

## Summary of comments made by Biofuelwatch at ISH3

### 1. Uncertainty with regard to nitrogen deposition

We're concerned that there's no mention of uncertainty in the modelling, so we'd like to ask Natural England to consider this. The current modelling already predicts loads that exceed critical loads (e.g. the critical load for nitrogen is exceeded at Thorne Moor which supports breeding nightjars) yet there's no mention of uncertainty. There's an acknowledgement that there already is uncertainty so the potential impacts of those uncertainties should be considered and that's something we'd like Natural England to ask the applicant.

### 2. Amine modelling

Referring to REP3-021: BIO1.12 NE Response from Natural England: 'The applicant has concluded that "the revised amines modelling has no material impact on ecological receptors due to the low contribution from amines to nutrient nitrogen (N) deposition and acid deposition and hence no change to the conclusions of the HRA". Natural England has no in-house modelling expertise so cannot comment on the detail of the revised modelling. **Assuming the Environment Agency has no major concerns with the specifics of the modelling**, we accept that the revised impacts at the relevant protected sites (in terms of Nitrogen deposition and acid deposition) are as previously presented.'

We request that Natural England ask the Environment Agency whether it is the case that they don't have any concerns with the modelling? And to ask the Environment Agency whether they have followed the environment agency's "golden rule" (Presentation: How the Environment Agency assesses permit applications -Habitats and ammonia -Rick Gould, Ellie Stubbs and Judith Ford) that screening model results must be higher than the detailed modelling results. And that detailed modelling results must be validated for representative situations. We would ask whether the ADMS 5 modelling of amines and nitrosamines has been validated for a representative situation and, if not, why the applicant has not validated the amine chemistry parts of ADMS before submitting their application?

### 3. Badgers

Obviously the survey data isn't released, but it's not sufficient for the applicant to say badgers will be re-located -they need to be re-located to suitable habitat and there needs to be a clear plan in place to show when and how this will happen with timing considered to ensure this takes place outside of the breeding season. Badgers are a protected species. It's not enough to just say they'll be moved.

### 4. Typographical error

We raised our concern that there was a an error in the calculation (or recording) of a building height which is a fairly easy figure to measure or predict. This was explained as a typographical error, however this makes us question how we can have confidence that there aren't similar errors in other aspects of the application, which are far more mathematically complex and with much greater degrees of uncertainty and which would not be so easy to spot.

Summary of comments made by Biofuelwatch at ISH4

Query re press release regarding the pausing of Drax's BECCS programme

This issue was raised by another interested party, James Hewitt.

The applicant responded that the front-end engineering programme of the BECCS programme was continuing. We asked therefore why a press release had been issued to the contrary. The applicant repeated that its front-end BECCS engineering programme was continuing. The ExA asked if this answered our query. We responded that no it didn't. The applicant again repeated that the front-end engineering programme was continuing and the ExA clarified that the planning application process was continuing. However this still didn't answer the question of why a press release had been issued which presented contrary information to that which the applicant provided at the hearing and we would appreciate further clarity on this from the applicant.