Grangemouth Community Council’s position is broadly supportive of the Scottish Government’s policies in pursuit of a renewable energy future for our nation.

We do feel however that it is important to be clear on what is defined as a renewable source. Our definition would be:

“A naturally recurring force of nature capable of being harnessed by man to produce energy”

Examples of that would include wind, wave, solar and tidal sources.

We would contend that the harvesting of wood products on an industrial scale for the purposes of energy production falls well short of being defined as a renewable source.

We also have concerns that the proposed replacement of the harvested wood with so called fast growing alternatives may have significant environmental justice implications; in terms of land use and habitat impact and population movement. This we feel runs contrary to the Scottish Governments stated aims of ensuring climate justice in pursuit of a sustainable energy future.

http://www.scotland.gov.uk/News/Releases/2012/03/climate-justice01032012

With regard to the specific proposals submitted by Forth Energy for the Port of Grangemouth currently the subject of a Public Inquiry; we have a clear mandate from our constituents to object to what is proposed. 986 individual objections from members of the public were submitted to the Energy Consents Division of the Scottish Government and none of support.

Reasons for objection were as follows:

**Sustainability**

We see no sustainability or for that matter any degree of future power security in these proposals. How can it be sustainable to grow, harvest and process biomass overseas, then transport it around the world in an effort to improve Scotland’s carbon footprint.

If all the proposed new biomass power plants in Scotland were to be granted planning permission they would consume an estimated 4,226,300 oven dried tonnes of wood per year. That equates to five times the amount of wood available domestically for use across all industries as estimated by the Wood Fuel Task Force. We would contend that this clearly runs counter to the Scottish Governments own stated policy for biomass on an appropriate scale.
Visual Impact
The location and scale of the proposed structures associated with these proposals will have a dominant presence close to the commercial centre of our community and more significantly a residential area. The applicant seeks to mitigate this impact by making reference to existing industrial structures on the basis that their proposals will have “no significant impact” on the current situation. We disagree; the existing industrial structures referred to tend to be on the urban fringes of our community and in the main not a visible presence for the majority of the community. The proposed development will create a wholly new industrial facade.

Air Quality
Grangemouth is a designated air quality managed area (AQMA); this is not a badge to be worn with pride but recognition that action is required to improve air quality in order to prevent damage to the health of local residents. The applicant in their submission acknowledges the situation and again seeks to make the case that the impact of their proposals will have “no significant impact”. We do not agree; the cumulative effect of emissions from the proposed plant and other existing industrial plants surrounding the community is bound to have an effect that can only undermine efforts to improve local air quality.

In response to a question by a member of this committee to the Minister for the Environment and Climate Change; it has been revealed that since the AQMA was put in place in November 2005 until February 2012 there have been 761 exceedances of the Sulphur Dioxide (SO2) 15 minute mean objective measured across the three monitoring sites within our community. This figure has to be set against an objective of 35 exceedances per annum. It is also worthy of note that this situation has occurred despite the oversight of SEPA. The point that we would seek to make is that despite assertions that there will be “no significant impact” and reliance on the regulatory authorities to safeguard the health and wellbeing of the community there are no guarantees.

Proposals of the type and scale proposed by Forth Energy at Grangemouth create a number of difficulties for the Community Council.

In the first instance the scale of the proposals requires a Section 36 application under the Electricity Act 1989. The application also includes a deemed planning consent. This requires any parties wishing to comment on the proposals to communicate with both the Scottish Government Energy Consents Division and the local planning authority.

The volume of information and its technical nature has to be read and understood in order to make meaningful comments and or objections. Given that in the main community councils are populated by laymen and women we feel that additional provision should be made to facilitate access to expert independent opinion.

Applicants will often quote one or other regulatory authority as having ratified their proposals or that the regulatory authority will manage perceived risk or environmental impact. While we would not want to malign the relevant regulatory authorities and their efforts to protect our communities however it is a sad fact of life
that mistakes are made or understanding of the impacts are not fully appreciated. We would not have to look too far to find examples.

Lack of community council resources can negatively impact on equity of the decision making process. Applicants such as Forth Energy have access to what would appear limitless resource to present and defend their proposals against objections. The community council’s access to funding is limited to an annual grant from the local authority the sum being determined by the population numbers it represents in our case circa £1k.

Applicants are required by the planning system to enter into community engagement as part of the application process. We recognise the value of this; however the interpretation put on the outcomes from that engagement can be misrepresented to imply community acceptance from a very low sample.

Our experience of wind turbine applications has been limited to a single application in 2007 located within the scope of an adjacent community council. The application was for a single turbine producing 2 MW from a 125 Metres high unit. We objected on the grounds of visual impact. The scale of the proposal within the greater urban area in a location surrounded by flat terrain had in our opinion a disproportionate impact. The application was initially refused but that decision was overturned on appeal. To date there has been no evidence to suggest that the applicant is preparing to install the proposed turbine.

Walter Inglis (Convener)
12 April 2012