

From: Kenneth Jenkins [REDACTED]
Sent: 18 October 2018 23:02
To: Drax Re-power
Subject: Re: Drax Re-power – EN010091

Drax Re-power Team,

As per our only question, under ref AQ 1.12, the document in question is found here:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf

Shows on page 17 of this comprehensive study into attributed deaths to air pollution, that Selby is the highest in this local region. Even though Selby is a less urban area than others on the lists, it compares to inner city attributions.

Attributable factor of 5.1 % of all deaths in the area to air pollution.

We have also referenced this under reference 8, on our written representation, that we intend to submit early and today.

This will follow as a PDF.

Yours sincerely,
Mr Kenneth Jenkins
Friends of the Earth

From: Kenneth Jenkins [REDACTED]
Sent: 18 October 2018 23:17
To: Drax Re-power
Subject: Written Representation against Drax Re-power, Friends of the Earth Selby.

Drax Re-Power Team,

Thank you for allowing us to attend your first meeting.
We feel our Relevant Representation can act as our summary of our Written Representation. This means we can submit our Written Representation for an earlier deadline and give time for others to see it. We also didnt want to repeat Biofuelwatch and Client Earth's Representations that would likely cover more specific facts and be more legally prepared.
We are a charitable organisation (so our funds, abilities and time is limited) and we are here to represent local views on the impact, mainly around health and wellbeing. I hope any 'none standard approaches' to written representations can be overlooked in the hope the wider points we want to make are considered in our representation.

Thank you and we are here if you have further questions. File attached.

Yours sincerely,
Mr. Kenneth Jenkins
Friends of the Earth, Selby



Friends of the Earth, Selby

October 2018

Written Representation Against Application by Drax Power Ltd for an Order Granting Development Consent for the Drax Re-Power Project

The Department for Business, Energy and Industrial Strategy (BEIS) have already made the decision that they wish to reduce their forecasts on how many gas powered plants are required by 2035 from 14 gigawatt (GW) to 6GW. This is based on the fact that renewable, alternative energies are looking set to replace the need for burning gas, even more than previously anticipated. [Ref 1](#). Add to this the large amount of already approved and built gas power plants and it will result in many plants being left dormant. This has been mentioned in our Friends of the Earth report, which shows that the UK already has 16.2GW of gas fired power stations built, approved, or awaiting approval. [Ref 2](#). Drax is not on this list and their new proposal will help exceed the original BEIS forecasts and far surpass the new 2017 figures. Drax Power is aware of this and is hoping that the government and Planning Inspectorate will simply continue with the rollout anyway, in a bid to prevent any reduction in size.

Friends of the Earth believe that Drax needs to drastically reduce its size and impact, mainly because:

- It's the biggest polluter in the UK and is making little progress towards reversing its major impact on health and the environment. (This will be discussed in more detail below.)
- It relies too much on subsidies and has been branded by the Telegraph as 'a subsidy addict'.
- Its operations have had, and continue to have, a detrimental effect on the health of the local population.
- It manipulates the local council to the detriment of the local community.

What is dirty and what is clean?

Clean energy comes from renewable sources, sources that are infinite (sun, wind, water and tides). Drax Power Ltd. like to claim that their current burning of fossil fuels (be it coal, gas, or biofuel pellets) is good for the planet and future-proof. They are deluding themselves by adding words like 'renewable', 'abated', and 'clean'. As a recent Channel 4 Dispatches programme investigating Drax illustrated, chopping down trees in Canada, turning them into pellets, then transporting them on ships to burn is not clean, renewable energy. We are all aware that calling it such is deceptive. It's worth watching, or reading this short article summary of, the programme for further insight into this. [Ref 3](#). During production they conducted research at Nottingham University, which found that burning wood pellets produced 8% more CO2 than burning coal. [Ref 4](#). We think you'll agree that this is far from being green or renewable.

