Debbie Johnson

From: Siriol Hugh-Jones [redacted]
Sent: 01 May 2013 11:06
To: Planning
Subject: Ref: AWDM/0868/12: Objection to 32MW Biofuel power station at Shoreham

Dear Mr Appleton,

I wish to object to Edgeley Green Power's planning application for a power station to run on biofuels.

Firstly, I believe that this is not a sustainable development as defined in the National Planning Policy Framework. It will, directly and/or indirectly, increase the demand for palm oil, which is a key driver of tropical deforestation and has been identified by the UN Environment Programme as the main cause of permanent forest loss in Indonesia and Malaysia. Palm oil and other biofuel feedstocks are also linked to land-grabbing, human rights violations and increased hunger.

Edgeley Green Power speak about planning to use tallow, tall oil and used cooking oil. Used cooking oil is already in high demand for biodiesel and there is no evidence of any spare supplies. Tallow and tall oil are not waste products – they are being fully used by other industries who would otherwise resort either to palm oil or fossil fuels. A report commissioned by the UK Government in 2009 showed that burning more tallow as biofuel will lead to more palm oil being imported for soap and cosmetics. Edgeley Green Power also state that they do not rule out using palm oil directly. They state they would use it as long as it was not fit for human consumption, for example because it became contaminated in shipping containers – which I expect will be the norm in ships used to supply fuels.

Local impacts will include more air pollution which will have a negative effect on public health. As for the economic effects, I would question Edgeley Green Power's claim about 20 local permanent jobs being created because biofuel power stations (with fuel being delivered directly from ships via pipeline) have almost no labour requirements other than for specialist technical support. And a small number of local jobs cannot make up for the the serious environmental and social effects associated with such a power station.

Secondly, I am concerned that the power station will lead to increased concentrations of small particulates and NO2, with Air Quality Management Areas due to breaches or anticipated breaches of legal NO2 levels already having been declared in the vicinity. In Ealing, West London, the Secretary of State upheld a local authority decision (following a planning appeal) to reject an application for a smaller, 18.5 MW biofuel power station because of the amount of NO2 which would be emitted in an area with high existing NO2 levels. The NO2 mitigation used by that power station would have been similar to that proposed by Edgeley Green Power.

As well as objecting to the application I would ask for it to be referred to the planning committee rather than being decided under delegated powers, given its scale and impact. Many thanks.

Yours sincerely,

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