Application Number P/11/01677/FUL/MIN
Warren Lane, Bramham LS24 9NU
Single storey building with mezzanine floor to house sustainable electricity generating
equipment with 2 external fuel storage tanks and 25 m high chimney.

From: Ian Lander, Biofuelwatch, 10th June, 2011

Dear Mr Brigden,

Biofuelwatch wish to object to Rocpower's re-submitted planning application for an 8 MW biofuel power station at Warren Lane, Bramham. This application forms part of much larger plans announced by Rocpower for a total of 60MW output from biofuel burning. The re-submitted application is much like the original one with minor changes applying to passing places in a highway added, some buildings moved to improve visual impact and landscaping included. In other words the larger issues we object to below are completely unaltered by the re-submitted application.

We object to the application on the following grounds:

1. Air Pollution
2. Noise
3. Access
4. Location
5. Previous use of site/land
6. Biodiversity – local wildlife
7. Sustainability of fuel source
8. Greenhouse gas emissions and climate change
9. No Combined Heat & Power (CHP)
10. Rocpower Design & Access Statement

1. Air Pollution

The Air Quality Assessment undertaken by Environ states: *'Air quality in the vicinity of the site is expected to be good and the predicted background pollution concentration provided by Defra has indicated that existing concentrations of pollutants will comfortably meet the relevant air quality objectives'.* We would suggest that you would expect air quality to be good and that background levels in a rural location in the green belt would meet relevant air quality objectives. This is why the green space is so valued by local residents. It is a strange logic to then maintain that because air quality is good it can afford to be lowered.

Table 3.6, Identifies Sensitive Receptors – it refers to Tadcaster School Running Track. We assume that this is within Tadcaster grammar school. Pupils would surely be affected by air pollution in other parts of the school?

We draw your attention to the following paragraphs, with our highlights: *'With both stack heights the predicted annual mean nitrogen dioxide concentrations emitted by the proposed electricity generation plant are greater than 1% of the annual mean objective at all the selected receptor locations (Table 4.1). The short-term concentrations are Air Quality Assessment Hargreaves Service Plc and Rocpower Ltd UK16-15064 Issue: 514 over 10% of the short term objective at*

the two closest receptors and at the point of maximum concentration. ***Emissions of nitrogen dioxide cannot, therefore, be considered as insignificant'****…* *'Predicted PM10 concentrations with both stack heights are over 1% of the annual mean objective at the majority of the selected receptor locations, (Table 4.3). The 24 hour concentrations exceed 10% of the objective at the point of maximum concentration and at one receptor location.* ***Therefore emissions of PM10 cannot be considered to be insignificant****.* ***Emissions of PM2.5*** *are predicted to be over 1% of the annual mean objective at the majority of receptor locations (Table 4.5),* ***therefore emissions cannot be considered as insignificant'.*** And *'For both stack heights the predicted concentrations arising from the facility alone for nitrogen dioxide,* ***PM10 and PM2.5 were in excess of the H1 guidance criteria below which emissions can be considered to be insignificant****. Therefore, the assessment has given consideration to the cumulative impact of both process contribution and background concentrations to calculate the predicted environmental concentrations (PEC)'….'Where the process concentrations cannot be considered to be insignificant, the next stage in the assessment process is to consider the process contribution together with the existing background concentration, to calculate the Predicted Environmental Concentration (PEC) to determine the overall impact on air quality'…. 'Given the existing predicted background concentrations in the vicinity of the site, the potential for the emissions from the facility to result in a breach in an air quality objective is considered to be minimal with either stack height. However, guidance from the Environment Agency given in H1 indicates that where detailed modelling has predicted PECs above 70% of an air quality* ***objective there is a "presumption that serious pollution control measures would be necessary".*** *Pollution control measures in this instance could be the raising of the stack height to 25 m'.*
– This would increase the visual aspect, impact and nuisance of the development.

