Yorkshire Wildlife Trust

1 St. George's Place,
York, YO24 1GN
T 01904 659570
E info@ywt.org.uk
@YorksWildlife

The Planning Inspectorate
3B Eagle Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your ref: EN010081

1st November 2017

Eggborough CCGT - Examining Authority's Written Questions

The Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 42,000. The Yorkshire Wildlife Trust is the second oldest of the 47 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

Question BE 1.3 Woodland Screening
Yorkshire Wildlife Trust in its Relevant Representation [RR-011] states that the proposed woodland screening proposals may not be sufficient to raise the condition of the woodland to 'good' as non-native trees cannot be removed and the canopy is mainly closed which reduces opportunities for improving the understorey of the woodland.
For Selby DC/Yorkshire Wildlife Trust
ii) Comment on the extent to which you are satisfied that the Applicant's biodiversity offsetting metrics summarised in table 5.2 and Appendix 2 of the Indicative Landscape and Biodiversity Enhancement Strategy [APP-035] are satisfactory in demonstrating the achievement of "a small net gain in biodiversity" as a result of the proposed development.

The calculation of an increase in biodiversity is almost entirely dependent on changing the condition of the woodland from a score of 2 (moderate) to a score of 3 (good)[1] . As the woodland area is 11ha this has a much larger impact on the results of the calculation than the other habitats to be enhanced or created which are all less than 1.5ha in area. The baseline biodiversity units for the woodland are 88 units (11 x 2 x 4) where 2 is the condition of the woodland and 4 is the distinctiveness. The calculation for the result of enhancement using the multiplier of 3 for Good Condition is 132 biodiversity units (11 x **3** x 4), an increase of 44 units. The units are then adjusted for the amount of time it will take to create or enhance habitat and the difficulty of this, giving a final total for the woodland enhancement of 25.88 units. If this amount is left out of

[1] Pages 133-137 Appendix 2 Biodiversity Offsetting Metrics, Document 5.10 Indicative Biodiversity and Landscape Strategy.

Yorkshire Wildlife Trust

1 St. George's Place,
York, YO24 1GN
T 01904 659570
E info@ywt.org.uk
@YorksWildlife

the calculation, instead of a calculation that biodiversity will be enhanced by a total of 3.22 units there will be a net loss of biodiversity of 22.66 units.

It is our opinion that it will not be possible to enhance the entire 11ha of woodland as trees cannot be removed due to its screening function. As the primary function of the woodland is to screen the power station, it is very densely planted with a closed canopy, meaning that little understorey planting can grow as minimal light penetrates the woodland floor. As the screening function of the woodland must be maintained the proposed under storey planting will not be successful except around the edges of the woodland. In this case a lower number of hectares which would actually be enhanced would also give a different result to the offsetting calculations. If a more realistic figure lower than 11ha were used in the calculations it is likely that the total would show a net loss of biodiversity units. Such would be contrary to national biodiversity policies, in particular Paragraph 118 of the NPPF and paragraph 5.3.4 of the Overarching National Policy Statement for Energy (EN-1). It is our opinion that a project of the scale of Eggborough Power Station should go much further than just demonstrating no net loss for biodiversity and should deliver biodiversity gains.

iii) Comment on the extent to which reliance is placed on the condition of the woodland as achieving a "good" condition.

The Trust does not dispute the possibility that the woodland can be improved to some extent with the variety of approaches suggested. A wide range of suggestions are provided from improving woodland edge habitat with some plug planting and providing nest boxes and deadwood piles. In fact a number of the techniques such as deadwood piles and under storey improvement were suggested by the Trust at our first meeting with the applicants in April 2017. However the Trust is not convinced that this will be sufficient to raise the condition of the woodland from "Moderate" to "Good" condition at the site. The woodland contains non-native trees and due to the screening function of the woodland these trees cannot be removed. The woodland also has a closed canopy which means that it will not be possible to provide glades or clearings within the woodland. Without removing trees there will be a lack of sunlight to the floor of the woodland which will make it very difficult or impossible to establish a diverse ground storey flora, hence the suggestion that establishing a more diverse flora at the edge of the woodland would be carried out.

If the woodland condition cannot be changed from "Moderate" to "Good" as shown above the calculation of biodiversity units would show a net loss of units.

Question BE 1.4 Attenuation Pond:
Yorkshire Wildlife Trust in its Relevant Representation [RR-011] states that the proposed attenuation pond will not be as ideal for biodiversity purposes as the existing lagoon, because it is smaller in size and its primary purpose is for drainage purposes.
Explain how an additional 0.3ha (3.00 biodiversity units) will be delivered by the attenuation pond with

Yorkshire Wildlife Trust

1 St. George's Place,
York, YO24 1GN
T 01904 659570
E info@ywt.org.uk
@YorksWildlife

specific reference to the primary function (drainage) and the extent to which the secondary function (biodiversity enhancement) can also be achieved within the context of the DCO [APP-005].

Further to our relevant representation the Trust now believes that it is incorrect to include an attenuation pond in a biodiversity calculation. The Trust is very pleased that the pond is to be enhanced for biodiversity but in conversations with experts on calculating biodiversity offsets the Trust has been told that it is not usual to include a pond which is designed as part of a drainage system in an offsetting calculation. This is because its primary function is not to provide biodiverse habitats, therefore the conditions within the pond may fluctuate/ change due to its functioning as a drainage pond.

Question BE 1.5 Use of Selective Catalytic Reduction:
Provide comments on the effect of the proposed development on wildlife should the use of Selective Catalytic Reduction to reduce NO2 emissions be implemented.

The Trust does not have expertise in this area but understands that the use of this technology can decrease CO2 emissions but increase NO2 emissions which can have impacts on vegetation in sensitive habitats. The Trust would defer to the opinion of Natural England on this question.

Question BE
Yorkshire Wildlife Trust in its Relevant Representation [RR-011] states that the wider area does not appear to have been considered adequately in the application, which they say is vital to ensure that local biodiversity is not affected by the application.
Respond.

The building and operation of the Eggborough CCGT will have impacts on the ecology and biodiversity of the habitats within and surrounding the power plant. The biodiversity and landscape strategy proposed for the development only provides mitigation for the onsite impacts, for which it doesn't fully mitigate. Off site compensation should therefore be considered and the Trust has shared with the developers some potential projects which could compensate for loss of habitat and would enhance biodiversity in the wider area.

Nothing has been proposed for the offsite biodiversity impacts. Such impacts may include loss of bat foraging habitat, noise and disturbance during the construction phase and offsite nitrogen deposition. The proposed development will also contribute to climate change impacts due to further investment in the use of fossil fuels.

Yorkshire Wildlife Trust

1 St. George's Place,
York, YO24 1GN
T 01904 659570
E info@ywt.org.uk
@YorksWildlife

Paragraph 5.3.4 of the Overarching National Policy Statement for Energy (EN-1)[2] states that '*The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests'*

Sara Robin
Conservation Officer
Yorkshire Wildlife Trust
Telephone: 01904 659570
Email: sara.robin@ywt.org.uk

[2] Department of Energy and Climate Change. (2011). Overarching National Policy Statement for Energy (EN-1).