

ABERDEEN CITY COUNCIL

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COMMITTEE	Zero Waste Management Sub Committee
DATE	12 May 2016
DIRECTOR	Pete Leonard
TITLE OF REPORT	<b>Zero Waste Project: Energy from Waste Update</b>
REPORT NUMBER	ZWM/16/7630
CHECKLIST COMPLETED	Yes

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**1. PURPOSE OF REPORT**

The purpose of this report is to update the Committee on the progress of the East Tullos Energy from Waste Project.

**2. RECOMMENDATIONS**

The Zero Waste Management Sub-Committee:

1. Notes the report.
2. Invites the Project Director to attend the next Zero Waste Sub-committee meeting.

**3. FINANCIAL IMPLICATIONS**

No new financial implications arise from this report.

**4. OTHER IMPLICATIONS**

Legal. Specialist legal support is being provided to ensure the development of the Inter-Authority Agreement is undertaken in accordance with best practice and minimizes risk to the Council.

Resource. The Council has allocated capital resource for the purchase of the site in East Tullos and to manage the procurement of an EfW contractor; Inter Authority Agreement 1 provides for the costs of applying for planning permission to be shared between Aberdeen City, Aberdeenshire and the Moray Councils.

Personnel. The Waste and Recycling Service are providing the technical lead to the project, the Finance team also provides the Finance lead. The Procurement and Commercial service are providing

project and legal support and the Asset management team are managing the purchase of the land. Sustainability and environmental. The Zero Waste Project will deliver substantial advances in sustainability and environmental performance.

## **5. BACKGROUND/ MAIN ISSUES**

### **5.1 Joint Working on Energy from Waste**

5.1.1 Aberdeen City, Aberdeenshire and The Moray Councils continue to work on the development a joint Energy from Waste (EfW) solution for the management of non-recyclable waste.

5.1.2 On 16<sup>th</sup> December 2015, Aberdeen City Council agreed to enter into an Inter-Authority Agreement (IAA) with the other authorities that established a commitment of funds for the period to summer 2016 for the preparation of a more detailed, longer-term IAA to cover the procurement phase. In addition, advisors have been appointed for the next phase; PWC on financial matters and DWF for legal issues. Linda Ovens has been appointed as Project Director and is now developing a work programme to get the three authorities to the position of making decisions on whether to proceed with IAA2. Linda will be supported by Heather Martin from the Procurement and Commercial Service as interim Project Manager.

5.1.3 A Project Board has been established with one appointment from each Authority. Supporting the Board an interim project team has been established with Aberdeen City Council providing Technical and Financial leads whilst Aberdeenshire provides Legal support. It is anticipated that a Technical Advisor will have been appointed by the time committee considers this report. Officers across the three authorities are developing common positions in relation to contract structure and procurement strategy that will inform the development of a second stage IAA. This agreement will authorise commencement of the procurement process and put in place mechanisms for cost sharing.

5.1.3 A further element of the governance structure for the project is the establishment of an elected member steering group. This group recently met on 13 April 2016 in Inverurie. The group oversees the development of the project and provides feedback and advice to the Project Board and Team. The meeting received two project updates outlining the progress made to date and the main issues facing the project in the coming months.

5.1.4 The key workstream facing the team is determination of the form of procurement and consequent operation of the facility. There are two main routes being considered, firstly a 'standard' design, build and long term operation contract and a second option of a design and build contract leading to operation of the facilities by the Councils themselves. Each option has costs, benefits and risks and work over the summer will focus on balancing these issues for the best interests of the three authorities.

