through the whole pre-application period to provide views at every stage	All Project literature and the Project website highlight prominently how stakeholders can provide their views by Freephone, Freepost, email and the Project website. Consultation feedback forms/questionnaires were available to complete at public exhibitions and online at the Project website during the consultation periods.

## 9 Section 42: Duty to Consult

This section sets out the consultation that has taken place on the Project in accordance with Section 42 'Duty to consult' of the 2008 Act.

At the same time as consulting persons under Section 42, the Applicant also consulted a number of other persons who, while there was no statutory duty to consult them, it was considered may be interested in the Project. These consultees, referred to as 'non-prescribed consultees', were consulted in the same manner and provided with the same information as the Section 42 consultees.

### 9.1 Who was consulted?

The Section 42 consultation involved the Applicant consulting the 'prescribed persons', the relevant local authorities and persons within Categories 1, 2 and 3 of Section 44. The Section 42 consultation involved the Applicant consulting a large number of persons within the immediate vicinity of the Project site to ensure that all of those persons who might fall within Categories 1, 2 and 3 of Section 44 were made aware of the Project. Following further land referencing work and noise modelling, it was possible to refine the list of persons falling within Categories 1, 2 and 3 and the final (reduced) list of such persons is provided within the Book of Reference.

Consistent with the Applicant's objective to consult widely on the Project, as confirmed above, a number of 'non-prescribed' consultees were also consulted as part of the Section 42 consultation. These non-prescribed consultees included persons identified prior to the statutory consultation on the Project that it was considered appropriate to consult as they may be interested in the Project.

In total, over 180 prescribed persons, relevant local authorities, relevant statutory undertakers and non-prescribed consultees were consulted during the Section 42 consultation, in addition to approximately 800 potential Section 44 persons (the majority originally consulted were subsequently found not to be within Categories 1, 2 or 3 of Section 44).

### 9.2 How were they consulted?

All of the Section 42 and non-prescribed consultees originally identified by the Applicant were consulted by letter (the consultation letter) sent by Royal Mail registered post. The letter provided information on the Project, details of the locations and opening times of the venues where hard copies of the consultation documents could be inspected, stated a deadline for the receipt of consultation responses and was accompanied by a CD containing the consultation documents.

In a limited number of cases the Royal Mail were unable to deliver the letter, either because there was no one available to sign for the letter or the person was no longer at the address. In these cases, and notwithstanding advice received from PINS that the Applicant had done everything reasonably possible by sending letters by registered post, the decision was taken to send a further letter by standard post, accompanied by a copy of the original consultation letter and providing a link to the consultation documents on the Project website, as well as listing the locations and opening times of the venues where hard copies of the consultation documents could be inspected and stating a deadline for the receipt of responses.

Further to the above, with regard to Section 44 persons, where the land referencing work was unable to establish the owner/beneficiary of land within the Project site, or where an owner/beneficiary had been identified but it was not certain that they were the relevant person, the Applicant erected site notices in locations around the Project site in areas close to these land ownership interests. The site notices advised of where hard copies of the consultation documents could be inspected and stated a deadline for the receipt of responses.

In addition, the Applicant sent letters (again providing information on the Project, venues for the inspection of the consultation documents and stating a deadline for the receipt of responses) to a number of additional Section 44 persons who were identified later in the pre-application process. The letter was accompanied by a CD containing the consultation documents.

### 9.3 What were they consulted upon/what information was provided?

All of the Section 42 consultees (including the non-prescribed consultees) were provided with a letter explaining why they were being consulted, providing background information on the Project, summarising its main components and stating a deadline for the receipt of responses.

The letters were accompanied by a CD containing the consultation documents or included a link to the Project website where the documents could be accessed. The following documents were made available:

- an example copy of the consultation letter,
- a Site Location Plan,
- a plan showing the extent of the Project site outlined in red,



- a PEIR, comprising a number of technical reports relating to the key environmental topics being assessed as part of the EIA for the Project and a Non-Technical Summary of the PEIR.

#### 9.4 When did the consultation take place/deadlines for responses

The Applicant sent the consultation letters to the prescribed consultees, relevant local authorities and non-prescribed consultees dated 13 June 2014. The consultation formally started on 17 June 2014 and the letters stated that the deadline for the receipt of responses was 5pm on 15 July 2014.

In June 2014 the Applicant was not in a position to carry out the Section 42 consultation in respect of Section 44 persons as the land referencing work being undertaken to identify those persons had not been completed. The Applicant therefore sent the consultation letters to the Section 44 persons identified by the land referencing on 18 July 2014. The consultation formally started on 22 July 2014 and the letters stated that the deadline for the receipt of responses was 5pm on 19 August 2014.

Letters were sent out on 4 September 2014 to the limited number of persons who had not received the letters sent on 13 June and 18 July 2014. These letters gave a further period for people to make comments on the Project (the deadline stated was 5pm on 6 October 2014).

Site notices were also erected on 4 September 2014 in respect of the unknown/uncertain landownership interests. The notices stated that the deadline for receipt of responses was 6 October 2014.

Letters were sent to the additional Section 44 persons who were identified after 18 July 2014 on 4 September 2014. These stated the same deadline for the receipt of responses as the other letters sent out on the 4 September 2014 as well as the site notices.

In addition, letters were sent to a number of further Section 42 consultees (potential statutory undertakers) on 10 October 2014. These included the NHS Acute, Care and Mental Health Trusts and a telecoms operator. Although it was considered that the Project was not relevant to the NHS Trusts in terms of their responsibilities, the Applicant took the decision to consult them as a number of other NHS bodies had previously been consulted. The letters sent were accompanied by a CD containing the original consultation documents and stated that responses should be received no later than 10 November 2014.

Table 9.1 summarises the Section 42 consultation undertaken by the Applicant.

**Table 9.1: Section 42 Consultation Dates and Periods**

S.42 Consultation	Date of Letter/Notice	Consultation Period
Letters to prescribed consultees, relevant local authorities and non-prescribed consultees	13 June 2014	17 June - 5pm on 15 July 2014
Letters to S.44 persons (Categories 1, 2 and 3)	18 July 2014	22 July - 5pm on 19 August 2014
Letters to persons who did not receive 13 June and 18 July 2014 letters; erection of site notices in respect of unknown/uncertain land ownership interests; letters to additional S.44 persons	4 September 2014	5 September - 5pm on 6 October 2014
Letters to potential additional statutory undertakers	10 October 2014	14 October - 10 November 2014

In all cases, letters were sent so as to provide consultees with at least the statutory period.

### 9.5 How could feedback be provided?

The consultation letters sent advised of a variety of ways in which consultees could respond. These included:

- Project website: [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)
- Email: [info@whiteroseccs.co.uk](mailto:info@whiteroseccs.co.uk)
- Freepost: White Rose CCS Project – Freepost Consultation
- Telephone: 0800 169 5290

### 9.6 Response to the consultation

A total of 41 separate consultees responded to the Section 42 consultation. The majority of the responses were received from Section 42 consultees. In a number of cases consultees submitted more than one response, with a number of these being submitted after the relevant consultation deadlines (the Applicant still took these into account).

Of the responses received approximately 30 raised specific comments/issues on the Project or requested further information, with the remainder either confirming that the consultee had no comments to make or merely acknowledging receipt of the consultation letter and documents.

## 10 Section 46: Duty to Notify Secretary of State of Proposed Application

Section 46 of the 2008 Act places a duty upon the applicant for a DCO to notify the SoS of the Section 42 consultation that it is to carry out. The applicant must comply with this requirement either before or at the same time as commencing the Section 42 consultation. In doing so, the applicant must send to the SoS the same information that is to be provided to the Section 42 consultees.

The Applicant commenced the Section 42 consultation in June 2014. In accordance with Section 46 PINS were notified of the start of the Section 42 consultation (consultation of prescribed consultees, relevant local authorities and certain non-prescribed consultees) on 12 June 2014, prior to the formal start of the consultation on 17 June 2014. PINS were notified by email and letter (posted by Royal Mail Special Delivery), both dated 12 June 2014. The letter was accompanied by a CD containing the consultation documents that were to be sent to the consultees as well as a list of those consultees.

PINS acknowledged receipt of the 12 June 2014 Section 46 notification by email and letter, both dated 17 June 2014.

As already referred to in Section 8, in June 2014, the Applicant was not in a position to carry out the Section 42 consultation in respect of Section 44 persons as the land referencing work being undertaken to identify those persons had not been completed. The Applicant therefore consulted the Section 44 persons at a later date in July 2014. PINS were notified of this consultation by email and letter (again posted Royal Mail Special Delivery) on 18 July 2014, the same day that the letters were sent to the consultees and in advance of the formal start of the consultation on 22 July 2014. The notification was not accompanied by the consultation documents as these had not changed from those provided to consultees in June 2014.

The Applicant commenced further Section 42 consultation in early September 2014. This is explained in Section 8, but in summary included:

- letters being sent to a limited number of persons who (based on Royal Mail delivery records) had not received the 13 June and 18 July 2014 consultation letters,
- the erection of site notices around the Project site in areas close to unknown/uncertain land ownership interests, and
- letters being sent to a number of additional Section 44 persons who had been identified after the 18 July 2014 consultation of Section 44 persons.

PINS were notified of the above consultation by email and letter (sent Royal Mail registered post) on 3 September 2014, prior to the letters being sent and site notices being erected on 4 September 2014. PINS were provided with copies of the letters sent out but again the consultation documents were not provided as these remained the same as those issued to consultees in June and July 2014.

PINS acknowledged receipt of the additional Section 46 notifications by email on 15 September 2014. The email received from PINS confirmed that Section 46 only requires the applicant to notify PINS of the start of the Section 42 consultation and that as such, the July and September notifications would not be treated as formal Section 46 notifications.

In view of PINS email dated 15 September 2014, the Applicant did not issue a Section 46 notification in respect of the further Section 42 consultees (a limited number of potential statutory undertakers) consulted in October 2014. Details of the Section 46 notifications issued by the Applicant are summarised in Table 10.1.

**Table 10.1: Section 46 Notification Dates**

S.42 Consultation and Date	S.46 Notification Date	PINS Acknowledgement Date
Letters to prescribed consultees, relevant local authorities and non-prescribed consultees	12 June 2014	17 June 2014
Letters to S.44 persons (Categories 1, 2 and 3)	18 July 2014	15 September 2014
Letters to persons who did not receive 13 June and 18 July 2014 letters; erection of site notices in respect of unknown/uncertain land ownership interests; letters to additional S.44 persons	3 September 2014	15 September 2014

# 11 Section 48: Duty to Publicise

Section 48 'Duty to publicise' of the 2008 Act requires applicants to publicise a proposed application for a DCO in the 'prescribed manner'. The prescribed manner is set out at in the APFP Regulations at Regulation 4 'Publicising a proposed application'.

APFP Regulation 4, amongst other matters, specifies that the Section 48 notice must be published once in a national newspaper, once in the London Gazette (and once in the Lloyds List and an appropriate fishing journal if offshore development is involved) and for at least two successive weeks in one or more local newspapers circulating within the vicinity of the land to which the Project relates. The notice must provide details of how to respond to the publicity and a deadline for the receipt of responses by the applicant, being not less than 28 days following the day the notice is last published.

The requirements of APFP Regulation 4 in relation to the preparation and publication of a Section 48 notice and how the Applicant has complied with these are set out in Table 2.1 at Section 2.

The first Section 48 Notice for the Project was published by the Applicant in late June/July 2014, so as to broadly coincide with the Stage 2 - Section 47 consultation, providing wider publicity of the Project to the general public, but also the Section 42 consultation. The Section 48 Notice was published in The Independent (a national newspaper) and the London Gazette, in addition to a number of local newspapers circulating within the vicinity of the Project site and throughout the 10km Public Consultation Zone and beyond. The local newspapers selected for the Section 48 Notice were the same as those that had been used by the Applicant to provide updates on the Project and publicise consultation activities and events.

The Section 48 Notice stated that the Applicant must receive any comments on the Project no later than 5pm on 1 August 2014. Details of the newspapers that it was published within and the relevant dates are set out in Table 11.1 below.

**Table 11.1: Newspapers used for first Section 48 Notice**

Newspaper	Dates
The Independent	26 June 2014
London Gazette	26 June 2014
Yorkshire Post	26 June 2014
Selby Times	26 June & 3 July 2014
Goole Times	26 June & 3 July 2014
Selby Courier	27 June & 4 July 2014
Goole and Howden Courier	27 June & 4 July 2014

No consultation responses were received as a result of the publication of the first Section 48 Notice.

The Applicant published a second Section 48 Notice in the Lloyds List and the Fishing News in early September 2014.

The requirement to publish a Section 48 notice in the Lloyds List and an appropriate fishing journal (APFP Regulation 4), relates to the circumstances where a Project includes offshore development. What constitutes offshore development is not defined within the 2008 Act or the APFP Regulations, other than Section 15(4)(a) of the 2008 Act, which refers to offshore within the context of the definition of a generating station being development “*in waters in or adjacent to England or Wales up to the seaward limits of the territorial sea...*”.

As the Project involves the potential use of and works on land adjacent to an existing jetty on the River Ouse, which is within a part of the River channel that is tidal; the Applicant took the view that this component of the Project could potentially be considered as ‘offshore development’ and therefore that a Section 48 notice should be published in the Lloyds List and an appropriate fishing journal. These works did form part of the Project when the Applicant embarked on the Stage 2 - Section 47 and the Section 42 consultation, at which point the PEIR was first made available.

It is important to note that the jetty works solely encompass the creation of a new hardstanding area adjacent to the existing jetty for laydown and construction purposes and not works to the jetty itself or in the River channel.

The Fishing News was selected by the Applicant to satisfy the requirement of APFP Regulation 4 to publish the Section 48 Notice in an appropriate fishing journal, on the basis that this publication is regularly used to publicise NSIPs that involve offshore development.

APFP Regulation 4 does not stipulate that a Section 48 notice must appear in the relevant newspapers and publications at the same time, only that the notice is published. It is therefore considered that the Applicant has complied fully with the requirements of APFP Regulation 4.

The publication of the second Section 48 Notice was timed to broadly coincide with the further Section 42 consultation that commenced in early September 2014 and stated the same deadline for the receipt of responses (5pm on 6 October 2014) as the consultation letters and site notices that were issued/erected for that consultation.

No consultation responses were received as a result of the publication of the second Section 48 Notice.

EIA Regulation 11 places a requirement upon applicants, where an application is EIA development, to at the same time as publishing the Section 48 notice, send a copy of that notice to the relevant consultation bodies and any person notified by PINS to the applicant in accordance with EIA Regulation 9(1)(c). The Applicant's compliance with EIA Regulation 11 is dealt with at Section 11.

## 12 EIA related Consultation

The Project is considered to fall within Schedule 1 of 'The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009' (the EIA Regulations) and is therefore 'EIA development'. An EIA has been undertaken, and an ES has been produced and submitted as part of the Application.

This section provides a summary of the EIA consultation that has taken place during the pre-application process. This is covered in more detail within the ES itself in each of the relevant technical reports.

### 12.1 EIA Notification and Scoping – Regulations 6(1) and 8(1)

At an early stage in the pre-application process the Applicant identified the Project as EIA development and that it would therefore be necessary to notify PINS of its intention to produce an ES and also to obtain a 'Scoping Opinion' with regard to the scope and coverage of that ES.

In view of the above, the Applicant commenced early engagement with a number of key technical consultees both to introduce the Project and also to start to discuss the proposed scope of the EIA, including the studies and survey work that would be required. Informal discussions and meetings took place with a number of bodies, including Selby DC, NYCC and technical consultees such as the EA, NE and EH. The discussions and meetings and subsequent dialogue with the technical consultees and others was used to inform the preparation of an 'EIA Scoping Report' detailing the environmental topics that the Applicant proposed to include within the scope of the EIA for the Project and those that it was proposed would be scoped out.

In December 2012 the Applicant submitted an EIA Scoping Report to PINS. The Scoping Report provided formal notification under Regulation 6(1)(b) of the EIA Regulations of the Applicant's intention to undertake an EIA for the Project and to produce an ES documenting the findings of this. The Scoping Report also formally requested a Scoping Opinion pursuant to EIA Regulation 8. The Scoping Report identified a number of topics that it was proposed to 'scope out' of the EIA. These topics included waste; construction, demolition and environmental management; and vibration effects.

Following receipt of the application for the Scoping Opinion, PINS consulted the relevant consultation bodies in accordance with EIA Regulation 8(6) to obtain their views. A Scoping Opinion was issued by PINS on 14 January 2013. This was accompanied by the responses received from the relevant consultation bodies. The Scoping Opinion confirmed that the SoS was broadly satisfied with the suggested



approach and topics to be covered by the EIA but drew the Applicant's attention to a number of general points as well as points made in respect of specific topic areas.

## 12.2 EIA Transboundary Effects – Regulation 24

Following the issue of the Scoping Opinion, PINS carried out 'Transboundary Screening' of the Proposed Development in accordance with EIA Regulation 24.

The 'Transboundary Screening Matrix' completed by PINS is dated 12 April 2013. It confirms that the SoS is of the view that the Project is 'not likely to have a significant effect on the environment in another EEA State'. The Matrix confirms that in reaching this view the SoS applied the precautionary approach (explained in PINS Advice Note 12: Transboundary Impacts Consultation); and took into account the information supplied by the Applicant. It concluded that 'no further action is required at this stage'.

## 12.3 Approach to Preparation and Publication of Preliminary Environmental Information

PEI is defined in the EIA Regulations as "information ... which (a) has been compiled by the applicant; and (b) is reasonably required to assess the environmental effects of the development (and of any associated development)". The Scoping Opinion provided by PINS (and the comments received from the scoping consultees) was used to inform the Applicant's preparation of a PEIR which was also informed by dialogue with key consultees upon the draft chapters of the PEIR. An early draft of the PEIR was also issued to key technical consultees before it was made available during the Stage 2 - Section 47 and 42 consultation.

The finalised PEIR was issued for the Stage 2 - Section 47 consultation and the Section 42 consultation. It represented the environmental information that was available at that point in time. The PEIR was made available for inspection by the public during the Stage 2 - Section 47 consultation at a number of venues and also at the public exhibitions that were held in July 2014. It was also sent to the Section 42 consultees on a CD containing all of the consultation documents or alternatively, these consultees were provided with a link to the PEIR and other documents on the Project website.

As confirmed in Section 8, the PEIR included a Summary PEIR, a number of technical reports relating to the key environmental topics being assessed as part of the EIA for the Project and a Non-Technical

Summary to aid understanding of the EIA process and the environmental assessments undertaken. The PEIR issued was in effect a draft ES.

Dialogue with key technical consultees in relation to the PEIR has informed the preparation of the ES and also influenced the project. For instance, dialogue with technical consultees in relation to the noise assessment work identified the need for additional acoustic attenuation on some items of plant and this has been incorporated into the design of the Project.

**12.4 EIA Regulation 11 Notification**

In accordance with EIA Regulation 11 ‘Pre-application publicity under Section 48 (duty to publicise)’ the relevant EIA consultation bodies were, at the same time as the first (late June 2014) and second (early September 2014) Section 48 Notices were published, sent a copy of the Notices as these were to appear in the relevant newspapers and publications.

It should be noted that the Applicant was not notified by PINS of any persons pursuant to EIA Regulations 9(1)(c).

**12.5 Preparation and Finalisation of the ES**

Dialogue has continued with key technical consultees as part of the process of preparing and finalisation of the ES. This has included a number of meetings as set out in Table 12.1.

**Table 12.1: Consultation with Technical Consultees on Draft ES Chapters**

Body	EIA issues discussed	Date
Natural England	Habitats Regulations Assessment No Significant Effect Report (HRA NSER), draft badger licence application and biodiversity enhancement.	12.07.14
Selby DC	Construction hours, noise assessment criteria and results, transport and air quality/dust.	25.07.14
NYCC	Highway accesses, biodiversity enhancement, landscape and visual and socio-economic.	29.07.14
ERYC	Highways.	30.07.14

## 13 Section 49: Duty to take account of responses to Consultation and Publicity

Section 49 'Duty to take account of responses to consultation and publicity' requires applicants to have regard to any 'relevant responses' received to the statutory consultation and publicity carried out in accordance with Sections 47, 42 and 48. A relevant response is a response received by the applicant before the deadlines set in relation to the statutory consultation and publicity. As such, there is no statutory duty for the applicant to take account of responses received after the relevant deadlines.

This section sets out how the Applicant has taken account of the responses received to the statutory consultation and publicity that has been carried out for the Project. It details the Applicant's comments in respect of the responses received (including how the Project and Application has taken account of these); identifies where consultation has resulted in changes to the Project and Application; and also, where appropriate, references the relevant Application Document(s) in respect of the responses received and changes made. The Applicant has also, where possible, taken account of any responses received after the consultation deadlines.

As confirmed in Sections 1 and 4, the non-statutory consultation carried by the Applicant in Summer 2013 was used to introduce the Project to the local community and key consultees. The responses to this consultation were reviewed by the Applicant, however, due to the early stage of the Project this consultation was aimed at informing people of the proposals and what was intended in terms of statutory consultation going forward. The Applicant has not therefore afforded the non-statutory consultation the same weight as the statutory Section 47, 42 and 48 consultation and publicity and it is not considered any further within this section.

This section contains the following tables relating to the statutory consultation:

- Tables 8.1 and 8.2 - Section 47 consultation (Stages 1 and 2).
- Table 9.1 - Section 42 consultation.

There is no table in relation to the Section 48 publicity as no responses were received to that publicity.

Each table provides the following information:

- a summary of the comments/issues raised by the consultation responses received,
- the Applicant's responses in respect of those issues (including how these have been taken into account, where relevant), and

- any changes that have been made as a result of the consultation responses.

In the case of both the Section 47 and Section 42 consultation responses, these have been reviewed and the comments summarised and then checked to ensure that they accurately capture the issues raised.

Each response to the Section 47 consultation has been given an identification (ID) number. These can be cross-referenced to the relevant feedback form or response if required.

A relatively limited number of issues were raised by consultees. This was particularly the case in relation to Section 47 consultees where the vast majority of comments received were generally supportive and did not seek changes to the Project.

The principal changes that have resulted to the Project and Application as a result of pre-application consultation are summarised in Table 13.1 below.

