Development of a new underground metallurgical coal mine and associated development at Former Marchon Site, Pow Beck Valley and area from Marchon Site to St Bees Coast

Planning Inspectorate reference: APP/H0900/V/21/3271069

OPENING STATEMENT ON BEHALF OF FRIENDS OF THE EARTH (FoE)

Introduction

1. This called-in application raises a number of important issues, but there is one simple and fundamental matter at its heart: the climate crisis.

2. It is a matter of agreement between the main parties at this inquiry that:

   a) the climate crisis is a real and pressing concern,

   b) the climate crisis is caused by human greenhouse gas (GHG) emissions, and

   c) the climate crisis is unfolding as we speak.

3. It is also clear from the evidence before this inquiry that these basic points are agreed by the UK government,[1] its scientific advisors,[2] and the United Nations.[3]

4. It is hard to overstate the importance of this. The threat which the climate crisis poses is not just very serious: it is existential. Global temperatures are increasing year on year. The effect of these temperature increases is well known: the melting of the polar ice caps, more frequent and more extreme weather events, and the erosion of our environmental

[1] See e.g. Press Release: UK enshrines new target in law to slash emissions by 78% by 2035 [CD 8.21]: "*We must collectively keep 1.5 degrees of warming in reach and the next decade is the most critical period for us to change the perilous course we are currently on.*"
[2] See e.g. the CCC's report, Net Zero: The UK's contribution to stopping global warming [CD 8.8], Executive Summary (p 11): "*The UK should set and vigorously pursue an ambitious target to reduce greenhouse gas Emissions"; "Now is a crucial time in the global effort to tackle climate change*". See also Chapter 2, p 578: "*Human activity has already led to 1°C of global warming from pre-industrial levels which has resulted in damaging impacts on lives, infrastructure and ecosystems that are apparent today*."
[3] See e.g. IPCC's Sixth Assessment Report – Summary for Policymakers [CD 8.42] , SPM-5: "*It is unequivocal that human influence has warmed the atmosphere, ocean and land. Widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred*."

life support systems, all of which are leading us down a shorter and shorter path to irreversible climate breakdown. It is no exaggeration to say that climate change is the single greatest challenge that humanity has ever faced. Climate change is now a spreading wildfire which will consume us utterly if we do not stop pouring fuel on the flames. This is all uncontroversial.

5. The remaining pathways out of the unfolding crisis are similarly uncontroversial. Only drastic action on our part can prevent environmental disaster. In the words of the National Planning Policy Framework (NPPF), "*radical reductions in greenhouse gas emissions*" are required.[4] The UK government's net zero target, enshrined in law, is a vital part of that global requirement.

6. If the UK is to achieve that important target, the UK's Climate Change Committee (CCC) has noted that "*deeper decarbonisation of industries like steel and cement will be needed*."[5] This is self-evident. The most common means of creating steel from iron, Blast Furnace-Basic Oxygen Furnace (BF-BOF), involves the combustion of fossil fuels such as coking coal. As a result, the steel industry is currently a major contributor to GHG emissions. If the UK is to stand any chance of meeting its domestic and international climate obligations, this will have to change.

7. The challenge we face is global in scale, and will require positive intervention by national governments around the world. However, it must also be tackled at the local level. This is because the emissions generated by a particular activity, such as burning a particular amount of coking coal, have a near linear relationship with the consequent global warming caused by those emissions.[6] In other words, every tonne of GHG emissions adds cumulatively to global warming. And so every coal mine that is allowed to open, every lump of coal that is burned, all of it contributes directly and proportionally to climate change. There is no safe or inconsequential level of GHG emissions, and so "salami slicing" specific proposals on the ground that their individual contribution is negligible is not an answer. But this works both ways: every coal mine that is *not* allowed to open, every lump of coal that *stays in the ground* helps tackle the existential threat of climate change.

[4] NPPF, para 152.
[5] CCC, The Sixth Carbon Budget: The UK's Path to Net Zero [CD 8.10], p 270.
[6] IPCC's Sixth Assessment Report – Summary for Policymakers [CD 8.42], SPM- 36-37.

8. All of that being the case, there is an obvious cognitive dissonance between (on the one hand) an understanding of both the mammoth scale of the global climate challenge we face and what we must do to overcome it, and (on the other) the applicant's suggestion that the UK should open a new deep coal mine.