## **5.2 East Tullos Energy from Waste Planning Application**

5.2.1 A planning application was submitted by Aberdeen City Council in early March to develop an approx. 150,000 tonnes per annum energy from waste facility on the former gas storage site on Greenbank Crescent, Aberdeen. See Appendix 1 for details of location and design. The application includes an Environmental Statement and various Impact Assessments addressing a wide range of potential impacts. Key factors raised through the consultation process were:

1. Traffic impact, especially the potential to increase congestion and safety issues on Wellington Road
2. Over-development in the south of the city
3. Torry is the 'dumping ground of Aberdeen', why here?
4. There is a history of bad neighbours, why would this be any different?
5. Lack of trust in the City Council and SEPA as the regulator
6. Scepticism that the Council will deliver a heat system to benefit local people
7. Concern about impact on air quality and health, both generally across the south of the city but also around the current Air Quality Management Area at the north end of Wellington Road

5.2.2 The detailed Impact Assessments address the traffic, health and air quality issues as well as other concerns such as odour, visual impact and site selection. The Council considers all the issues raised are managed through good design and appropriate mitigation measures incorporated in the proposals such that no significant adverse effects will arise from the proposal.

5.2.3 In relation to issues surrounding confidence in the Council and SEPA, officers have consulted widely on the project and continue to work with the Stakeholder Group to prepare and provide detailed information addressing concerns. A visit was arranged in March to a comparable Energy from Waste facility in Lincoln, England. Seven Community Council members and a representative from Aberdeen Friends of the Earth attended and saw a 150,000 tonnes per year facility in its second year of

operation. The site was clean, odour free and has an exemplary operating track record to date. Emissions control has been effective with no requirement for the Environment Agency to take action against the site since it opened. Monitoring, both on and off-site, demonstrates that there are no adverse effects on the community or environment and the Stakeholder Group met with local residents who also made it clear that they were very happy with the operation of the facility.

5.2.4 A further visit was arranged for late-April to Lerwick, Shetland to see the District Heating system in the town that is fuelled by the island's energy from waste plant. It is hoped that continued engagement and provision of real-life experiences elsewhere will increase knowledge and understanding of how energy from waste facilities can be beneficial to communities and do not represent a threat or inflict harm on local residents.

5.2.5 The period for public representations in relation to the planning application has now closed; it is anticipated that the Planning Service will make an initial report to the Planning Committee requesting that a Planning Hearing is established as a result of the Council having a significant interest in the application and because of the anticipated level of public interest. Determination of the application is still expected to be in the autumn of 2016.

5.2.6 A template letter of objection and leaflet have been circulating in the Torry and surrounding area. These raise a number of issues; a copy of each of these documents and commentary on the issues is attached in Appendix 2.

## **6. IMPACT**

### **Improving Customer Experience –**

A key customer benefit of the joint working will be the provision of the most cost-effective waste management solution for city residents. In addition, the development will facilitate the provision of low and stable cost heat and power to up to 25,000 households.

### **Improving Staff Experience –**

The proposal will provide clean, spacious and indoor disposal facilities for Council refuse collection crews. The Council's contractor will also benefit from improved office and welfare facilities compared to those currently in place.

### **Improving our use of Resources –**

Development of the East Tullos EfW facility will enable the Council minimize the amount of waste sent to landfill, thereby reducing costs and mitigating the cost pressures on the service.

**Corporate -**

This project links to the Smarter Environment theme of Aberdeen – the Smarter City vision and is a key outcome from the Aberdeen City Waste Strategy. The project enables the Council to comply with its statutory obligations to collect recycling from all households.

**Public –**

AN EHRIA has been completed during the formulation of the Aberdeen City Waste Strategy. The recycling service that will be enabled by the Altens East facility will ensure that all households across the city get equal access to recycling services, addressing the current inequitable level of service delivery.