We draw your attention to the conclusion drawn by Environ, on behalf of Rocpower in light of EU air quality legislation which stresses that there are no safe levels of PM 2.5 (Directive 2008/50/EC). In light of this, we contend that the subjectivity implied by the PEC is not acceptable to the receptors identified and local residents who want to enjoy access to the green belt.

LCC are aware that Rocpower already operate a biofuel power station in Wakefield. We understand that runs of tall oil. Local residents complainted to the local council about smoke emissions almost as soon the plant began opearting. Flue gas treatment equipment was subsequently added. Unfortunately, the particulate filters rapidly blocked up with particulates, resulting in the generators shutting down. We understand from the applicant, that this is currently an inherent problem with using tall oil. We understand from SCACC that this treatment equipment has now been disconnected. In order to avoid falling foul of the Clean Air Act Rocpower are left with no option, but to shut down the power station when the wind is blowing in the direction of local residents, who have complained. There is also an issue with odour emissions. All of these operational problems must make the power station less efficient, profitable and even viable, unless the applicant uses other forms of bio-liquid, such as palm oil or soya.

2. Noise

We suggest that the findings of the Noise Assessment are unsatisfactory.

3. Access

We draw your further attention to the concerns of local residents as expressed by Bramham Parish Council. Below is a summary of their detailed knowledge of the problems associated with access:

The A1/A64 would take long Heavy Goods Vehicles (HGVs) down Spen Common Lane which is a narrow single track badly maintained country lane without passing points and with several blind bends.
There are two alternative routes:

(i) A64 to A659 towards Tadcaster turning left at Rudgate and left again onto Toulston Lane, past Tadcaster Grammar School and left into Warren Lane. This is not possible due to the weight limit on Toulston Lane imposed by North Yorkshire County Council (NYCC),
(ii) A1/A64 roundabout to Spen Common Lane continuing on Paradise Way turning right onto Aberford Road, turning right onto Toulston Lane and right onto Warren Lane. This involves passing through the conservation area of the village of Bramham. Aberford Road is narrow, with no footpath and banking to one side and generally parked cars on the other. It also passes the recreation ground and allotment gardens which attract considerable pedestrian usage. The junction of Aberford Road and Toulston Lane consists of a 90o "blind" bend unsuitable for HGVs. Both of routes (i) and (ii) would result at the junction of Toulston and Warren Lanes. This is an accident blackspot (there have been at least 2 accidents so far this year),
Warren Lane itself is a narrow, single track, badly maintained country lane without designated passing points which would risk damage to protected hedgerows.

Biofuelwatch are also aware from local residents that Warren Lane and Spen Common Lane regularly flood. Last winter, during the ice and snow, local residents who have oil heating were unable to receive supplies as the oil company couldn't deliver because the road was un-gritted and there are steep banks at each end of the road. Finally, the University have made passing spaces smaller by placing tree trunks/boulders at the entrance so only a car can fit in, which would prevent lorries using them.

This City Development Department Highways Development Control objected to the development on the following grounds: *'The only access to this proposal is via Warren Lane which is a narrow road in a poor state of repair which has no dedicated passing places. The proposed use will generate large HGV tanker vehicle movements every day of the week and it is considered that the current state of Warren Lane is not suitable to accommodate these types of large vehicles'.*

4. Location

The site as described by Environ, is located in a predominantly rural location. It is in fact within the green belt which makes it inappropriate for development. Please see our comments below that pertain to documentation submitted by the developer regarding the green belt. The power station will be close to Tadcaster grammar school. We oppose the development based on reduced air quality for pupils and safety risks, due to additional heavy goods traffic. The power station will also increase air pollution over land owned by the University of Leeds that is used by agricultural students for growing food. Air pollution could also adversely affect arable produce and livestock at Bee Farm, Paradise Farm and Quarry Farm.

5. Previous use of site/land

Although the application site was previously used as peaking site to supply electricity, this should have been returned to its former state once the site had shutdown. This was woodland in the greenbelt. This did not happen. We therefore contend that the application is not a re-use of the land, as the applicant portrays.

