

The Rule 6 letter states at Annex B that:

"The designated National Policy Statements (NPS) for Energy Infrastructure, specifically the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) apply to this Examination and to decision-making relating to this application.

The ExA will consider the Proposed Development in accordance with the NPSs and any other applicable policy or considerations the ExA deems to be important and relevant. "

It is my submission that the ADOPTED National Policy Statement for Renewable Energy Infrastructure (EN-3) does not address the use of post-combustion carbon capture at biomass power stations. It cannot therefore be used as a basis for examining this Proposed Development.

Secondly, the ADOPTED EN-1 states:

"Carbon Capture and Storage

3.6.4 As explained in paragraph 2.2.23 above, to meet emissions targets, dependency on unabated fossil fuel generating stations must be reduced.

To help achieve this reduction but maintain security of supply, it is necessary to reduce carbon emissions particularly from coal-fired generating stations. Carbon Capture and Storage (CCS) has the potential to reduce carbon emissions by up to 90%, although the process of capturing, transporting and storing carbon dioxide also means that more fuel is used in producing a given amount of electricity than would be the case without CCS. The complete chain of CCS has yet to be demonstrated at commercial scale on a power station. Whilst there is a high level of confidence that the technology involved in CCS will be effective, less is known about the impact of CCS on the economics of power station operation. There is therefore uncertainty about the future deployment of CCS in the economy, which in the Government's view cannot be resolved without first demonstrating CCS at commercial scale.

3.6.5 The Government is leading international efforts to develop CCS. This includes supporting the cost of four commercial scale demonstration projects at UK power stations. The intention is that each of the projects will demonstrate the full chain of CCS involving the capture, transport and storage of carbon dioxide in the UK. These demonstration projects are therefore a priority for UK energy policy. The demonstration programme will also require the construction of essential infrastructure (such as pipelines and storage sites) that are sized and located both for the purpose of the demonstration programme and to take account of future demand beyond the demonstration phase. The IPC should take account of the importance the Government places on demonstrating CCS, and the potential deployment of this technology beyond the demonstration stage, in considering applications for consent of CCS projects and associated infrastructure

AND

4.7.4 The Government has taken a number of steps to facilitate and encourage the demonstration of CCS technology. The demonstration programme described in 3.6.5 focused initially on coal-fired power stations. This is because the emissions from coal generation are substantially higher than from other fuels, including gas; the projected increase in coal use globally creates a greater urgency to tackling emissions from coal; tackling emissions from coal first makes most economic sense because of the greater emissions intensity; and new coal generating stations would contribute to the diversity and security of UK energy supplies as we make the transition to

a low carbon mix. However, CCS will also be required for other combustion generating stations in future and the Government has therefore extended the demonstration programme to include gas-fired generating stations."

My contention is that "uncertainty about the future deployment of CCS in the economy" has not been resolved because CCS has not been demonstrated at commercial scale. EN-1 refers to four CCS demonstration projects stating: "that each of the projects will demonstrate the full chain of CCS involving the capture, transport and storage of carbon dioxide in the UK."

In fact, only very small demonstrations of CCS on power generation have been completed and these could not realistically be described as at commercial scale; also the demonstration projects have not involved the transport and storage of carbon dioxide using the technology proposed for the Drax BECCS development, so they have not demonstrated the "full chain of CCS".

My contention therefore is that it is premature to consider this proposal because the conditions set out in EN-1 regarding commercial-scale demonstrations have not been met.