**7. MANAGEMENT OF RISK**

No new risks have emerged in relation to this update report

**8. BACKGROUND PAPERS**

Appendix 1. Images of EfW Facility

Appendix 2. Template Letter/Leaflet and Council Commentary

**9. REPORT AUTHOR DETAILS**

Peter Lawrence

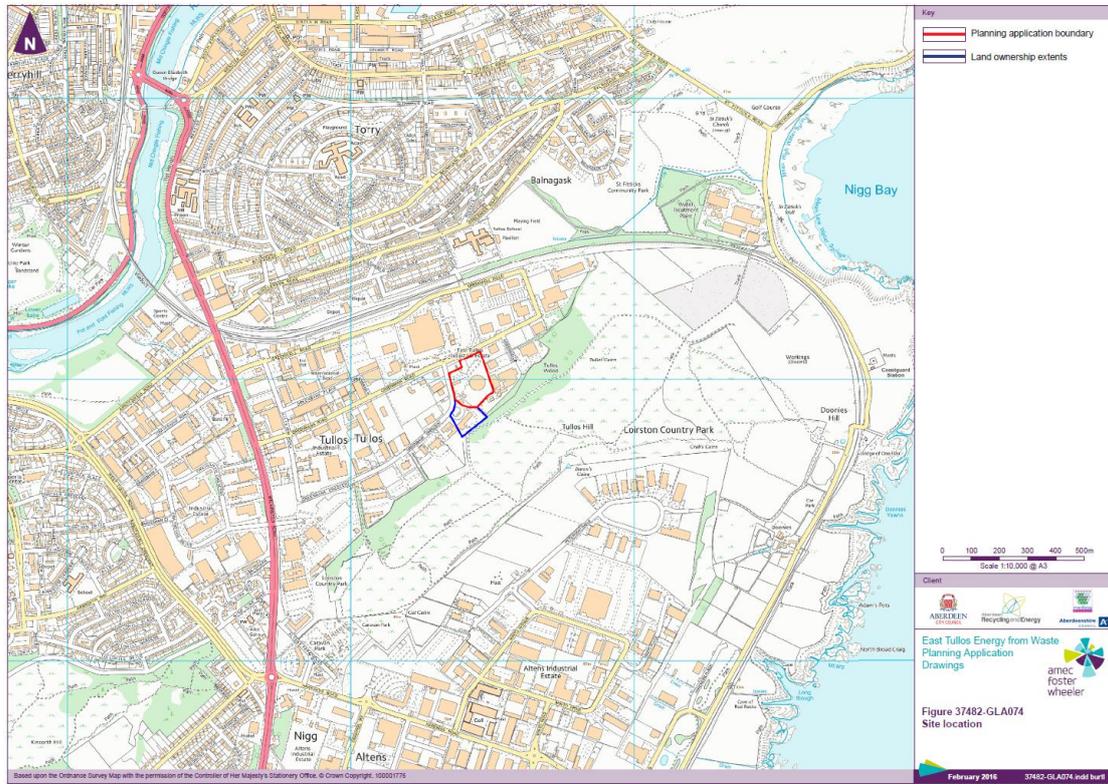
Waste and Recycling Manager

[PLawrence@aberdeencity.gov.uk](mailto:PLawrence@aberdeencity.gov.uk)

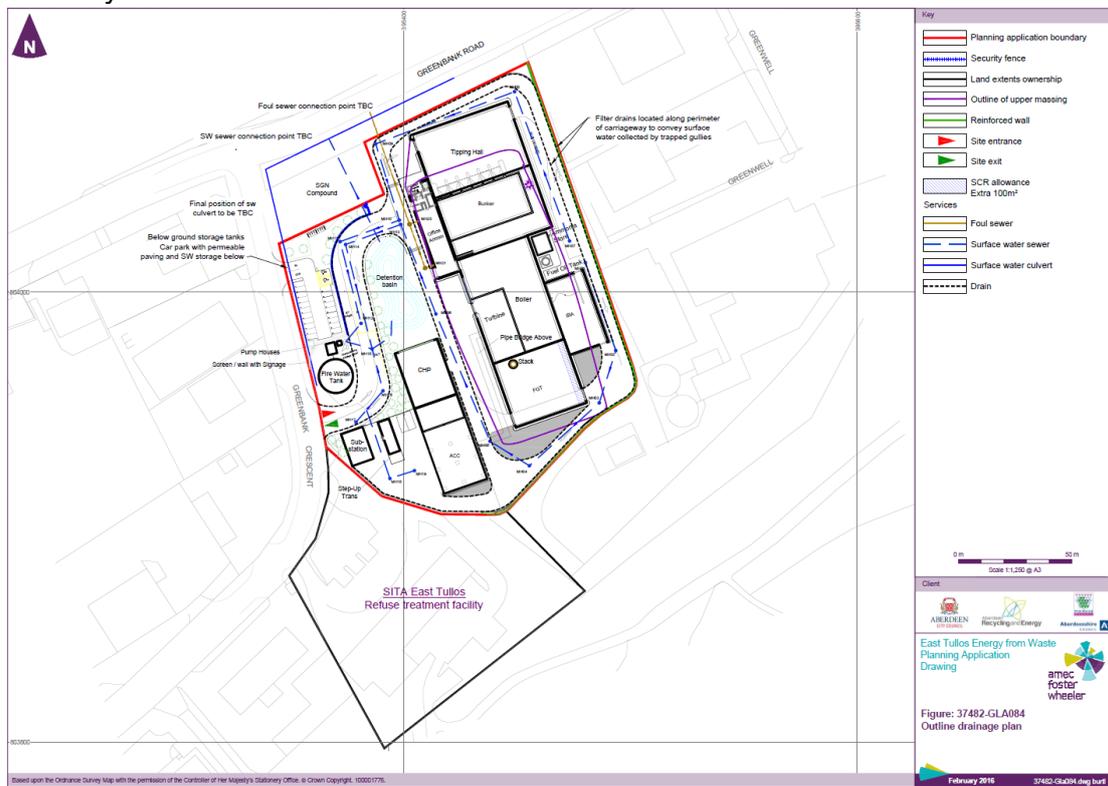
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# Appendix 1. Energy from Waste Plant Location and Visual Impressions