**Table 13.1: Changes to the Project/Application**

Change made	Reason	Type of consultation
Acoustic cladding added to coal and raw material towers and conveyors.	Following consultation with Selby DC EHO regarding appropriate noise limits during operation.	Consultation related to the assessment of noise as part of the EIA of the Project.
Aviation warning lighting to be installed upon emissions stack and secured by requirement.	CAA recommendation.	EIA scoping and S.42 consultation.
Requirement added to DCO relating to air safety and charting of structures on aviation maps.	CAA recommendation.	EIA scoping and S.42 consultation.
Further landform modelling for the LVIA.	NYCC LVIA comments.	S.42 consultation.
Landscape Character Areas (LCAs) defined for the LVIA.	NYCC LVIA comments	S.42 consultation.
Landscaping/planting strip added between operational area of the Project site and Drax Augustinian Priory SM.	Discussions with EH regarding setting of the SM.	EIA related consultation relating to cultural heritage assessment within the EIA.
Correct local policy references included in relevant Application documents.	In response to comments from Selby DC planning case officer.	S.42 consultation.
Habitats Regulations Assessment undertaken.	In response to comments from NE regarding the commissioning period for the generating station.	S.42 consultation.

### 13.1 Summary

This section has clearly demonstrated that the Applicant has taken into account the responses received to statutory consultation undertaken

pursuant to Sections 42 and 47 of the 2008 Act, and that, where appropriate, changes have been made to the Project/Application.

# 14 Other Consultation and Engagement

This section summarises the other consultation and engagement that the Applicant has undertaken during the pre-application process, and the Examination phase. That undertaken during the pre-application process is non-statutory consultation, some of which took place alongside the statutory consultation.

## 14.1 PINS Consultation

Throughout the pre-application process the Applicant has maintained dialogue with PINS in order to provide updates on the Project and obtain advice in relation to matters such as the drafting of Application. A summary is provided below:

**Table 14.1: PINS Consultation**

Activity	Purpose	Date
Meeting	Inception meeting to introduce the Project.	22.02.12
Document submission	Submission of draft SoCC for review.	12.10.12
Meeting	Update meeting to discuss status of the Project.	07.08.13
Document submission	Submission of draft Consultation Report scope/structure. Comments provided by PINS on 08.08.14.	18.07.14
Meeting	Update meeting.	07.08.14
Document submission	Submission of draft DCO, Explanatory Memorandum, Land Plans, Works Plans and Book of Reference. Comments provided by PINS on 18.09.14.	19.08.14
Meeting	Roundtable meeting with Selby DC, NYCC, EA, Marine Management Organisation (MMO) and NE.	18.09.14
Document submission	Second draft DCO, Explanatory Memorandum, Lands Plans, Works Plans, Book of Reference and Consultation Report submitted. Comments provided by PINS on 31.10.14.	08 & 09.10.14

## 14.2 Local Community and political representatives

Throughout the pre-application process the Applicant has provided updates to the local community via press releases and the Project website in addition to presentations to Selby DC district councillors, the Central and Eastern CEFs that operate within the area surrounding the Project site, town and parish councils and the Joint Consultative Committee relating to the existing Power Station site (this includes a wide range of stakeholders, including parish, district and county councillors as well as regulators and specific businesses).

The Applicant intends to continue providing such updates throughout the pre-examination and examination stages.

### 14.3 Local Authorities and Technical Consultees

The Applicant has maintained dialogue with the most directly affected local authorities, notably Selby DC, in addition to key technical consultees throughout the pre-application process. This has included regular update meetings with Selby DC, as well meetings with a number of key technical consultees (e.g. NYCC, the EA, NE and EH) to provide updates on the Project and informally discuss matters relating to the EIA.

In addition, the Applicant provided the draft DCO Requirements to a number of consultees for review on 10 October 2014. This included Selby DC, NYCC, ERYC, the EA, the MMO, NE, EH, the Internal Drainage Board and the CAA. The draft Requirements were accompanied by drafts of the Works Plans and Access and Rights of Way Plans. Copies of the draft Order and Explanatory Memorandum were sent to Selby DC and NYCC on 15 October 2014. Comments on the draft requirements were received from NYCC and the CAA and were taken account of in finalising the draft Order.

The Applicant has also commenced engagement with a number of consultees in relation to the agreement of SoCG. Draft SoCG were issued to Selby DC, EH and NE on 16 September 2014 and NYCC, ERYC and the EA on 17 September 2014. Dialogue is on-going with these consultees regarding the SoCG.

### 14.4 Examination phase

As part of the Examination phase, Public Hearings form a key part of PINS determination process. For the WRCCS an initial Preliminary meeting was held at the Lowther Hotel in Goole on April 22, 2015. The meeting was an opportunity for PINS to issue the Examination Process timetable.

Interested Parties (those organisation who have registered with PINS) who attended the meeting included, NYCC, SDC, EA, NGCL as well as a local Parish Councillor from Long Drax.

Following the Preliminary Hearing, the Issue Specific Hearings were also held at the Lowther Hotel, Goole, on the dates and times set out below:

- Issue Specific Hearing on Environmental Issues, 1 July 2015
- Open Floor Hearing, 1 July 2015
- Compulsory Acquisition Hearing, 2 July 2015
- Issue Specific Hearing on the draft DCO, and

- in addition to the Hearings, an Accompanied Site Visit took place on 3 July 2015. This was an opportunity for PINS as well as other organisations to see the proposed WRCCS location during a tour. The advertising for the Accompanied Site Visit was carried out on PINS website. Members of the public were also able to attend. Selby DC, NYCC and local councillors from Long Drax attended

As part of the Examination Process, there was a need for a number of alterations to be made to the detail of the WRCCS project. These were raised by CPL prior to the Preliminary meeting and resulted in the need for an additional period of consultation to take place. This was organised to take place from 7 May to 12 June.

The changes that were made to the project included;

- changes to the powers sought within the draft DCO in respect of the stopping up and creation of footpaths as a result of the confirmation by North Yorkshire County Council of the 'Footpath Nos. 35.47/1, 35.47/6 & 35.47/10, Long Drax and 35.6/12, Barlow, Drax Power Station, Long Drax Diversion Order' on 13 February 2015. The substance of the footpaths to be stopped up and created remains similar,
- the removal of two of the three electricity grid connection options originally included within the Application as a result of the grid connection offer from National Grid Electricity Transmission plc to connect to the 400kV substation adjacent to the existing Drax Power Station site,
- the Applicant has also submitted updated Application documents in respect of the section 51 advice issued by PINS on 17 December 2014, and
- in addition, the Applicant has submitted a technical note that reports on traffic sensitivity testing undertaken in respect of heavy goods vehicle movements associated with the operational phase of the Project as biomass (if used) is proposed to be delivered by road.

The documents are available to view online on the PINS website: <http://infrastructure.planningportal.gov.uk/projects/yorkshire-and-the-humber/white-rose-carbon-capture-and-storage-project/?ipcsection=docs&stage=app&filter=Reports> and on the Project website: [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)

As part of the Consultation, responses could be sent to CPL in a number of ways:



- by email: [info@whiteroseccs.co.uk](mailto:info@whiteroseccs.co.uk),
- by post: White Rose CCS Project – Freepost Consultation, and
- via the Project website: [www.whiteroseccs.co.uk/public-consultation](http://www.whiteroseccs.co.uk/public-consultation).

# 15 Yorkshire and Humber Cross Country Pipeline DCO

## 15.1 Background

National Grid Carbon Limited (NGCL) is a wholly owned subsidiary of the National Grid group of companies. CPL has been set up to pursue the White Rose CCS Project (the WR Project).

CPL has entered into an agreement (the FEED Contract) with the UK Government's Department of Energy and Climate Change (DECC) to carry out, among other things, the engineering, cost estimation and risk assessment needed to determine the budget required to develop and operate the WR Project. The contents of this K45 report draws on work, which was undertaken by National Grid and partly funded under the European Union's European Energy Programme for Recovery (EEPR). As a whole, the WR Project would consist of an end-to-end electricity generation and carbon capture and storage (CCS) system including, a coal fired power station, carbon dioxide capture, processing, compression and metering facilities; transportation pipeline and pressure boosting facilities; offshore carbon dioxide reception and processing facilities, and injection wells into an offshore storage reservoir.

## 15.2 Scope

National Grid will provide the transportation and storage element of the project. This includes the transportation pipeline and pressure boosting facilities; offshore CO<sub>2</sub> reception and processing facilities, and injection wells into an offshore storage reservoir.

The transportation and storage elements of the WR Project comprise two elements: the "Onshore Scheme", which includes the construction of a Cross Country Pipeline (including the Above Ground Installations (AGIs) such as Pipeline Internal Gauge Traps, a multi-junction, it's block valve sites and an onshore pumping station) to transport CO<sub>2</sub>, in dense phase from electricity generation and industrial capture plants in the region and the "Offshore Scheme" which includes an offshore pipeline to transport the CO<sub>2</sub> to a permanent storage site beneath the North Sea. The Onshore and Offshore Schemes are located, sized and designed to accommodate CO<sub>2</sub> emissions captured from multiple sources; although an initial, direct connection which the White Rose CCS Project power station itself forms the primary focus of the FEED Contract.

The Onshore Scheme requires a new buried high pressure cross country pipeline of approximately 67km in length with an external diameter of 610mm for the transportation of the dense phase CO<sub>2</sub> to a location on the Holderness coast. The Offshore Scheme requires a

new high pressure 90km sub-sea pipeline to a geological storage site. The storage site presently proposed is a saline aquifer located approximately 1000m below the seabed. The Onshore and Offshore Schemes would be joined at the Mean Low Water Mark using appropriate landfall techniques. The Onshore Scheme is a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 and hence is subject to the grant of a Development Consent Order (DCO). The Offshore Scheme is subject to a separate consenting procedure under the Petroleum Act 1998 and the Energy Act 2008 and has been subject to a separate application.

# 16 Purpose

The purpose of this document is to share details of National Grid's public and stakeholder management plan for the transportation and storage components of the WR CCS Project.

The table below outlines the knowledge deliverables provided by this report and where they are addressed.

**Table 16.1: Deliverables Index**

Deliverable	Location
Stakeholder mapping	Chapter 19
Social Site Characteristic work: Socio-economic Political Cultural	Chapter 19
Public and Stakeholder engagement team	Chapter 20
Engagement plans and strategy	Chapter 20
Key messaging	Chapter 20
Engagement material	Chapter 20
Liaison with Key stakeholders and approach followed for generating the SoCC	Chapter 19
Liaising with statutory consultees	Chapter 19
Method and Generation of consultation reports	Chapter 19

# 17 Project Definition and Study Area

## 17.1 Project Definition

Under the WR Project FEED contract with DECC it is National Grid's responsibility to deliver a CO<sub>2</sub> transportation and storage system. Although the initial connection of the transportation and storage system will be with the WR power station itself, the system is designed to support the provision of Carbon Capture and Storage (CCS) technology in the Yorkshire and Humber Region. This constituent element of the WR Project in its entirety, known as the Yorkshire and Humber CCS Transportation and Storage Project, would comprise the construction of a Cross Country Pipeline and sub-sea pipeline for transporting CO<sub>2</sub> captured from power projects in the region to a permanent geological storage site beneath the North Sea. The Project includes both onshore and offshore elements which are subject to separate consenting regimes (the "Onshore Scheme" and the "Offshore Scheme").

The onshore elements of the Project are collectively termed the Yorkshire and Humber CCS Cross Country Pipeline (shortened to the "Onshore Scheme") and are proposed to comprise the construction of a Cross Country Pipeline and associated infrastructure including Pipeline Internal Gauge (PIG) Traps, a multi junction, three block valves, a Pumping Station (collectively termed "Above Ground Installations" or "AGIs) and any necessary interconnecting local pipelines and associated works. As the length of the proposed Cross Country Pipeline will exceed 16.093km it constitutes a nationally significant infrastructure project (NSIP) pursuant to the Planning Act 2008 (the Act). An application has been made to the Planning Inspectorate (PINS) for a Development Consent Order (DCO) and is subject to determination in November 2015. The Onshore Scheme is the subject of this report.

It is planned that the multi-junction would act as a "hub" for the development of an onshore regional CCS Pipeline network and therefore would be a catalyst for efficient growth of a commercially competitive CCS industry in the Yorkshire and Humber region. DECC expressed support for this approach in its document "Government response to the CCS Cost Reduction Task Force" in which they said "we specifically welcomed projects with clustering potential".

Figure 17.1: CO<sub>2</sub> Transport and Storage System



Source: National Grid

The offshore elements of the Project are collectively termed the Yorkshire and Humber CCS Sub-Sea Pipeline and Geological Storage Site (shortened to the “Offshore Scheme”) and are proposed to comprise the construction of a 90km subsea Pipeline to a geological storage site. This is subject to a separate consenting regime to that for onshore, requiring authorisation by the Secretary of State for Energy and Climate Change in accordance with both the Petroleum Act 1998 and the Energy Act 2008.

### 17.2 Geographical Context

Within the UK, Yorkshire and Humber is one of the most energy intensive regions. Its power stations provide around 18% of the nation’s electricity generation, which together with other industry in the

region collectively comprise the largest cluster of CO<sub>2</sub> point source emitters (i.e. static emitters) in the UK.

Most of these facilities are located relatively close together so could potentially be connected to a single CCS pipeline over time to create a regional CCS network. This would allow the capture of most of that 60 millions of tonnes of carbon dioxide, which is produced every year by this cluster of fossil fuel power stations and large industrial plants, and make a significant contribution to reducing UK emissions.

CCS has been widely recognised as part of a package of potential solutions to tackling climate change and securing our future energy supply. CCS can reduce the carbon dioxide emissions of existing power stations by as much as 90% from new power stations. UK Government energy policy in particular identifies CCS as a technology that can help reduce UK dependence on unabated fossil fuel consumption. The Overarching National Policy Statement for Energy (EN-1) indicates that CCS can help diversify and decarbonise electricity generation, whilst contributing to climate change targets and maintaining security of electricity supply. Retaining fossil fuel as part of the energy mix in the UK could potentially help reduce energy costs and provide energy from these sources in a cleaner and more responsible manner. It could also support renewable energy development (for example by providing a reserve to cope with any intermittent electricity supply from wind power).

**17.3 Timeline**

Figure 17.2 below provides an overview of National Grid’s engagement with the public and stakeholders with regards to the transportation and storage components of the WR CCS Project.

A Project Development Milestone Chart is included as Figure 1 in Document 5.1 of the Consultation Report provided for the Yorkshire and Humber (CCS Cross Country Pipeline) Development Consent Order, Under S37(3) (c) Planning Act 2008.

**Table 17.1: NGCL Timeline Stakeholder Engagement**

Stage	Activity	Timescale
Project Stakeholder Engagement		Early 2011 to June 2014
Project inception	Specific stakeholder communications strategy conceived, to support National Grid’s CCS development aspirations. This strategy broadly comprised two phases: ‘educate and inform’ and ‘engagement’	Early 2010

Stage	Activity	Timescale
Pre-Stage 1	Public and Stakeholder engagement on the Onshore Scheme commenced and continued until National Grid's DCO application was submitted to PINS in June 2014;	Early 2011 to June 2014
<b>Pre-Stage 1</b>		
Pre-Stage 1	Stakeholder Mapping Early in 2010 comprehensive stakeholder analysis by National Grid (thereafter stakeholder analysis has been constantly reviewed). Early in 2011, National Grid conducted a comprehensive, desk-based review of statutory and non-statutory stakeholders.	May 2010 to May 2011
Pre-Stage 1	Stakeholder Mapping Early in 2010 comprehensive stakeholder analysis by National Grid (thereafter stakeholder analysis has been constantly reviewed). Early in 2011, National Grid conducted a comprehensive, desk-based review of statutory and non-statutory stakeholders.	Early 2010 to early 2011
Pre-Stage 1	Consultation was divided into broad Stages 1 and Stage 2.	Early 2010
Pre-Stage 1	Prior to the commencement of the consultation, National Grid carried out desktop research and entered into dialogue with local authorities, ERYC, SDC and NYCC	23rd May 2011 for two weeks
Pre-Stage 1	National Grid published an initial information advert (in eleven Newspapers) that summarised the concept of Carbon Capture and Storage (CCS) and highlighted that National Grid was exploring the options for a CCS project in the Yorkshire and the Humber region.	Week commencing 23rd May 2011
Pre-Stage 1	Full page advert containing information on the project and the consultation exhibitions was published in 13 newspapers, each of which had distribution areas that covered all or part of the route corridor options.	June 2011 The advert ran across two weeks
<b>Stage 1</b>		
Stage 1 engagement	Inspection copies of the project information leaflets and electronic copies of the Strategic Options Appraisal Report (SOAR), Route Corridor Study (RCS) and Consultation Strategy were made available in a number of libraries.	June 2011
Stage 1 engagement	Prior to the launch of the full project website, a provisional pre-consultation website launched ( <a href="http://www.ccs-humber.co.uk">www.ccs-humber.co.uk</a> ).	June 2011
Stage 1 engagement	16 public exhibitions took place, including two on a Saturday. These were open events at which members of the local community could view proposals and maps, talk to project team representatives and give their views using written feedback forms.	June 2011
Post Stage 1 engagement	Presentations were offered to members at each Authority through which the Pipeline was proposed to run. DMBC accepted the offer and NYCC invited National Grid to brief councillors on the project as part of a wider briefing on low carbon energy projects in the region. ERYC and SDC did not consider briefings necessary at this juncture	Late 2011
Post Stage 1 engagement	A total of 10 MPs were identified as representing constituencies that could be affected by the preferred route corridor, briefings were offered to all 10, but were not taken up at this stage.	Late 2011
Post Stage 1 engagement	Parish councils were invited to send representatives to attend one of three sessions held in different locations along the route corridor in March 2012. Representatives from 18 parish councils attended the sessions.	12th, 13th, 15th March 2012
	Feedback report for Stage 1 was produced	
Pre-Stage 1A engagement	An advertisement containing information on the scheme and consultation was published in eight local newspapers with distribution areas that covered the preferred route corridor; as well as the Yorkshire County Gazette and a notice in the Kingfisher Bulletin.	4th to 18th (2 weeks) June 2012 This advertisement ran once in each newspaper across a



Stage	Activity	Timescale
		two week period prior to the start of Stage 1A Consultation on the 19 June.
<b>Stage 1A</b>	<b>Stage 1A (Non-Statutory)</b>	<b>June to July 2012</b>
Stage 1A engagement	At the start of Stage 1A, approximately 5,300 addresses within the consultation zone were contacted by letter with a project summary and details of planned Stage 1A public exhibitions. In addition, an invitation letter was sent to residents in Ulrome, as despite falling outside the consultation zone, the village was identified as being in close proximity to the southern landfall option.	June 2012
Stage 1A engagement	Following discussions with the Parish Council, National Grid organised for a minibus to take residents who wished to attend the public exhibition in Barmston from Ulrome to the exhibition and back.	4th, 11th, 18th June 2012 An additional letter was sent to Ulrome residents on 21 June 2012, informing them of this arrangement
Stage 1A engagement	Inspection copies of reports were made available at a number of libraries and Council centres located in the vicinity of the preferred route corridor.	June 2012
Stage 1A engagement	Notification letters were sent to Parish and Town Council Clerks asking Clerks to display a project poster advertising the exhibitions.	June 2012
Stage 1A engagement	A total of seven public exhibitions were held in seven different locations along the Preferred Route Corridor, explaining the concept of and need case for CCS, why the Yorkshire and Humber region had been chosen for the proposed project, the preferred route corridor, what happens offshore and environmental matters.	June and July 2012
Stage 1A engagement	Online information and feedback facility were made available via the project website: <a href="http://www.ccshumber.co.uk">www.ccshumber.co.uk</a> .	
	SDC, ERYC, NYCC and the Marine Management Organisation (MMO) were consulted on the SOCC document, prior to its publication, as prescribed under section 47 of the Planning Act 2008	July 2013
	National Grid notified PINS of its intention to commence Stage 2 (Statutory) Consultation on the 23 September 2013	23 August 2013
	The SOCC was published	9th September 2013
<b>Stage 2 (Statutory)</b>		<b>September to November 2013</b>
Stage 2	The SoCC produced for the Stage 2 (Statutory) Consultation was based upon the previous Stage 1 and Stage 1A Consultation Strategies that had been produced and agreed with affected local planning authorities for Stages 1 and 1A	
	Both Stage 2 and Stage 2A Consultations have been completed in accordance with the SoCC.	
Stage 2 engagement	Local Authorities, PILs and Statutory Consultees were sent a notification letter (on the 9th) advising of the launch of Stage 2 Consultation and a letter with a CD copy (on the 23rd) of consultation documentation alongside a hard copy of the Project Non-Technical Summary Report.	9 to 23rd September 2013
Stage 2 engagement	Notifications of the forthcoming consultation and exhibition events were sent to 2,959 addresses within the consultation zone. On the 20 September 2013 residents of Wadehouse Lane were sent specific Project information via letter given their proximity to the proposed multi-junction site.	9th September 2013

Stage	Activity	Timescale
Stage 2 engagement	Goole Town Council, South Cave Parish Council, Catwick Parish Council, Tickton and Routh Parish Council and Coniston Parish Council were contacted on 9 September 2013 by letter advising of the forthcoming exhibitions, website, freephone and postal address.	9th September 2013
Stage 2 engagement	In order to effectively consult PILs, and give them the opportunity to speak to members of the National Grid project team, separate events were organised and held in advance of each public exhibition. In addition to the PILs consultation events, one-to-one meetings were offered to PILs throughout the statutory consultation period.	
Stage 2 engagement	On 9 September 2013 a holding page featured on the CCS website with a summary note on the forthcoming statutory consultation, SoCC advert and email registration box. The full website, which included information from the exhibition boards (text, images and maps), an interactive map (of the route), online feedback form and all Project documents, went live on the day of the consultation. On 4 November the website was updated to note the end of consultation and the online feedback form was removed.	9th September to 4th November 2013
Stage 2 engagement	Advertisements detailing and encouraging attendance at the consultation events were placed in 8 local papers over two consecutive weeks. In addition a notice was placed in the Kingfisher Bulletin.	9th to 21st September 2013; two consecutive weeks.
Stage 2 engagement	Posters advertising the launch of the Stage 2 Consultation and public consultation events were distributed to the Clerks of 80 Parish Councils on 9 September 2013, to appear on Parish Council notice boards in the area.	9th September
Stage 2 engagement	Nine public exhibition events were held in accessible locations along the route	23rd September to 2nd October 2013
Stage 2 engagement	A press release announcing the close of consultation was issued towards the end of Stage 2 as a reminder to encourage further feedback responses over a dedicated Freephone number, online or by post. The dedicated email address. However, ( <a href="mailto:nationalgrid@ccshumber.co.uk">nationalgrid@ccshumber.co.uk</a> ) remained in place for members of the local community wishing to express views or ask questions at any point. A dedicated phone line was also maintained.	
Stage 2	Prior to the launch of the Stage 2A Consultation, National Grid produced and consulted on its Consultation Strategy for localised Statutory Stage 2A Consultation with the MMO, SDC, ERYC and NYCC between 23 December 2013 and 10 January 2014	23rd December 2013 to 10th January 2014
	<b>Stage 2A (Statutory)</b>	<b>February- March 2014</b>
Stage 2A engagement	Ahead of and during Stage 2A Consultation, meetings were held with the MMO, ERYC, SDC and NYCC to brief each authority on the outcome of Stage 2 Statutory Consultation and the forthcoming localised Stage 2A Consultation. All of these parties were invited to the Stage 2A exhibition event	27th January 2014
Stage 2A engagement	In advance of Stage 2A Consultation local residents were written to on 27 January 2014 notifying them of the forthcoming consultation and exhibition	27th January 2014
Stage 2A engagement	Relevant consultees, including PILs and Local Authorities identified within Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) were sent a Stage 2A invitation letter on the 27 January 2014 advising of the launch of Stage 2A Consultation. On 11 February 2014, the day prior to the start of Stage 2A Consultation period,	27th January to 11th February 2014

Stage	Activity	Timescale
	these consultees were sent a further letter alongside a CD copy of the consultation documents	
Stage 2A engagement	Parish Councils which had been consulted during previous consultation stages were notified of formal consultation and invited to the exhibition as part of this stage of consultation, with notification letters issued on 27 January and 11 February 2014. Barmston and Fraisthorpe Parish Council were offered a separate meeting given the locality of the Stage 2A consultation. This meeting was held on 12 February 2014 at Barmston Village Hall	27th January to 12th February 2014
Stage 2A engagement	An advertisement detailing and encouraging attendance at the consultation exhibition was placed in the Bridlington Free Press for two consecutive weeks; on 30 January 2014 and 6 February 2014.	30th January 2014 to 6th February 2014; two consecutive weeks.
Stage 2A engagement	Public exhibition was held at Barmston Village Hall on 12 February 2014.	12th February 2014
Stage 2A engagement	Posters advertising the Stage 2A Consultation and the exhibition event on the 12 February were distributed to the clerks of four Parish Councils (Barmston and Fraisthorpe Parish Council, Carnaby Parish Council, Lissett and Ulrome Parish Council and Burton Agnes Parish Council) to appear on Parish Council notice boards in the area.	12th February 2014
	<b>Stage 2B (Statutory)</b>	<b>April to May 2014</b>
Stage 2B engagement	The North Yorkshire Moors National Park and Yorkshire Dales National Park Authorities were re-consulted as statutory consultees (in line with S42 of the Act).	
Stage 2B engagement	PILs were sent letters with a map of their individual land interest advising of the changes.	Letters were issued to affected parties on 30 April 2014, with the deadline for comments 30 May 2014.