6. Biodiversity – local wildlife

Red kites are seen daily in the wood next to the plant. According to the RSPB the red kite is on the amber list of endangered species, this is defined below:

Amber list criteria: Species with unfavourable conservation status in Europe (SPEC = Species of European Conservation Concern); Historical population decline during 1800–1995, but recovering; population size has more than doubled over last 25 years; Moderate (25-49%) decline in UK breeding population over last 25 years, or the longer-term period; Moderate (25-49%) contraction of UK breeding range over last 25 years, or the longer-term period; Moderate (25-49%) decline in UK non-breeding population over last 25 years, or the longer-term period; Rare

breeder; 1–300 breeding pairs in UK; Rare non-breeders; less than 900 individuals; Localised; at least 50% of UK breeding or non-breeding population in 10 or fewer sites, but not applied to rare breeders or non-breeders. Internationally important; at least 20% of European breeding or non-breeding population in UK (NW European and East Atlantic Flyway populations used for non-breeding wildfowl and waders respectively)

7. Sustainability of fuel source

Please see our comments bellow that pertain to this issue with regards to documentation submitted by the developer.

8. Greenhouse gas emissions and climate change

Please see our comments bellow that pertain to this issue with regards to documentation submitted by the developer.

9. No Combined Heat & Power (CHP)

The applicants Design and Access Statement says: *"This proposal meets the ever growing need for point of use electricity generation".* The rural location is clearly unsuited tor point of use in terms of both electricity and heat. The development will use some waste heat, but most will be passed into the atmosphere. This is an inefficient use of natural resources, which must be taken into consideration under planning regulations.

10. Rocpower Design & Access Statement

Tall Oil & Vegetable Oil Co Products as a Renewable Fuel
'Rocpower Limited are developing a portfolio of renewal energy generation plants throughout the UK, identical to this proposal, utilising Tall oil and vegetable co products as the feed stock. The oil has been selected as the primary fuel due to its contribution in tackling greenhouse gas emissions as well as its availability'. The Oil is classed as carbon neutral.'

We refute that the oil is carbon neutral. We assume that when Rocpower refer to 'the oil' this is tall oil and they infer it is readily available. Tall oil is a by-product of paper production. We understand that at various times, Rocpower have said they will source tall oil from North America, Canada and Scandinavia or a variant of these countries. We would inform you that such a supply may well not be readily available. This is because there are there are major pulp mill closures all over North America and Scandinavia and have been for many years. There is a supply of beetle-infested wood in North America that is being salvaged logged (which is damaging to the environment), but this is mainly being used for bio energy, not converted to pulp and paper. In North America from a trade point of view, there is presently a big shift from pulp and paper to biomass. We would imagine if Rocpower really wanted to use tall oil, it would more than likely originate form Indonesia, Brazil, Chile, Uruguay, and we are not aware that such supply routes exist. This suggests that Rocpower will need to import bio-liquids such as palm oil, which they do indeed refer to. Furthermore we would point out that tall oil is unsustainable, even more so in view of the fact that pulp mills are increasingly concentrated in countries with the worst environmental and social practices and lack of legal enforcement. At a public meeting, Sheffield Campaign Against Climate Change (SCACC) put it to Mr Slater the director of Rocpower that tall oil is not really sustainable as we use more trees than we replace and he did not argue, saying "that's the nature of the business".

Mr. Slater also informed SCACC that Rocpower sources tall oil from Rotterdam which imports it from various countries. This is at odds with previous statements about supply coming from North America and Scandinavia and is more in-keeping with our understanding of a globally traded commodity. In the first three months, of their Wakefield biofuel power station operating, Rocpower reported to Ofgem that they were burning primarily vegetable oil and very little tall oil. Between