## Site Location



## Site Layout



## Night Study from St Fitticks Church



# APPENDIX 2

## Incinerator Update



**Threat of an incinerator is being planned near Tullos Primary - the incinerator is to burn all three North East's councils waste.**

City Council bureaucrats admit to Councillors that burning waste is their plan due to planned EU laws and the City Council's poor waste practise.

This time Council bureaucrats are calling the incinerator plan *Energy from waste (EfW)*; the bureaucrats plan (for now) is to opt for burning household waste while other waste material maybe burnt at the East Tullos site for potentially 40+ years.

**No safety guarantee:** David Fryer reported back to Torry Community Council and said that he had asked for assurances that the incinerator plant is safe - to date, no assurances had been given by the council.

**Planned site is not the first choice:**

Council documents show that the site near East Tullos Primary was joint second with five other sites. One other site scoring highest of all for the potential incinerator location.

## Protect Torry Protect Aberdeen

Was planning criteria written to make Torry yet again a dumping ground?

If, and its a big if, the incinerator was needed, why in the event of a leak is it in an urban area - would it not be safer in away from many peoples homes? Perhaps at a rural business park? SEPA report emissions can travel 15Km+.

**No business case** - Torry Resident Simon McLean says: "...I've read documents supplied by the Council and obtained more data, visited the council's choice of incinerator in Lincolnshire - why didn't we get to visit the EfW plant in Runcorn? I hear in Runcorn, local people there are in a legal battle over health concerns. Aberdeen city council plans seem more about money and less about Aberdeen resident's welfare or the environment - burning instead of recycling is not green..."



**Plan B?** Focus is on building an incinerator while not calling it an incinerator. Mr McLean says, that he has not seen evidence of alternative plans that would be more energy efficient, safer and less of a financial risk to people or the cash strapped council. - was this not considered; why an incinerator?

**What will they burn?**  
Sweden and Germany are importing waste in to their countries to fuel their incinerators as they have much higher recycling rates. Its alleged that Aberdeen city council plan to send household waste to Europe to be burnt while they wait to build an incinerator.

If Grampian, improves its recycling - council bureaucrats plan to burn commercial waste and bio-fuels!



**Yet More traffic:** Over 200 HGV trips are anticipated per week. Application is for 24hrs a day deliveries. The report claims traffic not to be significant - can we afford to keep adding to our already busy road network?

No guarantee Torry and elsewhere in the City wont feel the further effect of these lorries in our neighbourhoods.

Traffic accident plan focus' on a small area (3 roads) - what about all the pupils walking to the poorly planned & questionable replacement school for Torry Academy?