# 18 Legislation and Guidance that have Influenced Stakeholder Engagement

National Grid's approach to stakeholder engagement has been guided by its experience and expertise in the promotion of major infrastructure proposals around the UK as well as the expectations of prevailing legislation and guidance. The Planning Act 2008 in particular puts considerable emphasis on undertaking and demonstrating meaningful consultation in the development of projects and accordingly, for the Onshore Scheme, National Grid's approach to consultation was guided by the requirements of the following primary and secondary legislation:

## Primary Legislation:

- Planning Act 2008;
- Localism Act 2011 (amends certain provision in the Planning Act 2008 and abolishes the Infrastructure Planning Commission);
- Growth and Infrastructure Act 2013; and
- Infrastructure Act 2015.

## Secondary Legislation:

- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009;
- The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009;
- The Infrastructure Planning (Interest Parties) Regulations 2010; and
- The Infrastructure Planning (Prescribed Consultees and Interested Parties etc.) (Amendment) Regulations 2013.

The National Grid team also made use of guidance provided by relevant government departments and PINS. Below is a list of the guidance and advice notes used during the process.

- Planning Act 2008 Guidance on the pre-application process;
- PINS advice note two: the role of local authorities in the development consent process;
- PINS advice note eleven: working with public bodies in the infrastructure planning process;
- PINS advice note fourteen: compiling the consultation report; and
- PINS advice note sixteen: the developer's pre-application consultation, publicity and notification duties.

It is important to note that at the time of application submission, no other CCS applications had been progressed pursuant to the provisions of the Planning Act 2008 and that relatively few DCO applications had

been made for linear projects. Accordingly, National Grid was aware that, as a result, many stakeholders would not be familiar with the extensive pre-application and examination process required by the Act. To ensure that all stakeholders, which included persons with an interest in the land (PILs) and statutory undertakers, amongst others understood what was required of them, National Grid worked closely with affected parties, held regular meetings, extensive community consultation and encouraged an open dialogue to ensure that a lack of understanding in the expectations of the process would not inhibit or unduly delay the application for development consent.

Potential future applications for connecting transportation infrastructure from other emitters to the Onshore Schemes multi-junction are likely to be over 16.093km long and therefore would be considered NSIPs and require application to be made under the Planning Act 2008. However, in a number of cases they might not reach this length and may not be classified as nationally significant infrastructure project pipelines and would therefore, fall under the jurisdiction of the Town and Country Planning Act 1990.

# 19 Social Site Characterisation Work

## 19.1 Approach to Stakeholder Mapping

Throughout the lifetime of the project, National Grid has carefully and proactively identified all stakeholders.

In 2010, when the project was at a very early stage, National Grid carried out a comprehensive stakeholder analysis to identify, categorise and assess stakeholders that could potentially be affected by the project. This included identifying and, as appropriate, evaluating:

- three county councils, identifying in each case identifying the key councillors, electoral history and the main local issues;
- 11 local authorities, identifying in each case the key councillors, electoral history and the main local issues;
- more than 500 parish councils and 23 town councils in each of the local authorities;
- statutory and non-statutory groups, such as English Heritage, CO<sub>2</sub> Sense Yorkshire (a subsidiary of the then Regional Development Agency, now a regional carbon dioxide reduction charity), Friends of the Earth and CBI Yorkshire and Humber;
- organisations with an offshore interest, including The Crown Estate, North Sea Fisheries Committee and the relevant port authorities;
- local campaign groups and networks, including Drax Power Station Consultative Committee, the Humber Economic Partnership and Stop Climate Chaos; and
- media outlets, such as local newspapers, regional television stations and local radio stations.

This stakeholder categorisation process not only ensured that the team identified those stakeholders and interested parties that could be affected, but also ensured a detailed understanding of local issues and the region's energy and economic context. From this work it was clear that job creation and the region's economy were of paramount importance in the region, that dealing with climate change was also a key priority for local authorities and industry groups in particular and that CCS was already on the radar of local authorities and some groups. It was also important to note that the region was politically diverse with respect to council leaderships and MPs so cross-party support would be desirable. Finally, it was apparent that the number of stakeholders and other parties that could take an interest would be significant and therefore expansive consultation that covered a significant range of topics would be essential throughout the project development stages.

Throughout the lifetime of the project development, National Grid constantly reviewed which stakeholders and other parties could take an interest. This took account of refinements of the geographical scope of the project, new organisations that emerged and other groups and stakeholders that were identified.

In early 2011, as the broad strategic connection options were being determined and a preferred strategic connection option selected, National Grid conducted a comprehensive, desk-based review of statutory and non-statutory stakeholders, including relevant statutory stakeholders, MPs, MEPs, county councillors, district/unitary councillors and relevant officers, parish councillors from across the region, environmental and local interest groups, community organisations. As the route corridor was defined, this was reviewed further and a consultation zone for the Stage One (informal) Consultation was produced.

The identification of stakeholders has continued throughout the lifetime of the project, ensuring recommendations on other stakeholders and interested parties were gathered, including 'hard to reach' groups, and that stakeholder records were specifically refreshed at the various informal and formal consultation stages. The consultation zone was adapted and refined for each consultation stage.

## 19.2 Objectives

At project inception a specific stakeholder communications strategy was conceived, to support National Grid's CCS development aspirations. This strategy broadly comprised two phases: 'educate and inform' and 'engagement'.

In the early stages of the project development, National Grid sought to educate and inform stakeholders and local communities about the energy challenges facing the region, CCS as a technology and the potential of a CCS project in the region. This was discussed with stakeholders in meetings, explained to the wider public in a series of specific local newspaper adverts before the Stage One Consultation, and further in the Stage One Consultation. We ensured that this principle of 'educate and inform' continued throughout the lifetime of the project development to encourage broad engagement and ensure those taking an interest and giving feedback understood the energy and technological context for the project. Furthermore, this has ensured that local and regional stakeholders who give feedback on other CCS and energy projects do so from a position of knowledge of the context.

In parallel with this, the stakeholder engagement programme was designed to both meet the legislative requirements and Planning Inspectorate guidance, and deliver a comprehensive engagement to ensure a wide range of stakeholders and others were engaged and had the opportunity to give feedback to also help inform the development of the project. This process helped National Grid to secure broad acceptance for its project amongst stakeholders and communities and ensured views of stakeholders and communities helped to influence the development of the project.

### 19.3 Social Site Characterisation

The project is linear by nature and has stretched over a significant geographical area – originally the strategic options included land on both sides of the River Humber, covering areas in both the East Midlands and in the Yorkshire and Humber region. The overall vision to connect the pipeline to other emitters across the region to create a network, plus the offshore project, meant that potential interest stretched even beyond the proposed route. It was therefore necessary to take a wide-ranging approach to considering demographics, cultural characteristics, political will and local environmental matters.

### 19.4 Sources of information

National Grid's consultation experience extends from its experience of both gas and electricity transmission projects that it has worked on prior to and since the introduction of the Act. From this experience, this project has been able to draw upon effective, tried and tested methods of engagement.

In devising the engagement approach, National Grid also gave careful consideration to the Act, associated legislation and regulations, and other regional DCO projects to ensure National Grid followed emerging best practice.

### 19.5 Overview of public and stakeholder engagement

#### 19.5.1 Information Sources

Engagement on the Onshore Scheme commenced in early 2011 and continued until National Grid's DCO application was submitted to PINS in June 2014. When the DCO application was accepted, stakeholders, local communities and other interested parties were notified in accordance with legislative requirements. Thereafter, National Grid has continued discussions with landowners and statutory stakeholders throughout the DCO examination.



As described above, the linear nature of the project and the form of the project meant that a significant number of individuals and organisations needed to be engaged. National Grid developed a number of different engagement means to ensure appropriate methods were used for separate organisations and individuals, depending on their interest and nature. These included:

Table 19.1: Engagement Means

Source / Means	Stakeholder/s	Objectives and comments (how views were captured)
Meetings	Joint monthly meetings with local planning authorities (planning officers): East Riding of Yorkshire; Selby District Council; Doncaster Metropolitan Borough Council (until such time as the DVPP no longer formed part of the DCO being pursued); and North Yorkshire County Council.	Round-table updates and discussions. Outline of proposals, relevant issues, consideration of options and feedback, discussions about planning process.
	Regular meetings with all landowners, agents, tenants (Persons with an Interest in the Land, PILs).	Discussion of land issues, timescales and planning process, feedback and agreements.
	Establishing and regularly meeting these thematic groups: Water Thematic Group, 8 members including Natural England, Environment Agency and CEFAS; Ecology Thematic Group, 8 members including RSPB, Yorkshire Wildlife Trust and the Environment Agency; Archaeology Thematic Group, 4 members including English Heritage and Humber Archaeology Partnership; Landscape Thematic Group, 7 members including the Forestry Commission and Natural England.	Round-table, outline of proposals, relevant issues, discussions, consideration of options and feedback. Minutes recorded and were published in the DCO Consultation Report.
Stakeholder presentations	Directly affected parish councils, MPs and local authorities (members) along the route.	To provide updates and capture further informal feedback. Held at appropriate junctures to discuss further issues.
SoCC / Consultation Strategy	Local planning authorities.	Comments sought on the draft SoCC, making sure it reflected the best consultation methods for the locality alongside confirmation with the LPAs of those groups considered hard to reach, and how best to contact them.
Open format public events (public exhibitions)	Local residents, landowners, community groups, local authorities and other interested parties, plus wider public	Outline of proposals (including about CCS), one-to-one questions and answers, feedback form for capturing comments.

Source / Means	Stakeholder/s	Objectives and comments (how views were captured)
Consultation website, telephone line, email address and freepost address	Stakeholders, public and media	Interactive feedback form during consultation, general public and other interested parties able to email or telephone National Grid team with comments/queries.
Media monitoring	National, regional and local media – print and broadcast	Monitoring of local and industry news to develop a fuller understanding of local and regional characteristics and issues, other infrastructure projects and project coverage.

In addition, National Grid sourced local information through its own, non-obtrusive research, including desk-based research and site visits / walking tours of the route. This helped the team, to develop a detailed understanding of geographical, environmental and construction considerations.

19.5.2 **Stages of Consultation**

Consultation on the Onshore Scheme commenced in 2011 and was divided into two broad stages, Stage 1 and Stage 2, each including sub stages.

Stages 1 and 1A were non statutory stages of consultation in that they were voluntary and additional to the prescribed consultation requirements set out in the Act.

In undertaking Stage 1 Consultation in 2011 and Stage 1A Consultation in 2012, National Grid ensured that the views of stakeholders, local communities and other interested parties were considered and informed the development of the project at each key stage. It also ensured National Grid could provide updates at appropriate junctures and that many of those stakeholders and interested parties who took part in the subsequent, statutory Stage 2 Consultation already had detailed knowledge of the project, the technology and the planning process, and had already influenced the development of the project.

The approach to consultation was divided into two broad stages to reflect the nature of the stage of project development, the nature of options and the availability of supporting information. Stage 1 (and Stage 1A) sought feedback on broad options based predominately (but not exclusively) on desk based information. Stage 1 and 1A consultation was completed in accordance with a consultation strategy agreed with the affected local planning authorities;

- Stage 1 sought views on the strategic pipeline options and the pipeline route corridors for the Onshore Scheme;

- Stage 1A concentrated on the siting options for the Above Ground Infrastructure (AGIs) and preferred route corridor to connect the proposed White Rose project. During Stage 1A, different ‘design style’ options were also consulted on for the proposed compressor site and pumping station site.

Separate feedback reports were produced to provide full accounts of consultation during Stages 1 and 1A; these are available at [www.ccs-humber.co.uk](http://www.ccs-humber.co.uk) and are appended to the Consultation Report, which forms part of the DCO application.

Stage 2 sought feedback on a ‘preferred scheme’ based on detailed surveys, investigations and ongoing discussion with stakeholders.

- Stage 2 formed the statutory stage of consultation: i.e. consultation completed in accordance with the requirements of the Act on the proposed DCO application. The Stage 2 Consultation was completed to meet the requirements of sections 42 to 49 of the Act.
- Stage 2A sought feedback on a change to the location of the Barmston pumping station following feedback from Stage 2.

Stage 2B was a standalone consultation contacting PILs whose land drainage may have been affected by changes to the scheme.

### 19.5.3 Project Issues Appraisal

Table 19.2 below summarises the issues that were considered as part of analysis of feedback.

**Table 19.2: Feedback from Consultations and other Stakeholder Engagement Activities**

Consultation Stage	Issue
Stage 2	Consultation process
	Project need
	Environmental Matters
	Routeing
	Siting
	Visual effects / design
	Construction
	Drainage
	Compensation
	Safety
	Separation distances
Stage 2A	Project need

Consultation Stage	Issue
	Visual effects / design
	Safety
	Separation distances
	Offshore
Stage 2B	Consultation was so precise that any comments received were dealt with on a case by case basis

#### 19.5.4 Responses Appraisal: Outcomes and Project Changes

Consideration of the feedback received through consultation and wider stakeholder engagement has been a major contributing factor in the decision-making stages in the development of the Onshore Scheme. Consultation has been completed at an early enough stage in the development of proposals to allow consultees to have a real opportunity to influence the proposed development. In particular, consultation with stakeholders has helped inform decisions at the following stages of project development:

- selection of a preferred 'strategic option';
- selection of preferred pipeline corridor;
- Selection of preferred sites for all AGIs;
- 'micro-siting' of AGIs;
- design style of the pumping station and compressor station; and
- identification of preferred pipeline route.

The elements of the Onshore Scheme that have changed materially as a result of feedback from consultation can be summarised as:

- the location and siting and design of AGIs (including permanent access);
- the route of the Pipeline;
- the inclusion of appropriate land drainage within the Order Limits to mitigate the effects of the Pipeline on the land;
- details of the road network routes to be utilised in the construction of the Onshore Scheme;
- the location of the Landfall point;
- the Pumping Station location and design style; and
- the location of Construction Compounds.

#### 19.6 Project Stakeholders

National Grid directly engaged with a wide range of stakeholders to help develop the project and ensure stakeholders had the opportunity to learn about the proposals and give their comments during the

consultation stages. These stakeholders included Section 42 consultees, including parish councils:

- Local Authorities as identified in Section 43 of the Act;
- further regional Local Authorities that may have had an interest in the project;
- persons with an Interest in Land including those identified in Section 44 of the Act;
- Parish Councils affected by highways routes;
- prescribed consultees as identified in Section 42 of the Act;
- residents within the consultation zones;
- MPs, MEPs and councillors;
- business stakeholders;
- local business, environmental (marine/offshore and other interest groups);
- hard to reach groups (identified through dialogue with LPAs);
- individuals/groups that have previously given comment;
- individuals/groups that have registered an interest on project website; and
- local and regional media.

In addition, prior to the commencement of the consultation, National Grid carried out desktop research and entered into dialogue with local authorities, ERYC, SDC and NYCC seeking contact details and names of hard to reach groups within their respective authority areas alongside the best methods of communication with these groups. Following this dialogue, the following parties were included in statutory consultation:

- Bridlington Coastguard;
- Bridlington Lifeboat Station;
- Coastal Conservation Officer (National Grid contacted the North East Coastal Group and East Riding Coastal Forum under this title as part of the statutory consultation);
- East Yorkshire Badger Protection Group;
- East Riding of Yorkshire Rural Partnership;
- Heritage Coast Officer;
- Gypsy/Traveller Groups or Show people (National Grid contacted the following groups under this header):
  - Friends, Families and Travellers and Traveller Law Reform Project;
  - Gypsy and Traveller Involvement Officer;
  - Gypsy Traveller Federation;
  - Hull GATE – Gypsy and Traveller Exchange;
  - National Association of Gypsy and Traveller Officers;
  - Gypsy Roma Traveller Achievement Service; and

- Showmen's Guild of Great Britain;
- Selby Civic Society and Chambers of Commerce; and
- Selby Council's Community Engagement Forums (National Grid wrote to East and West Community Engagement Forums).

### 19.7 Legislative Requirements

The Yorkshire and Humber CCS Cross Country Pipeline is an NSIP and is therefore subject to examination by PINS under the Act. For more information please see Chapter 18 above.

## 20 Approach of Engagement

### 20.1 Team Structure

The team was led by National Grid with support from a specialist stakeholder and community consultation company. The team was further supported by technical, environmental and engineering team members with legal input as required to help ensure compliance with relevant legislation.

### 20.2 Engagement Strategy and Plans

#### 20.2.1 Generating the Consultation Strategies and the Statement of Community Consultation (SoCC)

Members of the team were asked to participate in the development of the Consultation Strategy for the Stage 1 (Non-Statutory) Consultation and the SoCC for the Stage 2 (Statutory) Consultation.

National Grid sought input from Doncaster Metropolitan Borough Council (DMBC), East Riding of Yorkshire Council (ERYC), North Yorkshire Council (NYC) and Selby District Council (SDC) to develop the Consultation Strategies which formed the basis of the Stage 1 and Stage 1A Consultations.

The SoCC produced for the Stage 2 (Statutory) Consultation was based upon the previous Stage 1 and Stage 1A Consultation Strategies that had been produced and agreed with affected local planning authorities for Stages 1 and 1A. Both Stage 2 and Stage 2A Consultations have been completed in accordance with the SoCC. In July 2013 SDC, ERYC, NYCC and the Marine Management Organisation (MMO) were consulted on this document, prior to its publication, as prescribed under section 47 of the Planning Act 2008.

In producing the Stage 1 and Stage 1A consultation strategies and formal SoCC, National Grid researched the local area and considered the most appropriate means of consulting each category of consultee, given the nature and scale of the Onshore Scheme. This included working with SDC, ERYC, MMO and NYCC to understand the needs of the communities they represent and the best communication mechanisms to be utilised to contact the local community, including hard-to-reach groups.

### 20.3 Engagement Strategy

Consultation has been undertaken at a series of stages to help manage the balance between consulting early, but having the necessary detail for consultees to provide meaningful feedback. At each stage of the

consultation process, clear parameters were set to explain to consultees what decision the specific stage of consultation was designed to inform.

In developing National Grid's approach to engagement and consultation, particular regard has been had to accessibility of exhibition venues and the nature of consultation materials. National Grid understood that a number of people attending exhibitions may not be familiar with CCS as a technology so the display information included explanations of the CCS process, simple experiments to help aid understanding of the properties of carbon dioxide and detail on why the project is being proposed in Yorkshire and the Humber region.

National Grid made numerous references to the importance of CCS in letters, adverts/notifications, display panels, brochures/leaflets and other materials and the website. Of the many documents produced a few examples are provided at Appendix E.

**Figure 20.1: Carbon Dioxide – familiar uses and simple experiments**





Source: National Grid

National Grid ensured it maintained ongoing consultation with relevant groups such as the Environment Agency, Natural England and the MMO, as well as Local Authorities. This has mainly taken the form of one-to-one meetings. Thematic Group meetings have also taken place, with prescribed consultees, during the evolution of the Onshore Scheme.

The Stage 1 (Non-Statutory) Consultation was undertaken with stakeholders, the public, other parties and local communities living in the vicinity of the proposed route corridor options identified, in line with the agreed Stage 1 Consultation Strategy.

## 20.4 Messaging and Engagement Materials

### 20.4.1 Consultations

National Grid undertook five rounds of consultation to support the transportation and storage elements of the project. The table below list when each consultation took place.