9. That contradiction is at the centre of this inquiry.

10. This opening statement will summarise FoE's position under the following headings:

    a) The need for West Cumbria Mining (WCM) coal,

    b) WCM's 'perfect substitution' argument,

    c) The wider impact of the proposals on emissions,

    d) Conclusion on climate change,

    e) Landscape impacts,

    f) The national policy tests,

    g) Questions raised in the Secretary of State's call in-letter,

    h) Overall conclusions on permission.

The need for WCM coal

11. There is no need for WCM coal. Steelworks in the Europe and the UK are currently supplied with metallurgical coal from the US and Australia. Even at current levels of consumption (the continuation of which is far from a foregone conclusion) already permitted reserves in those countries are more than enough to continue that supply up to and beyond 2050. Consequently (and leaving aside the question whether, with a sulphur content of over 1.5%, WCM coal even meets the specification for high volatile type A (HVA) metallurgical coal) WCM would be adding to a supply that already exceeds what is actually needed.[7]

[7] See e.g. Global Coking Coal Mine Dataset, para 2 (Appendix 1 to Prof Ekins' Proof) [SLACC/PE/2].

12. Critically, with a projected production of 2.78 million tonnes per annum (Mtpa) (against WCM's estimate of a continuing European demand for 55 Mtpa) and a sulphur content which requires it to be blended with either American or Australian coal, the addition of WCM coal to the market would not change that baseline coal supply situation: with or without WCM, European and British steelworks will continue to depend on imports. Any argument based on the supposed advantages of "security of supply" is, therefore, simply bogus. In any event, there is no proposed planning condition which would require the coal extracted by WCM to be used in either this country, or mainland Europe.

13. The basic argument that there is no need for WCM coal is exacerbated by the fact that WCM is seeking a permission which would allow it to continue to produce 2.78 Mtpa until 2049. With no mechanism for reviewing that end-date, or curtailing the production of WCM coal if it is no longer needed, the grant of permission effectively locks us in to an assumption that the UK and the rest of Europe will still be reliant on BF-BOF steel production methods for the next 30 years. There is no basis for that. In particular:

    a) The Climate Change Act 2008 sets a domestic, legally binding target for the UK Government to reduce its greenhouse gas emissions by at least 100% (Net Zero) compared to 1990 levels by 2050.

    b) The UK government, and 191 parties around the world, have signed up to the Paris Agreement, under which there are binding international commitments to limit increases in global warming.

    c) The UK's latest nationally determined contribution ("NDC"), communicated to the United Nations Framework Convention on Climate Change on 12 December 2020, commits the UK to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, as compared to 1990 levels. This period covers that in which the proposed mine would be operational.

    d) It is common ground that achieving these targets will involve significant reductions in the GHG emissions associated with steel production within both the UK and Europe.

    e) In contrast, Mr Truman's evidence on behalf of WCM assumes no serious action is taken by either the UK, or Europe, to address climate change. Even Wood

Mackenzie's alternative scenario (which is relegated to an ignored part of Mr Truman's appendices) fails to grapple properly with the Paris temperature limits. This is wholly unrealistic. As Dr Cullen has observed:[8]

> "if the UK and EU are to achieve the reductions to which they have committed, they need to introduce measures to ensure Mr Truman's Base Case scenario does not happen."[9]

f) There are alternative technologies available which are far greener than BF-BOF, and will become more appealing to British and European steelmakers over time:

i. As Dr Cullen notes, there is potential for much greater production of steel through recycling scrap.[10] The UK economy is saturated with steel products, and accordingly could meet a high percentage of its steel needs through recycling: a process which requires only 2% of the metallurgical coal needed for BF-BOF production from iron ore. The EU and US both have comparatively higher levels of scrap steel recycling, measured by the ratio of steel scrap consumption to crude steel production (54% and 72% respectively, compared to the UK's 34%), suggesting that the UK has a high degree of headroom here.[11]

ii. Although it has yet to be rolled out at scale, the technology for producing steel through direct reduced iron (Hydrogen-DRI) is tried and tested, and will only become more attractive to steelmakers during the proposed lifetime of the mine.

iii. WCM argues that there are significant hurdles to overcome before Hydrogen-DRI will be commercially viable at scale, but the same is also true for the future use of BF-BOF, which will, increasingly, only be acceptable if it is associated with Carbon Capture and Storage (CCS). As Mr Truman notes in his Proof, CCS is currently very expensive, is not currently capable of achieving the required capture