The current Torry Academy school is not planned to get energy from the plant as the school's site may not be for educational purposes anymore... Is more traffic coming? What's been planned?

## Time is running out - 13.04.2016:

Planning objections need to be in before April 13th. A draft letter of objection is available to send to the planning authority (Aberdeen city council) NB the applicant is also Aberdeen City Council.

**What can you do to stop the Incinerator plan. (easy steps)**

1. Send an email to: [cleanairnoincinerators@gmail.com](mailto:cleanairnoincinerators@gmail.com)  
We will email back a draft planning objection letter to you.

No internet? Use a local Library, to print off or email your objection to the Council (see below)

2. Fill in the blanks and send to: [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)

or post a paper copy to:

Development management, Communities, Housing and Infrastructure, Aberdeen City Council, Business Hub 4, Marischal College, Broad Street, Aberdeen AB101AB

Please note a few local Torry shops have draft letters for you to fill in there.

Thank you, and the best of luck.

**Follow on Facebook:**  
*No to the incinerator on our doorstep*

### Thoughts on the incinerator:

Experts said DDT, asbestos and thalidomide were safe.

Its unclear who pays for this energy source alleged to be for homes the pipes / heat exchangers.

Creating a more industrial site in our communities has adverse affects on health, and education.

### History repeating?

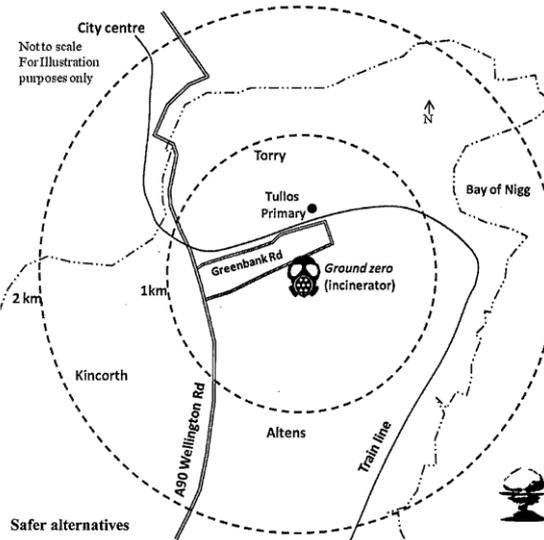


Waste water Treatment plant

- Residents Shown something new and shiny
- Aberdeen gets something different and managed different
- Questionable regulation
- Millions reported to be spent tackling the 'Torry Pong'

**Regulators**  
SEPA  
City Council

•Residents Shown something new and shiny, (Lincolnshire 2016)...



### Safer alternatives

Areas of Australia changed their waste practise, decades ago increasing recycling / reducing packaging working with & legislating for business to do their bit

The result is much better than being offered here in Aberdeen.

There are better solutions.

### Case study:

**New, Runcorn incinerator (EfW)**

Alleged to have had a Chemical Leak:

16 casualties admitted themselves, causing a lock down of the hospital's accident and emergency department as staff dealt with the decontamination.

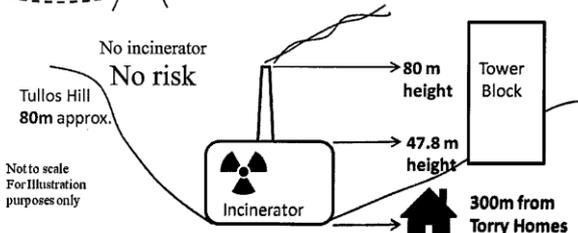
Further alleged hundreds of local resident are involved in a legal case due to the incinerator.

House prices reported to have fallen

### Things can go wrong

**No incinerator  
No risk**

**Emission range - 15km**  
(could reach: Balmadie, Dyce Airport, Westhill, Peterculter and Newtonhill)



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Development Management  
Communities, Housing and Infrastructure  
Aberdeen City Council  
Business Hub 4, Marischal College  
Broad Street  
ABERDEEN AB10 1AB

Date:.....

