APP/NR/2 - VOL1

PEEL ENVIRONMENTAL MANAGEMENT UK LTD AND BILSTHORPE WASTE LTD

BILSTHORPE ENERGY CENTRE

PUBLIC INQUIRY UNDER SECTION 77 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) INTO THE PROPOSED DEVELOPMENT OF AN ENERGY FROM WASTE FACILITY ON LAND AT BILSTHORPE BUSINESS PARK, BILSTHORPE, NOTTINGHAMSHIRE

PINS REFERENCE: APP/L3055/V/14/3007886
LPA REFERENCE: ES/2950

PROOF OF EVIDENCE OF NICHOLAS ROBERTS

PLANNING POLICY AND RELATED PLANNING MATTERS

APPENDICES - VOLUME 1

Appendices A-I and N-X

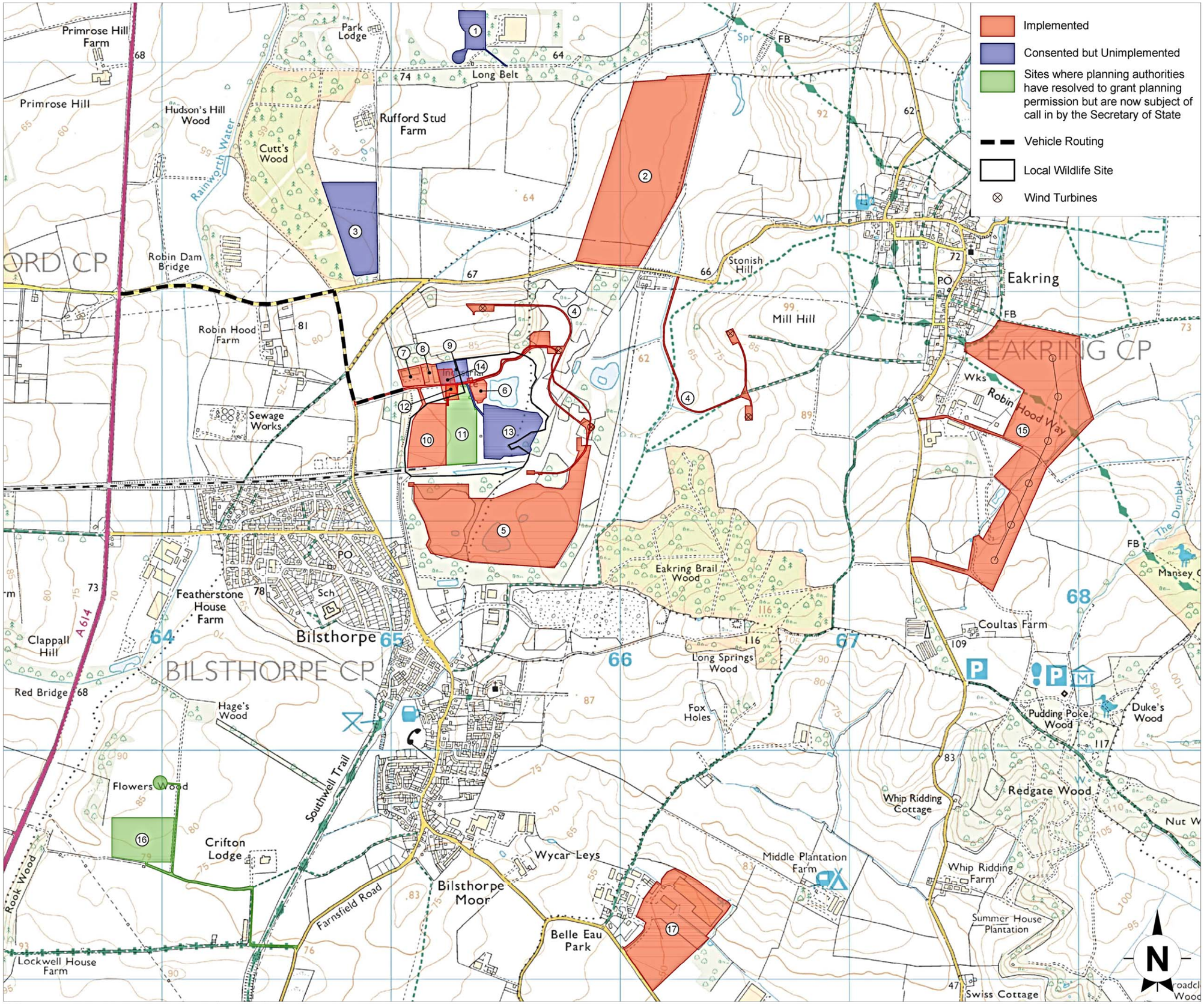
October 2015

APPENDICES

APPENDICES – These are bound separately in 2 volumes. The first contains Appendices A-I and N-X. The second contains the Submitted Written Statements in Appendices J-L.

APP/NR/2 – A	Plan showing development projects in and around Bilsthorpe Business Park
APP/NR/2 – B	Batsworthy Cross Judgement
APP/NR/2 – C	Extracts from the Government Review of Waste Policy in England (Defra, 14 June 2011)
APP/NR/2 – D	Extracts from the National Policy Statement (NPS) for Energy EN-3 (DECC, July 2011)
APP/NR/2 – E	Extracts from the UK Renewable Energy Strategy (DECC, 15 July 2009)
APP/NR/2 – F	Extracts from The UK Biomass Strategy (Defra, May 2007)
APP/NR/2 – G	Extract from The UK Low Carbon Transition Plan (HM Government, 15 July 2009)
APP/NR/2 – H	Extracts from Severnside Energy Recovery Facility (SERC) recovered appeal decision (Reference: APP/P0119/A/10/2140199)
APP/NR/2 – I	Extracts from the Secretary of State's Decision (19 May 2011) and Inspector's Report (3 March 2011) in relation to the Cornwall EfW inquiry (Reference: APP/D0840/A/09/2113075)
APP/NR/2 – J	Written Statement by Mr Robert Sutton in respect of Heritage Matters
APP/NR/2 – K	Written Statement by Mr Jon Mason in respect of Landscape and Visual Matters