**Table 20.1: Consultation Calendar**

Consultation	Date
Stage 1 (Non-Statutory)	June-August 2011
Stage 1A (Non-Statutory)	June-July 2012
Stage 2 (Statutory)	September-November 2013
Stage 2A (Statutory)	February-March 2014
Stage 2B (Statutory)	April-May 2014

### 20.4.2 Stage 1 Consultation

Prior to the publication of the full details of Stage 1 Consultation, National Grid published an initial information advert (week commencing 23 May 2011) that summarised the concept of Carbon Capture and Storage (CCS) and highlighted that National Grid was exploring the options for a CCS project in the Yorkshire and the Humber region. This was aimed at helping to inform stakeholders and the public about the technology (such information was repeated at the consultation).

This advert was published in eleven local newspapers: Beverley Guardian; Doncaster Free Press; East Riding Advertiser; East Riding Mail; Gazette and Herald (Ryedale and Malton); Goole Howden and Thorne Courier; Pocklington Post; Selby Times; The Press (York); Thorne and District Gazette; and Yorkshire Post.

Subsequently, a full page advert containing information on the project and the consultation exhibitions was published in 13 newspapers, each of which had distribution areas that covered all or part of the route corridor options. The advert ran across two weeks in June 2011 prior to the start of Stage 1 Consultation on 27 June 2011.

**Table 20.2: Stage 1 Advertisement Placement Calendar**

Publication Week	Publication
13 June 2011	Doncaster Free Press East Riding Advertiser Pocklington Post Selby Times Yorkshire Post
20 June 2011	Beverley Guardian Bridlington Free Press Driffield Post East Riding Mail (Part of the Hull Daily Mail) Gazette and Herald (Ryedale and Malton) Goole and Howden Courier The Press (York) Thorne and District Gazette

The Stage 1 Consultation started on 27 June 2011. Inspection copies of the project information leaflets and electronic copies of the Strategic Options Appraisal Report (SOAR), Route Corridor Study (RCS) and Consultation Strategy were made available in a number of libraries.

16 public exhibitions took place, including two on a Saturdays. These exhibitions were held between 2pm-7pm on weekdays and 11am-4pm on weekends. These were open events at which members of the local community could view proposals and maps, talk to project team representatives and give their views using written feedback forms. Consultation events were held at venues near the route corridor options.

Each exhibition was also preceded by a stakeholder session, reserved for County, District and Parish Councillors and other relevant political stakeholders, which was held one hour prior to the public event.

At the exhibitions there were a number of exhibition boards which provided information on the project. Also available at the exhibitions were feedback forms which members of the public could fill in and submit at the event or take home and return via a freepost address.

Online information and feedback facility were also made available via the project website: [www.ccs-humber.co.uk](http://www.ccs-humber.co.uk). Prior to the launch of the full project website, a provisional pre-consultation website was launched in June 2011 to enable people to register their details in order that they could be notified when the full website went live.

#### 20.4.3 Post Stage 1 engagement

In late 2011 presentations were offered to members at each Authority through which the Pipeline was proposed to run. DMBC accepted the offer and NYCC invited National Grid to brief councillors on the project as part of a wider briefing on low carbon energy projects in the region. ERYC and SDC did not consider briefings necessary at this juncture. Both the DMBC and the NYCC presentation covered the need for the project, the rationale for the selected preferred corridor and an outline of the planned consultation and construction timetables.

Group briefings were also offered to parish councils in the vicinity of the preferred route corridor. Parish councils were invited to send representatives to attend one of three sessions held in different locations along the route corridor in March 2012. Representatives from 18 parish councils attended the sessions at:

- Carlton Village Hall, 6pm, 12 March 2012;
- Cass Centre, Driffield, 6pm, 13 March 2012; and
- Market Weighton Community Centre, 6pm, 15 March 2012.

A total of 10 MPs were identified as representing constituencies that could be affected by the preferred route corridor, briefings were offered to all 10, but were not taken up at this stage.

#### 20.4.4 Stage 1A Consultation

At the start of Stage 1A, approximately 5,300 addresses within the consultation zone were contacted by letter with a project summary and details of planned Stage 1A public exhibitions. In addition, an invitation letter was sent to residents in Ulrome, as despite falling outside the consultation zone, the village was identified as being in close proximity to the southern landfall option. Following discussions with the Parish Council, National Grid organised for a minibus to take residents who wished to attend the public exhibition in Barmston from Ulrome to the exhibition and back. An additional letter was sent to Ulrome residents on the 21 June, informing them of this arrangement.

An advertisement containing information on the scheme and consultation was published in eight local newspapers with distribution

areas that covered the preferred route corridor; as well as the Yorkshire County Gazette and a notice in the Kingfisher Bulletin. This advertisement ran once in each newspaper across a two week period prior to the start of Stage 1A Consultation on the 19 June.

**Table 20.3: Stage 1A Advertisement Placement Calendar**

Publication Week	Publication
Week commencing: 4 June 2012	Doncaster Free Press Goole Courier Selby Times Kingfisher Bulletin (digital newsletter)
Week commencing: 11 June 2012	Bridlington Free Press Yorkshire Post Beverley Guardian Driffield Post East Riding Mail
Week commencing: 18 June 2012	Yorkshire County Gazette

Inspection copies of reports were made available at a number of libraries and Council centres located in the vicinity of the preferred route corridor.

Notification letters were sent to Parish and Town Council Clerks asking Clerks to display a project poster advertising the exhibitions.

A total of seven public exhibitions were held in seven different locations along the Preferred Route Corridor.

At each exhibition there were a number of static display boards explaining the concept of and need case for CCS, why the Yorkshire and Humber region had been chosen for the proposed project, the preferred route corridor, what happens offshore and environmental matters. Maps were displayed showing the proposed siting options for the Compressor/Multi-Junction, Block Valve sites and the Pumping Station, the landfall options at the coast and the proposed route corridor options to the White Rose CCS project.

Also available at the exhibitions were feedback forms which members of the public could fill in and submit at the event or take home and return via a freepost address. Online information and feedback facility were also made available via the project website:

[www.ccsnumber.co.uk](http://www.ccsnumber.co.uk).

#### 20.4.5 Stage 2 Consultation

On 23 August 2013 National Grid notified PINS of its intention to commence Stage 2 (Statutory) Consultation on the 23 September 2013, as required by Section 46 of the Act.

Local Authorities, PILs and Statutory Consultees were sent a notification letter on 9 September 2013 advising of the launch of Stage 2 Consultation and a letter on the 23 September 2013 with a CD copy of consultation documentation alongside a hard copy of the Project Non-Technical Summary Report.

Also on 9 September 2013, written to notifications of the forthcoming consultation and exhibition events were sent to 2,959 addresses within the consultation zone. On the 20 September 2013 residents of Wadehouse Lane were sent specific Project information via letter given their proximity to the proposed multi-junction site.

In addition Goole Town Council, South Cave Parish Council, Catwick Parish Council, Tickton and Routh Parish Council and Coniston Parish Council were contacted on 9 September 2013 by letter advising of the forthcoming exhibitions, website, freephone and postal address.

In order to effectively consult PILs, and give them the opportunity to speak to members of the National Grid project team, separate events were organised and held in advance of each public exhibition. These were held at the same venues as the public consultation, using the same consultation material and occurred two hours prior to the opening of each exhibition to the public. In addition to the PILs consultation events, one-to-one meetings were offered to PILs throughout the statutory consultation period.

Nine public exhibition events were held in accessible locations along the route. These were chosen according to their proximity to settlements, ease of access for cars and disabled users, and suitable indoor space for hosting an exhibition-style consultation event. The events took place between 23 September and 2 October 2013.

Advertisements detailing and encouraging attendance at the consultation events were placed in 8 local papers over two consecutive weeks, as shown in the following table. In addition a notice was placed in the Kingfisher Bulletin edition of 12 September 2013.

**Table 20.4: Stage 2 Advertisement Placement Calendar**

Date	Newspaper
9 September 2013	Lloyds List London Gazette
11 September 2013	The Guardian
12 September 2013	Bridlington Free Press Driffield Times and Post Goole Times Selby Times and Post
13 September 2013	Farmer's Weekly Fishing News Yorkshire Post
17 September 2013	The Metro (Yorkshire)
19 September 2013	Bridlington Free Press Driffield Times and Post Goole Times Selby Times and Post
21 September 2013	Yorkshire Post

Posters advertising the launch of the Stage 2 Consultation and public consultation events were distributed to the Clerks of 80 Parish Councils on 9 September 2013, to appear on Parish Council notice boards in the area.

The events explained the consultation process to date and the reasons for identifying the proposed pipeline route, before seeking views on the final location and design of AGIs, preferred pipeline route and construction compound locations and associated construction accesses.

All events featured the same display boards providing information on the Onshore Scheme, with some supporting information on the Offshore Scheme, maps of the preferred pipeline route and AGI locations including overview and four individual route sections, construction work areas and construction access routes. A television screen showed National Grid's animation of the project, including details on the need, technology and earlier rounds of consultation. Props including sandstone and water to demonstrate the absorption properties of the rock were available alongside and an experiment for children with vinegar and bicarbonate of soda demonstrating the properties of carbon dioxide.

National Grid representatives from several disciplines including construction, planning, land and environmental assessment were on

hand to explain the Onshore Scheme and answer questions from members of the local community attending the events.

All relevant published information, including National Grid factsheets and technical documentation, was also available. A full list of materials available at the consultation events is given below:

- Preliminary Environmental Information Report;
- Non-Technical Summary;
- Preferred Scheme Report;
- Siting Study for Multi-junction, Block valves, Pumping Station and Drax PIG trap;
- Book of Plans for Multi-junction, Drax PIG trap, Tottlingham block valve, Dalton block valve, Skerne block valve and the Pumping Station;
- Project maps consisting of a route overview map and four individual pipeline route section maps:
  - Section map 1 - Camblesforth to Tottlingham;
  - Section map 2 - Tottlingham to South Dalton;
  - Section map 3 - South Dalton to Skerne; and
  - Section map 4 - Skerne to Barmston;
- Project information leaflet;
- 12 exhibition display boards;
- AGI illustrative images book; and
- Feedback Form.

Feedback forms were available at the events for consultees to record their comments. These could be completed at the events or taken away and posted to a National Grid freepost address. Attendees were also advised that they could record their comments via an online feedback form on the Project consultation website or via a dedicated Project freephone number. A press release announcing the close of consultation was issued towards the end of Stage 2 as a reminder to encourage further responses.

The dedicated email address ([nationalgrid@ccshumber.co.uk](mailto:nationalgrid@ccshumber.co.uk)) remained in place for members of the local community wishing to express views or ask questions at any point. A dedicated phone line (0800 954 9517) was also maintained.

The main National Grid website featured information on the Onshore Scheme and the consultation under the 'In Your Area' section: <http://www2.nationalgrid.com/UK/In%20your%20area/Projects/Yorkshire%20and%20Humber%20CCS/>) together with a dedicated link to the Yorkshire and Humber CCS consultation website. On 9 September 2013 a holding page featured on the CCS website with a summary note

on the forthcoming statutory consultation, SoCC advert and email registration box. The full website, which included information from the exhibition boards (text, images and maps), an interactive map (of the route), online feedback form and all Project documents, went live on the day of the consultation. On 4 November the website was updated to note the end of consultation and the online feedback form was removed.

The Yorkshire and Humber CCS website also had a dedicated link to the White Rose NSIP Project website.

#### 20.4.6 Stage 2A Consultation

The SoCC as published (9 September 2013) and agreed with Local Authorities and the MMO, provided National Grid with the option to pursue further localised consultation. National Grid verbally updated PINS of its intention to pursue a localised statutory consultation during a conference call in December 2013.

Additional Preliminary Environmental Information was produced in support of the consultation for Landscape and Visual, Archaeology, Ecology and Water Resources; and reported as an Addendum to the PEIR.

The documents consulted on as part of the Stage 2A consultation were:

- Pumping Station (Alternative Site) Site Assessment;
- Pumping Station (Alternative Site) Book of Plans; and
- Preliminary Environmental Information Report – Addendum.

Prior to the launch of the Stage 2A Consultation, National Grid produced and consulted on its Consultation Strategy for localised Statutory Stage 2A Consultation with the MMO, SDC, ERYC and NYCC between 23 December 2013 and 10 January 2014.

As agreed with the local authorities and the MMO, the Consultation Zone for Stage 2A extended 500 metres either side of the potential pipeline route (starting where it deviated from that shown during Stage 2 Consultation) and 1000 metres around the initial and alternative Pumping Station sites. The zone was expanded to also include all of the residents of the villages of Barmston and Fraisthorpe. In addition, all statutory consultees were notified and invited to participate in the consultation, local residents that fell within the Consultation Zone were notified and invited to participate in the consultation, along with other parties that had previously registered an interest in the Project via the website or had previously submitted feedback at any of the previous



stages of consultation. Those PILs directly affected by the proposed changes were notified and invited to participate in the consultation.

Relevant consultees, including PILs and Local Authorities identified within Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) were sent a Stage 2A invitation letter on the 27 January 2014 advising of the launch of Stage 2A Consultation. On 11 February 2014, the day prior to the start of Stage 2A Consultation period, these consultees were sent a further letter alongside a CD copy of the consultation documents.

Parish Councils which had been consulted during previous consultation stages were notified of formal consultation and invited to the exhibition as part of this stage of consultation, with notification letters issued on 27 January and 11 February 2014. Barmston and Fraisthorpe Parish Council were offered a separate meeting given the locality of the Stage 2A consultation. This meeting was held on 12 February 2014 at Barmston Village Hall.

Ahead of and during Stage 2A Consultation, meetings were held with the MMO, ERYC, SDC and NYCC to brief each authority on the outcome of Stage 2 Statutory Consultation and the forthcoming localised Stage 2A Consultation. All of these parties were invited to the Stage 2A exhibition event.

In advance of Stage 2A Consultation local residents were written to on 27 January 2014 notifying them of the forthcoming consultation and exhibition this mail out included:

- 37 residents within the consultation zone;
- 181 consultees such as councillors, MPs and local groups with whom National Grid had previously consulted as part of their wider consultation (in addition to the s42 a Prescribed Consultees);
- 283 people who had registered on the website; and
- 134 previous feedback respondents.

One public exhibition was held at Barmston Village Hall on 12 February 2014.

An advertisement detailing and encouraging attendance at the consultation exhibition was placed in the Bridlington Free Press for two consecutive weeks; on 30 January 2014 and 6 February 2014.

Posters advertising the Stage 2A Consultation and the exhibition event on the 12 February were distributed to the clerks of four Parish Councils (Barmston and Fraisthorpe Parish Council, Carnaby Parish Council, Lissett and Ulrome Parish Council and Burton Agnes Parish Council) to appear on Parish Council notice boards in the area.

National Grid representatives from several disciplines including construction, planning (including design), land and environmental assessment were on hand to explain the Onshore Scheme and answer questions from the local community attending the events.

All relevant published information, including National Grid factsheets and technical documentation, was also available.

Feedback forms were available at the event for consultees to record their comments. These could be completed at the event or taken away and posted to a National Grid freepost address. Attendees were also advised that they could record their comments via an online feedback form on the Project consultation website.

#### 20.4.7 Stage 2B Consultation

The stage commenced on 30 April 2014 and concluded on 30 May 2014. It sought views from affected s44 parties on the revised location of the Limits of Deviation and Application Boundary. These changes were all considered to be minor and localised and only affected PILs already consulted during Stage 2. No additional PILs were identified as a result of these changes.

In addition to consulting on changes to the Onshore Scheme, the North Yorkshire Moors National Park and Yorkshire Dales National Park Authorities were re-consulted as statutory consultees (in line with S42 of the Act).

Both Authorities were telephoned to discuss this issue, were offered a meeting with National Grid to discuss the proposals further and were written to formally by National Grid. Both Authorities were also provided with up to date Project information.

PILs were sent letters with a map of their individual land interest advising of the changes. Letters were issued to affected parties on 30 April 2014, with the deadline for comments 30 May 2014.

## 20.5 Statutory Consultation

National Grid conducted its Statutory Consultation in line with the Act and associated regulation. Please refer to Chapter 4 above for further information.

PINS and the project's specific case team was also a useful source of information. Its advice notes, such as Advice Note Fourteen, which sets out what should be included in the Consultation Report, were vital in assisting the National Grid project team to ensure the Statutory Consultation complied with all necessary legislation and regulations.

## 20.6 The Consultation Report

At the end of both informal stages of consultation, National Grid produced a Feedback Report. This outlined the process used to conduct the consultation and detailed the feedback received from members of the public. This report also allowed National Grid to outline the changes made to the scheme as a result of the consultation.

Collating the statutory Consultation Report, at the end of the Stage 2, Stage 2A and Stage 2B Consultations, required the collaborative involvement of all the members of the National Grid team and consultants. The document went through multiple iterations and peer reviews. This ensured that what was produced was a robust, accurate and consistent account of the consultation National Grid conducted over four years ahead of the DCO submission in July 2014. The feedback reports produced at the end of Stage 1 and Stage 1A were summarised in the final Consultation Report and appendices in full.

## 21 Key Learning for Knowledge Transfer

**Early briefings and engagement** helped to ensure stakeholders and communities not only had an involvement in the development of the project, but also gained in-depth understanding of the project so they could give informed feedback. In addition, it provided time to fully explore and resolve issues prior to submission of the DCO application.

**Tone and complexity of consultation materials** ensured that some stakeholders and residents with very limited technical knowledge were able to participate fully in the engagement process. 'Hands-on' visuals and activities were used at public events, as well as language that was straightforward to explain the need in simple terms.

**Public exhibitions in local venues** at convenient times helped to ensure that as many individuals could fully participate, even if they are time poor or do not have the means for transportation. The venues had car parks and disabled access. We also provided bespoke solutions such as providing a bus for residents of Ulrome to take them to the exhibition in Barmston to ensure they were able to attend the Stage 1A exhibition.

**The location of the proposed project** meant that most local residents were apathetic towards the project. This area of the UK already has a large amount of infrastructure, and power generation is vital to the local economy. Therefore there is a high level of tolerance for infrastructure projects.

**Learning from other DCO applications** will continue to help future applications and ensure requirements are met and best practice is followed.

**Establishing the website** as an accurate and regularly-updated source of information helped to drive understanding and participation in the consultation, particularly amongst stakeholders and the public who did not attend the exhibitions. An online feedback form helped to capture as many views as possible.

**Freephone, email address and freepost address** in particular helped to ensure lines of communications with residents and stakeholders remained open and questions could be answered in the often lengthy gaps between the consultation stages. These also helped to support participation in the consultation as consultees and residents could ask questions about forthcoming events or the feedback process.

**Early engagement with PINS** ensured that the projects were fulfilling the requirements to the DCO application and all stakeholders and interested parties were consulted in the correct way.

**Section 55 of Planning Act 2008** outlines the criteria under which a DCO will be accepted by PINS. The Consultation Report is the main document, which fulfils these criteria, and therefore stakeholder engagement is vital to the acceptance of the DCO.

**Newsletter and Leaflets** allowed information to be communicated to a wide audience and in an easy to read way.

**Computer software**, such as 'Darzin' used by team, enables users to understand, structure and implement stakeholder engagement processes.

**Identifying locations for Exhibitions** where there are the facilities to hold an exhibitions which will be suitable.

**Identifying locations for Consultations** that are needed for the displaying of information/documents as part of the consultation processes. This is important as there can be a lot of information and identifying venues where they may have space issues will ensure a smooth consultation process.

**Workshops** that can take place during the public exhibitions assist in dealing with common queries that are raised as part of the public exhibition process.

**Video** is a useful way to impart information, particularly if the videos show simple information and pictures instead of a 'talking heads' arrangement as it will be easier to explain complicated information.

**Questionnaires** were used at Exhibitions to gauge people opinions of the Project. This was vital in identifying where work was required to provide additional information to ensure people were fully informed.

**Consultation fatigue** was a risk towards the end of the final consultations. The number of non-statutory and statutory consultations meant that many local residents began to question when consent might be granted and when/if the development would actually be built. This meant we had to ensure that the timeline was accurately communicated.

## 22 Summary of Conclusions and Recommendations

National Grid and CPL drew on their considerable consultation experience to ensure that the stakeholder engagement undertaken was as inclusive and comprehensive as possible. This was achieved through a public and stakeholder engagement plan and strategy of first identifying all key stakeholders involved.

Integral to this public and stakeholder engagement plan was a successful full scale consultation programme which engaged all stakeholders from MPs and MEPs, to environmental and local interest groups and community organisations. The full chain public and stakeholder engagement also included ongoing reviews and updates, recording, analysing and responding to consultations throughout the development of the project and can be regarded successful from the turnout, responses and support garnered throughout the course of the White Rose FEED programme.

The following tables 22.1 and 22.2 summarise the conclusions and recommendations together with associated engagement means used during the course of the public and stakeholder engagement process.

**Table 22.1: Summary of Conclusions**

Conclusion	Engagement means
Consultation campaign that included an-educate-and-inform phase to build awareness before the main consultation and engagement commenced.	Stakeholder workshops, public accessibility to project documents, linked up with the OPP and CO2 pipeline consultations. Dedicated project websites, adverts and posters to promote exhibitions, public exhibitions, good media relations and community, county council, local council and business briefings.
Early engagement with the determining authority (in this case PINS) and Local Authorities to ensure a comprehensive stakeholder database was produced, which covered all stakeholders.	PINS advice notes, meetings, letters and DCLG guidance 'Planning Act 2008 and SoCC / Consultation Strategy.  PINs advice notes, roundtable meetings, letters and DCLG guidance 'Planning Act 2008' and SoCC / Consultation Strategy. Monthly meetings were also held with the Consent Services Unit. Monthly meetings were held with North Yorkshire County Council, East Riding of Yorkshire Council, Selby District Council and Doncaster Metropolitan Council for updates.
A detailed review of the actions necessary to comply with all legislation and regulations is a necessary prerequisite for scoping and planning the task.	Worked closely with legal and planning experts with experience from other projects. Used DCLG guidance 'Planning Act 2008', meetings and clarification from PINS.
Ensuring that the DCO and all engagement opportunities were adequately explained to stakeholders. National Grid and CPL were aware that the Planning Act 2008 and PINS itself is relatively new and as such many stakeholders needed effective communication to ensure they understood the process.	This was achieved through the information provided on the <a href="http://www.whiteroseccs.co.uk">www.whiteroseccs.co.uk</a> and <a href="http://www.ccsnumber.co.uk">www.ccsnumber.co.uk</a> websites, as well as information provided via stakeholder engagement meetings: workshops, presentation day, consultation exercise days, progress review meetings and project consultation meetings and in newsletters which were distributed to local residents as well as the adverts which were placed in local and national newspapers.

