

Public inquiry on the development of a new underground metallurgical coal mine and associated development

Site: Former Marchon Site, Pow Beck Valley, Whitehaven, Cumbria. Appeal Ref: APP/H0900/V/21/3271069

Planning Inspector: Mr Stephen Normington - September 8, 2021

Statement by Ciara Shannon, a Cumbrian resident. Interested Party

1. I am grateful to you, Sir, for the opportunity to contribute, and thank you for dedicating time today for multiple voices to be heard.

My position is that I object to the development of Woodhouse Colliery.

I am currently working on a Green Investment Plan for Cumbria, but today, I am speaking in an independent capacity and in terms of background - I have been working on climate change in various capacities since 2006.

My statement today includes additional comments from my contribution sent on May 5, 2021, and then some newer thinking.

My contribution in May - focused on the Business Case Against WCM, plus considered the outstanding opportunities for a green recovery plan in Cumbria and asked a simple question if we had thought of alternatives to the mine. It also included summaries from various joint submissions I did with Duncan Pollard to Cumbria Council that outlined why we thought Woodhouse Colliery would soon become a 'stranded asset'. Where its coking coal reserves, could, in the words of the former Bank of England Governor Mark Carney (2015), become "literally unburnable" as the world moves toward a low-carbon global economy.

Unburnable carbon and stranded assets were first coined by Carbon Tracker - an award-winning climate NGO. To quote them - 'stranded assets are now generally accepted to be those assets that are no longer able to earn an economic return, because of changes associated with the transition to a low-carbon economy. Or, in simple terms, assets that turn out to be worth less than expected because of changes associated with the energy transition'.

2. My Next Point is On the Price of Carbon. Looking at West Cumbria Mining's (WCM), recent proof of evidence - as far as I can tell WCM, has once again, not considered an increase in carbon prices into their cash flow projections.

WCM needs to think about how the UK's and European carbon prices will impact its business model. As WCM will likely export 85% or so of its coking coal to the EU - the price of carbon in Europe (EU ETS) and the EU's Carbon-Border-Adjustment Mechanism – (which will put an additional carbon price on WCM's EU exports) - must be factored into their cash flow analysis.

Carbon prices will have a significant impact on WCM's economics of coal extraction and will undoubtedly weaken its profit margin.

Fewer profits will squeeze costs - force more jobs to be mechanised – meaning less jobs and lower salaries.

But beyond WCM's business model, a carbon price will also be a major factor in the future economics of the global metallurgical coal market versus green hydrogen etc.

These are important economic - material considerations - as any economic benefits in terms of regional revitalisation and jobs that WCM may bring to Copeland - could be fragile and short-lived.

With lower profits, Woodhouse Colliery will not be able to support a strong and vibrant economy for long - nor pay the salaries it promised.

I was also a bit surprised to see in WCM's recent proof of evidence on the 'Metallurgical Demand Outlook' (pg 385 on) by Wood Mackenzie's that they only shared the 2.0 scenario - but the 1.5 scenario which has been out since March 2021 was not mentioned.

Not only does it call for immediate action and collaboration at an unprecedented scale, but to quote from Wood Mackenzie Asia Pacific Head of Markets and Transitions, Prakash Sharma: "To be on a 1.5-degree pathway, carbon support prices will need to reach **US\$160 per tonne (t)** of CO₂ by 2030. Today, the carbon price stands at about US\$60 per tonne.

3. To add to this carbon price point, perhaps I can **share some important news.**

In the last week or so - there has been a significant development in that the Government has announced **a large hike** to its carbon price that it will use to appraise and evaluate emissions connected to public policies and projects.

The 2022 price has been lifted from £27 (traded) and £72 (non-traded) to **£248 per tonne.**

While this isn't a price that will be charged - it is a price that will be used by decision-makers when they weigh up the pros and cons of a project and decide whether to give it government approval.

This 'high carbon appraisal price' is likely to have major implications for accelerating climate action and approving new projects in the UK.

Sir, such a high carbon appraisal price by the government must surely be an important material consideration for you in deciding whether to give the mine approval?

4. In a bid to not repeat my previous submission - beyond new adding information - my contribution today also considers the mine with the 3D lens of planning.