[8] Dr Cullen's Rebuttal
[9] At para 1.3.1.
[10] Dr Cullen's Proof, para 5 [FOE/JC1].
[11] Dr Cullen's Proof, para 6.1 [FOE/JC1].

rates associated with steel production, and there are difficulties in identifying storage sites sufficiently close to the places where the carbon is produced.[12]

g) In the circumstances it is clear that government policy on coking coal is only heading in one direction. Increasingly, the market for steel will follow suit, as major consumers demand only "green" steel. The economic and reputational incentives to switch to cleaner methods of steel production will follow the evolving national policy, which will inevitably continue to harden against the extraction and combustion of coking coal.

h) That direction of travel will itself influence the future of BF-BOF. Most European steelworks relying on the use of BF-BOF will require significant levels of investment if they are to continue beyond 2030. Investors will be cautious about placing their money in what may become a stranded asset by as soon as 2035.

The 'perfect substitution' argument

14. Despite the likely limited impact of WCM coal on British and European markets, WCM argues that its proposal will be beneficial because there will be a reduction in the GHG emissions associated with transporting the coal. This is not accepted.

15. First, as the CCC noted in its letter to the Secretary of State:

> "The opening of a new deep coking coal mine in Cumbria will increase global emissions and have an appreciable impact on the UK's legally binding carbon budgets. The mine is projected to increase UK emissions by 0.4Mt CO2e per year. This is greater than the level of annual emissions we have projected from all open UK coal mines to 2050."[13]

16. The figure of 0.4Mt was taken from WCM's May 2020 AECOM Report. That has since been superseded by the (recently amended) report from Ecolyse, which estimates that the total cumulative lifetime emissions in its mitigated scenario will be approximately 1.9Mt

[12] Mr Truman's Proof, para 4.7 [WCM/JT/1].
[13] [CD 8.13].

CO2e. WCM now proposes to offset this, but – as Mr Broekhoeff and the Gold Standard Foundation explain – this is a fundamentally inappropriate use of carbon credits.

17. Second, and in any event, the GHG emissions associated with transport are dwarfed by the emissions (which Professor Barrett estimates[14] to be in the order of 220 Mt CO2e) associated with combustion. As the UN Production Gap Report (2019) concluded, there is a causal relationship between production limitation and emission reduction. Conversely, production increases lead to emission increases.[15]

18. While WCM accepts that end user emissions are capable of being a material consideration,[16] it argues that combustion should be discounted, on the basis that the WCM coal will perfectly substitute for US or Australian coal and, therefore, will not generate additional GHG emissions, because the US or Australian coal will be left in the ground.

19. That argument is contrary to basic economic theory. Basic market economics shows that an increase in supply leads to a reduction in price, which increases overall demand. There is no evidence before this inquiry that the demand for coking coal is so inelastic that basic market economics would not apply, i.e. an increase in the supply of coal will simply lower the global market price for coking coal, and ultimately increase demand (as a number of previously unviable projects would become viable as a result of the shift in price).

20. Moreover, it is clear from FoE's evidence that even if British and European steel mills switched from US coal to WCM coal,[17] the US would continue to mine the same grade of coal for sale elsewhere. This is because, as Mr Simon Nicholas notes, there is a proven and growing market for U.S. metallurgical coal in Asia.[18] The distance from the U.S. to Asia and the resultant cost of transport does not stop U.S. metallurgical coal being sold into the Asian market. It would also follow that transport emissions may well increase overall as a result of this substitution, since US coal previously bound for the UK (approx.

[14] Barrett proof (FOE/JB1) para 3.4.7
[15] [CD 8.7]
[16] See e.g. Mr Thistlethwaite's Proof, para 5.140: "*as I am advised I recognise that these downstream emissions may nevertheless be capable of being a material consideration in the determination of the planning application provided that they are fairly and reasonably related to the permitted development. That is not to say that they are a material consideration – simply that they may be depending on the facts of the case."* [WCM/ST/1]
[17] And of course, there is no proposed condition that WCM coal must be sold domestically or in Europe.
[18] Mr Nicholas' Proof, para 3.4 [FOE/SN1]

4,000 miles) would in future travel some 7,000 miles to more distant Asian markets such as China.

