

## **Text from the Standard Response Objection Letter**

I wish the previous objections, that have still not been answered by Helius, to still be considered as very valid reasons against proceeding with the plans as currently presented. I feel that Helius have failed to come up with a project that has demonstrated any direct benefit to the local people of Southampton, especially those living in the immediate vicinity. I also feel Helius have failed to hold acceptable public consultation on their project as many of the answers to questions requested and/or then asked of them throughout the extended consultation process have either being omitted, deferred or just plain ignored by Helius throughout their consultation period.

### Inadequate Public Consultation

As the latest proposal is a continuation of previous rounds of consultation all faults with the previous consultation stages still remain. Residents questions haven't been answered and the information we requested after the first public consultations has still not been given to us after this latest round of exhibitions. The new round has focused purely on the project siting, layout and external appearance. The new information was initially released via the press with many local residents getting their first knowledge of the new appearance and scheme details via the local newspaper.

The residents concerns with regard frequency, timings and locations of the public meetings, as advised by the No Southampton Biomass group, were totally ignored by Helius and as such there is a real worry certain members of the public would not have had adequate chance to attend and question Helius in person – although even then, as the residents that have asked questions have discovered, many are not then satisfactorily addressed by Helius.

At both rounds of public consultation the information residents want to know has not been included on the exhibition boards and Helius' representatives have not always been able to answer questions put to them with regard to the boards. The latest round had a complete lack of detailed knowledge on any aspect of public concern. The inadequately detailed slides from the first consultation period, such as transport and noise reports, were not improved on but removed completely from this latest round of exhibitions. How could we see the changes the new site and layout have bought? No shadow projections or study documents were available to see, just a summary on a small part of a single board mentioning 30 minute periods. There was no information on how long the footpath and cycle way alongside Millbrook dual carriageway would be shadowed or any mitigation steps that may be needed here for pedestrian and cyclists safety despite the request that No Southampton Biomass made to Southampton City Council and Helius "We are also concerned over winter shadows. These could affect both Millbrook dual carriageway and local homes. It would be good if Helius could be asked to provide a light survey/calculation showing the extent of overshadowing that would be caused throughout the seasons."

There was an inability to reject any of the 3 designs as not good enough. At all points we are being asked to say which of 3 designs we prefer. Helius failed to

offer the chance to say none of the above and implied we had to select a favourite. In the non technical consultation document it even says in section 2.28

*Feedback received on each of the three design approaches will inform the selection by the company of a single architectural approach for inclusion within the submitted application.*

This is not a consultation but a railroading from day one!

An important point with regard large scale fires at the site was agreed by SCC as something that should be covered by the public exhibitions. The Council replied to Helius “that details of how an operator would deal with unexpected large scale fires are included at the public consultation events” – this information was not then covered by Helius in enough/any detail and the only response given to residents was it wouldn’t catch on fire. Residents rightly wish to know that in a worst case scenario the plans are indeed adequate to prevent a public health concern or danger to our homes that lie just 250m from the site.

#### Still too large and still too close

Despite claims of a project that is 2000 square metres smaller it is still too large and will be visible for miles. We are also not given details anywhere on the exhibition boards or project website that states the new overall size so we can put the so called 2000 square metre reduction in to context. The size of the emission stack has not reduced and the main boiler house is still a massive development within just 250m of residents homes.

The layout has been designed to offer clear views on the static photo points. What they fail to show via 180 degree images or alternative camera angled shots is the impact of turning your line of site even a few degrees. This massive development will still block many views of the port and will be an impeding blot on the landscape.

There is currently a draft Hampshire Waste & Mineral Policy being considered that will specifically state this site is unsuitable for large scale development unless demonstrated appropriate for the area. Helius have yet to display any “local” benefits to the residents living within the site only causing issues that will alter our lives and lead to mitigation to overcome problems ie TV signal strength/additional environmental lighting or deterioration of our everyday lives ie air pollution/noise pollution/visual impact.

#### Emissions – Damaging Effect on Air Quality

A key concern is that of risk to health. Emissions from burning biomass, in particular small (PM 2.5, PM10) particulate matter, are well known to cause serious health problems. Even small increases in irritant pollutant gases, including nitrogen dioxide, can cause respiratory disease in otherwise healthy people and can be potentially deadly to those already vulnerable, which includes children and old people. There are a number of schools and nurseries in close proximity of the proposed site. Even small amounts of

dioxins and heavy metals (possible emissions from burning chemically treated wood) can cause cancer and birth defects. This is an unacceptable health risk to the local population. Of particular concern to the breast cancer community regarding Biomass power stations is the release of toxic chemicals including dioxin and polycyclic aromatic hydrocarbons into the air in communities already experiencing needlessly high rates of breast cancer. There would also be fallout from the power station potentially spreading ash across a vast area of Southampton including Southampton common which is a site of Special Scientific Interest. Within the technical document habitat management of this site is discussed yet Helius have yet to conduct the research that details what this may be. How can we be adequately consulted when Helius can't answer simple questions such as what habitat management could be needed due to their pollution.