Reference 1:

<https://www.theguardian.com/business/2018/jan/29/gas-fired-plants-to-reap-huge-subsidies-despite-uncertain-future>

Source material:

<https://www.gov.uk/government/publications/updated-energy-and-emissions-projections-2017>

Reference 2:

https://friendsoftheearth.uk/sites/default/files/downloads/enough_is_enough_2012.pdf

Reference 3:

<https://cliscep.com/2018/04/17/channel-4-on-the-green-energy-scam/>

Reference 4:

<https://theenergyadvocate.co.uk/2018/04/16/burning-wood-pellets-is-worse-for-environment-than-using-coal/>

The government have finally seen this and are now stopping any new biofuel subsidies. Canada-based organisations signed on Biofuelwatch's first representation, agreeing that Drax is having a negative 'global impact'. We will of course leave Biofuelwatch and partners to submit their own full written representation around this topic.

How does this link with their current proposal?

It shows that they have a slanted view of what is green, what is financially viable and the way they currently generate energy. They are the third biggest polluter in Europe and the biggest in the UK.

Their 'repower' project is about taking a fossil fuel (gas) and burning it. This is a finite resource and should therefore be regarded as a high risk business proposal, one that will damage not only the government's climate change targets, but also the health and wellbeing of the planet.

Environmental impact:

We should not be assessing the current impact on climate change this proposal would have on the basis of previous coal-based pollution output - the two are incomparable. We believe that the Planning Inspectorate is aware of this anomaly within the proposal, both from the first meeting and Biofuelwatch's coverage of the topic. However our interpretation is that if there is an opportunity to reduce impact it should not be based on current pollution levels, but rather on a baseline that would allow the local population a reprieve from the current excessive levels of pollution.

Impact on the local population:

Much of what Drax outputs has an impact on the local population, both the particulates that are released into the air and the cloud cover the power station creates. The plume Drax produces blocks an average of 10 hours of sunlight per month - this reduction in access to natural light can have an impact on Vitamin D levels. [Ref 5](#). The Scientific Advisory Council on Nutrition (SACN), an independent advisory body to the government, made links between Vitamin D levels and a range of health problems, including musculoskeletal health, heart diseases, type 1 diabetes, cancer, and multiple sclerosis. [Ref 6](#).

In a report titled 'Europe's Dark Cloud', released by the WWF and other bodies, it was estimated that Drax caused 590 premature deaths in 2013. There were also 14,620 asthma attacks in children attributed to its emissions. [Ref 7](#).

We must take into consideration the accumulative impact on the local area, already nicknamed 'megawatt alley'. Residents are bombarded with power stations, and with Eggborough already



Reference 5: Drax blocking light.

being approved for gas the public have decided enough is enough and are demanding cutbacks. A government report determined that particulate air pollution was responsible for 34 deaths within Selby in the year 2010. Ref 8. Is it logical to assume that Selby's proximity to Drax is the reason for its high levels of air pollution?

Too many subsidies:

Friends of the Earth feel Drax is applying a little too late, in a last ditch attempt to cling onto their outdated policies and infrastructure while still acquiring new subsidies. Their entire proposal is outdated, not future-proof and far off track from what the government needs. Drax Power Station was built during a time of environmental ignorance and it appears that they are stuck in their ways, tied down to their site and old ideas. Looking at this it seems as though they will continue to come forward with fossil fuel burning ideas far into the future. Therefore we believe it would be within the interests of the Planning Inspectorate and the government to ignore their repeated planning attempts until they can bring forward a proposal that helps meet the government's climate change commitments and paves the way for radical new green thinking.

Questions over the company's finances:

It's not for Friends of the Earth to conduct an audit into Drax Power Ltd. However, we should all be questioning how Drax operates so we can get a sense of risk for this venture. We've seen how major infrastructure projects can be damaged by unreliable companies such as Carillion. As an organisation we have doubts about the company and their practice of registering different companies to apply for gas subsidies under different infrastructure projects.

