

Just Transition Wakefield respectfully requests that the Planning Enquiry into Drax Power's dDCO to retrofit CCS to up to two boiler/turbine units be suspended or postponed. We propose three reasons for this, although we accept that there are also technical issues with the currently adopted policy frameworks EN1 and EN3, which are also overdue review.

1. The Government Biomass Strategy has not been published. The Government consulted on a new Biomass Strategy in 2021, with the expectation that this would be published during 2022. As this has not yet been published, this critical policy framework is missing and cannot contribute to the evaluation of the dDCO.

2. The Government's Net Zero Strategy was found to be in breach of the Climate Change Act in a High Court judgement, with the Government being required to publish a revised Net Zero Strategy that is legally compliant by the end of March 2023. Again, as this has not yet been published, this critical policy framework is missing and cannot contribute to the evaluation of the dDCO.

3. As we observed in our initial relevant representation, this proposal forms part of the Humber Low Carbon Pipeline project, and cannot realistically be consented without the pipeline. We therefore argue that Drax Power's dDCO should not be considered until the pipeline is being, or has already been, considered.

For all of these reasons, we argue that the planning enquiry should be paused until all relevant policy frameworks are approved and supporting consents are in place.