April 2010 and April 2011, they reported having burnt 85% tall oil pitch and 15% vegetable oil, including UCO. They claimed the tall oil was from the USA (not Scandinavia or Canada). Please note that company reporting to ofgem is not audited. Elsewhere, Rocpower have stated that the fuel will be derived from FSC accredited wood from Scandanavia and Canada. This lack of consistency, is we would suggest a cause for concern, regarding operation of the plant and the issue of sustainability. In February this year, the Right Honorable Mr. Pickles, Secretary of State for Communities and Local Government in reviewing a public inquiry on a biofuel power station ruled at Avonmouth found: *'However, he considers that the sustainability of bioliquids (i.e. liquid fuels derived from biomass and not used for transport) is a material consideration which is relevant to his decision.'*

Rocpower refer to "Co-products" or "by-products", which can be used as a fuel. These will already be in demand by other industries. Burning them in the UK for electricity generation will add to the overall global demand for liquid fuels. Given that both the UK and the EU are net importers of vegetable oil, this new demand will be met largely by expansion of the highest yielding and cheapest biofuels like palm oil. EU biofuel 'sustainability and greenhouse gas standards', now incorporated into the UK's Renewables Obligation, are entirely inadequate, do not currently take account of indirect climate impacts of biofuels and ignore impacts on human rights, food, water and most biodiversity. However, there is nothing in Rocpower's application to suggest that they have even considered complying with those weak and inadequate standards.

It should be of interest to LCC that the Environmental Review, prepared by Environ states: *'The site will make use of various types of fuel sources e.g. Tall Oil (a by-product from the pulping of pine trees), palm oil etc. that are commercially available on the market. The initial start-up of the engines will be achieved through the use of bio-diesel. The choice of fuel will be largely dependent on availability and prevailing financial conditions'.*

This is somewhat different to the rather vague information supplied in Rocpowers Design and Access Statement. A new demand for biofuel, especially palm oil, by Rocpower will, either directly or indirectly, result in more deforestation and more land-grabbing at the expense of indigenous and other forest-dependent peoples as well as small farmers in countries such as Indonesia, Cameroon or Colombia. Palm oil expansion is the main cause of deforestation in Malaysia and Indonesia, according to the UN Environment Programme, and is accelerating rainforest destruction in many other countries, including Papua New Guinea, Colombia, Ecuador, Uganda and Cameroon. Studies have shown that biofuels linked to palm oil expansion in South-east Asia, whether directly or indirectly, cause many hundreds of times more greenhouse gas emissions than using the equivalent amounts of mineral oil. Plantation expansion caused by the increasing demand is also linked to the displacement and eviction of indigenous peoples, small farmers, and other communities, often involving human rights abuses.

The director of Rocpower told Sheffield Campaign Against Climate Change (SACC) that it was never Rocpowers intention to burn palm oil and they would accept a planning condition excluding it. Whilst this assurance might be welcomed, it differs to that included in paperwork submitted to Leeds City Council , where they offer to exclude 'virgin' palm oil and soya, but NOT palm oil and soya. This subtle difference is significant. Unfortunately in reality, due to the global nature of the feedstock commodity supply chain, any increased use of biofuel can lead to a displacement affect that means increased use of palm oil and rainforest destruction.

Their Design and Access Statement continues:

'At the start of the Industrial Revolution atmospheric CO2 levels were around 280 ppm. Today that levels stands at 381 ppm – an increase of a mere 36% of what is no more than a fractional gas. Yet the effect on global weather patterns has been frightening with freakish weather increasingly being experienced around the world. Predictions now are for CO2 levels to rise to 500 ppm (effectively double) by 2040 and to around 700 ppm (effectively triple) by 2100 – if that

happens most life forms on earth will be facing extinction. The only sensible course of action for the 21st Century is to cease releasing fossil carbon into the atmosphere.'

We are pleased that Rocpower assert that climate change is so serious. We do not agree that the only option is to 'cease releasing fossil carbon into the atmosphere' as the atmosphere does not differentiate between fossil carbon and terrestrial carbon, which is released when biofuels or biomass is burnt.