APP/NR/2 – L	Written Statement by Mr Dean Kettlewell in respect of Noise and Vibration Matters
APP/NR/2 – M	Written Statement by Mr Jon Mason in respect of Landscape and Visual Matters
APP/NR/2 – N	Severn Trent Water BEC Sewer Capacity Assessment
APP/NR/2 – O	Extracts from Rookery South Resource Recovery Facility IPC Panel's Decision and Statement of Reasons (IPC Reference EN0100011)

APP/NR/2 – P	Extracts from the Secretary of State's Decision (26 May 2011) and Inspector's Report (17 March 2011) in relation to the Rufford ERF inquiry (Reference: APP/L3055/V/09/2102006)
APP/NR/2 – Q	Plan showing the location of the former Sherwood Forest Special Landscape Area
APP/NR/2 – R	Extracts from the Inspector's Report (10 January 2012) in relation to the Battlefield EfW inquiry (Reference: APP/L3245/A/11/2146219)
APP/NR/2 – S	Extract from Inspector's Report (26 February 2013) in relation to the Kings Lynn EfW inquiry (Reference: APP/X2600/V/12/2183389)
APP/NR/2 – T	Extracts from the Secretary of State's Decision (15 December 2010) and Inspector's Report (2010) in relation to the Ardley EfW inquiry (Reference: APP/U3100/A/09/2119454)
APP/NR/2 – U	Extracts from the Secretary of State's Decision (20 July 2012) and Inspector's Report (24 February 2012) in relation to the Middlewich EfW inquiry (Reference: APP/R0660/A/10/2129865 and APP/R0660/A/10/2142388)
APP/NR/2 – V	Extract from the Reporter's appeal decision notice (29 November 2012) in relation to Invergordon residual waste to energy facility inquiry (Reference: PPA-270-2017-1)
APP/NR/2 – W	Cabinet Office Press Release in respect of Air Products TV2 Power Purchase Agreement
APP/NR/2 – X	Applicant's appraisal of UKWIN's supplementary representation in respect of the Lock Street appeal decision