Conclusion	Engagement means
Establish clear and effective lines of communication with local residents to allow the community to easily contact the project team.	Maintaining a website and provision of a freephone number, freepost address and email address to allow the community to easily contact the project team. Sending newsletter to all businesses and households which are within the vicinity of the Project sites and/or identified as stakeholders.
Provision of communication documents, which are clear and concise so as to allow all local residents an understanding of the project and the technology around carbon capture and storage, gave the impression of transparency and elicited very little negativity.	Open format public events (public exhibitions); sending newsletter to all businesses and households which are within the vicinity of the Project sites and/or identified as stakeholders.
Project updates, where appropriate, at key milestones provided a focus for the team demonstrated that stakeholders were being kept informed.	Dedicated Project Websites.
Rigorously recording and processing all feedback received during the consultations is essential.	Ensured that this feedback was reported in either feedback reports and/or in the Consultation Report.
Consideration of all the feedback received during the consultation stages and in other discussions with consultees alongside environmental and technical studies in the development of the project.	Undertake reviews to validate incorporation of and response to feedback. For example, feedback helped to inform the selection of the preferred pipeline route corridor and the siting and design of the pumping station and other above ground infrastructure.

**Table 22.2: Summary of Recommendations**

Recommendation	Activity
Engagement as early as possible with the determining authority to ensure a comprehensive stakeholder database is produced.	Engaged at an early stage with roundtable meetings.
Ensuring all the legislation and regulations are captured and understood.	Worked closely with legal and planning experts with experience from other projects.
Establish clear and effective lines of communication with local residents.	Establish a website and organise easy access by phone, email and post to the Project.
Ensure that all communication documents were clear and concise. Consider the use of Public Relation experts.	Newsletter and public exhibition information.
Rigorously record all feedback received during the consultations and ensure that this feedback is reported in either feedback reports or the Consultation Report.	Establish process for collecting feedback which should be collated and organised (database) to allow easy reporting.
Maintain Engagement with the local community, relevant local authorities and key stakeholders throughout all stages of the project.	Use Public Relations experts to advise how this should be done. Newsletter to be published regularly.
Follow the statutory notification and publicity requirements pursuant to Section 56 of the 2008 Act that the Applicant would need to fulfil following acceptance of the Application for examination by the SoS that would provide a further opportunity for interested parties to make comments.	Publish adverts in local and national newspapers.
Continuous engagement with the local community, relevant local authorities, and key stakeholders following the submission of the application, as well as throughout the construction, commissioning, operation and decommissioning phases of the Project, should the Order be made by the SoS.	Update on the status of the project and project timeline phase on project website and press releases.
Continuous issuance of updates on the Project. Regular contact would be maintained with Selby DC and NYCC and dialogue would be maintained with other key stakeholders.	Through the Project website and press releases.
Statutory notification and publicity requirements pursuant to Section 56 of the 2008 Act that the Applicant would need to fulfil following acceptance of the Application for examination by the SoS that would provide a further opportunity for interested parties to make comments.	



## 23 Glossary

Abbreviation	Meaning or Explanation
AGI	Above Ground Installation. These are structures and engineering such as elements of block valves and pumping stations that will be required to be above the ground.
Air mode	The mode of operation when the power plant is operating in a “conventional” air fired mode. The downstream capture of CO <sub>2</sub> is not possible in this mode.
ALA	Acquisition of Land Act 1981.
AOD	Above Ordnance Datum.
AONB	Area of Outstanding Natural Beauty.
APFP Regulations	The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Sets out detailed procedures that must be followed for submitting and publicising applications for Nationally Significant Projects.
Applicant	Capture Power Limited.
Application	The Application for a Development Consent Order made to the Secretary of State under Section 37 of the Planning Act 2008 in respect of the Project, required pursuant to Section 31 of the Planning Act 2008 because the Project is a Nationally Significant Infrastructure Project under Section 14(1)(a) and Section 15 of the Planning Act 2008 by virtue of being an onshore generating station in England or Wales of 50 Megawatts electrical capacity or more.
Appropriate Assessment	An assessment carried out under the Habitats Directive where a plan or project is likely to have significant effects upon a European site designated for its nature conservation value.
Associated Development	Defined under Section 115(2) of the Planning Act 2008 as development which is associated with the principal development and that has a direct relationship with it. Associated development should either support the construction or operation of the principal development, or help address its impacts. It should not be an aim in itself but should be subordinate to the principal development.
ASU	Air Separation Unit.
BAT	Best Available Techniques.
Block Valve	Block valves are required for isolation and monitoring of the Pipeline. These would include buried pipework, valves, an instrument building and a vent stack.
BOR	Book of Reference, as required by The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.
BS	British Standard
CAA	Civil Aviation Authority.
Capture Power Limited	The Applicant. A joint venture comprised of Drax CCS Limited, ALSTOM UK Holdings Limited and The BOC Group Limited.
CCS	Carbon Capture and Storage.
CEF	Community Engagement Forum.
CEMP	Construction Environmental Management Plan.
CHP	Combined Heat and Power.
CO <sub>2</sub>	Carbon Dioxide.
CO <sub>2</sub> pipeline	The National Grid Carbon Limited Yorkshire and Humber CCS cross-country CO <sub>2</sub> pipeline that will be used for the onward transportation of CO <sub>2</sub> captured from the combustion flows of the coal-fired power plant for permanent storage beneath the North Sea.
Coal-fired power plant	The generating station forming part of the Project, primarily fuelled by coal, but with the ability to co-fire biomass, that will be capable of generating up to 448 megawatts gross of electricity, including CO <sub>2</sub> capture facilities.
COMAH Regulations	Control of Major Accident Hazards Regulations 1999.
Construction Laydown Area	Land within the Project Site to be used for temporary laydown and construction areas.

Abbreviation	Meaning or Explanation
Consultation Report	The report prepared by the Applicant documenting the consultation it has carried out including that required by the Planning Act 2008 and how responses to the consultation have been taken into account.
CPL	Capture Power Limited.
CTRTP	Construction Traffic Routing and Travel Plan.
DAS	Design and Access Statement.
DCLG	Department for Communities and Local Government.
DCO	Development Consent Order
EA	Environment Agency
EH	English Heritage
EIA	Environmental Impact Assessment
EMS	Environmental Management System.
EN-1	Overarching National Policy Statement for Energy.
EN-2	National Policy Statement for Fossil Fuel Electricity Generating Infrastructure.
EN-5	National Policy Statement for Electricity Networks Infrastructure.
EP	Environmental Permit.
EPA	The Environmental Protection Act 1990.
ERYC	East Riding of Yorkshire Council
ES	The Environmental Statement documenting the findings of the EIA.
Essential Infrastructure	Defined in the Technical Guidance to the National Planning Policy Framework (2012) as: essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk, essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood, and wind turbines.
EU	European Union.
EU ETS	European Union Emissions Trading System.
European site	A term used to refer collectively to Special Areas of Conservation, Special Protection Areas or Ramsar Sites.
existing Power Station site	All of the land comprised within the existing Drax Power Station site.
Exception Test	A planning principle that requires applicants for projects in Flood Zones 2 and 3 to demonstrate that it will be safe and have wider sustainability benefits for the community.
Explanatory Memorandum	A document that explains the intended purpose and effect of a DCO and the authorisations and powers that it seeks.
FDO	Footpath Diversion Order.
FEED	Front End Engineering and Design.
FGD	Flue Gas Desulphurisation.
FOD	Footpath Diversion Order.
Formal Consultation	Statutory consultation in accordance with S.42, 46, 47 and 48 of the Planning Act 2008.
FRA	Flood Risk Assessment.
FTE	Full Time Equivalent.
Funding Statement	A statement setting out how the Applicant intends to fund any compulsory acquisition of land required or any compensation claims made by parties that may be affected by the Project.
GPU	Gas Processing Unit.

Abbreviation	Meaning or Explanation
GW	Gigawatts. A measurement of power. A gigawatt equates to 1000 megawatts.
ha	Hectares. A metric measurement of area.
HA	Highways Agency.
HGV	Heavy Goods Vehicle.
Host local authorities	The local authorities whose area the Project site is within being Selby District Council and North Yorkshire County Council.
HRA	Habitats Regulations Assessment.
HRAR	Habitats Regulations Assessment Report.
HRSA	Habitats Regulations Screening Assessment.
HSC	Hazardous Substances Consent.
HSE	The Health and Safety Executive.
IDB	Internal Drainage Board.
IED	Industrial Emissions Directive.
Informal Consultation	Non-statutory consultation (i.e. not carried pursuant to S.42, 46, 47 and 48 of the Planning Act 2008).
IPC	Infrastructure Planning Commission (now PINS)
Km	Kilometres.
kV	Kilovolts.
Land Plan	A plan showing all of the land that is required for the Project and/or over which rights are to be sought as part of the DCO.
LCA	Landscape Character Area.
LDA	Land Drainage Act 1991.
Limits of deviation	The lateral limits shown on the Works Plan(s) and the vertical limits (upwards and downwards) determined by reference to the section plan(s) submitted as part of the Application and within which the Project may occur.
Local Development Plan	A statutory document or a set of documents prepared and adopted by a planning authority which set out the local policies governing development within its administrative area. The local development plan document can be made up of a number of DPDs.
Local Impact Report	A report prepared by a local authority identifying the impacts of a Nationally Significant Infrastructure Project upon its area.
LVIA	Landscape and Visual Impact Assessment.
m	Metres.
MMO	Marine Management Organisation
Multi-Junction	An above ground facility at the connection point of a number of buried Pipelines which accommodates Pig Traps for each Pipeline (to allow the inspection and maintenance of the Pipeline) and connecting pipework with isolation valves.
NE	Natural England
NGCL	National Grid Carbon Limited
NSIP	Nationally Significant Infrastructure Project (defined in the Planning Act 2008)
NYCC	North Yorkshire County Council
Ofgem	Office of Gas and Electricity Markets
Operational area	The area of land required by the Project when operational.
Order	The White Rose CCS (Generating Station) Order, being the DCO that would be made by the Secretary of State authorising the Project, a draft of which has been submitted as part of the Application.

Abbreviation	Meaning or Explanation
Order Land	The land to which the Order relates and comprising all the land within the Order Limits that is required for the Project.
Order Limits	The limits of the land to which the Application relates and shown on the Land Plans and Works Plans within which the Project must be carried out and which is required for its construction and operation.
Other Consents and Licences document	A document setting out the other consents and licences that are required for the construction and operation of the Project and that are being advanced separately to the DCO Application.
OTRTP	Operational Traffic Routing and Travel Plan.
Oxy mode	The mode of operation when the power plant is operating on oxygen rather than air allowing the downstream capture of CO <sub>2</sub> .
Oxy-Power Plant	The whole power plant comprising the boiler, turbine/generator, gas clean up, gas processing unit, air separation unit, cooling water system, materials handling systems and all other balance of plant items required to generate power and deliver CO <sub>2</sub> to the transport and storage system.
PEI	Preliminary Environmental Information.
PEIR	Preliminary Environmental Information Report (term defined in the Planning Act 2008) and a requirement for NSIPs that are EIA development
PIG Trap	Pipeline Internal Gauge
PIL	Person with an Interest in Land
PINS	Planning Inspectorate
PPG	Planning Practice Guidance.
PPGN	Planning Policy Guidance Notes.
PPS	Planning Policy Statements.
Project	Carbon transportation and storage
Pumping Station	A Pumping Station would re-pressurise the Carbon Dioxide to maintain the pressure in the Pipeline e.g. before it is piped offshore.
RCS	Route Corridor Study
Requirements	The 'requirements' at Schedule 2 of the draft Order that, amongst other matters, are intended to control the final details of the Project as to be constructed and also to control its operation, amongst other matters to ensure that it accords with the EIA and does not result in unacceptable impacts.
Rochdale Envelope	The approach applied to the EIA of a development whereby flexibility needs to be retained in the design of the development at the consenting stage. This involves defining the maximum parameters for the Project and assessing these to ensure that the environmental effects of the Project in its final built form have been adequately assessed.
SDC	Selby District Council
s44	Person with an Interest in the Land (PIL) as defined by the Planning Act 2008
SOAR	Strategic Options Appraisal Report
SoCC	Statement of Community Consultation
SoS	Secretary of State
Onshore Scheme	The construction of a Cross Country Pipeline to transport the CO <sub>2</sub> to the sea shore to feed the offshore scheme.
Offshore Scheme	An offshore pipeline to transport the CO <sub>2</sub> to a permanent storage site beneath the North Sea
SPA	Special Protection Area.
SPZ	Source Protection Zone.
SSSI	Site of Special Scientific Interest.

Abbreviation	Meaning or Explanation
Statement of Reasons	A statement setting out the reasons and justification for the compulsory acquisition of land or rights in land within the Order Limits.
Statutory Consultation	Consultation in accordance with S.42, 46, 47 and 48 of the 2008 Act.
SUDS	Sustainable Urban Drainage Systems.
SWMP	Site Waste Management Plan.
TA	Transport Assessment.
TCE	The Crown Estate.
TCPA	Town and Country Planning Act 1990.
the 2008 Act	The Planning Act 2008 which is the legislation in relation to applications for NSIPs, including pre-application consultation and publicity, the examination of applications and decision making by the Secretary of State.
The Site	The Project Site or the Order limits.
Works Plan	Plan(s) showing the Works Numbers referred to at Schedule 1 of the Order and submitted with the Application.
WSI	Written Scheme of Investigation.

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# Appendix A    OPP Public Exhibition Display Boards



## Welcome to today's public exhibition

This public exhibition offers you an opportunity to look at plans being developed for a new low carbon coal-fired power station proposal called the White Rose Carbon Capture & Storage Project.

Unlike conventional coal and gas-fired power stations which emit carbon dioxide (CO<sub>2</sub>) gas to the atmosphere where it contributes to global warming, CO<sub>2</sub> produced from electricity generation at White Rose would be captured and transported by underground pipeline for safe and permanent storage deep below the North Sea.

This public exhibition is part of a first formal public consultation round taking place between 7th April and 16th May 2014. As part of the planning system process, public consultation is required under Section 47 of the Planning Act 2008 for large infrastructure proposals such as White Rose.

Members of the White Rose project team are here today to discuss the White Rose proposal with visitors and to answer any questions that you may have.

We would be grateful if you would complete a White Rose questionnaire before you leave today so that your views can be considered as part of the formal public consultation round.



[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)





## Need more answers?

We will be pleased to help with any further enquiries that you may have. Please don't hesitate to approach a member of the White Rose project team who is here today with any questions that you have.

You can also continue to ask more questions, find out the latest information and provide us with your feedback about the White Rose CCS Project in the following ways:

- Freephone **0800 169 5290**
- Email **info@whiteroseccs.co.uk**
- Write to **FREEPOST CONSULTATION**

Additional information is also available on the White Rose website at [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)

Please complete a White Rose questionnaire before you leave today so that your views can be considered as part of this first formal consultation phase.

We will be returning in the summer with a second public consultation phase that will include more public exhibitions. We will be able to show you how the White Rose plans have progressed between now and then with the help of the feedback you give us today.

**Thank you very much for attending today's public exhibition.**



[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)

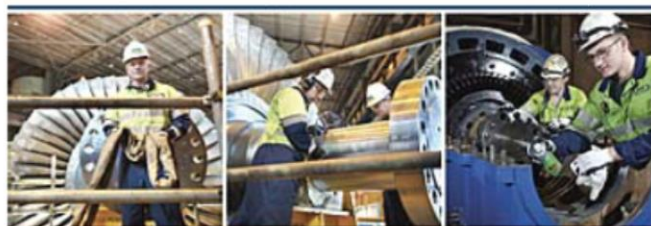


## Involving you in the planning process

Because the White Rose proposal exceeds 50MW electricity generating output it is classified as a nationally significant infrastructure project (NSIP).

As an NSIP, White Rose requires a development consent order (DCO) before it can be built. Capture Power expects to submit a DCO application to the Planning Inspectorate (PINS) in Autumn 2014. Between now and then, Capture Power will continue to seek pre-application feedback from members of the public during the current formal consultation round and during a second consultation round this summer.

After the DCO submission is submitted members of the public will be able to submit representations to PINS before and during the examination stage. PINS will then make a recommendation about whether White Rose should be issued with a DCO and a final decision will be made by the Secretary of State for Energy and Climate Change.



[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)



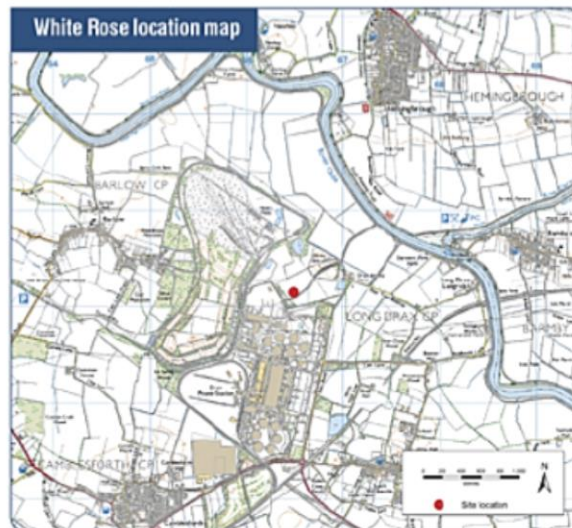
## Community matters

We will continue to consult with the community as the White Rose CCS Project proposal progresses. The community feedback we obtain during this first round of formal consultation will be carefully considered.

A second round of formal consultation with accompanying exhibitions will take place this summer once we have completed a range of environmental studies, currently underway. At that stage more technically detailed construction and operational information will be presented for consideration.

Once again, feedback will be invited from the community as well as from other statutory and technical consultees. This will offer an additional opportunity for feedback to be submitted before a DCO application is submitted to the Planning Inspectorate seeking consent to construct and operate the project.

Listening and communicating is a core element of Capture Power's commitment to the community. We will also ensure that the community is kept up-to-date with news about the White Rose proposal as it progresses.



[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)



## Appearance and location

The White Rose plant will be located on land owned by Drax, north of the existing power station, which will help provide screening from a number of southerly directions for nearby residents. The White Rose buildings will be designed to blend into the backdrop provided by other existing power station infrastructure when viewed from the north.

The total footprint of the site including the air separation units, cooling units, ancillary buildings and associated development is approximately 27 hectares. The main areas of plant will include a stack or chimney, a boiler house and a hybrid air and water cooling system.

Ongoing environmental and engineering studies as well as consultation feedback will help to shape the final design. However, we are able to offer an indicative illustration today of how the White Rose proposal might appear.

A final preferred design option will be available to view during the second round of formal consultation that will take place in the summer.



An indicative illustration of Drax Power Station (left) and the White Rose Carbon Capture and Storage Project (right)



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## Caring for the environment

We recognise the importance of the local environment and have taken care to consider a wide range of environmental factors in developing our plans.

A series of environmental studies are currently underway to consider important matters such as air quality, traffic levels, job creation and socio-economic issues, visual impact, landscaping, noise, ecology, archaeology and others.

We will present the preliminary information on the social and environmental effects of White Rose during the second round of formal consultation this summer in the form of a series of topic specific reports.



An environmental consultant undertakes landscape and soilwork surveys to the north of the site.



A wide range of environmental surveys are underway.

The environmental studies provide important information on the construction and operation of White Rose and are used to help shape the final design of power station. Views and opinions received about environmental matters during formal consultation are important and will be considered by the project team as part of the ongoing environmental work.

Ultimately the environmental studies, including consideration of relevant consultation responses, will be brought together in an Environmental Statement which will be submitted as part of the full development consent order (DCO) application.



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## Latest news and progress

Outline plans for White Rose were unveiled last year and showcased at three informal public exhibitions held at Drax, Selby and Goole in July 2013. The intention was to gain early feedback from the community to help guide the formal consultation phases this year.



White Rose summer exhibition July 2013



DECC Secretary of State, Edward Davey MP at Drax

Attended by over 110 visitors who discussed various issues with White Rose project staff, questionnaires returned by visitors indicated that over 75% of attendees viewed the White Rose proposal positively.

Peter Emery, Drax production director and a board director at Capture Power, said: "We were very pleased at the interest shown in the project by those attending the exhibitions, and receiving feedback at such an early stage is incredibly helpful to the process."

In December, the Secretary of State for Energy and Climate Change, Edward Davey MP, visited Drax Power Station to announce that White Rose had been awarded a front end engineering and design (FEED) contract under the Government's CCS Commercialisation Programme.

The FEED study is a two-year programme of detailed engineering, planning and financial work to finalise and de-risk all aspects of the White Rose proposal.

Addressing Drax staff, Mr Davey said: "I'm proud that the UK is at the forefront of developing CCS - which could be a game-changer in tackling climate change and provide a huge economic advantage not just to this region, but to the whole country."

[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)



## Introducing Capture Power

The White Rose CCS Project is being proposed by a consortium called Capture Power Limited.

Capture Power Limited has been formed by three companies, Alstom, Drax and BOC. Capture Power will be responsible for the development, construction, and operation of the White Rose proposal.

Alstom is a global leader in the world of power generation and power transmission. One quarter of the world's power station fleet relies on Alstom technology. Alstom is a pioneer in large-scale and efficient CCS technologies.

Drax is the owner of Drax Power Station, the largest power station in the UK, typically meeting between 7% and 8% of the UK's electricity needs. Drax is currently transforming itself into a predominantly biomass-fuelled generator through the conversion of three of its six generating units to burn sustainable biomass in place of coal.

BOC is the UK's largest industrial and special gases provider. With capabilities in all three currently viable CCS technologies - oxyfuel combustion capture, pre-combustion capture and post-combustion capture - BOC is working to develop second generation CCS technologies such as that proposed at White Rose.



[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)



## The White Rose proposal

The White Rose CCS Project proposal is to build a new state-of-the-art 426MW (gross) clean coal power plant with full CCS capability. The demonstration plant would have the potential to co-fire biomass and would provide enough safe, reliable and clean electricity to meet the typical demands of more than 630,000 homes as well as capturing approximately 90% of all the CO<sub>2</sub> - some two million tonnes annually - that would otherwise be emitted to the atmosphere. White Rose would be the first power station to employ a CCS technology variant called oxyfuel combustion.