'Green Belt
The site is located in the Green Belt and is clearly inappropriate development, according to PPG2 definitions. Therefore, if the development is to be approved, Very Special Circumstances must be demonstrated which outweigh the harm to the Green Belt. PPS22 notes at Paragraph 13 that: When located in the green belt, elements of many renewable energy projects will comprise inappropriate development, which may impact on the openness of the green belt. Careful consideration will therefore need to be given to the visual impacts of projects, and developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason of inappropriateness and any other harm if projects are to proceed. Such very special circumstances may included the wider environmental benefits associated with increased production of energy from renewable sources'.

Unfortunately biofuels will create more greenhouse gas emissions than fossil fuels due to Land Use Change, Indirect Land Use Change, farming practices, transportation and processing.

'The PPS1 Climate Change Supplement comments, at paragraph 3 that:
Climate change is the greatest long term challenge facing the world today.'

It is therefore completely unacceptable for this development to go ahead as it will increase climate change.

'It also comments at paragraph 5 and 6 that:
Changes in climate are likely to have far-reaching, and potentially adverse, effects on our environment, economy and society for which we need to prepare and adjust. There is therefore an urgent need for action on climate change.
Clearly this is an issue of high significance in balancing planning decisions for proposals of this nature, which also conflict with the objective of maintaining the openness of the Green Belt. In principle, guidance is clear that the need to act on climate change is so significant that it can outweigh Green Belt harm.'

It is equally clear that this wholly inappropriate and technically unacceptable technology that creates greenhouse gas emissions does not apply to these paragraphs.

'The Climate Change Supplement also notes, at paragraph 20, that planning authorities should: not require applicants for energy development to demonstrate either the overall need for renewable energy and its distribution, nor question the energy justification for why a proposal for such development must be sited in a particular location;

Rocpower appear to be arguing against themselves here, insofar that the previous paragraphs have sort to justify the need for renewable energy in order to mitigate climate change?

'and - ensure any local approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances;
- We contend that this so-called renewable should be precluded as climate change is an exceptional circumstance and the plant will increase, rather mitigate climate change.

This guidance is again clear in its intensions. The overriding factor in this guidance is to accommodate low carbon and renewable energy generating capacity. Taking an overview of the relevant policy guidance, the combined issues of climate change; the need to transition to lower carbon forms of energy generation; taken with national energy security, are clear national and global priorities. This is reflected across the suite of national planning policies. Notwithstanding this, the protection afforded by the Green Belt is also a factor which must be taken into account. It is difficult to see how a policy designation which is not based on any inherent landscape, visual or other environmental quality can be taken to outweigh an issue as significant as our society's need to adapt to and mitigate climate change. Nonetheless, it is a balancing factor and therefore worth considering the extent of effect on the purposes of the Green Belt, as a means of establishing the extent of harm to the Green Belt.'

This argument might carry some weight if the technology put forward produced no carbon emissions or very little. However to reiterate some mathematical imperatives, burning biofuels will physically and absolutely produce carbon from the stack. This is irrefutable. In order to produce the feedstock carbon will have been released from Land Use Change (LUC), Indirect Land Use Change (ILUC), farming, processing and transportation. For the micro-maths to work feedstock burnt must be replaced. Even if this could be guaranteed, this act of photosynthesis will not sequester the additional carbon emissions from LUC, ILUC, farming, processing and transportation.

Rocpower do not refer to the following paragraphs from 'The PPS1 Climate Change Supplement but they are equally relevant to the paragraphs they selected:

'KEY PLANNING OBJECTIVES
9. To deliver sustainable development, and in doing so a full and appropriate response on climate change, regional planning bodies and all planning authorities should prepare, and manage the delivery of, spatial strategies that: conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change;'

We contend that the local and global affects of biofuels are contra to this paragraph.

'DECISION-MAKING PRINCIPLES
10. Regional planning bodies and all planning authorities should apply the following principles in making decisions about their spatial strategies:
– the proposed provision for new development, its spatial distribution, location and design should be planned to limit carbon dioxide emissions;
- climate change considerations should be integrated into all spatial planning concerns;'

We contend that the development is contra to these principles.

