

DR. CAROLINE LUCAS

Green Party
for the South East of England

Mr Chris Butler
Case Officer - Development & Transport Division
Regeneration & Development Directorate
Medway Council
Compass Centre
Chatham ME4 4YH

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Dear Chris,

I am writing with reference to EON's planning application to construct two advanced supercritical coal-fired generating units at Kingsnorth. Please ensure that my objections to this application are placed on record and conveyed to the relevant Council members and staff.

Britain is committed to cutting CO2 emissions by 30% by 2020, in part through reducing demand for energy alongside investment in low and zero carbon technologies. We must deliver these reductions if we are to meet our obligations under the Kyoto framework - and the Green Party argues that even these are not sufficient to avert catastrophic climate change. The proposed development at Kingsnorth undermines the Kyoto target and its means of delivery, producing 4.5 million tonnes of CO2 per annum, which is equivalent to more than 5% of Britain's 30% goal. It is essentially a 'business as usual' proposition that will lock Medway Council into a long-term contract and remove any incentive to encourage energy efficiency amongst consumers.

Kent is ideally placed to benefit from wind, tidal and biomass energy generation; renewable solutions that can all deliver energy security and new employment opportunities. The EU has a target for 20% of its power to be generated renewably by 2020 and the UK is currently struggling to meet its share of the commitment. Replacing the existing power plant at Kingsnorth is a good opportunity to invest in renewables and make progress towards the EU target. EON's application is also based on centralised and wasteful power generation. Renewable technology is well suited to decentralisation, an approach that helps to cut the amount of energy lost through the national grid, as well as encourages individuals to become more energy efficient through a closer relationship with energy generation.

Furthermore, coal fired generation is a highly carbon intensive form of energy generation. The proposed development at Kingsnorth may well be slightly more efficient than the existing plant but it relies on dated technology that does not match the efficiency improvements of EON's facilities in other parts of Europe.

Even some in the oil industry are now openly acknowledging that we are rapidly approaching the point at which global oil production peaks, and thereafter declines. As demand for oil outstrips supply, costs will rocket - we have already seen significant price increases this year - and this will have a knock on effect on the price of coal. It is ludicrous to be investing in a technology that relies on finite and costly fossil fuels, when renewable alternatives exist that make use of free and infinite raw materials. The Energy White Paper makes the case that guaranteeing energy supply must be a twin priority, alongside reducing the impact of energy generation and usage on the climate, yet this application will neither offer security of supply nor any substantial CO2 savings compared to the existing plant or non-coal based alternatives.

The timing of this proposal is worrying on two major counts. Firstly, if granted planning permission the plant would become operational in 2012, yet this timescale coincides with a crucial period in terms of CO2 emissions. The IPCC state that the levels of CO2 emissions required to trigger a rise in global temperature of more than 2 degrees above pre-industrialised levels could be reached in the next 8-10 years. Such a rise would be triggered by atmospheric CO2 concentrations above about 400 parts per million (ppm). Given

that recent annual increases stand at 2ppm and the current levels are 380ppm, the threshold for a 2 degree global temperature increase could be dangerously close if we do not control emissions urgently.

The other timing element of concern is that the EU is aiming for coal powered energy generation to have near-zero CO2 emissions from 2020. The European Union's own communication of January 2007 states:

The expectations of higher costs associated with CCS-equipped power plants after 2020 give rise to a tangible risk. This is the risk of a "non-CCS technology lock-in" as the result of ill-considered investment decisions with respect to the coal-fired capacity due for replacement in the coming 10-15 years. It is imperative to avoid a situation where much of the new build before 2020 is undertaken in a way that would either preclude or insufficiently guarantee the addition of CCS components on a sufficiently wide scale after 2020.

Any carbon capture and storage elements of the EON proposal at Kingsnorth are projected to come on stream before 2015, so will not benefit fully from the EU's programme of developing best practice. It is also likely that the EU will set new binding targets for coal fired power stations. Given that the existing facility could continue to operate for up to 25 years, the timing of EON's planning application suggests that they hope to avoid having to meet expected improvements in technical standards.

I stress, we are at a crucial stage in the battle to control rising atmospheric temperatures and it is foolhardy to even be considering a scheme that will squander so many opportunities to reduce our carbon footprint.

Medway Council also risks setting a dangerous precedent if it does not object to the planning application for Kingsnorth. It will send out a message to EON and other utilities companies that the government's commitment to reducing CO2 emissions is worthless and that a leading council in the South East, one of the regions likely to be worst affected by climate change, is not committed to playing its part.

When considering the need to replace capacity, I would argue that the first consideration must be what measures are in place to reduce demand. Then carbon neutral sources of power should be given priority, followed by state of the art plant if there is no other option. EON's proposal does not appear to have been developed in this context and I would urge Medway Council to formally object to what is an ill thought through application that fails to deliver either energy security or urgent CO2 reductions.

Thank you for your attention and I look forward to learning the outcome of the meeting on November 21st, when I understand this matter will be discussed.

Yours sincerely,



Caroline Lucas - Green Party MEP for South East England.