Peel Environmental Management UK Ltd

1. Stud Farm AD Facility 09/01455/CMA, 10/0063/OMA and 13/00983/CMA
2. Solar Farm, Land to North of Eakring Road 14/00839/FULM
3. Solar Farm, Field Reference 3753 15/00083/FULM
4. Wind Turbines 05/02799/FULM and 07/02799/FULM with non-material amendments
5. Solar Farm 12/01594/FULM and 14/01283/FULM
6. Alkane compound 08/01695/CMA & 13/01405/CMA
7. Phase 1 04/02627/RMAM
8. Phase 2 05/00866/RMAM
9. Phase 3 06/00535/FULM
10. Highways Depot 08/00709/FULM and 11/00078/FULR3M
11. BEC
12. Temporary Stockpiling and Screening of Red Shale 12/01699/FULR3N
13. Removal of Colliery Spoil 14/00976/CMA
14. Temporary Storage of Coal & Red Shale 12/00503/CMA
15. Erection of 6 T-pylons & Overhead Lines 13/00117/FULM
16. Featherstone Horse Farm Wind Turbine and Solar Farm - Application reference 13/00893/FUL - call in reference App/38030/V/15/3129889
17. 14/01782/FULM Erection of 26,000sqm B8 floorspace, 1,500sqm of ancillary B1 floorspace and a 2.2ha solar farm. 15/01135/FULM Variation of Conditions attached to 14/01782/FULM

Bilsthorpe Energy Centre

Figure PI 1.1

Planning History, Local Wildlife Site and Vehicle Routing

Scale	Date
NTS	August 2015

Neutral Citation Number: [2013] EWHC 1138 (Admin)

Case No: CO/12831/2012

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
ADMINISTRATIVE COURT

Bristol Civil Justice Centre
2 Redcliffe Street
Bristol BS1 6GR

Date: 09/05/2013

Before :

MR JUSTICE KENNETH PARKER

- -

Between :

ANITA COLMAN	**Claimant**
- and -	
SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT	**First Defendant**
- and -	
NORTH DEVON DISTRICT COUNCIL	**Second Defendant**
- and -	
RWE NPOWER RENEWABLES LIMITED	**Third Defendant**

- -
- -

David Cocks QC and Zack Simons (instructed by **Richard Buxton**) for the **Claimant**
Richard Honey (instructed by **The Treasury Solicitor**) for the **First Defendant**
John Litton QC (instructed by **Burges Salmon**) for the **Third Defendant**

Hearing dates: 19 April 2013

- -

Judgment

Mr Justice Kenneth Parker :

Introduction

1. This is a claim under section 288 of the Town and Country Planning Act 1990. The Claimant, Anita Colman, seeks the quashing of the decision of the Inspector, Mr R W N Grantham BSc(Hons) MRSC MCIWEM, appointed by the Secretary of State for Communities and Local Government, the First Defendant, contained in a decision dated 22 October 2012. The Inspector held an inquiry over 15 days from June to September 2012 and undertook both accompanied and unaccompanied site visits.

2. The Inspector granted planning permission for the construction of nine wind turbines of 103m in height to blade tip on land at Batsworthy Cross, Knowstone, North Devon.

> resources and its ecological, recreational and archaeological value."

22. These policies are, in my view, on their own express terms very far removed from the "cost/benefit" approach of the NPPF. The policies as such do not permit any countervailing economic or similar benefit to be weighed in the scales. A submission that such benefits may be implicitly taken into account would be immediately rejected as running directly contrary to both the language and rationale of the relevant policies. Mr Cocks QC sought to meet this formidable objection by submitting that such benefits, recognised as central to the NPPF, would always constitute a "material consideration" relevant to the grant of development permission, and should, therefore, be "read into" the relevant policies.

23. I reject that argument on two grounds. First, the NPPF in referring to "relevant policies" is plainly directing the mind of the decision maker to the express terms of the relevant policies and requiring the decision maker to compare, for consistency, the express terms with the "cost/benefit" approach of the NPPF. Secondly, and perhaps more importantly, it is a fundamental and long established principle of planning law that something identified as a "material consideration" (such as the putative economic and environmental benefit in the present context) is conceptually distinct from considerations identified in the development plan and does not *ceteris paribus* carry the same weight as an aim or consideration identified in the development plan itself. It is, therefore, essential, both analytically and in policy terms, to separate objectives or considerations specifically set out in the development plan from something else that can count only as another "material consideration". Mr Cocks' argument confounds elements that fall within different relevant categories, and which have a different character for planning purposes, and it cannot rescue the inconsistency that is obvious on its face between the relevant policies and the NPPF.