'24. In doing so, planning authorities should take into account:
– the ability to build and sustain socially cohesive communities with appropriate community infrastructure, having regard to the full range of local impacts that could arise as a result of likely changes to the climate;
– the effect of development on biodiversity and its capacity to adapt to likely changes in the climate;'

The development and its feedstock will have an adverse affect on these two issues.

'Local requirements for decentralised energy to supply new development
26. Planning authorities should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in their area.'

An evidence-based understanding of the life-cycle analysis of biofuels will preclude it as a fuel source.

'DETERMINING PLANNING APPLICATIONS
39. In the interim period before the development plan is updated to reflect the policies in this PPS, planning authorities should ensure proposed development is consistent with the policies in this PPS and avoid placing requirements on applicants that are inconsistent. Where proposals are inconsistent with the Key Planning Objectives set out in this PPS, consideration should be given to how proposals could be amended to make them acceptable or, where this is not practicable, to whether planning permission should be refused.'

We assert that the development is indeed at odds with Planning Objectives set out in PPS on grounds of sustainability and local issues and that proposals can not be amended to make them acceptable and as such planning permission should be refused.

'Designing environmental performance into proposed development
41. Where possible, planning authorities should make use of Design and Access Statements to obtain from applicants the information necessary to show how their proposed development will contribute to the Key Planning Objectives set out in this PPS and relevant RSS and DPD policies consistent with this PPS.'

We would suggest that the Design and Access Statement is both inaccurate and does not contain enough information to show how the development will contribute to the Key Planning Objectives.

'42. In their consideration of the environmental performance of proposed development, taking particular account of the climate the development is likely to experience over its expected lifetime, planning authorities should expect new development to:
– deliver a high quality local environment;
– provide public and private open space as appropriate so that it offers accessible choice of shade and shelter, recognising the opportunities for flood storage, wildlife and people provided by multifunctional greenspaces;'
We would suggest that the current use as greenbelt satisfies this requirement, but that the development does not.

Their Design and Access Statement continues:

'We analyse the effects of the development on the five purposes of including land in the Green Belt below:

To assist in safeguarding the countryside from encroachment;

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.

We contend that the application is at odds with the former and as regards the latter, it si mis-leading and inaccurate to describe this part of the green belt as either derelict or urban land, that is need of urban regeneration. Indeed according to Branham Parish Council, in their objection to the application: *'In accordance with The Town and Country Planning (General Permitted Development) Order 1995 Part 17 on cessation of its use as a peaking site, the site should have been "returned to its former state", in this case an undeveloped woodland area within the green belt known as Headley Plantation. YEDL removed the generating equipment from the site, but failed to comply with the legislation and have not removed the concrete base and electrical connection, or replanted the trees'.*

PPG2 advises, at paragraph 1.7 that:
The purposes of including land in the Green Belts are of paramount importance to their continued protection

'We have reviewed these purposes and concluded that there would be no significant or material effect on the ability of the Green Belt in this area to continue to perform its main role'.

- This is rather subjective as any development threatens the greenbelt.

'Whilst there will be changes in openness as a result of the new development, these are not significant. The fundamental point is that the functioning of the Green Belt in this area will not be harmed'.

- We suggest that the height of stack and pollution, together with access problems are significant.

'Compared to the urgency of the climate change situation, and the need for us as a wider society to adopt any feasible measures to reduce out reliance on fossil fuels, we consider the harm to the Green Belt to be negligible'.

- This is cynical and deeply mis-leading, as the development will be responsible for more greenhouse gas emissions than fossil fuel equivalent.

'The wider environmental benefits derived from this development should carry great weight in decision making. It is, therefore, our view that this factor outweighs the limited harm to the Green Belt, and represents the very special circumstances needed to justify the development'.

