

I am writing on behalf of Just Transition Wakefield, to comment on the planning application from Drax Power to retrofit CCS units to two furnaces. We believe the following issues are relevant and ought to be examined.

We are of the view that the weight of scientific evidence against the industrial scale burning of the world's forests, the doubts expressed recently about the sustainability of biomass burning by no less than the Secretary of State for BEIS, and the accumulating evidence against Carbon Capture and Storage (<https://ieefa.org/resources/carbon-capture-remains-risky-investment-achieving-decarbonisation>) mean that the need for this particular technology at this particular site should be questioned. This is particularly true now that the government's own net zero strategy has been found to be in breach of its commitments under the Climate Change Act.

1. The role of Drax Power and BECCS technology in combating Climate Change.

In paragraph 4.1.1 of the Needs and Benefits document (5.3), Drax Power references EN-1(2011) as justification, but we argue that the proposal is not fully aligned with this document or the National Planning Policy Framework (sustainable development criteria) because the development is not compatible with increasing productivity, supporting communities' health, protecting our natural environment or improving biodiversity.

We wish to challenge is on grounds that:

- The weight of evidence against industrial biomass burning being classified as carbon neutral is mounting, including its contribution to averting climate change (<https://www.documentcloud.org/documents/20482842-scientist-leter-to-biden-van-der-leyden-michel-suga-moon-february-11-2021>);
- The evidence questioning CCS as a mature, scaleable technology is accumulating (<https://ieefa.org/resources/carbon-capture-remains-risky-investment-achieving-decarbonisation>);
- The Government's Net Zero Strategy has been found to be in breach of the Climate Change Act;
- The energy loss to operate the CCS plant will produce less energy not more.

2. The interdependency between this application and the North Sea Pipeline and underground storage reservoir.

While we recognise that Drax's current application is separate from any applications for a North Sea pipeline to store the CO₂, we believe that the current BECCS application cannot be meaningfully examined in isolation without considering that BECCS at Drax depends on investment on a massive scale for a future pipeline in the North Sea.

3. Flood Risk Assessments

On page 21 of the Flood Risk Assessment Document (Appendix 12.1, Document Reference Number: 6.3.12.1) it is stated “*there are no records of historical flooding in the area of Drax Power Station or within the carbon capture location boundary*”.

We wish to challenge the flood risk assessment on the grounds that:

- Drax and the surrounding area is a known area of flood risk (<https://www.yorkpress.co.uk/news/19941922.cawood-bridge-near-selby-closed-river-ouse-flooding/>) with flooding becoming more frequent;
- The flood risk assessment needs to be re-evaluated to take into account the latest Climate Change Risk Assessment (CCRA 2022);
- Drax’s flood risk assessment fails to consider risks to the rail supply network which we believe is a major omission as it crosses both the Aire and the Ouse flood plains.

4. Technical

Capturing and compressing CO₂ takes a lot of energy: there’s a high risk of the resultant shortfall in electricity production being met from increased fossil gas elsewhere; or met by Drax’s own production further lowering the efficiency of an already old and inefficient plant. This is contrary to the Planning Systems aim to ‘help increase the use and supply of renewable and low carbon energy and heat’. Further, evidence is accumulating that the technical challenges of CCS will prevent its widescale roll-out and adoption, raising genuine financial and climate risks (<https://ieefa.org/resources/carbon-capture-remains-risky-investment-achieving-decarbonisation>).

5. Green Jobs, apprenticeships and the local economy

We believe the forecast of jobs supported by the BECCS project, based on the analysis by Vivid Economics appended to 5.3, is inflated, insufficiently supported by evidence. It was commissioned by Drax and cannot be considered as an independent study.

- Post-construction, predicted direct jobs drop from 4904 to 375 without redeployment plans;
- Projected induced and indirect jobs fall from 2120 and 3240 to 960 and 1800 respectively – again a serious concern for the local economy

6. Air pollution and Health

The CCS system that Drax Power proposes uses amine solvents to separate the CO₂ from the flue gases.

We believe that the health risk assessments are lacking detail, in particular with respect to:

- The loss of amines from the system and their subsequent degradation into probable carcinogens;
- The lack of reliable research that would enable effective regulation and monitoring, as summarised by SEPA’s report (<https://tinyurl.com/bde33mvz>)

7. Biodiversity

We have two biodiversity concerns.

Locally, we have concerns that the proposal will lead to the disturbance and degradation of vital habitats and so risk harming a wide range of protected species. It is therefore not sustainable development as defined by the National Planning Policy Framework. It fails to protect the natural environment or to enhance biodiversity, and is incompatible with:

- Commitments made in the Environment Act 2021 to support the “conservation and enhancement of biodiversity in England”
- The aims of the Defra Nature Recovery Green Paper (March 2022) “to address the drivers of nature’s decline including habitat deterioration, loss and fragmentation”.

The proposed development will adversely impact nationally-and international designated areas that cannot be adequately mitigated or compensated for.

The application for consent is deficient in that:

- It relies on outdated species information, including species surveys from 2018, and therefore does not properly assess the impact of the proposed development.
- It does not pay sufficient attention to the potential for damage to watercourses by sediment and accidental release of chemicals.
- The proposals for Biodiversity Net Gain do not consider rivers.
- The risk of nitrosamine deposition which could impact habitats within the surrounding protected sites is not recognised.

Secondly, we have evidence that despite Drax Group’s assertions, their wood pellet supply is not sustainable and in some cases is open to legal challenge. We have evidence that Drax’s supply chain in Estonia may be in breach of UK sustainability standards, and that Drax’s supply chain in British Columbia threatens critical Caribou habitats and at least partly occupy indigenous lands that neither the Canadian nor British Columbian states are legally entitled to licence. These vulnerabilities undermine the business case and therefore the application.