

The Energy Consents Unit
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(also by e-mail: leithbiomass@scotland.gsi.gov.uk)

10th March 2011

Dear Sir/Madam,

Objection to the Proposed Biomass Plant at Imperial Dock, Leith

I wish to place on record my objection to the Forth Energy proposals to build a biomass plant at Imperial Dock, Leith. I know you have received some very thorough and detailed critiques of the proposals by numerous organisations and individuals. I am not going to attempt to replicate these but rather, as a Member of the Scottish Parliament for Lothians, I hope in this letter to set out my own personal objections, and to reflect some of the key concerns of the hundreds of constituents (both private residents and businesses) who have contacted me on this issue.

There are two principal complaints. The first complaint is that the proposed location of the plant, for a variety of reasons, is entirely inappropriate. The second concern is that, regardless of where this plant is to be located, consent to its construction would fly in the face of well thought-out Scottish Government policy in relation to biomass.

The Proposed Location for the Plant

Over several years now, a great deal of thought, planning and investment has gone into the regeneration of Leith. That process is far from complete, but progress has been made. The Forth Energy proposal puts this progress at risk and not only contradicts but also completely undermines local planning policies. The location of the plant, so close to housing and in an area zoned for residential development and public greenspace, is highly objectionable. Understandably, many constituents have expressed shock that, having bought a property in full knowledge of plans to develop the area for residential and commercial purposes, they are suddenly now faced with living next door to the largest biomass plant in Scotland - and all that this entails in terms of noise, pollution, air quality, traffic congestion and health.

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There are already problems of air quality in streets close to the proposed plant. Residents are fearful that emissions from locating a biomass plant here can only make matters worse, and this appears borne out by studies that have been referred to in a number of the detailed letters of objection you have received. Similarly, air quality will be detrimentally affected by the consequential increase in traffic on local roads caused by HGVs delivering fuel and removing ash.

A further concern shared by constituents across Edinburgh and beyond is the visual impact of the proposals. I hope that you will have available to view the various sketches and impressions of how this proposed plant will look. Massive in scale and incorporating a 120 metre high chimney, not only would local properties be utterly overwhelmed but a significant blot on Edinburgh's landscape will emerge, visible from across the city including the UNESCO World Heritage Site – once again in complete contradiction to local plans to preserve view corridors.

In my mind there can be no doubt that the building of this plant would significantly undermine further residential and commercial development in the area and have a detrimental impact on tourism – undoing a great deal of work and undermining public and private investment over several years.

For these reasons an overwhelming majority of residents and local businesses are fundamentally opposed to the location of the plant – and justifiably so.

Scottish Government Policy

In my view, it is also abundantly clear that the Forth Energy proposals run contrary to Scottish Government policy on biomass.

I would refer you in particular to the “Draft Electricity Generation Policy Statement 2010” which states: “The Scottish Government would prefer to see biomass deployed in heat-only or combined heat and power schemes, off gas-grid, at a scale appropriate to make best use of both the available heat, and of local supply”. The document also sets out the reasoning behind that policy. The government aims for 11% of heat to be generated from renewables by 2020. Use of biomass is one of the important ways that this heat target can be met – but supply of biomass is not without limits. Therefore to use biomass for generating electricity only would be to waste massive amounts of heat energy potential and represent a very inefficient use of resources. The larger the scale of the plant, the less likely it is that a developer will be able to utilise the heat for local supply. And using biomass for off-grid schemes means the highest carbon savings are made because it will likely be displacing oil or coal generated heat. I am in full support of this policy.

The proposed biomass plant at Leith is quite simply the opposite of what Scottish Government policy envisages for biomass. The Leith plant would be large scale, on-grid, and the use of heat energy is nothing but a vague aspiration.

On that last point, it is important that this application is recognised as being in reality concerned with electricity only. Shortly after news of the proposals emerged, I met with Forth Energy. It was quite clear that little thought had been given as to how to

utilise the heat that would be produced by the plant. Subsequently, the company has sought to retrieve the situation by going through the motions of including some potential for harnessing heat. But the plans are vague, entirely uncosted and completely meaningless. To my mind their inclusion simply reflected a growing realisation at Forth Energy that the Scottish Government's developing policy would tend to preclude a large electricity-only plant. Quite simply, there are no credible plans relating to how such heat can be distributed locally. Provision for heat should be central to a project of this nature – not an afterthought.

More generally, it is far from clear that the existence of such a plant will contribute in a meaningful way to Scottish Government climate change targets, notwithstanding the significant public subsidy that it could potentially attract. The plant will of course emit carbon as biomass is burned, and the claimed carbon re-capture from planting and growing replacement crops would take decades to realise. Indeed, doubts over the extent of carbon savings claimed for large biomass electricity plants has led to a Scottish Government review of whether this type of plant should attract public funding under the renewables obligations scheme. To my mind there are far better uses of public money that could contribute much more immediately to tackling climate change.

A plant of this scale would in addition create serious problems for the wood panel, sawmill and related forest industries. I have received representations from the Wood Panel Industries Federation and have been thoroughly persuaded by them. I understand that they will be writing to you separately.

It is absolutely clear that the overwhelming majority of residents living in the vicinity of the site of the proposed plant are against this proposal. This was true when I carried out a consultation in March of 2010 when well over a hundred residents contacted me to make their opposition to the plant clear, with only a handful in support. I'm sure that opposition to the plant has grown and hardened since that time and that this will be reflected in the number of objections lodged to the proposals.

Yours sincerely,

Shirley-Anne Somerville MSP