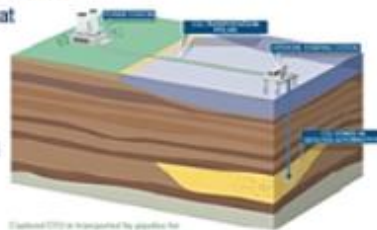
The captured CO<sub>2</sub> would be transported from the White Rose site through National Grid's proposed Yorkshire and Humber CCS Project pipeline for safe and permanent storage in geological formations deep beneath the North Sea. More information about that project can be viewed at [www.ccshumber.co.uk](http://www.ccshumber.co.uk)



### What benefits will White Rose bring?

White Rose is expected to bring a number of significant economic benefits to the local area and wider Yorkshire and Humber region including:

- more than 1,000 new construction jobs over the four-year plant development period at the Drax site
- at least 60 operational jobs at the new plant, as well as additional, indirect supply and maintenance employment opportunities
- increased turnover for local and regional businesses operational periods



© National CCS in partnership by agreement for permanent storage deep beneath the seabed

[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)





## Implementing CCS technology

The development of CCS demonstration projects needs to start now to enable wider adoption of the technology in coming years so that power stations and industrial plants fitted with CCS technology can contribute meaningfully to the target to reduce greenhouse gas emissions by at least 80% by 2050.

The Government's strategy to develop a world-leading CCS industry is explained in the UK CCS Roadmap published by the Department of Energy & Climate Change in 2012. It contains a number of commitments which include:

- Creating an electricity market that will enable CCS to compete with other low carbon technologies
- Working closely with industry to reduce costs, including through the establishment of a CCS Cost Reduction Task Force
- Removing barriers and obstacles to CCS deployment
- Promoting the capture and sharing of knowledge to accelerate deployment

Following successful development of early CCS demonstration projects like White Rose, the Government anticipates that power stations equipped with CCS technology could provide the UK with:

- 13 gigawatts (GW) of clean fossil fuelled power generation by 2030
- More than 20% of total energy demand by 2050
- Savings of more than £30bn annually by 2050 through meeting emissions targets

The Government further estimates a UK CCS industry could sustain 100,000 jobs by 2030 and generate up to £6.5bn annually across the UK.



[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)



## What is carbon capture and storage?

Carbon capture and storage (CCS) is an innovative technology that can reduce levels of CO<sub>2</sub> emitted to the atmosphere by fossil fuel power stations and heavy industry by capturing the CO<sub>2</sub> at source so that it can be stored safely and permanently offshore deep under the seabed.

### Capture

CO<sub>2</sub> is captured from a power station, cement factory, steel works or other industrial facility and compressed for transportation.

### Transportation

The CO<sub>2</sub> is transported to a suitable offshore storage location. Large amounts of compressed CO<sub>2</sub> are efficiently transported using underground pipelines.

### Storage

The CO<sub>2</sub> is injected under high pressure into deep natural porous rock formations offshore, where it will be stored safely and permanently.

### Creating CCS clusters

The potential of CCS to reduce CO<sub>2</sub> emissions will be further escalated when the technology is deployed in local networks or clusters. A number of power stations and industrial plants can utilise a single transportation pipeline and offshore storage facility for all the CO<sub>2</sub> that would otherwise be emitted to the atmosphere.

White Rose could act as an anchor project and catalyst for the development of a regional Yorkshire and Humber CCS cluster that would capture, transport and store tens of millions of tonnes of CO<sub>2</sub> annually.



[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)



## What is CO<sub>2</sub>?

Carbon dioxide (CO<sub>2</sub>) is a natural gas which is produced by most living organisms, including humans and animals. It is produced when we breathe out and it is consumed by plants to aid their growth and development through photosynthesis. CO<sub>2</sub> is used in everyday products including fizzy drinks, fire extinguishers and decaffeinated coffee. But like many things, too much of it can be a bad thing.

CO<sub>2</sub> is also a by-product of burning fossil fuels such as coal and gas, for example, when generating electricity. The release of large quantities of CO<sub>2</sub> into the atmosphere is considered to be a major contributor to global climate change.

In November 2008, the Government passed the Climate Change Act, making the UK the first country in the world to have a legally binding commitment to cut greenhouse gas emissions, including CO<sub>2</sub>. The aim is to reduce emissions by at least 80% by 2050 from 1990 levels.

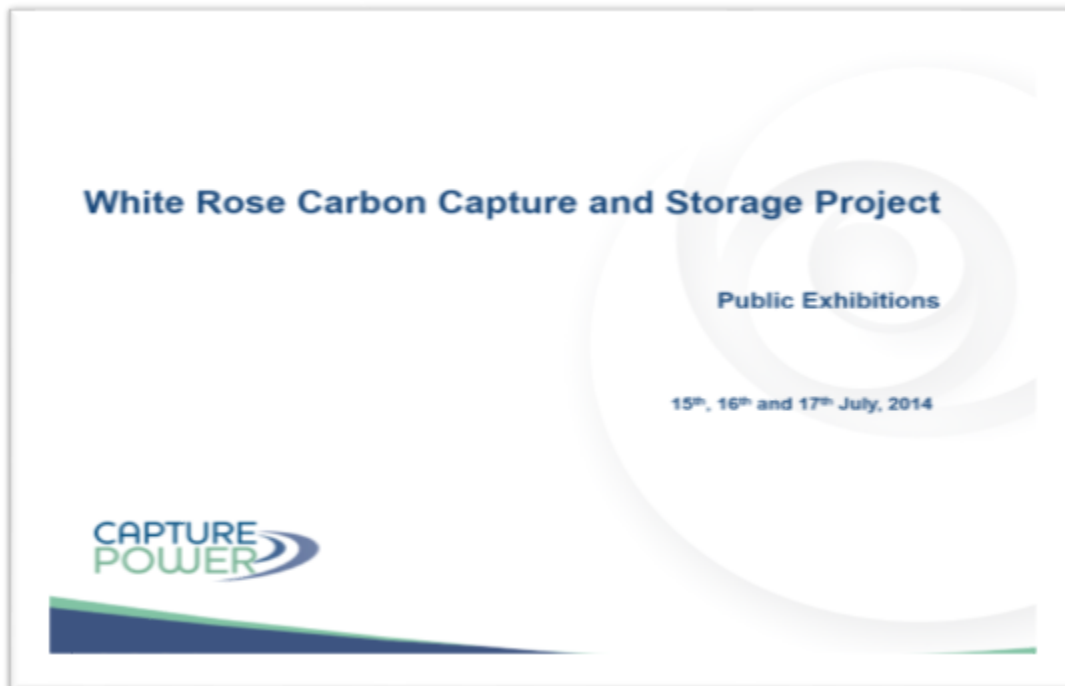


**CAPTURE  
POWER**




[www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)

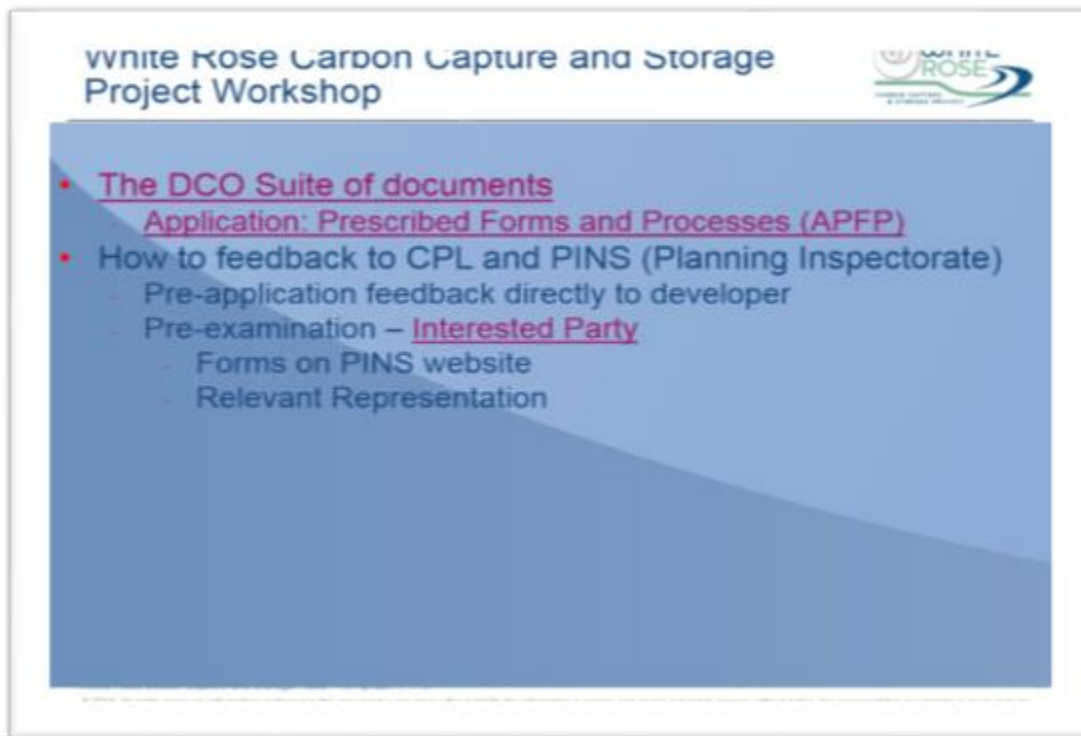
## Appendix B OPP Public Exhibition Workshop Presentation




White Rose Carbon Capture and Storage Project Workshop



- **CCS and technologies – Courtesy of CCSA website**
  - [Pre-Combustion Capture](#)
  - [Post-Combustion Capture](#)
  - [Oxyfuel](#)
  - Why have we opted for Oxyfuel?
  - [CO<sub>2</sub> Storage](#)
- **[The DCO process and the Planning Act, 2008](#)**
  - Meaningful consultation
  - Consultation to date
  - Attendance and presentations
  - Feedback from events
- **[PEIR](#)**
  - Documentation generated
  - Feedback from PEIR and analysis
  - Provisional effects and mitigation
  - Who have we liaised with (S42/S47)



White Rose Carbon Capture and Storage  
Project Workshop



- **The DCO Suite of documents**
  - **Application: Prescribed Forms and Processes (APFP)**
- **How to feedback to CPL and PINS (Planning Inspectorate)**
  - Pre-application feedback directly to developer
  - Pre-examination – **Interested Party**
    - Forms on PINS website
    - Relevant Representation

# Appendix C OPP Stakeholder Mapping Report



Capture Power White Rose CCS Project

## Stakeholder Identification and Mapping - Issues and Risk Analysis

Pendragon Public Relations

Updated January 2014

## Publication and Revision History

Publication date

Revised

Revised

Revised

## Contents

Section 1	White Rose Carbon Capture and Storage Project
Section 2	Research Methodology
Section 3	Project Issues Appraisal
Section 4	WRCCS Stakeholders
Section 5	Identified Community Issues
Section 6	Risk Assessment and Analysis
Section 7	Stakeholder Engagement
Section 8	Monitoring and Adapting to Changes



## 1. White Rose Carbon Capture and Storage Project

### Project description

The White Rose CCS Project (WRCCS) is a proposal to develop a 426 megawatt (MWe gross) CCS demonstration plant immediately north of the existing Drax Power Station on land owned by Drax Power Limited. The White Rose project is participating in the UK Government's CCS Commercialisation Programme and has been awarded Front End Engineering and Design (FEED) study funding by the Department for Energy and Climate Change (DECC).

A modern coal-fired power plant equipped with full carbon capture technology, the White Rose project is designed to demonstrate that CCS plants can generate low-carbon power competitively whilst helping to limit damaging climate change. The proposal will also play a potentially important role in helping to establish a CO<sub>2</sub> transportation and storage network in the Yorkshire and Humber area.

The plant will generate enough electricity to supply the equivalent needs of over 630,000 homes with 90% of all the CO<sub>2</sub> produced by the plant being captured and transported by pipeline for permanent storage deep beneath the North Sea.

### About Capture Power

Capture Power Limited has been formed by three companies, GE, Drax and BOC. The consortium will be responsible for the design, construction and operation of the White Rose CCS Project.

GE will have the responsibility for construction and Drax for the operation & maintenance of the power plant including the CO<sub>2</sub> capture facilities. BOC will have the responsibility for the construction and operation & maintenance of the air separation unit that provides oxygen for plant operations.

### GE

- A global leader in the world of power generation, grid solutions and renewable energy.
- A pioneer in large-scale and efficient CCS technologies.

### Drax

- Drax Power Limited ("Drax") is the operating subsidiary of Drax Group plc and the owner of Drax Power Station, the largest, cleanest and most efficient coal fired power station in the UK. The output capacity from the station's six generators is 3,960MW. At current average output levels it meets some 7% of the UK's electricity needs.
- The existing power station has been burning a proportion of biomass fuel alongside coal for a number of years with a current co-firing capacity of 500MW, enough to produce 12.5% of the power station's total generation output from renewable and sustainable biomass.
- In 2010, the power station generated around 7% of the UK's renewable power, more than twice that of the next largest renewable facility.

- Drax Power Station is already the largest co-firing facility in the world, saving over 1.5 million tonnes of carbon dioxide emissions in 2010, through the displacement of coal.

### BOC

- BOC is the largest UK industrial, medical and special gases provider. Sectors include steelmaking, refining, chemical processing, environmental protection and enhancement, wastewater treatment, welding and cutting, food processing and distribution, glass production, electronics and healthcare.
- BOC is part of The Linde Group, a world-leading gases and engineering company with approximately 62,000 employees in more than 100 countries worldwide and a revenue of €15bn sales in 2012.
- BOC has a strategy that is strongly focussed on innovation, with clean energy technologies at the forefront of investment.
- BOC has capabilities in all three currently viable CCS technologies – post-combustion capture, pre-combustion capture and Oxyfuel capture.
- BOC is working with research partners to explore second generation carbon capture technologies.

### UK Government CCS Roadmap

The government recognises that CCS could help play an important part to play helping the UK reach its ambitious decarbonisation targets. In April 2012 the government published the UK CCS Roadmap which explains how government policy will encourage the uptake of CCS in the UK with the aim of having at least one operational CCS plant by 2020.

Commitments made in the roadmap include:

- Create an electricity market that will enable CCS to compete with other low carbon sources;
- Launch a CCS commercialisation programme with £1bn of capital support;
- Work closely with industry to reduce costs, including through the establishment of a CCS Cost Reduction Task Force;
- Remove barriers and obstacles to deployment;
- Develop the regulatory environment, including for the long-term storage of CO<sub>2</sub>;
- Promote the capture and sharing of knowledge to accelerate deployment; and
- Help build a stable foundation by supporting private sector access to skills and developing the supply chain.

The White Rose project was shortlisted as a CCS commercialisation programme contender in March 2013 and in December 2013 it was confirmed by DECC that a contract had been signed between DECC and Capture Power to take forward a two-year FEED programme. A final investment decision about whether White Rose will be taken forward is due to be made by DECC in 2015.

### Yorkshire and Humber CCS Cluster

The White Rose CCS project is part of the wider Yorkshire and Humber CCS cluster which in its entirety includes National Grid's Yorkshire-Humber CCS Trunk line designed to:

- Transport up to 17 million tonnes of CO<sub>2</sub> every year
- Run from CO<sub>2</sub> emitting power stations and industrial sites in the Yorkshire and Humber region to Barmston in East Yorkshire
- Transport liquid CO<sub>2</sub> from the White Rose CCS Project at Drax power station, near Selby in North Yorkshire, and other future power stations and industrial developments
- Deposit and store the CO<sub>2</sub> in North Sea aquifers

## 2. Research Methodology

### Introduction

It is the case that many large scale infrastructure projects have been the subject of objection resulting from concerns within the communities affected by the proposed development. The extent of stakeholder objection has, on occasions, resulted in projects faltering. CCS projects outside the UK have been no exception.

In order to ensure meaningful and effective stakeholder engagement detailed research and analysis was carried out to inform the planning and implementation of strategies in order to minimise the risk of community objection through lack of understanding.

This work included a comprehensive identification and mapping exercise to identify the stakeholders affected by the WRCCS project, to understand their likely and potential issues, concerns and needs and to develop effective engagement strategies and tactics.

The results of this exercise are the subject of regular review to keep abreast of changes including national and local elections.

This document is concerned with stakeholders and stakeholder issues in relation to the WRCCS Project and does not consider wider stakeholder issues associated with the Yorkshire and Humber CCS Cluster.

### Six stage approach

A six stage approach was adopted:

1. Project issues appraisal
2. Stakeholder identification
3. Assessment of potential community issues/concerns

4. Risk assessment and analysis
5. Development of stakeholder engagement strategies and tactics
6. Ongoing monitoring and adaptation

### Sources of information

The proposed site for WRCCS Project is on the existing 4,000MW coal fired power station site near Selby in Yorkshire. The site is a very large industrial complex and has been the subject of a number of significant developments requiring significant stakeholder engagement in the recent past.

The following recent developments have provided the benefit of up-to-date local stakeholder and community feedback and engagement providing valuable and current stakeholder information:

- August 2012 – Ouse Renewable Energy Plant – 299 MW biomass plant – Section 36 Consent
- June 2012 – Lytag Aggregate Plant – produces 200,000 tonnes of lightweight aggregate annually from pulverised fuel ash sourced from Drax Power Station – Town and Country Planning Act consent from Selby District Council.
- December 2011 - Biomass storage domes – construction of four 50m high biomass storage domes and associated biomass handling facilities at Drax Power Station. Town and Country Planning Act consent from Selby District Council.

In addition to the above the following existing liaison arrangements exist which allow a two way dialogue with the community and key stakeholders:

### Drax Power Station Consultative Committee

The Drax Power Station Consultative Committee (DPSCC) brings together local stakeholders and acts in both an advisory and consultative capacity. The Committee meets once a year and provides its members with an update on relevant business issues.

The Committee provides members with the opportunity to ask questions about the business and ensures positive and open communication between all the parties. The WRCCS Project proposal has been discussed by the Committee previously and will continue to remain on the agenda.

### Community Engagement Forums

There are a number of local forums organised by Selby District Council which meet three times a year and are attended by the board membership, other local councillors, local people and other interested stakeholders. The purposes of the forums are to discuss local issues of importance.

The WRCCS Project site lies within the Central Community Engagement Forum area but also borders areas covered by the Eastern Community Engagement Forum and the Southern Community Engagement Forum.

Attendance and presentations by Capture Power personnel at Forum meetings provides the opportunity for valuable two way engagement.

#### Staff Open Forums

Drax Power Station employs 869 staff 92% living within 10 km of the site. A series of Staff Open Forums takes place annually and provides an opportunity to secure regular feedback on community issues and developments from Drax personnel.

The WRCCS Project is be an ongoing Staff Open Forum agenda item providing valuable community insights and a vehicle for identifying any existing and emerging issues.

Table 1 summarises the information sources/channels used to obtain core information in preparing this analysis and report:

Table 1 Information sources/channels

Source/channel	Stakeholder/s	Information
Drax Power Station Consultative Committee	County councillors, district councillors, parish councillors, Environment Agency, Selby Area Internal Drainage Board, Forestry Commission, rail operators	Outline of proposal details, discussions about local issues, consideration of options, feedback
Community Engagement Forums	District councillors, parish councillors, local community stakeholders	Outline of proposal details, discussions about local issues, consideration of options, feedback
Staff Open Forums	Drax employees	Outline of proposal details, discussions about local issues, consideration of options, feedback
Recent local planning applications and associated engagement programmes	Community members, immediate neighbours, local and national politicians, parish councils, local interest groups, technical consultees, local NGO groups	Attitudes and reactions towards Drax Power and to developments on the Drax site, understanding of the role and importance of Drax, understanding of energy issues and the economic worth of developments at Drax to the local economy, understanding of climate change and security of supply
Meetings with immediate neighbours	Immediate neighbours	Attitudes and reactions towards Drax Power and to developments on the Drax site, understanding of the role and importance of Drax, understanding of energy issues and the

		economic worth of developments at Drax to the local economy, understanding of climate change and security of supply, any specific issues that could impact WRCCS
Media analysis	National, regional and local media – print and broadcast	Outline of proposal details, discussions about local issues, analysis of reported viewpoints
Local Authority websites	LA officers and councillors	Stakeholder details, policy issues, attitudes and previous decisions affecting the Drax site
Social media analysis	Interested stakeholders	Discussions about proposal and local issues, analysis of comments and viewpoints
Web sources	Interested stakeholders	Discussions about proposal and local issues, analysis of comments and viewpoints
Post Code Anywhere	Community members	Comprehensive address listings of community members within 3km and 10km areas of potential impact of WRCCS Project
Legislation and Government Guidance	Prescribed consultees – Planning Act 2008	Legislative requirements and stakeholder consultation guidance
Other CCS projects		
Meetings/liaison with relevant local authorities including discussions surrounding the development and agreement of the SoCC	All host and neighbouring authorities	Identification of key stakeholders and any current issues - selection of appropriate and effective engagement methods
WRCCS Project personnel and professional advisors	Technical professionals	Consideration of appropriate proposal options and current legislation and national and local guidance

### 3. Project Issues Appraisal

Table 2 below summarises the potential project issues that have been considered as part of our analysis categorised using a PESTEL framework:

Table 2 Potential project issues

Factor	Project issue
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Political	National policy
	Local policy
	Site planning history
	Community acceptance/objection
	Political support
Economic	Jobs
	Business/contract opportunities
	Property values
	Socio-economic issues
Social	Demographics
	Current and ex Drax employees
	Power generation and coal mining history
	Drax reputation in locality
	Previous consultation
Technological	Safety
	Plant and ancillary components
	Pipeline and storage infrastructure
Environmental	Landscape and visual
	Noise and vibration
	Transport and access
	Air quality

	Archaeology and cultural heritage
	Ecology and nature conservation
	Hydrology
	Geo-environmental
	Climate change
	Security of supply
Legal	Planning Act 2008 compliance
	Localism Act compliance
	Government guidance compliance

#### 4. WRCCS Project Stakeholders

This section identifies all the local community stakeholders relevant to the WRCCS project broken down as follows:

- Prescribed consultees
- Community
- Media
- Business
- Education
- Environmental NGOs

Table 3 below details the community organisations identified as relevant prescribed consultees with regard to the WRCCS Project:

Table 3 Community prescribed consultees

Consultee	Organisation name
Relevant parish councils (within identified 3km and 10km area zones)	Within 3km Barlow Parish Council



	<p>Barmby on the Marsh Parish Council</p> <p>Camblesforth Parish Council</p> <p>Carlton Parish Council</p> <p>Cliffe Parish Council</p> <p>Drax Parish Council</p> <p>Long Drax Parish Council</p> <p>Hemingbrough Parish Council</p> <p>Newland Parish Council</p> <p>Within 10km</p> <p>Airmyn Parish Council</p> <p>Asselby Parish Council</p> <p>Barlby with Osgoodby Parish Council Brayton Parish Council</p> <p>Bubwith Parish Council</p> <p>Burn Parish Council</p> <p>Chapel Haddlesey Parish Council</p> <p>Eastrington Parish Council</p> <p>Foggathorne Parish Council</p> <p>Gateforth Parish Council</p> <p>Goole Town Council</p> <p>Goole Fields Parish Council</p> <p>Heck Parish Council</p> <p>Hensall Parish Council</p> <p>Hirst Courtney Parish Council</p> <p>Hook Parish Council</p> <p>Howden Parish Council</p>
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	<p>Kilpin Parish Council</p> <p>Newland Parish Council</p> <p>North Duffield Parish Council</p> <p>Rawcliffe Parish Council</p> <p>Selby Town Council</p> <p>Snaith &amp; Cowick Parish Council</p> <p>Spaldington Parish Council</p> <p>Temple Hirst Parish Council</p> <p>West Haddlesey Parish Council</p> <p>Wistow Parish Council</p>
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Table 4 below details the community organisations identified as Section 43 consultees with regard to the WRCCS Project:

Table 4 Section 43 community consultees – host local authorities and neighbouring authorities (to either Selby District Council or North Yorkshire County Council)

Host Authority	Selby District Council
Host Authority	North Yorkshire County Council
Neighbouring Authority	Yorkshire Dales National Park Authority
Neighbouring Authority	East Riding of Yorkshire
Neighbouring Authority	City of York Council
Neighbouring Authority	Harrogate Borough Council
Neighbouring Authority	Leeds City Council
Neighbouring Authority	Wakefield City Metropolitan District Council
Neighbouring Authority	Doncaster Metropolitan Borough Council

Neighbouring Authority	Bradford Metropolitan Borough Council
Neighbouring Authority	Lancashire County Council
Neighbouring Authority	Cumbria County Council
Neighbouring Authority	Durham County Council
Neighbouring Authority	Darlington Borough Council
Neighbouring Authority	Stockton-on-Tees Borough Council
Neighbouring Authority	Redcar and Cleveland Borough Council
Neighbouring Authority	Middlesbrough Council
Neighbouring Authority	North Yorkshire Moors National Park Authority
Neighbouring Authority	Peak District National Park Authority

Table 5 below outlines the local authority officers identified with regard to the WRCCS project:

Table 5 local authority officers

Officer	Authority
Chief Executives	All host and neighbouring authorities
Directors of Planning	All host and neighbouring authorities
Directors of Environment	All host and neighbouring authorities

Table 6 below details the Community stakeholders identified with regard to the WRCCS Project:

Table 6 Political and community stakeholders

Stakeholder	Organisation
Councillors	All host and neighbouring authorities
Ward councillors	Host authorities
Planning, Environment & Development Committee members	All host and neighbouring authorities plus certain neighbouring authorities

Parish councillors	All relevant parish councils within identified 3km and 10km area zones
Group political leaders	All host and certain neighbouring authorities
MPs	Host and neighbouring constituencies
MEPs	Host constituency
Drax staff	Staff within 3 km radius of site Staff within 3 to 10 km radius of site
Residents	Immediate neighbours Residents within 3 km radius of site Residents within 3 to 10 km radius of site
Landowners and tenants	Landowners surrounding Drax Power Station land and affected by National Grid pipeline route
Seldom heard groups	Groups identified and agreed with host authority as part of the SoCC. Additionally other groups that participate in the public consultation process.
Special interest groups	Groups identified and agreed with host authority as part of the SoCC. Additionally other groups that participate in the public consultation process.