The wider impact of the proposals on emissions

21. The direct impact of the proposed mine on climate change is significant: an additional 1.9Mt CO2e, according to the Ecolyse Report. That increase alone makes these proposals environmentally unacceptable for the purposes of the NPPF, and is a material consideration sufficient to justify a refusal of permission. The combustion of Whitehaven Coal would add a further 220 Mt CO2e to this total.

22. However, the adverse impact on climate change of this proposal would not only come from the operational use of the mine and the burning of the coal that is taken out of the ground. It would also come from:

    a) The stifling effect on the emergence of new clean technologies,

    b) Emissions in other countries, if those countries were to follow the UK's example.

1) <u>The effect of the proposals on the emergence of new technologies</u>

23. One of the factors slowing down the uptake of alternative technologies such as hydrogen-based steel production is that when these new technologies are first introduced, they are comparatively more expensive.

24. WCM is very clear that the coal mined at Whitehaven will be cheaper than US and Australian coal. If it were otherwise, it would be difficult to see how it would could be said to replace US and Australian coal in European markets.

25. That being the case, it is obvious that the introduction of WCM coal to the market would increase the price differential between coal-based BF-BOF steel production and emerging technologies such as Hydrogen-DRI. This would inevitably increase the barriers to entry to the market for these technologies. The effect of creating a new cheap,

steady supply of coking coal would therefore be to "lock-in" elements of the UK steel market to carbon-intensive production methods for a number of years.[19]

2) The effect of the proposals on emissions in other countries

26. On the world stage, the UK holds itself out as a leader that is proud of its record in bringing other countries to the table on climate change issues, such as the Paris Agreement. As the Prime Minister said ahead of COP26 [CD 8.21]:

> "We want to continue to raise the bar on tackling climate change, and that's why we're setting the most ambitious target to cut emissions in the world.
>
> The UK will be home to pioneering businesses, new technologies and green innovation as we make progress to net zero emissions, laying the foundations for decades of economic growth in a way that creates thousands of jobs.
>
> We want to see world leaders follow our lead and match our ambition in the run up to the crucial climate summit COP26, as we will only build back greener and protect our planet if we come together to take action."

27. However, the UK can only credibly claim to be a world leader on climate issues if it practises what it preaches. The UK is hosting COP26 this year, the United Nations climate change summit. As the CCC noted in respect of the original decision not to call-in this application, "*this decision gives a negative impression of the UK's climate priorities in the year of COP26*."[20]

28. The same would be true of the grant of planning permission. If countries such as China and India see that the UK is consenting new coal mines at the same time we are telling them that they need to reduce their dependence on coal, the UK will lose any moral authority it might have previously had on this issue. If that happens, the implications (in terms of climate change) are potentially far wider than the burning of an additional 2.78Mtpa coal.

29. Overall, the next 12 months is a vital opportunity for the UK to punch above its weight on the global stage, making a positive impact on climate change far beyond cutting its own emissions through strong climate leadership. Conversely, there is a real danger that

[19] See Prof Ekins' Proof, para 3.13 [SLACC/PE/1].
[20] [CD 8.13].

a perceived failure of climate leadership on the UK's part will have a damaging precedential effect in terms of global GHG emissions.

30. In addition to the direct climate change consequences of the extraction and combustion of WCM coal, the effect of granting this application on the UK's global standing among nations is a freestanding material consideration that weighs strongly against this proposal.

Conclusion on climate change

31. For these reasons, there are overwhelming reasons to refuse this scheme on climate change grounds.

Landscape and Visual impacts

32. In addition to calling evidence on climate change and GHG emissions, FoE is also calling evidence on landscape and visual impacts. These impacts are of importance, not least because the Marchon site falls within the immediate setting of the Sandstone Coastal Downs Area of Local Character, which is a landscape of relatively high value and includes the St Bees Heritage Coast.

33. To address these impacts, FoE has instructed Peter Radmall, a Chartered Landscape Architect with 35 years of professional experience, and Michael Spence, a Chartered Landscape Architect with 29 years' experience. On the basis of work done by Mr Spence, Mr Radmall has identified a number of concerns about how the images in WCM's Landscape and Visual Impact Assessment (LVIA) have been presented, as well as wider points of disagreement.

