

Submission of James E Hewitt [IP 20032086] for Deadline 10

I draw the following conclusions from this planning application process:

1 Given their highly contentious nature, it would seem inappropriate to assess projects such as this in isolation from scrutiny of their likely performance, their downstream and upstream impact and related circumstances. The Secretary of State should not decide the proposal without appreciating these points of contention.

1.1 The Examining Authority should either reject the application or withhold judgment on it. The latter not least because government policy might require substantial revision on publication of the Biomass Strategy.

1.2 To maximise pressure for subsidy, the applicant might present acceptance of the application as if it confirms the need for the project and that the proposals will work as set out in the application – even though acceptance does nothing of the sort.

1.3 A Freedom of Information request has been submitted to Ofgem, seeking the terms of reference for the current investigation into compliance by the applicant with reporting requirements under the Renewables Obligations scheme. A letter has been received by Ofgem highlighting why the woody biomass which the applicant burns at Drax power station may be eligible for subsidy whilst much of this demonstrably neither derives from sustainably managed tracts nor is carbon neutral. Ofgem is presumably well aware of reasons for the discrepancy between the widespread, increasing public concern and mere compliance with a contested regional certification scheme. It is hoped that responses will be provided in good time before that investigation is concluded and the Biomass Strategy is finalised.

2 Rather than making a positive difference and driving down costs of energy dispatched, the prospective subsidies – Contracts for Difference for (i) Electricity and (ii) CCS – would do the opposite. By endorsing the burning of imported woody biomass, the market is likely to expand, adding pressure on the scarce resource thereby increasing prices for wood raw material – implicitly adding to insecurity of supply. Adding CCS (especially given that it is unlikely to work at anything like the rate which the applicant suggests) would compound the reality that *imported woody biomass power BECCS* is one of the highest cost “solutions” available. (Wood is increasingly required to displace fossil fuel in packaging, building materials, industrial chemicals and as biofuel – in a circular bioeconomy)

3 As Climate Emergency Policy and Planning points out, the applicant has not complied with Environmental Impact Assessments requirements - despite carbon accounting being central to the purported aim of the proposed works.

4 If the proposed works are anything more than mere a subsidy-seeking pretence (perhaps in cahoots with governments which prefer not to take the steps required to meet national and global reductions in greenhouse gas emissions), then it is remarkable that there are no plans to capture the post-combustion emissions of all four biomass units. The plans do not indicate the locations of units 1 and 2.

5 The applicant's apparent muddle over whether the proposed works are to generate base load power or intermittently reinforce the view that the application is a pretence (or not yet ready for adjudication). The former (baseload) would maximise subsidy payment. The latter (intermittent) would minimise both dispatchable electricity generation and carbon capture. The utopian vision of 95% capture rate and lack of related details concerning likely performance give further cause for rejecting or withholding judgement.

6 Prospects for blue hydrogen are rapidly declining as underlying hyperbole and huge energy cost are exposed. This will correspondingly reduce the justification for a number of the enterprises which were to supply captured CO₂ to the rupture-prone pipeline network through which any CO₂ captured by the applicant's proposed works would be transported for what increasingly seems likely to be impermanent storage.

Thank you for the conduct of this planning application process.