24. For these reasons I conclude that the Inspector properly directed his mind in the present context to the relevant policies and correctly analysed the inconsistency between those policies and the NPPF.

B. Historic Buildings and Ancient Monuments (Cultural Heritage)

25. SP policy CO7 is as follows:

> "**Historic Settlements and Buildings**
>
> The quality of Devon's historic environment should be conserved and enhanced. In providing for new development particular care should be taken to preserve the historic character of settlements, the character and appearance of conservation areas, the historic character of the landscape, listed or other buildings of historic interest and their settings and parks and gardens of special historic interest and their settings." (My emphasis)

26. LP policy ENV17 is as follows:

> "**Policy ENV17 (listed buildings)**

Government Review of Waste Policy in England 2011

- With increased trust in energy from waste and innovative incentives, recovery infrastructure is generally accepted, and industry and communities make use of energy from waste to routinely meet a proportion of their energy and waste management needs.

Renewable energy from waste

213 In 2009/10, 13.6% of local authority collected waste was used for energy recovery and 46.9% was landfilled. Figures from the 2010 survey of commercial and industrial (C&I) waste arisings in England show that while 52% of C&I waste was recycled, re-used or composted, only 2% was incinerated with energy recovery.

214 Energy recovery is an excellent use of many wastes that cannot be recycled and could otherwise go to landfill. It can contribute secure, renewable energy to UK demand for transport, heat, biomethane and electricity and is generally the best source of feedstocks for UK bio-energy needs. Our horizon scanning work up to 2020, and beyond to 2030 and 2050 indicates that even with the expected improvements in prevention, re-use and recycling, sufficient residual waste feedstock will be available through diversion from landfill to support significant growth in this area, without conflicting with the drive to move waste further up the hierarchy. Maximising the potential for growth in continuous generation available from energy from waste will require both better use of the available residual waste and development of high efficiency flexible infrastructure.

215 Based on the capacity forecast published in support of the 2010 Spending Review assessment of waste PFI, waste derived renewable electricity from thermal combustion in England is calculated to grow from the current 1.2TWh to between 3.1TWh and 3.6TWh by 2020, depending on how much of the solid recovered fuel produced is utilised in the UK. Similarly it is projected that sufficient food waste will be available to help deliver the Government's ambition for sustained growth in anaerobic digestion.

216 The potential for deploying more efficient electricity generation could further enhance the renewable energy derived from this waste. Better use of heat, both directly and through continued growth in the market for refuse derived fuels going to industrial Combined Heat and Power users will also play an important part in ensuring that we extract the maximum value from residual waste. The introduction of the Renewable Heat Incentive (RHI) is expected to bring forward an increase in the combined and dedicated generation of renewable heat from waste as well as production of biogas for heat production and the injection of biomethane into the gas grid.

217 Research indicates that when used for heat, biomethane generated from residual wastes could produce greenhouse gas savings of between 66% and 92% compared to natural gas[14]. Waste provides a potentially valuable source of biomethane through number of technologies including anaerobic digestion, gasification and pyrolysis. Similarly transport biofuels from waste can deliver higher lifecycle greenhouse gas savings and have good sustainability characteristics compared to crop-based biofuels.

218 The Government recognises that many of the technologies required to deliver more complex forms of energy recovery such as biomethane are less mature than other forms of energy recovery, with technical challenges to overcome, and the consequential difficulties associated with

14 Analysis of the Greenhouse Gas Emissions for Thermochemical BioSNG Production and Use in the UK-E4 Tech ñ June 2010- see Appendix J† (weblink: http://www.nnfcc.co.uk/metadot/index.pl?id=10772;isa=DBRow;op=show;dbview_id=2539)

DEPARTMENT OF ENERGY & CLIMATE CHANGE

National Policy Statement for Renewable Energy Infrastructure (EN-3)

Planning for new energy infrastructure

July 2011

2.5.9 EfW generating stations take fuel that would otherwise be sent to landfill. Waste can come from municipal or commercial and industrial sources. Some of the waste suitable for such plant may comprise biodegradable waste as described in the third bullet point of 2.5.5. This may also include solid recovered fuel (SRF) from waste. Where the proposed fuel is a prepared fuel, such as SRF, conformity of the waste / biomass with the waste hierarchy may have been considered by the Waste Authority from which the feedstock originated as part of their assessment of their waste management solution. The IPC should take account of any assessment in considering the application.