For guidance [adding in the caveat that I am not a planner], I looked at the National Planning Policy Framework (NPPF), the Planning Practise Guidance and the Development Plan for Copeland.

When I look back at my emails about this mine -, one of my first emails (Sept 2020) was to find out more about the pecking order of legislation.

Was planning legislation more important, in the hierarchy of things to approve this project than the Climate Change Act, 2008?

I asked as I was surprised by AECOM's comments (commissioned by WCM) (back in 2020) - point 6.1 (page 25) when it said that the Council is **only entitled**, to comply with the commitments in the Paris Agreement as a material consideration.

My confusion was further compounded that when I then looked through section 19(1A) of the Planning and Compulsory Purchase Act 2004 which states **there is a** legal duty to ensure that climate change mitigation and adaptation are core objectives integrated across all local planning policy and local plans. These plans should also include robust evidence-based carbon targets.

Add to this - the Planning and Compulsory Purchase Act of 2004 [it would seem] requires that local plans include policies that are “designed to secure” that the development and use of land contribute to the mitigation of, and adaptation to, climate change.

Clearly, climate change IS central to planning policy and reading through the National Planning Policy Framework (NPPF) and the Planning Practise Guidance - addressing climate change is one of the core land-use planning principles that should underpin both plan-making and decision-making.

This point was emphasised in June 2021, by Lord Deben, chair of the Climate Change Committee (CCC) and others - when they raised concerns that the Planning Bill must ensure that every development is assessed against efforts to cut greenhouse gas (GHG) emissions to net-zero by 2050.

5. But back to the National Planning Policy Framework. The NPPF's overall objective is ‘Achieving Sustainable Development’ - summarised - as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

As we come out of the pandemic, the Brundtland Commission’s definition is more relevant than ever - especially - with the growing expectation to build a better, fairer future for all.

A greater focus on sustainability and climate change in Copeland will transform people’s quality of life for the better, with clear net benefits to health, air and water quality, employment, energy affordability, community cohesion and biodiversity.

This becomes even more urgent when you read the IPCC’s latest report - alarmingly dubbed the ‘Code Red for Humanity’ which warns us that extreme weather and rising seas are hitting faster than expected. If global temperatures continue to rise, we are likely to cross 1.5°C thresholds

around 2030, if not before. Nine years or so from now. A stark reality that will impact young people the most.

6. Next up in the NPPF is 'Plan Making' - which states that the planning system should be genuinely plan-led.

The development plan that Woodhouse Colliery would be aligned to, I believe, would be 'Copeland's Vision 40' which is an interesting document as it looks at the 'Six Pictures of the Future' in key areas of Copeland's economy, encompassing innovation, research and development, the natural and built environment, connectivity, the visitor economy, the Energy Coast and the nuclear industry and supply chain.

While of course there are many more points to this document - I fail to understand how the coal mine fits into Copeland 40 Vision.

I believe Woodhouse Colliery undermines Copeland's Councils own efforts for a Net Zero Cumbria.

True innovation instead should be defined by the industries of the future, rather than those of the past.

True innovation must integrate the strength of Copeland's natural resources and its vast renewable energy potential.

Integrated planning for a net-zero economy must start as soon as possible, including greater coordination between local authorities, utilities, business and residents.

Other development plans to think about would be those from Cumbria Council and Cumbria's Local Enterprise Partnership (LEP).

As Copeland is of key strategic importance to the UK's energy security - the Northern Powerhouse, and the Borderlands Economic Growth Initiative must also be considered.

Plus, consideration should be given to Britain's Energy Coast Blueprint and its mission which is "To lead the transition of West Cumbria into an economy that will flourish in a low carbon future."

Possibly the overarching development plan should be the Prime Minister's 'Ten Point Plan for a Green Industrial Revolution' which included a £1 billion Net Zero Innovation Portfolio, alongside promises to end the sale of new petrol and diesel cars and vans in 2030; protect the natural environment; develop innovative clean energy technologies for making homes net-zero ready; setting up a Carbon Capture and Storage (CCS) infrastructure fund, and drive additional investment in renewable energy such as offshore wind.

