

**EN010120: Drax Bioenergy with Carbon Capture and Storage Project**  
Development Consent Examination

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Summary of final submission for Deadline 10  
17 July 2023

### **1. INCOMPLETE ENVIRONMENTAL IMPACT ASSESSMENT – ERRONEOUSLY RESTRICTED SCOPE.**

The Environmental Statement for this development is flawed because it does not provide a complete and sufficient assessment of the proposed development in combination with the carbon dioxide transport and storage (T&S) infrastructure.

The proposed development at Drax and the T&S infrastructure are effectively one project, and treating them separately for development consenting means that the environmental impacts of the end-to-end system cannot be established accurately.

There is an absolute and unavoidable functional interdependence between the proposed development and the T&S infrastructure

In my view it is clear that the T&S Infrastructure not only provides “supporting infrastructure” for the proposed development, but goes further and is in fact an essential component of the whole project.

In a relevant recent Court of Appeal judgement, the claimant (Ashchurch Rural Parish Council) successfully argued that a planning authority (Tewkesbury Borough Council) had acted irrationally in consenting a bridge when it took into account the benefits from a separate housing development proposal that would be facilitated by the bridge, but did not consider the harms of both. There are close similarities with this proposal.

In summary, ‘BECCS’ at Drax is not possible without transport and storage infrastructure, and it should not be consented until the environmental impacts of the two developments in combination can be considered. The Applicant cannot legitimately be granted the benefits of the proposed development without its full impacts and possible harms being properly assessed.

## **2. INCOMPLETE ENVIRONMENTAL IMPACT ASSESSMENT – ERRONEOUS EXCLUSION OF DIRECT EFFECTS (GREENHOUSE GASES)**

In REP2-096 I submitted that the development would accelerate climate change by perpetuating and increasing the amount of woody biomass imported for burning at Drax. The Environmental Statement inaccurately states the climate impact of the proposal because it ignores, or rather treats as zero, a very significant direct effect – the ‘combustion’ emissions of carbon dioxide from burning biomass.

In this context, I endorse the arguments put forward by Climate Emergency Planning and Policy at Deadline 9 (REP9-032), a summary of which is included in my D10 submission, titled **Unlawfulness of GHG gas emissions in the Environmental Statement (ES)**

## **3. BIOMASS POLICY (SUSTAINABILITY and AIR POLLUTION)**

In its November 2021 biomass policy statement, government referred to specific biomass sustainability and air pollution requirements for BECCS . These I would argue are essential to inform the examination and recommendation of consent for the proposed development, which is by a considerable margin the biggest consumer of biomass in the UK.

I referred to the absence of these requirements in my written representation (REP2-096). It is now the case that the revised Biomass Policy that would most likely define such requirements is scheduled for publication on 20 July, i.e. past the date of this examination’s closing on 17 July. Interested parties are therefore denied the opportunity to comment on how the Applicant’s proposals fit with the new updated sustainability and air pollution requirements.

I submit that it would be helpful if the ExA would adjust the examination schedule so that it and interested parties could review the expected sustainability and air pollution requirements for BECCS to inform the recommendation on granting consent.

## **4. DELAYS TO THE PROPOSED DEVELOPMENT SCHEDULE**

It is of great concern that the Applicant has announced two delays to the schedule since the start of the examination. The earliest operational start date for equipping the first biomass unit has been put back to end 2029, and subsequently the Applicant has sought permission to extend to seven years the allowed period from consent to start of development. Worst case, it appears that construction work could start as late as 2031, with operation of one biomass unit in late 2032.

My view remains that the proposed development will not deliver ‘negative emissions’ when seen from a global viewpoint, because of the flawed carbon

accounting which treats biomass combustion emissions as zero. However, the delays announced by the Applicant could likely have other unhelpful consequences in diverting policy and funding away from proven and easier to implement climate interventions like energy efficiency, genuine (non-combustion) renewables and energy storage.

## **5. EFFECTIVENESS OF LONG TERM GEOLOGICAL CARBON STORAGE**

The scope of examination is restricted as discussed in section one of this submission, with no consideration of the transport and storage infrastructure. Nevertheless, I believe it is important for the ExA in making their recommendation to advise the Secretary of State of the deeply concerning analysis published recently by IEEFA (Institute for Energy Economics and Financial Analysis) entitled “Norway’s Sleipner and Snøhvit: Industry models or cautionary tales?”.

Their analysis raises doubts about the long-term security of geological storage. IEEFA wrote:

*“Sleipner and Snøhvit, rather than serving as entirely successful models for CCS that should be emulated and expanded, instead call into question the long-term technical and financial viability of the concept of reliable underground carbon storage. They cast doubt on whether the world has the technical prowess, strength of regulatory oversight, and unwavering multi-decade commitment of capital and resources needed to keep CO2 sequestered below the sea – as the Earth needs – permanently.”*

## **6. CONCLUSION**

The Applicant has failed to make a convincing case that BECCS at Drax is technically viable and is deliverable commercially. The proposal does environmental harm, is likely to affect human health and it delays meaningful action to tackle the climate crisis. The policies against which it should be assessed are in a state of flux. I ask that consent be refused.