2.5.10 A proportion of the biodegradable waste may be classed as "renewable" for the purposes of Renewable Obligation Certificates (ROCs)[10] eligibility. However, this is not an issue of relevance to the IPC.

Combustion plant types and scale

2.5.11 Waste and biomass combustion plant covered by this NPS may include a range of different combustion technologies, including grate combustion, fluidised bed combustion, gasification and pyrolysis. The IPC should not be concerned about the type of technology used. However all types of technology will need to adhere to the policy set out below.

2.5.12 The fuel throughput capacity of the combustion plant considered by the IPC may vary widely depending on composition, calorific value and availability of fuel.

2.5.13 Throughput volumes are not, in themselves, a factor in IPC decision-making as there are no specific minimum or maximum fuel throughput limits for different technologies or levels of electricity generation. This is a matter for the applicant. However the increase in traffic volumes, any change in air quality, and any other adverse impacts as a result of the increase in throughput should be considered by the IPC in accordance with this NPS and balanced against the net benefits of the combustion of waste and biomass as described in paragraph 2.5.2 above and in Section 3.4 of EN-1.

Nature of applications

2.5.14 A waste/biomass combustion plant proposal is likely to consist of the following:

- a main combustion plant building incorporating emissions abatement technologies, electricity generation units, a cooling assembly (variety of types and methods) and chimney stack(s);
- buildings necessary for fuel reception, storage, sorting and pre-treatment facilities; and
- ancillary plant such as an electricity substation, civil engineering workshops and offices.

2.5.15 Some development proposals may also incorporate additional features such as waste transfer facilities.

10 Definition of biomass in the Renewable Obligation Order 2009.

Biomass/Waste Impacts – Air quality and emissions

Introduction

2.5.37 Generic air emissions impacts other than CO_2 are covered in Section 5.2 of EN-1. In addition there are specific considerations which apply to biomass/waste combustion plant as set out below.

2.5.38 CO_2 emissions may be a significant adverse impact of biomass/waste combustion plant. Although an ES on air emissions will include an assessment of CO_2 emissions, the policies set out in Section 2.2 of EN-1 will apply. The IPC does not, therefore need to assess individual applications in terms of carbon emissions against carbon budgets and this section does not address CO_2 emissions or any Emissions Performance Standard that may apply to plant.

2.5.39 In addition to the air quality legislation referred to in EN-1 the Waste Incineration Directive (WID) is also relevant to waste combustion plant. It sets out specific emission limit values for waste combustion plants.

Applicant's assessment

2.5.40 The applicant's EIA should include an assessment of the air emissions resulting from the proposed infrastructure and demonstrate compliance with the relevant regulations (see Section 5.2 of EN-1).

IPC decision making

2.5.41 Compliance with the WID and the Large Combustion Plant Directive[13] (LCPD) is enforced through the environmental permitting regime regulated by the Environment Agency (EA). Plants not meeting the requirements of the WID and/or LCPD would not be granted a permit to operate. The IPC should refer to the policy in Section 4.10 of EN-1 relating to other regimes.

2.5.42 The pollutants of concern arising from the combustion of waste and biomass include NO_x[14], SO_x[15], particulates and CO_2. In addition emissions of heavy metals, dioxins and furans are a consideration for waste combustion generating stations but limited by the WID and regulated by the EA.

2.5.43 Where a proposed waste combustion generating station meets the requirements of WID and will not exceed the local air quality standards, the IPC should not regard the proposed waste generating station as having adverse impacts on health.

2.5.44 Similarly, where a proposed biomass combustion generating station meets the requirements of LCPD and will not exceed the local air quality standards, the IPC should not regard the proposed biomass infrastructure as having adverse impacts on health.