Dear Sir,

**Application Reference P160276, proposed Incinerator (EfW), Torry, Aberdeen.**

I wish to object to the above application on the following grounds: -

- A This planned incinerator is contrary to the overarching national policy for zero-waste, will lead to increases in carbon footprints and contribute to climate change
- B This planned incinerator will be damaging to the environment, be a loss of amenity, and damaging to the health and wellbeing of communities
- C The long term financial implications of building this incinerator are flawed and could add to future debt that the council tax payers of Aberdeen will have to pay

In more detail, my concerns are

- 1 The proposal to incinerate waste rather than address the source of waste materials is the wrong priority and is contrary to policy R3 of the present LDP. Attention should be given to reuse and recycling of finite materials. This proposal can only lead to lower levels of recycling of many materials as they would be incinerated rather than reused.
- 2 The proposal to incinerate waste in one building from all of the North-East is contrary to Policy NE 10 and will lower of air quality in this area of Aberdeen which has a high concentration of odour creating industrial activities that use an over-stretched and inadequate network of roads.
- 3 The enormous size and design of this major proposal is contrary to Policies D1, and D6 will add to traffic congestion and air-polluting diesel exhaust fumes near and on routes leading to this proposed site in and around Torry which is known to have its own micro-climate. Baseline data used to support the planning application is flawed as the data used is taken from Dyce (7miles away). It is a well-known and established fact that temperature inversion is a North-East Coastal phenomenon creating a micro-climate in Torry that traps gases and odours
- 4. The proposed development of the site does not comply with Policy CF1 of the current LDP and can only adversely affect the health and mental wellbeing of the residents of Torry whose lives have been blighted over decades by serious odours from fish factories and the sewage works. The proposed site for this huge incinerator at the foot of the Gramps is too close to many thousands of family homes and one of the local primary schools. Enforcement action by the statutory regulators, SEPA and the City Council over the last 15 years proved totally inadequate to help communities when the sewage treatment works failed consistently with the repugnant odours affecting Torry and nearby communities

The building of this incinerator at the foot of the Gramps can only make Torry a dumping ground for the waste of the North East of Scotland. By reason of the clear deviation from National and Local Policy, and to meet local health and social needs of the local communities, I appeal to the Planning Committee and the City Council to refuse this application to build an incinerator next to Torry

Yours sincerely,

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## Comments on EfW leaflet and template objection letter

A leaflet and a template objection form have been circulated in the Torry area in recent weeks. The following provides a briefing on the Council's commentary on the issues raised:

### Template Letter

The letter contains the following objections to the planning application to develop an Energy from Waste (EfW) facility in East Tullos.

**Objection A:** The proposal is contrary to overarching national policy for Zero Waste, will lead to increases in carbon footprints and contribute to climate change:

**Commentary:** The proposal is in line with the Scottish Government's Zero Waste Policy. The Scottish Government Vision for Zero Waste is:

'This vision describes a Scotland where resource use is minimised, valuable resources are not disposed of in landfills, and most waste is sorted into separate streams for reprocessing, leaving only limited amounts of waste to go to residual waste treatment, including energy from waste facilities.'

This recognises that high efficiency EfW has a limited role to play in ensuring that value is obtained from all waste streams, including 'when they reach the end of their life'. This facility is designed to accept only non-recyclable materials left over after extensive reduction, reuse and recycling activities have been undertaken and sized on the basis that significant further improvements in recycling will be achieved prior to it commencing operations. The Councils will continue to pursue increased recycling and reduced waste production thereafter.

Diverting non-recyclable waste from landfill makes a significant contribution to the reduction in carbon emissions (and therefore minimising climate change impacts). Landfilling household waste results in the uncontrolled release of methane. Methane is a greenhouse gas and 23 times worse for the atmosphere than carbon dioxide. Furthermore, a significant proportion of waste burned in the EfW is from renewable sources thereby contributing to renewable energy targets and displacing fossil fuels currently used for heat and electricity production.