Table 7 below details the local and regional media identified with regards to the WRCCS project:

Table 7 Local and regional media

Title	Description
Selby Times & Post	Local newspaper
Goole Times	Local newspaper
The Press	Local newspaper
Yorkshire Post	Regional newspaper
Yorkshire Evening Post	Regional newspaper
Selby Online	Local website

BBC Look North	Regional TV
ITV Calendar	Regional TV
BBC Radio York	Regional radio
BBC Radio Leeds	Regional radio
BBC Radio Humberside	Regional radio
BBC York Online	Regional online
BBC Leeds Online	Regional online
BBC Humberside Online	Regional online

There are no identified neighbourhood publications but this will be monitored.

Table 8 below outlines the business stakeholders identified with regards to the WRCCS project:

Table 8 Business stakeholders

Business stakeholder	Organisation/description
Chambers of Commerce	Within host and neighbouring authorities
Economic development bodies	Within host and neighbouring authorities
Trade Unions	Within host and neighbouring authorities
Drax suppliers and contractors	Within 10km area zone
Local businesses	All local businesses within 3km area zone
Larger businesses	All larger businesses within 10km area zone

Table 9 below outlines the education stakeholders identified with regards to the WRCCS project:

Table 9 Education stakeholders

Education stakeholder	Organisation/description
Local Education Authority	North Yorkshire County Council

Schools	Schools within 3km area zone
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Table 10 below outlines the local NGO stakeholders identified with regards to the WRCCS project:

Table 10 Local environmental NGO stakeholders

Environmental stakeholder	Organisation/description
Greenpeace	Regional branch
Friends of the Earth	Regional branch
Wildlife groups	Local and regional organisations and branches

A summary of the WRCCS stakeholder mapping analysis can be found in Attachment 1.

## 5. Identified Community Issues

### Introduction

This section summarises all the actual and potential stakeholder issues that have been identified as having the potential to influence public acceptance of the WRCCS project. We have drawn on information from two sources:

- Interactions with Drax stakeholders
- Experience outside the UK

### Drax site stakeholder issues

Table 11 below is a summary of all the local stakeholder issues that have been raised during the informal WRCCS consultation in July 2013) and other recent site development applications weighted according to the approximate volume of positive/neutral versus negative references.

Table 11 Identified local community issues

Issue	Stakeholder	Positive or neutral	Negative
<b>Political</b>			
Parish Council support	Parish Councils within 10km	36	0
Ward councillor support	Selby DC ward councillors	2	0

	ERYC ward councillors	10	0
	NYCC ward councillor	1	0
MP support	Constituency MPs	9	0
MEP support	Constituency MEPs	4	2
Government support	Exhibition attendees	1	1
LPA officer support	Exhibition attendees	3	0
Local planning policy	Exhibition attendees	0	1
National planning policy	Exhibition attendees	0	0
<b>Economic</b>			
Operational jobs	Exhibition attendees	5	0
Construction jobs	Exhibition attendees	3	0
Economic boost	Exhibition attendees	7	0
Business opportunities	Exhibition attendees		
Education opportunities	Exhibition attendees	1	0
Development cost	Exhibition attendees	0	4
<b>Socio-cultural</b>			
Community support	Exhibition attendees	74	4
Business support	Local businesses and representation organisations	Highly positive	
Media support	All local and regional newspapers and broadcast media	Positive to factual	
Attitudes towards Drax Power Station	Exhibition attendees	2	1
Attitudes towards Climate Change	Exhibition attendees	74	5
Attitudes towards energy security	Exhibition attendees	7	1

Attitudes towards and support for CCS	Exhibition attendees	19	5
Attitudes towards industrial development	Exhibition attendees	0	5
Health perceptions and attitudes	Exhibition attendees	0	0
<b>Technological</b>			
Inefficient technology	Exhibition attendees	0	2
New technology	Exhibition attendees	7	6
Safety	Exhibition attendees	0	2
<b>Environmental</b>			
Transport and access	Exhibition attendees	1	4
Air quality	Exhibition attendees	2	1
Geo-environmental	Exhibition attendees	1	2
Agriculture	Exhibition attendees	0	0
Visual amenity	Exhibition attendees	0	1
Ornithology	Exhibition attendees	0	0
Hydrology	Exhibition attendees	0	0
Noise and vibration	Exhibition attendees	0	3
Hydrology	Exhibition attendees	0	0
Ecology	Exhibition attendees	0	0
Cultural heritage	Exhibition attendees	0	0
Aviation and radar	Exhibition attendees	0	0
Telecommunications and TV	Exhibition attendees	0	0
Waste and waste handling	Exhibition attendees	0	0
Light pollution	Exhibition attendees	0	0



Site issues	Exhibition attendees	0	0
<b>Legal</b>			
Planning Act 2008	Exhibition attendees	0	0
Localism Act	Exhibition attendees	0	0
Guidance compliance	Exhibition attendees	0	0

It can be seen from the summary above that there is currently substantial support for CCS in general and WRCCS in particular. Community support is very strong both in terms of the views expressed by individual community members (<10% negative) and Parish Councils (none expressing dissent). In addition MP and MEP support is almost unanimous.

The summary identifies two areas of potential community concern. The first relates to CCS technology where a small number of community members have raised issues in relation to novelty and safety. The second issue concerns transport and access where, again a small number of stakeholders have raised issues most of which relate to the adequacy of the Aire Road bridge on the A614 approach road to Drax power station from the M62.

**Experience outside the UK**

We have reviewed community stakeholder engagement experience at a number of proposed developments outside the UK, in particular Barendrecht and Maasvlakte CCS projects in the Netherlands to identify both potential stakeholder issues and stakeholder management successes and failures.

**Barendrecht**

Barendrecht provides an insight into the impact that community opposition can have on the progress of a CCS project and the potential issues of concern that can negatively influence community members. Key learning points include:

- Public acceptance is a vital component in securing political support
- Local and regional political support is a prerequisite for taking a CCS project through the permitting stage to fruition
- The merits of a local CCS development can be turned into a debate about the legitimacy of new coal-fired power stations

There were a limited number of predominant issues that coloured public opinion at Barendrecht:

- Safety
- Public health, notably the psychosomatic impacts of fear
- Appropriateness of the location
- Subsidies

It is notable that the four issues above are common across a wide range of major energy infrastructure projects in the UK. These issues are highly emotive, capable of generating genuine concern and fear amongst community members, and are frequently found at the heart of opposition campaign messaging.

These key local issues were compounded by Greenpeace taking the CCS debate beyond local issues and into a discussion focussed on their own negative agenda towards new coal-fired generation.

### Maasvlakte

In contrast to Barendrecht, Maasvlakte is useful in defining a number of stakeholder management best practices, in particular the importance of:

- Integrating all stakeholder management and communication
- Social skills and empathy particularly given the potentially highly emotive issues of safety and public health
- Putting CCS into the wider context of climate change and energy security
- Building close relationships with key decision makers and opinion formers
- Promoting local economic and other benefits
- Two way communications
- Coordinated external communications

## 6. Risk Assessment and Analysis

Our research and analysis has identified the following key WRCCS risk factors to public acceptance from a community stakeholder perspective are:

- Community fear and concern
- Local political opposition
- Organised opposition group
- Local media opposition
- NGO intervention

- National media opposition
- Uncoordinated communications

A community stakeholder Risk Register can be found as an attachment.

## 7. Stakeholder Engagement

### Objectives of the stakeholder management plan

The overall objective is to create a climate of understanding and acceptance among local decision makers and opinion formers and the local community to facilitate the permitting, construction and operation of the WRCCS project.

Specific objectives are to:

- Meet the consultation requirements prescribed in the Planning Act 2008, the Localism Act 2011 and all associated legislation and Guidance
- Secure Planning Inspectorate acceptance of the consultation processes
- Mitigate all identified risks

### Stakeholder management

This document is part of a comprehensive communications and engagement plan designed to clarify:

- Objectives
- Strategy
- Key messages
- Tactics
- Methods

A detailed protocol has been documented and agreed to ensure that all external communications activities and materials from members of the Capture Power consortium are coordinated. The protocol includes a CCS Argument Map which presents the pros and cons of the public debate supported by detailed Q&As covering all aspects of the WRCCS project.

All significant communications messaging is reviewed by appropriate technical team members. Equally technical documents such as Scoping Reports, EIA and NTS are reviewed from a communications perspective to avoid any community, political or reputation issues.

A risk register has been prepared and is continually reviewed and updated. The register is central to the continuing adaptation of the communications and stakeholder management programmes.

### Legislative requirements

The WRCCS is a nationally significant infrastructure project (NSIP) and will be examined and determined by the Planning Inspectorate. As such Capture Power is required to meet the consultation requirements prescribed in the Planning Act 2008 and the Localism Act 2011 and associated guidance, namely:

- Developing “an understanding of the community”
- Liaison with the Local authority in the preparation and agreement of a Statement of Community Consultation
- Pre-application consultation with communities, local authorities and those who would be directly affected by the proposals at a stage when their feedback provides them “with an opportunity to influence the way in which their community develops”
- Further consultation once views from the pre-application consultation have been taken into account and a preferred development option has been decided upon or is emerging
- Giving conscientious consideration to all consultation responses
- Preparation of a Consultation Report detailing how the legislative consultation requirements have been met

### Messaging

Messaging is developed in line with the following principles:

- CCS is a complex subject and is being presented as simply as possible with a focus on maximising the use of graphic representation
- CCS is being presented in the context, in particular climate change and security of supply
- Local economic and other benefits are being highlighted and promoted
- Ongoing benefits re jobs and investment

### Key engagement processes

In order to meet all the consultation objectives the WRCCS engagement programme has three key elements:

- An outreach programme designed to inform the community at large and to capture feedback
- A face to face engagement programme targeted at key stakeholders
- A range of specific measures to ensure that the views of the community as a whole are understood and ensure that the debate is not dominated by any single interest groups that might emerge

### Community outreach

The community outreach programme includes:

- Preparation and advertising of the SoCC
- Periodic community newsletters

- Frequently Asked Questions
- Community mailshots
- Local exhibitions
- Feedback questionnaires
- Website
- Freephone and freepost.
- Press releases
- Media advertising

### Key stakeholder engagement

An ongoing programme of liaison and face to face engagement will be targeted at the following key stakeholders:

- Parish Councils within 3 km
- Selby DC and North Yorkshire Ward councillors
- Constituency MPs
- Constituency MEPs
- Immediate neighbours
- Residents groups (none currently identified)
- Staff
- Community Engagement Forums
- Drax Power Station Consultative Committee
- Landowners
- Individuals/groups with identified issues
- Drax suppliers and contractors
- Key businesses
- Identified WRCCS champions
- Media

### Community opinion

A range of additional measures including polling and door to door canvassing will be used to gain an in depth understanding of community views and feelings particularly if any single interest or opposition groups become a risk in potentially dominating the local CCS debate and jeopardising public acceptance.

### Champions' panel

Third party endorsement for the Project could prove beneficial. Establishing a 'Champions Panel' comprising representatives from academia (for example, Universities of Leeds and Durham), UK and EU Parliaments (for examples, MEPS, cross-Party Yorkshire and Humber MPs), business (for example, CBI Yorkshire and Humber CBI), and a trade body/other (for example, Carbon Capture and Storage

Association, CO2sense) will be carried out early in the process enabling individual 'members' to be called upon to provide independent comment to supplement any communications materials.

Backing for CCS from environmental groups appears to be predicated on the extent to which carbon capture is deployed from the start of operations. There is generally support for a high percentage of carbon capture and little for a low percentage. Proactive communication with NGOs, in the first instance, Friends of the Earth, Greenpeace and WWF, is recommended at a national level to allow a full exchange of views regarding WRCCS, to emphasise the strengths of the Project in terms of percentage of carbon capture, and to reduce the risk of adverse NGO comment.

## 8. Monitoring and Adapting to Changes

### Recording stakeholder interactions

Legislation over the recent past and a series of high profile judicial reviews has elevated the importance of community consultation and stakeholder engagement. Best practice has been overtaken by legislative necessity to the extent that consultation issues can be the subject of successful legal challenges which can cause delay.

Against this background WRCCS is using systems to ensure that consultation and engagement activities and responses are recorded in an accurate, reliable and auditable way.

A specialised, web based stakeholder management software system is being used which provides real time access for all team members to a central record of all stakeholders and stakeholder interactions. The software tracks all activity, analyses both qualitative and quantitative stakeholder responses, has comprehensive reporting features and provides an auditable trail.

Comprehensive information is held on all key stakeholders including:

- Names and comprehensive contact and other information
- Comprehensive background information and known history
- All planned communications/interactions
- All communications/contact received
- All communications/interactions made
- Any media references of note
- Supporter/objector assessment

The software offers the following key features:

- Real time, up-to-date access to all team members
- Comprehensive feature rich stakeholder database
- Tracking and analysis of stakeholder issues using qualitative, quantitative and spatial analysis
- Issues and complaints management
- Built-in web survey facility
- Detailed and comprehensive reporting
- Data management with the highest security ratings

### Issues and trend analysis

Arrangements are in place to continuously monitor all stakeholder interactions and to adapt the WRCCS engagement strategy in light of changing circumstances and stakeholders.

Stakeholder information and interactions are comprehensively analysed and reported as a fundamental and day to day part of managing the engagement process.

Weekly qualitative and quantitative reports are prepared to monitor stakeholder issues and identify and track trends.

### Issues and trends reporting

The stakeholder management software uses an SQL Server to host the stakeholder database and Crystal Reports as its reporting engine, both enterprise grade software packages capable of effectively handling extremely large datasets. Multiple filters within the package are used to manage the stakeholder database in order to identify, track and report issues and trends including:

- Regions (geographic filter)
- Stakeholder contact groups
- Communication methods
- Issues
- Zone (sub-projects, non-consecutive project stages or other overlapping elements)
- Date

### Adapting to changing circumstances

The WRCCS project engagement strategy and plan are continuously reviewed at monthly project management meetings and updated in light of changes in stakeholders and new, emerging or developing trends.





# Appendix D OPP Finalised Statement of Community Consultation

30 JANUARY 2014



## Statement of Community Consultation pursuant to Section 47 Planning Act 2008

have *your say*...



## White Rose Carbon Capture and Storage Project

### Capture Power Limited

#### Statement of Community Consultation pursuant to Section 47 Planning Act 2008

#### HAVE YOUR SAY!

This Statement of Community Consultation (SoCC) explains how you can comment on proposals for the White Rose Carbon Capture and Storage Project (White Rose CCS Project or the Project).

The White Rose CCS Project will comprise a new, stand-alone, oxyfuel coal-fired power station with the ability to capture carbon dioxide (CO<sub>2</sub>), and will link up with a CO<sub>2</sub> transport and North Sea storage solution being developed separately by National Grid Carbon (NGC), known as the Yorkshire and Humber CCS Cross Country Pipeline. The White Rose CCS Project will be located adjacent to the existing Drax Power Station in Selby, North Yorkshire.

The Project could play an important role in the formation of a 'Yorkshire and Humber Cluster' for CO<sub>2</sub> transportation and storage as well as helping to develop carbon capture and storage (CCS) technology for other projects in the UK and abroad.

An application for a Development Consent Order (DCO) will be made by Capture Power Limited (CPL) to enable development and operation of the Project. CPL is a consortium made up of GE, Drax and BOC, all market leaders in developing and operating electricity generation facilities.

#### Application decision making

The DCO application will be made to the Planning Inspectorate, which examines and reports on applications for *nationally significant infrastructure projects* such as the White Rose CCS Project. The decision whether to grant development consent for the Project will be made by the Secretary of State.

Section 47 of the Planning Act 2008 requires CPL to explain to the local community how we will carry out required consultation with regard to the proposed White Rose CCS Project. Further information about the process is available on the National Infrastructure Planning website.

<http://infrastructure.planningportal.gov.uk/>

CPL is currently at the **pre-application consultation stage**. We are committed to full and extensive consultation on our proposals and are keen to receive feedback and suggestions as we further develop the Project.

The consultation feedback that is received from different elements of the wider community is important to us. Views expressed by all consultees will be considered and, where appropriate, included or taken into account within the Project design.

#### The White Rose CCS Project and national policy

The Climate Change Act commits the UK to reduce carbon emissions. The Government is committed to the development of CCS in the UK and has plans for delivering such plants by 2020. Facilities such as this are required if carbon reduction targets are to be met, as set out in the Government's national policy on electricity generation facilities (such as National Policy Statement EN-1, 2009).

The White Rose CCS Project will help to reduce CO<sub>2</sub> emissions and improve the UK's security of electricity supply by providing a new, flexible and reliable low carbon electricity generation option. The Project will generate enough electricity to supply the energy needs of the equivalent of over 600,000 households with low carbon electricity and help establish a carbon transportation and storage infrastructure capability within the UK.

### **Environmental Impact Assessment**

The White Rose CCS Project is an environmental impact assessment (EIA) development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. CPL has formally sought an opinion on the 'scope' of the environmental assessment, which has identified what potential environmental impacts will need to be considered as part of the application. An initial round of informal public exhibitions to introduce the Project were held in July 2013.

***We will be inviting the community to comment formally on the development proposals and to provide feedback and suggestions on the Project. This will be the first formal round of public events, including exhibitions and forums.***

Following on from this, we will prepare a preliminary environmental information report which will consider the potential environmental issues identified at scoping stage, and demonstrate how these, and any feedback received, have helped shape the Project.

***There will then be further opportunity to comment on the proposals and the preliminary environmental information relating to the Project. This will be the second series of public events.***

Comments and feedback on the preliminary environmental information will help us complete the environmental impact assessment.

This community participation will be supplemented by consultation with statutory consultees and stakeholder groups, who will all be invited to provide their views on the White Rose CCS Project.

When CPL submits the DCO application it will include an Environmental Statement (the final output of the EIA process) which will provide a full assessment of any environmental impacts identified, and how these will be reduced or eliminated.