13 Large Combustion Plant Directive 2001/80/EC can be found at: http://eur-lex.europa.eu/LexUriServ/site/en/oj/2001/l_309/l_30920011127en00010021.pdf

14 Oxides of nitrogen.

15 Sulphur oxides.

HM Government

The UK Renewable Energy Strategy

Building Britain's Future

ACT ON CO2

4.121 Our analysis suggests that using biomass to generate heat and electricity is a cost-effective way to meet the 2020 renewable energy target. Furthermore, when sourced sustainably, biomass, whether used to produce heat, electricity or biofuels, can make a significant contribution to our greenhouse gas targets and support wider sustainable development objectives at home and abroad. Our analysis indicates that around 30% of the UK renewable energy target could come from bioenergy for heat and power, rising to around 50% if biofuels for transport are included. In addition, it can provide the feedstock for a wide range of sustainable low carbon renewable materials and products.[96]

4.122 The policies set out here aim to build on existing efforts to increase the production of sustainable biomass in the UK and support the expansion of the biomass supply chain, in ways consistent with our energy and climate change objectives. This effort relies on our long-term financial support frameworks – the Renewables Obligation, the new Renewable Heat Incentive and Feed-In Tariffs, and the Renewable Transport Fuel Obligation (see Chapter 3). But it also requires us to address the key issues influencing the increased exploitation of bioenergy, in particular:

- Increasing supply;
- Ensuring sustainability;
- Enabling the use of bioenergy;
- Identifying new applications and sectors for bioenergy.

96 The Government is promoting this through the UK Biomass Strategy (including the revised Non-Food Crops Strategy Action plan) Defra/DTI/DfT (2007): 'UK Biomass Strategy'

same land area as current energy crops. It will also provide scientific data on hydrology, carbon balance, economic viability and possible environmental risks, such as the impact on landscape and biodiversity.

Figure 4.6:
A field of miscanthus

4.130 **Waste:** Waste biomass is an under-used resource which could provide a significant contribution to our renewable energy targets and reduce the total amount of waste that is landfilled in the UK. We estimate that 6 million tonnes of waste wood and 9 million tonnes of waste food are currently landfilled each year. Strenuous efforts are being made to minimise this waste – for example by improving the way date labelling on food communicates information about food safety to consumers – but it is clear that a supply of waste food and wood will exist for the foreseeable future.

4.131 Currently 6 TWh of heat and power is generated from biomass municipal solid waste collected by Local Authorities, and about 18 TWh from landfill gas.[103] If all the food and wood waste sent to landfill were used for energy it would generate 42 TWh, or approximately 18% of our renewable energy target.[104] Responses to

103 We expect the amount of energy generated from landfill gas to fall over time as the available landfill sites are used. The figures for current energy use are from BERR (2008): 'Digest of United Kingdom Energy Statistics 2008', Table 7.6.

104 Analysis for the Government's Waste Strategy for England set out that the most effective use of most biomass waste is to generate energy (via anaerobic digestion for wet food waste, and combustion (even over recycling) for contaminated waste wood). The biomass element of solid recovered fuel (SRF) also counts towards our renewable energy targets. Defra (2007): 'Waste Strategy for England 2007'.

intended that **revised guidance will be produced in 2010 and will include updated information on biomass technology.**

4.176 The Task Force also identified the need to increase and improve the information on biomass fuels and applications included in the guidance relating to Part L of the Regulations (covering the conservation of fuel and power). In response, the latest revision of the 2008 Heating Compliance Guidelines for domestic buildings for Part L includes updated information on using a wide range of biomass fuels, together with better information on biomass application in Combined Heat and Power and district heating.

4.177 Further details of these activities are set out in the final progress report on the implementation of the Government Response to the Biomass Task Force published in June 2009.[123]

4.178 **The Government will consult on the updates to part L and changes to part J of the building regulations this summer, with changes coming into force in 2010.**

Encouraging more energy infrastructure able to use biomass waste

4.179 The lack of combustion plants compliant with the Waste Incineration Directive (WID) and anaerobic digestion infrastructure acts as a barrier to fully exploiting biomass waste for energy. All combustion plant must be compliant with the WID before it can use waste as a fuel.

4.180 The 2009 Budget announced a **£10 million funding package which will go towards new composting and anaerobic digestion facilities**, which will eventually be able to process over 300,000 tonnes of additional food waste every year. This is in addition to the £10 million already earmarked in 2008 to build demonstration plants.