34. As Mr Radmall will explain, WCM's viewpoint selection is biased heavily in favour of the mine rather than the rail loading facility (RLF), which does not reflect the respective landscape harm:

    a) The RLF is the most damaging part of the project in relation to landscape character. It would be located within the Pow Beck Valley, a sub-unit of the Coastal Sandstone

Landscape Character Type (LCT) that is designated as a Landscape of County Importance. The RLF would introduce an uncharacteristic industrial feature of substantial scale into the landscape, together with associated sources of impact such as train movements, lighting and noise. These impacts would harm the appearance and tranquillity of the valley, amounting to a significant adverse effect on its character.

b) The RLF would also intrude into a range of views within and across the valley, giving rise to significant adverse effects on users of the nearest public rights of way (PRoWs), including a section of the Coast-to-Coast Path, and potentially also on the nearest residential properties. Only one viewpoint (VP14) relates to the Coast-to-Coast Path (CCP), and is located at a substantial distance (c5.5km) from the closest part of the project (the RLF). In view of the project's proximity to, and potential visibility from the CCP, this under-representation of the route is a deficiency.

35. As Mr Radmall will explain, despite the proposed mounding, the main mine structures would introduce an intrusive feature into this countryside and coastal setting. This is contrary to the provisions of NPPF para 174 (a) and (b), and to the requirement in 174 (c) to "maintain…the character of the undeveloped coast".

36. Contrary to WCM's contention, the proposed mitigation for the scheme has not minimised harmful effects "as far as possible". It is unclear from WCM's evidence the extent to which practical alternatives to the location and layout of the RLF have been fully explored. It is similarly unclear why a more comprehensive mounding scheme could not be achieved on the Marchon site.

37. Finally, there appear to be a large number of errors in the LVIA, including significant mis-positioning in respect of the visualisation images, such that the images are not compliant with the relevant guidance. As Mr Spence notes in his Rebuttal, no tripod appears to have been used, many views have been taken in poor weather, and the presentation of the imagery is often too small to be helpful.[21] Many of these points were shared with WCM at an early stage, but do not appear to have been taken on board.

[21] [FOE/MC3].

38. For these reasons, the landscape and visual impacts of the scheme are unacceptable, and planning permission should also be refused on this basis.

Other Matters

39. In preparing its case for this Inquiry, FoE has conscientiously sought to avoid duplicating the evidence produced by SLACC,[22] and is, therefore, not calling evidence on matters such as biodiversity and the overall benefits of the scheme. However, FoE has read SLACC's evidence on these issues, and supports SLACC's position. FoE has factored these matters in to its overall assessment of the Scheme.

The national policy tests

40. The test in the NPPF is clear: there is a firm presumption against the granting of planning permission for coal mines. The default position is that "*Planning permission should not be granted for the extraction of coal*", unless one of two exceptions applies:

    a) the proposal is environmentally acceptable, or can be made so by planning conditions or obligations; or

    b) if it is not environmentally acceptable, then it provides national, local or community benefits which clearly outweigh its likely impacts (taking all relevant matters into account, including any residual environmental impacts).

41. In respect of exception a), there is no doubt that the proposal is not environmentally acceptable nor can it be made so by conditions or planning obligations: and so the exception is not met:

    a) The evidence before the inquiry demonstrates that there will be significant environmental impacts from burning WCM coal, which will not be offset by US or Australian coal remaining in the ground. Nor will any transport emissions savings, such that they exist, offset the impact of burning the coal. The level of emissions

[22] Contrary to WCM's assertions in correspondence.

attributable to the mine will have a direct impact on global temperatures.[23] Moreover, the example set by the UK to other major economies in the year of COP26 could have a far greater impact in terms of global emissions, if those countries were to follow suite and consent their own fossil fuel extraction schemes.

b) Even with the proposed landscape mitigation, the Scheme will have unacceptable impacts on the landscape.

c) In addition (and subject to the discussion – which is yet to be had – on the manner in which the conveyor is to be constructed) the Scheme will adversely affect ancient woodland. Since the whole point about ancient woodland is that it is irreplaceable, those impacts cannot be mitigated. Indeed, that is precisely why national policy for the protection of ancient woodland (as set out in para 180(c) of the NPPF) is so strict.