Helius have provided even less information on air pollution at this latest exhibition with a single board saying all impact is negligible. This does not address the community's need or even Southampton City Council's call for Exhibitions to focus on public safety. There is no detailed information on the actual level of pollution that will occur across the city and especially in an already failing air quality area adjacent to the planned site where any increase in pollution can not be considered acceptable when we have the choice not to increase it further. There is also no information on the air quality during the construction phase and what this 3 year period could mean for local residents.

#### Increased Traffic – Congestion & Pollution

Although a large percentage of fuel is expected to come in by sea, there will inevitably be a significant increase in HGV movements locally, through residential and commercial areas and close to schools and public areas, to bring in supplementary fuel, and to remove ash. Helius' application glosses lightly over (and probably underestimates) these but even with their own figures, a maximum of 4 HGVs per hour, over a 24 hour/365 day operating period equates to over 35,000 HGV trips per year. This brings with it an unacceptable increase in traffic congestion in an already congested urban area, along with a guaranteed increase in atmospheric pollution and carbon emissions. This is likely to get worse over time, as the issue of fuel security and sustainability arises, making it more likely that fuels of various types may be sourced more locally. Already Millbrook Road is an Air Quality Management Area which was extended in 2010 due to the site not meeting Air Quality objectives because of the high levels of Nitrogen Dioxide (NO<sup>2</sup>). Therefore allowing further high polluting development on this scale within the area would exacerbate the situation and is simply wrong. Helius even state an adverse affect during construction with regards nitrogen dioxide and as this period could be as long as 3 years local residents should not be exposed to this further pollution for their health and well being.

#### Marine Ecology & Noise

Further proof of an inadequate consultation exists as the new plans appear to now only use air cooled condensers – this is a major change in the proposed operation of the plant and yet this formed no part of the public exhibition boards so residents, who aren't power station experts, have no idea of any of

the impacts of the plant no longer discharging process water. On the plus side our waterside ecology now seems safe from Helius. However, questions have now been raised in terms of the additional noise these external cooling fans will produce. As Helius failed to show an updated noise board to show the affect of these cooling fans residents have no idea of the likely noise impact from them. Noise from the docks is already a sensitive issue for many residents.

#### Sustainability/Fuel Security

All earlier concerns on sustainability have still not been answered by Helius. The evidence suggests that biomass harvesting is causing direct and indirect damage in the countries it is sourced, despite meeting current legislation as sustainably sourced. Even the likes of the RSPB has raised these concerns in their report Bioenergy: A Burning Issue.

#### Carbon Footprint & Climate Change

It is highly misleading to claim that the proposed plant is 'carbon neutral' or offers carbon savings. Burning biomass creates an immediate release of CO<sub>2</sub>, like any other carbon based fuel. Burning biomass actually releases more carbon, per unit of useful energy generated, than burning gas or oil. This means that every biomass plant creates a 'carbon debt' that is only paid off after many decades (estimated at 40-100 years) as replanted trees reach maturity (if trees are replanted). Evidence from around the world indicates that old forests are often not replaced 'like for like', but with plantations of fast-growing 'cash crops', so the long term damage to the planet and to biodiversity is potentially very extreme.

So as well as threatening the health and well-being of local residents, the proposed development will not help the UK to meet targets for reduced carbon emissions by 2030 or even 2050 and is damaging to the planet.

Helius public exhibition board even includes this line "The burning of fossil fuels is widely considered to be a key contributor to these temperature increases" this is completely inaccurate as it is the CO<sub>2</sub> released from the burning of fossil fuels – the very same CO<sub>2</sub> Helius will be releasing.

The consensus of the scientific community is a ceiling of a 2 degree rise in global temperature averages. As such any short term increase in CO<sub>2</sub>, regardless of historic or currently stored CO<sub>2</sub> is adding to the climate change affect Helius purport to be so concerned about.

#### The lack of CHP

Although Helius state that the scheme will be CHP ready, they would only proceed with this if a commercial opportunity to supply heat or steam emerged. Their report does not state if they have approached any potential customers and whether or not local residents would receive any benefits. At present there is no district heating infrastructure, there are no binding contracts, and details of how the supply of heat would be achieved (and paid for) are vague and lacking in detail.

Helius only now plan to investigate this further once the plant has been approved. This seems like nothing more than a nod to CHP and the reality is the company has no intention of ever implementing this aspect within their project themselves.

Summary

In summary, this proposed development is still wholly inappropriate.

I call on you to reject it outright. Please acknowledge receipt of this email and add my details as a concerned party for future communications.

I wish this objection to be registered and permit its publication.