Or the 2017 UK Industrial Strategy White Paper that recognized that Clean Growth was not simply a challenge, but a very significant opportunity to increase productivity, create jobs and scale-up earning potential across the country.

7. I now move to Section 6 - which refers to Building a Strong and Competitive Economy

I think there is a basic question to think about here - will Woodhouse Colliery support a strong, vibrant and healthy economy for current and future generations?

For me - the answer is no. But - I can understand why a £160 million investment with the promise of 510 jobs and thousands more down the supply chain would be an attractive offer [anywhere].

Following the loss of coal and steel on which the area thrived in the 1980s, Copeland has faced crippling unemployment and deprivation. There have been multiple financial hits - including the downsizing at the Sellafield and quite a few recent failed infrastructure bids.

Today, Cleator Moor, Frizington, Mirehouse, Harbour and Sandwith - ranks within the 10% most deprived in England.

It is understandable then that many people locally are supportive of the mine for the significant employment and new skills opportunities, as well as for the coffer of the corporate tax payments to the Government and the golden goose of it being a sizeable new export-led industrial project.

I was in Whitehaven just a few weeks ago and I asked someone who was a former miner what he thought the alternatives to the mine could be.

Silence.

I think part of the problem – is that alternatives to the mine have not been discussed locally. And nor were alternatives to the coal mine and green technologies properly discussed by the Cumbria Council's Development Control and Regulation Committee (DCRC).

Meanwhile, the mine risks locking in the region to a high-carbon future at a time when the need for a green recovery from COVID-19 is **imperative**.

8. I move now to Section 14. Meeting the challenge of climate change, flooding and coastal change

Paragraphs 152 to 173 state that the planning system should support the transition to a low carbon future and it should [153] take a proactive approach to mitigate and adapt to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes.

Why then would approval be given to go ahead with Woodhouse Colliery and its 9 million tonnes of CO₂e every year until 2049?

This is 2% of the UK GHG emissions - a percentage that will increase in future as the total of UK GHG emissions reduces.

9 million tonnes of emissions is as big as a country emits. In fact, the mine's emissions are the same as Papua New Guinea emits every year.

In my opinion, as the race to net zero heats up and becomes even more competitive - laggard counties such as Copeland with weak net-zero plans - alongside historical emissions will lose out on funding and investment opportunities.

Think about how the Government had to make targeted local decisions during the lockdown as part of its Covid response...

Without a doubt, WCM's emissions will increase Copeland's massive historical emissions - going back to the 1840s or so when the area was a hotspot for both coal and steel until 1986.

At a guess, Copeland's historical, cumulative emissions would easily equal a high emitting country.

Add to this, WCM emissions far exceed Copeland's own carbon budget. Yet, according to a recent carbon budget report done by the Tyndall Centre and the University of Manchester- Copeland will need to reduce its emissions by approx. 12.4% every year. **Not add to this.**

Surely, now is the time for Copeland to honour its historical contribution to climate change and clean up its act. Not agree to a new CO2 spewing deep coal mine that isn't needed.

9. Drawing towards the end of my contribution - I end with outlining the Planning Practise Guidance's focus on supporting the delivery of green energy.

Already, Copeland plays a nationally important role in terms of energy supply and security. It is recognised as a global centre for the nuclear industry with world-class research capabilities at the National Nuclear Laboratory and The University of Manchester's Dalton Cumbrian Facility. Moorside -a 600-acre site adjacent to the Sellafield nuclear complex has been included in a bid to host the UK's first prototype nuclear fusion plant and surrounding science, technology and business park. We should hear soon about that.

Then the Walney Extension Offshore Wind Farm, located 15km west of Barrow-in-Furness, is one of the world's largest - hosting over a fifth of the UK's wind farm generation capacity.

West Cumbria's coast holds significant potential for tidal energy generation and as you go inland, there are many of the UK's fastest flowing waterways with more than half of the North West's potential for small scale hydropower generation. Community-owned energy in Cumbria already flourishes - offering a route for connecting renewables to local ownership and empowerment.

In my opinion, harnessing Copeland's unique green assets to build a resilient, net-zero economy - is the way forward. But, there needs to be far more thinking about what else could we spend that £160M on? What are the alternatives to the coal mine?