4.181 We are also aware that the public do not fully perceive the benefits of energy from waste plants. This was reinforced by responses to the Renewable Energy Strategy consultation. **We are therefore producing a toolkit for Local Authorities to help them communicate more effectively on issues of concern to the general public.**

4.182 To help Local Authorities meet European targets on landfill, the Government extended the Private Finance Initiative (PFI) programme to support Local Authorities investment in alternative waste treatment and disposal infrastructure, including WID-compliant power plant. To date, the waste PFI programme has over 40 projects at various stages of conception, construction and operation involving a range of technologies.

123 DECC (2009): 'Progress Report on Implementation of the Government Response to the Biomass Task Force Report'

4.183 At the end of 2008, following the Renewable Energy Strategy consultation, we asked Local Authorities to take waste wood into consideration when applying for waste PFI credits. The result was that many of have now included plans for a WID compliant Combined Heat and Power plant. Waste wood from these Local Authorities will therefore be used for energy generation.

4.184 We also intend to:

- Enable online determination of the energy content from the biomass fraction of a mixed waste stream (e.g. solid recovered fuel) by encouraging the development of the science behind this process. This will enable energy from waste plants with Combined Heat and Power (CHP) to obtain the appropriate level of ROCs (and in the future, the RHI) more easily. **By April 2010, Defra will report on progress on designing equipment and methodologies to enable the biomass content of solid recovered fuel to be determined cost-effectively**.
- Develop a grant scheme to encourage the use of solid recovered fuel in industrial scale CHP facilities. We are in the process of seeking State Aids approval for this grant to provide time-limited support to help increase renewable heat capacity prior to the start of the RHI in April 2011. **If State Aids approval is granted, Defra will implement a Solid Recovered Fuel grant scheme by 1 April 2010.**

Box 4.9: Case study: Greater Manchester Waste Disposal Authority

In April 2009, Greater Manchester Waste Disposal Authority (GMWDA) signed a 25-year Private Finance Initiative waste and recycling contract with the Viridor Laing consortium to construct waste recycling, treatment and disposal facilities and provide a fully integrated solution for the 1.3 million tonnes of municipal waste which the Authority handles each year. The contract is worth £3.8 billion and is the UK's first such project on this scale.

The contract will incorporate 43 facilities and use a range of technologies new to the UK including Mechanical Biological Treatment with Anaerobic Digestion; a Materials Recovery Facility; and Combined Heat and Power, while also increasing and upgrading Greater Manchester's network of 25 Household Waste Recycling Centres.

Instead of being landfilled, residual waste that cannot be recycled will be processed into a Solid Recovered Fuel ('SRF') for use by INEOS Chlor, a major chemicals producer, to provide energy and steam for its plant at Runcorn, Cheshire. The fuel will feed a new Combined Heat and Power plant which will produce enough energy to provide around 12% of the Company's total energy needs which are currently generated from fossil fuels. It is anticipated that further supplies of SRF will be secured from other waste disposal authorities, which will increase this figure to around 25%, helping to secure the future of the one of the North West's largest chemical companies. INEOS is currently one of the UK's biggest single gas customers and use around 0.6% of the UK total gas demand – equivalent to the amount of energy used by a city the size of Liverpool.

Subject to meeting good quality efficiency criteria, the Combined Heat and Power plant should benefit from the banded Renewables Obligation, which came into effect on 1 April 2009; and from enhanced capital allowances for eligible equipment used for the combustion of SRF.

Through this contract, GMWDA's nine constituent District Councils will divert more than 75% of waste away from landfill and raise the Councils' municipal waste recycling from 30% today to over 50% by 2015.

Using biofuels in transport

4.185 The use of biofuels in vehicles is subject to technical constraints associated with both the vehicles and infrastructure. Vehicle manufacturers will currently only warranty vehicles sold in Europe to run on a blend of 5% biofuel by volume due to concerns that higher levels would affect vehicle reliability and performance. Although the blending limit is due to be increased to 10% by volume for bioethanol in petrol and 7% for the biofuel content of diesel, the lower energy content of biofuels means that around a maximum of 6.5% biofuel by energy will be able to be used in standard vehicles. This will make it difficult to meet the 10% transport energy target.

UK Biomass Strategy

May 2007

dti

Department for Transport

defra

Department for Environment Food and Rural Affairs