

## **Biofuelwatch's comments in response to the Rule 17 Questions of 22 June 2023 (R17QB).**

Biofuelwatch believes that this delay and proposed extension could have a number of impacts.

- The regulatory environment could have changed significantly within that time frame
- Accelerating climate breakdown is likely to contribute to such changes
- There is likely to be more information/research in a few years time on amine breakdown products
- There may be more information and research into CCS at this scale, its viability and associated environmental impacts, to inform the permitting process

In response to R17QB.3 specifically:

- There could very well be implications to baselines, other smaller scale developments may well have an impact on air quality baselines meaning this aspect would need to be reviewed
- There should be a requirement for additional survey work to be undertaken as there could be significant changes to the local ecology within this timeframe. The application included information from surveys as long ago as 2017 (e.g. [APP-142], [APP-143], [APP-144], [APP-146] and [APP-147]). Other surveys (such as [APP-137], [APP-138] and [APP-139]) were done in 2020 or 2021 but even these would be very out of date by the time the proposal would be completed.
- There are likely to be implications for conclusions drawn as a result of this extended commencement period due to a variety of changes that could take place within this extended time period, exacerbated by the impacts of accelerating climate breakdown examples of which include:
  - Updated flood risk modeling
  - Further temperature increases (increasing the risks arising from what appears to be an already inadequate maximum design temperature of 35°C)
  - Changes to local ecology

The delay further heightens a number of Biofuelwatch's concerns such as:

- The need to model impacts with the non-BECCS units not operational at all and continuous operation of the non-BECCS units. The delay further increases the already significant uncertainty arising from the assumed 4,000 hours of operation of the non-BECCS units.
- 'Given the age of the plant, with no plans included in the proposal to replace the aging pollution abatement technology with up to date technology, it is questionable whether carbon capture on such an old plant (with large amounts of public money expected) can be considered to be economically sustainable and the "right type" of proposal in the "right place" required by NPPF' (paragraph 374 of Biofuelwatch's deadline 2 submission [REP2-073])

- 'Prolonging the plant's use when biomass combustion is increasingly recognised as not in accordance with climate objectives' (paragraph 376 of [REP2-073])
- The predictions are based on an ADMS Chemistry Module that is itself based on 2011 research without updates to reflect the most recent scientific research on nitrosamine formation. Future updates to the ADMS Chemistry Module are likely. There may also be future validation studies of the software.

It is therefore highly likely that risks could be reduced and better quantified without compromise to the proposed start date of the proposal by delaying the DCO decision (or refusing the DCO decision and requiring reapplication closer to the proposed commencement of development).

In addition, in relation to the proposed pipeline which is a prerequisite for the 'storage' element of BECCS, delaying the DCO decision would allow for a clearer picture of whether this, and the other necessary, related storage aspects will be in place within the timescales required.