

From: Matthew McFeeley
Sent: 14 January 2021 15:58
To: 'Gerry.Carpenter@communities.gov.uk' <Gerry.Carpenter@communities.gov.uk>
Cc: 'PCU@communities.gov.uk' <PCU@communities.gov.uk>
Subject: Call-in Request: Woodhouse Colliery, Whitehaven, Cumbria; PCU/RTI/H0900/3255949 (SOU1/1)
Attachment: CCC (out) 7.1.21.pdf ([Letter to Cumbria County Council of 7 January 2021](#))

Dear Mr Carpenter,

Application for 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, Whitehaven, Cumbria, by West Cumbria Mining Ltd (Ref. PCU/RTI/H0900/3255949)

We act on behalf of South Lakes Action on Climate Change – towards transition (“**SLACC**”), which was among those who had requested that the Secretary of State call in the above application for an underground coal mine at Whitehaven, Cumbria for determination. Whilst recognising that the Secretary of State decided not to call in the application on the information before him, we note that certain new information has become available since the call-in requests were made. We recently sent a letter to Cumbria County Council setting out this new information, which I attach here.

In particular, this letter notes that the Government’s Climate Change Committee has recently released the Sixth Carbon Budget, covering the period 2033-2037 and associated analysis. The Sixth Carbon Budget, required under the Climate Change Act, represents legally binding advice on the volume of greenhouse gases that the UK can emit during this period. The data released alongside it also provides the most comprehensive view available of the required reductions on a sub-sector by sub-sector basis.

As the letter explains in detail, the annual operational emissions of this mine will exceed the available emissions in the Climate Change Committee’s sixth carbon budget projections for the entire coal mining subsector upon commencement of its mining operations, and by 2026 would represent 3.7 times the total emissions available for all open coal mines in the UK. (See pages 1-2 of the attached) Note that these figures do not involve counting any of the emissions from the use of the coal itself (which SLACC contend are also crucial to consider) but rely only on the operational emissions of the mine as calculated by the applicant and agreed by the County Council.

The letter also sets out at pages 2-3 that the Climate Change Committee projections are incompatible with findings that the need for coking coal in the UK will not significantly decrease over the coming decades prior to 2050, as Cumbria County Council has concluded. In fact, the projections indicate that coal use in the steel industry will need to drop by approximately two thirds by 2037. Yet the proposed mine would produce 2.78 million tonnes of coking coal annually (more than the total amount of coal used by the iron and steel industry in the UK in 2019, see Digest of UK Energy Statistics [here](#), 2.4 Supply and Consumption of Coal, row 29, column Y) for more than a decade beyond this date.

We consider that above issues go directly to the national and international significance of the application and demonstrate why (as set out in the Written Ministerial Statement of Nick Boles of 26.10.2012) the application:

- involves planning issues of more than local importance;
- may conflict with national policies on important matters;

- may have significant long-term impact on economic growth . . . across a wider area than a single local authority; and

In particular, any project that alone exceeds the available emissions space in its subsector may jeopardise the UK's ability to meet legally binding targets, and therefore clearly involves planning issues of more than local importance and potential conflict with national policies on important matters. At minimum, exceedances of emissions in a single sector by a single project will require emissions reductions in other sectors which exceed those projected by the Climate Change Committee. Such emission reductions beyond what the Climate Change Committee projects as feasible scenarios for meeting the budgets are likely to be costly and have significant economic impacts in those other sectors, affecting economic growth across a wider area.

Recent national and international press coverage of the decision not to call in the application (of which the NPCU will presumably be aware), in particular in the context of the UK's hosting the COP26 climate conference in November, and the fact that the UK may be accused of hypocrisy as it permits the mine while simultaneously urging other countries to end their reliance on coal, also demonstrate that the application is likely to:

- give rise to substantial cross-boundary or national controversy, and
- may involve the interests of ... foreign Governments

For these reasons, we respectfully request that the Secretary of State reconsider the decision whether to call in the Whitehaven mine (Cumbria County Council ref. 4/17/9007) based on the new information above.

Kind regards,
Matthew

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