42. In respect of exception b), the "great weight" that is usually attributed to the benefits of mineral extraction under NPPF para 211 (including to the economy) is specifically excluded in the case of coal extraction. While there are undoubtedly some community employment benefits that should be weighed in the planning balance, taking all relevant matters into account, including landscape impacts, the effect of a grant of consent on UK's global leadership, the lack of need for WCM coal, the inevitable net increase in emissions, and the overriding fact that we are running out of time to reverse the damage that has already been caused to our environmental life support systems by GHG emissions, it simply cannot be said that the employment benefits of the scheme "clearly outweigh" the serious negative impacts of the scheme. Accordingly, the second exception is not passed either.

43. This scheme therefore fails the national policy test in the NPPF, and should be refused permission on that basis.

The matters listed by the Secretary of State in his call-in letter

44. Turning briefly to the matters listed by the Secretary of State in his call-in letter:

[23] IPCC's Sixth Assessment Report – Summary for Policymakers [CD 8.42], SPM- 36-37.

1) the extent to which the proposed development is consistent with Government policies for meeting the challenge of climate change, flooding and coastal change in the NPPF (NPPF Chapter 14)

45. This application is not consistent with government policies for meeting the challenge of climate change.

46. Para 8 of the NPPF provides that sustainable development has an environmental objective, namely "*minimising waste and pollution*" and "*mitigating and adapting to climate change, including moving to a low carbon economy*." Extracting a significant amount of a polluting fossil fuel from the ground is clearly inconsistent with this objective.

47. Para 152 states that "*The planning system should support the transition to a low carbon future*" and should "*shape places in ways that contribute to radical reductions in greenhouse gas emissions*." Again, the conflict between a new coal mine and these objectives is glaring and significant. As the evidence before this inquiry shows, not only will this scheme fail to support the transition to a low carbon future, it will actively stifle it by locking in the most polluting means of creating steel.

2) the extent to which the proposed development is consistent with Government policies for facilitating the sustainable use of minerals in the NPPF (NPPF Chapter 17)

48. As has been stated above, there is a specific presumption against granting permission for the extraction of coal in para 217 of the NPPF. The two exceptions that allow the grant of permission for coal extraction are not met here, for the reasons already stated.

3) the extent to which the proposed development is consistent with the development plan for the area

49. The development plan comprises the Cumbria Waste and Minerals Plan 2015-30 (adopted 2017), the Copeland Core Strategy and Development Management Polices (adopted 2013) and the Proposals Map and relevant saved policies of the Copeland Local Plan 2001-2016.

50. Policy DC 13 is of particular relevance and is materially the same test as national policy on granting permission for coal extraction in the NPPF, paragraph 217. For the reasons already given, neither of the exceptions are met here.

51. It follows that this application is not in accordance with the development plan. In FoE's submission, there are no material considerations which would justify a decision which was other than in accordance with the development plan. Permission should therefore be refused under s.38(6) of the Planning and Compulsory Purchase Act 2004.

4) Any other matters the Inspector considers relevant.

(i) The need for the coal having regard to the likely future demand and use of the coal in the steel industry, including the consideration of alternative technology for the steel industry.

52. This heading has already been discussed above: the evidence shows that there is no future need for WCM coal, and that coal extraction on this site will have a negative impact on the bringing forward of alternative technology for the steel industry.

(ii) The effect of the proposed development on employment and the national and local economy

53. While, for the reasons advanced by SLACC, FoE considers the benefits of the scheme on both the local and national economy have been overstated, it accepts that there would be some positive impact on local employment and the national economy. However, this cannot outweigh the crippling cost of climate change, which has clear negative implications for the national economy. Moreover, it is telling that the national policy requirement to attribute "great weight" to the benefits of mineral extraction is specifically disapplied by the NPPF in respect of coal extraction. This suggests that limited weight should be given to those benefits in this particular case.

Conclusion

54. In conclusion:

a) This proposal would substantially increase UK GHG emissions at a time when, to paraphrase para 152 of the NPPF, we should be radically reducing them. This is contrary to national and local policy tests.

b) There is no national or European need for WCM coal.

c) The effect of introducing WCM coal to the global marketplace would not be to displace US coal, which can find alternative markets in Asia, but rather to reduce the overall price of coking coal, increasing the demand for BF-BOF steel and thus increasing GHG emissions even further.

d) The effect of granting permission shortly after the UK hosts COP26 would seriously damage the UK's global climate leadership, and indirectly increase GHG emissions by setting a damaging precedent for other nations.

e) The scheme would have material adverse impacts on landscape and views.

f) Accordingly, planning permission should be refused.

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