If financing is not an issue and there are no 'infrastructure risks' posed by financial worries, then why is Drax compartmentalising its developments of these gas powered sites? Why are they making subsidiary businesses with Companies House? It seems to us as though they are creating or limiting risk, or trying to lower their perceived overall climate impact by creating other companies such as Abergelli Power Limited and Hirwaun Power Ltd. Both new gas power stations are currently under review by the Planning Inspectorate.

Does the company really make a loss? If it's true that it receives over £1.8 million a day towards some of the work it does, how is it still making no profit?

Should it continue like this, knowing the history of its business with pellets, it seems that every future proposal could be money-oriented, aimed at getting more subsidies. The company's reliance on subsidies represents a serious risk to the government's investment in the business and the proposal itself. For the sake of people and our planet, we should not be propping up such a risky and questionable business. Friends of the Earth feel now is the perfect time to challenge the feasibility of this project.

Reference 6:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/537616/SACN_Vitamin_D_and_Health_report.pdf

Reference 7: [https://env-](https://env-health.org/IMG/pdf/dark_cloud_full_report_final.pdf)

[health.org/IMG/pdf/dark_cloud_full_report_final.pdf](https://env-health.org/IMG/pdf/dark_cloud_full_report_final.pdf)

Reference 8:

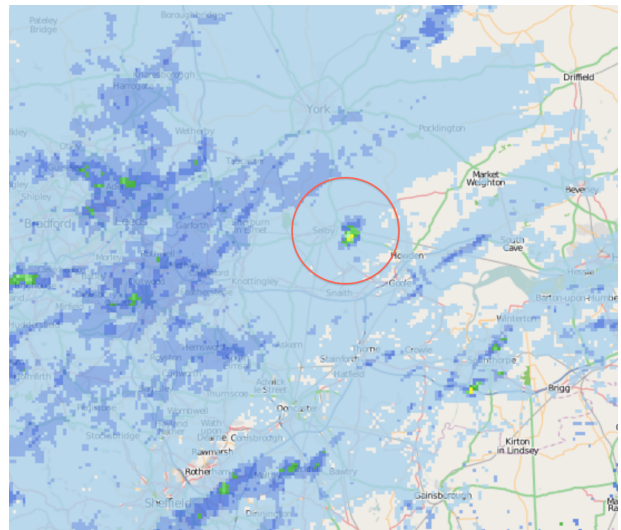
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf

Covert expansion plans:

We originally suggested in our first representation that Drax is operating a stealth expansion plan for the site. Since then, more facts have come forward which support the idea that their plans are for expansion. When Friends of the Earth asked in the first open floor hearing, "Why does this proposal not plan to remove current coal-based burning infrastructure, if it's called 'repower'?" the reply from the applicant's solicitor was defensive, asserting that it's a different project. One of Drax's staff suggested that they might use some of the infrastructure in the future for 'abated coal', which was a shock to the panel and those present, as this had never been mentioned before. When asked what they meant by 'abated coal' they went on to describe another 'dirty' energy source, labelled as clean. They hinted that the reason to leave the old infrastructure was not just for the new gas powered plant, but that it would be utilised for an 'as yet unannounced' expansion into burning coal again. This goes against promises and rulings made by the government to rid the energy markets of coal and their 2015 proposal to carbon capture coal that was refused after 112,000 people signed the petition against abated coal.

This is a prime example of Drax's covert way of slowly eroding opposition, desensitising the government and public by constantly bombarding us with repeated planning application attempts. Proposals that show little prospect of helping people and the planet through sustainable and renewable means.

The impact on the climate from this one site is so severe that Friends of the Earth believe Drax should be reducing its impact on a more serious scale, rather than approaching this application process with covert intentions of expanding. Surely we should be questioning the size of this power plant that is already large enough to create its own weather systems? This weather system can clearly be seen on the image shown. [Ref 9](#).



Reference 9: A Met Office weather chart displaying rainfall. Drax can be seen circled, creating its own rain clouds.

We are at the last stages of trying to protect the planet from unprecedented global warming. If we allow the biggest polluter in the UK to expand, then what standard are we setting for curbing climate change and where do we draw the line?