

Dear Mr McGroarty,

Re: RWE Generation UK plc application for a reserve generation peaker plant site adjacent to the Markinch Biomass Power Station, Ref 18/01692/FULL

I am writing to object to this planning application on behalf of Biofuelwatch. Biofuelwatch is a UK/US non-profit organisation which works to raise awareness of and campaign against the negative impacts of industrial-scale bioenergy, including biomass carbon emissions and adverse public health impacts. We support a transition towards genuinely low-carbon renewable energy combined with greater energy efficiency and energy conservation.

We have serious concerns about any developments which involve new fossil fuel power generation capacity. However, in this case, we are objecting to RWE's application for a gas peaker plant due to concerns about the potential cumulative impacts on noise levels and nitrogen dioxide levels to which nearby residents would be exposed, in addition to those caused by the existing biomass power station.

For both grounds of objection, we refer to Policy 10 of the Fife Local Development Plan adopted in 2017:

"Development will only be supported if it does not have a significant detrimental impact on the amenity of existing or proposed land uses. Development proposals must demonstrate that they will not lead to a significant detrimental impact on amenity in relation to:

1. Air quality, with particular emphasis on the impact of development on designated Air Quality Management Areas (see below)...
2. Noise, light, and odour pollution and other nuisances, including shadow flicker from wind turbines...
6. Construction impacts."

Noise impact:

According to the Planning Application Supporting Document, dated 15th June 2018, "a full noise assessment is provided as a Supporting Document for this application". This document, however, is not publicly available and we understand that it was withdrawn shortly after the planning consultation opened. Noise impacts are of particular concern with regards to this development. We believe it would be unacceptable to close the public consultation before members of the public have had four weeks of access to the noise impact assessment so as to give an informed opinion about it.

When Fife Council granted planning consent for a RWE's combined heat and power plant in May 2009, it imposed a planning condition stating:

"Noise from the operation of the new CHP Plant shall not exceed the following noise levels, expressed as a BS4142:1997 Rating Level, at

the nearest residential properties in Prestonhall (reference position H), during the stated times:

Daytime 0700-2300 LAeq (1 hour) 45 dB (A)
Night time 2300-0700 LAeq (5 minute) 45 dB (A)

The limits to apply to any 1-hour assessment period during daytime and any 5 minute period during night time, as per BS4142:1997 guidelines on assessment periods."

This planning condition remains legally in force, as confirmed to us by the Scottish Government's Energy Consents Unit.

We understand that RWE has been commissioning occasional noise monitoring during limited periods. We have been told that residents were initially advised that noise levels of 50 decibels were being 'observed', which would be a clear breach of the planning condition. We also understand that at least one resident has been undertaking her own noise monitoring and has found frequent exceedences of the 45 decibel limit. The same resident advises us that during the limited periods of noise monitoring carried out by RWE during the past 18 months, noise levels from the plant dropped well below what they had been previously, only to increase again once monitoring was ended. We do not know whether this period coincided with the plant operating at a lower load factor, since such information is not publicly available.

Furthermore, we understand that construction noise associated with the new heat pipe is adding to noise from the biomass power station. The construction and operation of a gas peaker plant would further add to noise. We therefore believe that compliance with Policy 10 of the Fife Local Development Plan cannot be guaranteed and that the application should therefore not be approved.

Given the paucity of evidence regarding current noise levels experienced by local residents, we suggest that Fife Council might want to require RWE Generation UK plc to undertake continuous noise monitoring at the nearest residential properties for a period of at least four weeks, during which time the power station must not be operating at less than the average load factor over the past two years. This would establish the background noise levels. In line with the existing planning consent for the biomass power station, any new development at the site should not be permitted unless maximum noise levels of 45 dB can be guaranteed for all residents.

Air quality (nitrogen dioxide) impacts:

We believe that the applicant's Air Quality Monitoring and Assessment Report is inadequate for the reasons set out below and that the application should not be approved in the absence of a substantial period of NO₂-monitoring at the nearest properties in the prevailing wind direction, followed by a new assessment and consultation period.

The NO₂ diffusion tube closest to the site is located at Queensway, Glenrothes, however this is not in the prevailing wind direction of the biomass power station. We are seriously concerned about the lack of NO₂ diffusion tubes in the area

around Mount Frost Drive which lies in the prevailing wind direction and may experience substantially higher NO₂ concentrations. We would suggest that Fife Council might want to require RWE to carry out diffusion tube monitoring in that area over a sufficient period of time to account for different weather conditions, including during conditions of winter-time temperature inversion.

We note that the developer's assessment assumes a maximum residential background NO₂ concentration which is just half the concentration measured by the Queensway diffusion tube. The argument given is that local diffusion tubes are located at roadsides or kerbsides and thus over-estimate residential NO₂ concentrations. Given that the Queensway tube is not in the prevailing wind direction of the biomass power station, there is a high chance that its readings are lower than the maximum level of NO₂ at residential receptors.

We further note that the developer claims that the plant is not expected to operate for more than 500 hours a year, yet we can see nothing in the planning documents to show that this claim can be relied upon. Peaker plants are most likely to operate during the winter and during weather conditions which are not ideal for wind energy generation. Such conditions often coincide with temperature inversions, when concentrations of air pollution are highest. This makes the use of credible background data – based on actual monitoring, not solely estimates – all the more important. Without accurate background data, we do not believe that compliance with Policy 10 of the Fife Local Development Plan can be guaranteed with regards to air quality.

Yours sincerely,

Almuth Ernsting