

Dear Ms Bingham,

Re: Planning application related to a wood gasification plant at Trostrey Court Farm, Usk, Ref DM/2018/01641

I am writing to object to the planning application related to a wood gasification plant at Trostrey Court Farm on behalf of Biofuelwatch. Biofuelwatch is a non-profit organisation which undertakes research, education, advocacy and campaigning in relation to the impact of large-scale bioenergy, and which campaigns for a reform of energy policy in favour of genuinely low-carbon renewable energy ([www.biofuelwatch.org.uk](http://www.biofuelwatch.org.uk)).

We have serious concerns about this application being presented and considered solely as an application for a new fuel storage building, the relocation of a portacabin office building and parking provisions. We note that, in September 2017, the developers submitted an application for "alterations and extensions of existing combined heat and power plant" (Ref DC/2017/01078), which they subsequently withdrew. We believe that this current application should, similarly, have been presented as constituting alterations and extensions of the existing energy plant. In particular, we note that the drawings presented for the current application differ from those associated with the approved application DC/2016/01465 in that they:

- include a 17m high flue stack next to the generator building;
- do not include a flare stack.

We have looked carefully through previous planning documents related to this site and cannot see any evidence that planning consent for a flue stack for the energy centre has ever been granted (as opposed to a flue stack for a separate wood drier plant in a different location).

A flare stack, as previously approved, is a vital safety feature for all gasification plants, needed to prevent a pressure build-up that could cause a major explosion by flaring off syngas which would, during normal operations, be burned to generate energy. Please see the European guidelines for the safe operation of biomass gasifiers regarding the need for an emergency flare: [https://ec.europa.eu/energy/intelligent/projects/sites/iee-projects/files/projects/documents/gasification\\_guide\\_final\\_guideline\\_for\\_safe\\_and\\_eco\\_friendly\\_biomass.pdf](https://ec.europa.eu/energy/intelligent/projects/sites/iee-projects/files/projects/documents/gasification_guide_final_guideline_for_safe_and_eco_friendly_biomass.pdf).

We are very concerned that the drawings associated with the new application omit a flare stack. A gasification plant without an emergency flare would pose a serious health and safety risk to residents and workers.

On the other hand, a flue stack – not previously approved, is an essential part of any combustion plant. Planning consent is required for any flue for a biomass generator with a capacity greater than 45 kWth ([https://www.planningportal.co.uk/wales/en/info/3/common\\_projects/20/flues\\_for\\_biomass\\_and\\_combined\\_heat\\_and\\_power\\_systems\\_non-domestic](https://www.planningportal.co.uk/wales/en/info/3/common_projects/20/flues_for_biomass_and_combined_heat_and_power_systems_non-domestic)).

We note that the developer states that approving this application would lead to them implementing the planning consent for DC/2016/01465, which we find

baffling because this is the only planning consent they ever obtained for biomass gasification, as opposed to bioliquid combustion for energy. The planning consent approved prior to DC/2016/01465 was very explicitly for bioliquids only and included (liquid) fuel tanks.

We are further concerned that no Environmental Impact Assessment has been required, even though the energy centre is large enough to come within Schedule 2 of the The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016, and even though the environmental impacts of operating a 7.4 MWe biomass gasification plant – in relation to air quality, traffic, visual impacts and possibly noise – are likely to be significant.

We therefore hope that Monmouthshire County Council will reject this planning application on the grounds that:

- it shows a flue stack for the energy centre being included in the drawings (one for which no planning consent has been granted so far), without it being addressed in the core planning documents, and without any assessment of the environmental impacts or the reasons why a height of 17m has been chosen;
- it fails to include an EIA or, for that matter, any environmental assessment of the impacts of the flue stack and its emissions on visual amenity and air quality;
- it includes drawings which show that the flue stack is to replace, rather than complement, a previously approved flare stack. Building a gasification plant without a flare stack would pose very serious health and safety risks.

Approving the application as submitted would allow the developers to operate a medium-sized biomass gasification plant with no planning conditions related to air emissions, health and safety or traffic for example.

We believe that the developers must be required to submit a different, comprehensive planning application for this proposal, and that Monmouthshire County Council should require this to be accompanied by a full Environmental Impact Assessment.

Yours sincerely,

Almuth Ernsting