- If the developer was serious about the wider environmental 'benefits' then for consistency, any wider adverse environmental affects should also carry 'great weight'. These will include habitat & biodiversity loss and damage to soil & water in the UK, EU, North America, South America, Central America, India, Africa and South East Asia due to feedstock supply. Adverse environmental affects will also be local and global from climate change.

'Site Suitability
The site is considered suitable for biomass renewable energy generation as:
□□*It is well served by the transport network only one tanker per day added to the network'* – we refute this assertion in detail in our objection, under Access.
□□*The site has previously been used for a similar operation* – we refute this in our objection.
□□*It is located within an existing industrial estate* – We suggest that this description of an industrial estate is mis-leading and this statement therefore equally problematical. For one, it fails to acknowledge that the site is within the green belt.

'Biomass Electrical Generating Process
The process uses Tall oil and vegetable oil co products which are classed as carbon neutral, as defined by the UK Renewable Obligation Scheme to power compression ignition engines which in turn drive alternators generating electricity'.

We are unable to find a definition that biofuels are carbon neutral in the UK Renewable Obligation Scheme. However guidance document, Renewables Obligation: Guidance for generators states:

'Changes made to the Orders in 2011 Sustainability criteria for bioliquids
2.8. The European Renewable Energy Directive specifies that generators using bioliquids must meet certain sustainability criteria in order to be eligible for subsidies from national Government support schemes, which includes the Renewables Obligation.

2.9. Therefore, as of April 2011 generators wishing to claim ROCs on electricity generated from bioliquids need to demonstrate to us that the fuels they use meet set greenhouse gas saving and land use criteria.

Energy produced by the proposed scheme is categorised under the European Union Renewable Energy Directive (EU RED) as renewable on the condition that it uses fuel from biological sources which fulfils certain criteria, including achieving a threshold level of greenhouse gas saving compared to using fossil fuels. For biofuel electricity generation, the threshold saving stipulated in the EU Directive is currently 35% and is scheduled to rise to 50% in 2017. This is somewhat different to suggesting that biofuels are carbon neutral or 100% saving.

Furthermore, the carbon intensity of the UK national grid (or grid intensity) was 530g CO2/kWh in 2008. In order to meet government targets for carbon reductions, in their October 2009 report, *Meeting Carbon Budgets - the need for a step change,* the Committee on Climate Change (the CCC) advised that in 2020 grid intensity will need to be 420 gCO2/kWh, in 2025, 200 gCO2/kWh and in 2030 80 CO2/kWh.

In conclusion, if Rocpower can not demonstrate these efficiencies or carbon intensity reductions the plant will not be allowed to operate.

'Appearance & Landscaping
The overall objective for the design of the small scale biomass power plant is to create a clean industrial character consistent with its role as a sustainable energy generation technology, within the proposed location.'

We would suggest that a plant that produces pollution by definition should not be classed as 'clean'.

'Conclusion
The promotion and use of renewable energy is now a key element of regional and national planning policy (PPS22 Renewable Energy). This proposal meets the ever growing need for point of use electricity generation. It will reduce CO2 emissions as it is carbon neutral and reduce the need for additional pylons in the future transporting electricity around the county and country'.

Crucially the plant would create carbon dioxide emissions from the stack – this can not be simply ignored by using the phrase carbon neutral. Fundamentally this technology is not carbon neutral. It could only be considered carbon neutral if the carbon absorbed by the feedstock was equal to that which is burnt. This can not be the case since the feedstock is farmed, which involves release of soil carbon and emissions associated with farm machinery, artificial fertilizers, pesticides, herbicides. The feedstock must then be transported and processed before further transportation to the forecourt. The feedstock may replace a natural ecosystem and will have led to indirect land use change. Both of these release carbon. Either land use change could well be Indonesian rainforest on peatlands, which will lead to a carbon debt of 840 years.

Not only is the myth of carbon neutrality being used as a reason to grant planning permission as per PPS22, the threat of climate change is also being used as a reason for building on the greenbelt. We object to both of these assertions and ask that along with the detailed local concerns listed they provide absolute grounds to reject this application.