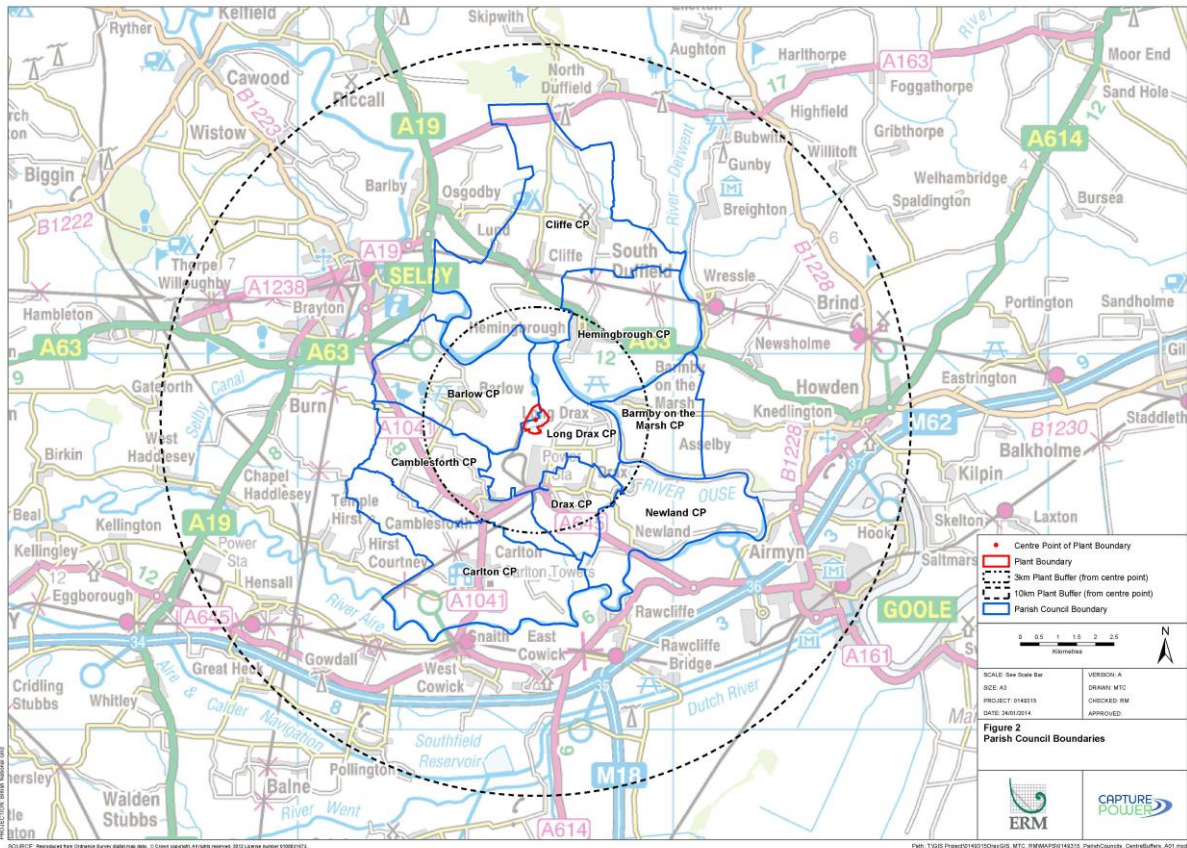
### How we will consult

Over the coming months, CPL will encourage the community to participate in our consultation programme so we can update you on the Project and gather your feedback.

Our consultation will centre on a zone of 10km around the site of the White Rose CCS Project, with particular focus on those closest to the site.

Throughout the pre-application consultation stage we will be:

- Providing Project updates on our website.
- Holding exhibitions, presentations and workshops where you will be able to speak to members of the Project team, view plans and documents relating to the Project and ask questions and provide feedback. Exhibitions, presentations and workshops will be held in venues in Selby and Goole, including Selby Town Hall, Drax Sports and Social Club and the Junction, Goole.
- Advertising exhibitions and workshops, and providing information on the Project, via media outlets, including the Selby Times & Post, Goole Times and Yorkshire Post.
- Displaying notices and posters throughout the area, including at Access Selby, Selby Library and Goole Library, providing information on the Project and advertising exhibitions and workshops.
- Distributing information leaflets prior to public events to all properties within an inner 3km radius consultation zone, shown on the map below, including all properties in all Parish Councils which lie entirely, or in part, within this radius. This includes Cliffe, Barlow, Camblesforth, Carlton, Long Drax, Drax, Newland, Barmby on the Marsh and Hemingbrough Parish Councils.
- Information leaflets will also be distributed to properties which lie alongside the existing road haulage route for Drax Power Station (the A614 and the A645 to junction 36 of the M62) and which is likely to be the main road haulage route for the project.
- Engaging with community groups, including Community Engagement Forums.
- Engaging with local business interests.
- Engaging with special interest and leisure groups.
- Displaying Project documents at Access Selby, Selby Library and Goole Library.
- Writing directly to people who have asked to be kept informed, including local community groups, councillors, MPs and local businesses.



Feedback is welcomed from anyone who is interested in the Project, whether they fall within or outside of the consultation zones.

**When we will consult**

This SOCC marks the start of CPL’s formal community consultation process.

Following on from this, there will be two formal stages to get involved in the pre-application consultation, as described above.

We will provide further information on the next steps in the process and details of exhibition events and workshops as the Project progresses over the coming months.

Opportunity will be provided throughout the whole pre-application period to provide your views at every stage.

**How to have your say**

**To learn more about the Project, or to provide your views on the White Rose CCS Project, you can:**

- Visit our website [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)
- Complete online feedback forms as part of our formal consultation process at [www.whiteroseccs.co.uk](http://www.whiteroseccs.co.uk)
- Call us on freephone 0800 169 5290
- Write to us at **White Rose CCS Project, Freepost Consultation**

This SOCC has been produced in agreement with Selby District Council and North Yorkshire County Council.

# Appendix E NGCL public consultation material

# What is carbon capture and storage?

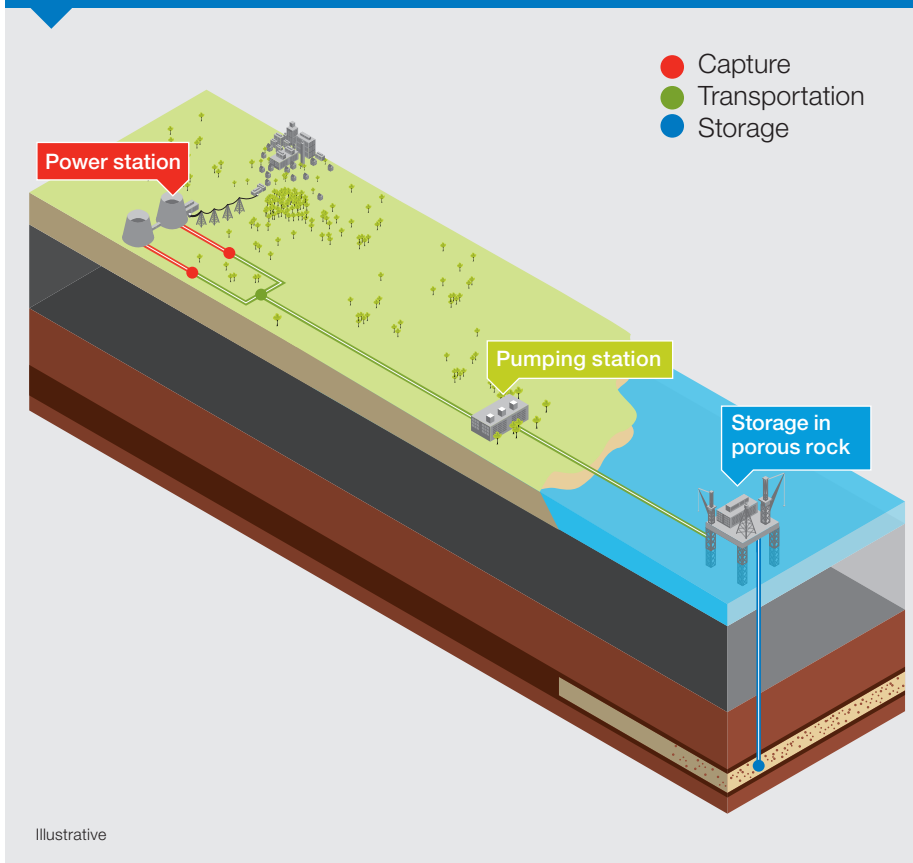


Carbon capture and storage (CCS) involves capturing carbon dioxide emissions from coal and gas-fired power stations or energy-intensive industrial plants such as steel works and transporting them to be stored permanently beneath the seabed in natural porous rock formations or depleted oil and gas fields.

In the UK, coal and gas-fired power stations are responsible for just under a third of carbon dioxide emissions. CCS has the potential to capture up to 90 per cent of the carbon dioxide produced by power stations and heavy industry and ultimately help reduce the volume of carbon dioxide released into the atmosphere in the UK.

CCS could also help increase the security of our domestic energy supply by allowing us to retain fossil fuel energy generation while using it in a cleaner and more responsible manner.

## How does CCS work?



### Capture

Carbon dioxide is created (from burning coal or gas which would otherwise be discharged into the atmosphere) and then captured from a power station, cement factory, steel works or other industrial facility and compressed for transportation.

### Transportation

The carbon dioxide is transported to a suitable storage location. Large amounts of compressed carbon dioxide are most efficiently transported using underground and undersea pipelines.

### Storage

Finally, the carbon dioxide is injected under high pressure into natural porous rock formations offshore, where it will be stored permanently.





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**Carbon dioxide (CO<sub>2</sub>) is a natural gas which is produced by most living organisms, including humans and animals.**

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## What is carbon dioxide?

Carbon dioxide (CO<sub>2</sub>) is a natural gas which is produced by most living organisms, including humans and animals. It is produced when we breathe out and is needed by plants to aid their growth and development.

Carbon dioxide is used in everyday products including fizzy drinks, fire extinguishers and decaffeinated coffee. In addition, it is produced when yeast and warm water are mixed and this is what makes dough rise. The gas is an integral part of everyday life.

Carbon dioxide is also a by-product of burning fossil fuels such as coal and gas, for example when generating electricity. The release of large quantities of carbon dioxide into the atmosphere is a major contributor to global climate change.



## CCS around the world



The technologies involved have been tested and proven elsewhere – for example, carbon capture and transportation has been used for decades in the US oil industry and carbon capture and storage has been carried out in the North Sea by Norway since 1996. This project would be one of the first commercial-scale, ‘end-to-end’ projects in the world.

There are a number of CCS projects in development globally, including in North America, Australia and China. However, this project could help position the Yorkshire and Humber region at the forefront of the global CCS industry.

# Why do we need it?

The burning of fossil fuels, such as coal and gas, to generate electricity is a major source of carbon dioxide emissions into the atmosphere, accounting for 40 per cent of global energy-related dioxide emissions – a major contributor to global climate change.

Significant steps are now being taken to reduce global carbon dioxide emissions and a number of countries and international bodies have policies and initiatives in place to address this issue.

## The opportunity

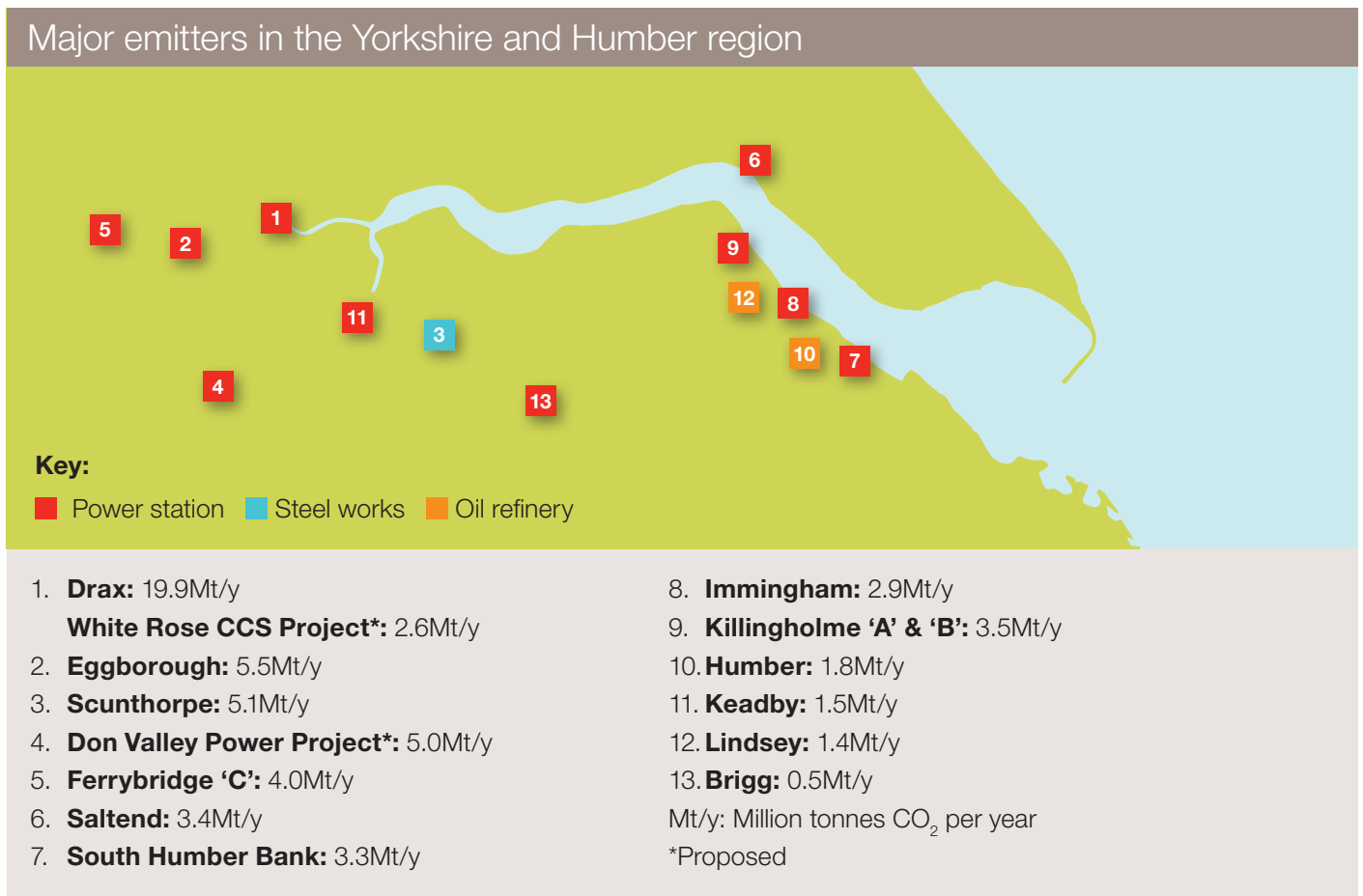
Yorkshire and Humber is the most energy-intensive region in the UK. Its concentration of fossil fuel power stations provides around 18 per cent of the nation's electricity generation and the region is also the location for a significant amount of heavy industry.

This concentration of power stations and industrial plants produces about 60 million tonnes of carbon dioxide every year – that's equivalent to about half of the total emissions from domestic homes in the UK.

Most of these facilities are located relatively close together so could

potentially be connected to a single CCS pipeline over time to create a regional CCS network. They are also located within approximately 100 kilometres of the East Yorkshire coast, providing good access to offshore storage locations beneath the North Sea seabed.

Creating a multi-user pipeline with facilities for other emitters to connect would provide the foundation for a future CCS network in the region and would increase capacity, minimise future disruption, speed up deployment and reduce deployment costs of CCS. Such a network could capture tens of millions of tonnes of carbon dioxide every year and make a significant contribution to reducing UK emissions.





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CCS has been widely recognised as potentially one of the most significant contributors to tackling climate change.

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## Policy support

In November 2008, the UK Government enacted the Climate Change Act, making the UK the first country in the world to have a legally binding long-term framework to cut carbon emissions. The aim is to reduce greenhouse gas emissions by 34 per cent by 2020 and 80 per cent by 2050 (compared to 1990 levels).

CCS has been widely recognised as potentially one of the most significant contributors to tackling climate change and securing our future energy supply. The Government's Overarching National Policy Statement for Energy (EN-1) recognises the potential contribution which CCS can make towards helping to diversify and decarbonise electricity generation, whilst contributing to climate change targets and maintaining security of electricity supply.

In April 2012, the Government published its CCS Roadmap with the goal of seeing commercial deployment of CCS in the UK.

The European Union is also supporting CCS projects across Europe (see page 11).



# Combating Climate Change

Carbon dioxide (CO<sub>2</sub>) is also a by-product of burning fossil fuels such as coal and gas, for example when generating electricity. The release of large quantities of carbon dioxide into the atmosphere is a major contributor to global climate change.

In November 2008, the Government passed the Climate Change Act, making the UK the first country in the world to have a legally binding commitment to cut greenhouse gas emissions, including carbon dioxide. The aim is to reduce emissions by 34% by 2020 and 80% by 2050 (from 1990 levels).

In the UK, coal and gas power stations are responsible for just under a third of carbon dioxide emissions. CCS technology has the potential to capture up to 90% of the carbon dioxide produced by power stations and heavy industry and ultimately help reduce the volume of carbon dioxide released into the atmosphere in the UK.

CCS could also help increase the security of our domestic energy supply by allowing us to retain fossil fuel energy generation, but using it in a cleaner and more responsible manner.

## National and International support

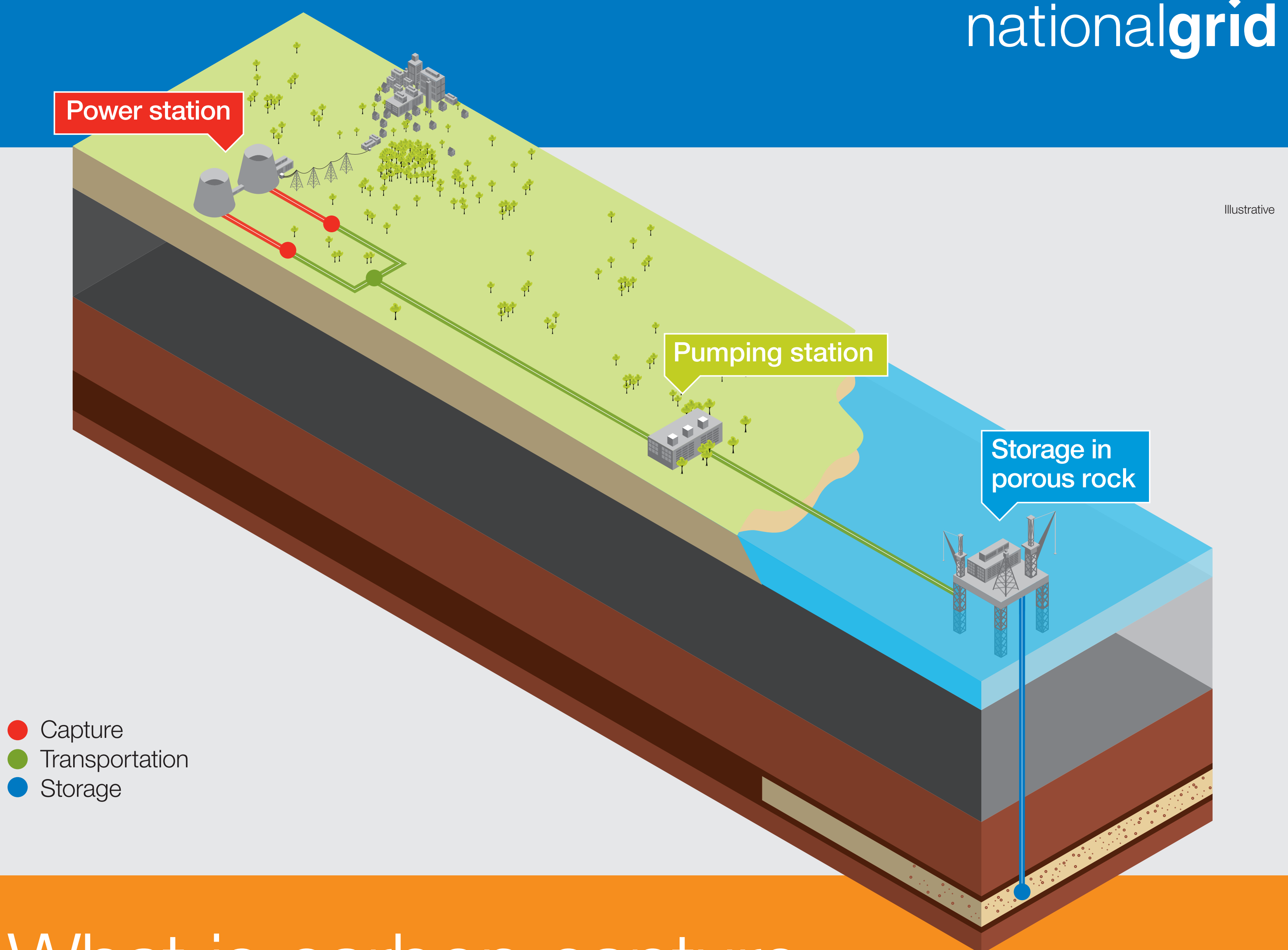
The UK Government and European Union have adopted policies that promote the development of CCS, including financial incentives to support the technology.

In April 2012, the Government published its CCS Roadmap with the goal of seeing commercial deployment of CCS in the UK. In March 2013, it announced two projects that are being considered for a share of £1 billion to support the development of CCS. This includes the White Rose CCS Project at Drax, which would connect to National Grid's proposed pipeline.

The European Union is also supporting CCS projects across Europe.

Internationally, CCS could make up to 20% of the global cuts in emissions needed by 2050, according to analysis by the International Energy Agency.





## What is carbon capture, transportation and storage (CCS)?

CCS is an innovative technology designed to capture, transport and permanently store carbon dioxide (CO<sub>2</sub>) produced by fossil fuel power stations and heavy industry.

The technologies involved have been tested and proven elsewhere – for example, carbon capture and transportation has been used for decades in the US oil industry and carbon capture and storage has been carried out in the North Sea by Norway since 1996. However, this project would be one of the first commercial scale ‘end-to-end’ projects in the world.

There are a number of CCS projects in development globally, including in North America, Australia and China. However, this project could help position the Yorkshire and Humber region at the forefront of the global CCS industry.

### Capture

Carbon dioxide is captured from a power station, cement factory, steel works or other industrial facility and compressed for transportation.

### Transportation

The carbon dioxide is transported to a suitable storage location. Large amounts of compressed carbon dioxide are most efficiently transported using underground and undersea pipelines.

### Storage

Finally, the carbon dioxide is injected under high pressure into natural porous rock formations offshore, where it will be stored permanently.

## Major emitters in the Yorkshire and Humber region

Illustrative



# Yorkshire and Humber: The opportunity

The Yorkshire and Humber region is an ideal location for CCS projects because of its concentration of fossil fuel power stations and large industrial plants that release millions of tonnes of carbon dioxide (CO<sub>2</sub>) every year.

These facilities produce about 60 million tonnes of carbon dioxide every year – that's equivalent to about half of the total emissions from domestic homes in the UK.

Most of these facilities are located relatively close together so could potentially be connected to a single CCS pipeline over time to create a regional CCS network. This could capture tens of millions of tonnes of carbon dioxide every year and make a significant contribution to reducing UK emissions.

These facilities are also located within about 100 kilometres of the East Yorkshire coast, providing good access to offshore storage locations beneath the North Sea seabed.

Plans are being developed for a number of CCS projects in the region, including the White Rose CCS Project at Drax.

### A CCS network

A CCS network involves connecting a cluster of fossil fuel power stations and industrial plants to a single, shared pipeline network. This can increase capacity, minimise future disruption, speed up deployment and reduce development costs, enabling more emitters to take advantage of CCS.