**Objection B:** The proposal will be damaging to the environment, a loss of amenity and damaging to the health and well-being of communities

**Commentary:** Environment. The planning application and the Environmental Statement (ES) reporting on the Environmental Impact Assessment (EIA) includes a range of assessments that demonstrate that there will be no significant adverse effects from the proposal. The air quality assessment shows that as a result of design mitigations, including adopting enhanced nitrogen dioxide abatement systems, there will be no demonstrable adverse impact on any of the 40+ receiver points modelled. SEPA will

scrutinise this assessment and we are confident they will come to the same conclusion. An odour impact assessment has also been undertaken and, as with many other examples from across the UK and Europe, it demonstrates that EfW facilities do not have adverse odour impacts arising from operations. Indeed, the management plan takes account of both normal operation and also how odour is contained during shutdowns. All operations are undertaken within buildings and the waste reception area and bunker have air extracted and fed into the furnace chamber in order to prevent odour release.

Amenity. It is unclear from the letter what element of amenity is considered to be lost, however, the site is currently brownfield within an industrial estate, derelict, occupied by large disused gas holder and secured. As a result the existing site holds no recreational or other public amenity value. A visual impact assessment has been undertaken and, as a result of the high quality design, it is considered to have a positive impact on visual amenity in the area.

Health and well being. The Health Impact Assessment also demonstrates that there will be no adverse impact on health arising from the EfW facility. The study considers the most extreme possible circumstances, for example individuals living near the plant their whole life and emissions from the plant being at the maximum permitted levels for the whole of that period, and concludes that exposure to harmful materials would be at such low levels as to be undetectable or well below levels where adverse health impacts can be foreseen. Experience from many similar facilities across the UK and Europe is such that no adverse health impacts relating to the energy from waste process have been identified.

**Objection C:** Long term financial implications are flawed.

**Commentary:** No detail is provided to support this assertion, therefore it is difficult to address. The three authorities have undertaken independent business cases that demonstrate that by taking the resolution of residual waste management into their own hands and dealing with their waste locally, this will not only secure the best value solution in a 'post-landfill' world but also minimise the risks of management of residual waste over a 25 year timeframe. Furthermore, the benefits of electricity and heat generation will be felt directly by the local communities and, in the case of heat, by householders and businesses in south Aberdeen.

### **Further Comments**

The letter makes reference to policies within the adopted local development plan (LDP) and takes no account of those included in the proposed Local Development Plan (pLDP) currently being examined by Scottish Government. This pLDP is a material planning consideration and must be taken into account by the planning authority. As detailed within the submitted Planning Statement, the proposals comply with both the LDP and the pLDP. Notwithstanding this, the following is an analysis of the claims made in reference to specific policies in the adopted LDP:

### **Policy R3 - New Waste Management Facilities**

The three authorities through published business cases have demonstrated that this proposal is the best solution to a regional requirement for the management of waste (Point 2 in the policy). Accepting that a single facility is the best solution, the best way to minimise transport across the region is to locate the facility closest to the largest concentration of waste arising (in and around Aberdeen). The site in East Tullos meets this criterion; potential localised impact arising from additional traffic is dealt with in other parts of this Commentary.

### **Policy NE10 - Air Quality**

The proposal complies with policy NE-10 as it will not result in detrimental impact on air quality as appropriate design mitigations have been incorporated in order to reduce effects to negligible. An air quality impact assessment is included in the application (a requirement of the policy) and demonstrates that there will be no significant adverse impacts on air quality arising from this development. The assessment follows the requirements set by SEPA and considers the potential impacts on over 40 receptor points in south Aberdeen and beyond. Two separate air dispersion models have been run for the proposal with emissions set at the maximum levels permissible under European legislation. EfW plants typically operate at levels much lower than the emissions limits in order to ensure that these are not breached, as a result even in the worst case scenario, the plant will not have adverse air quality impacts.

### **Policy D1 - Architecture and Placemaking**

The revised D1 policy in the pLDP varies quite considerably from the existing policy and it is considered that the design proposed complies with the requirement of both the LDP and the pLDP policy. The proposal addresses the requirements of D1 in that the full scope of the design assessment has been agreed with the Planning Authority. The design has evolved following consultation with the community and the design team at Aberdeen City Council's planning service. The design addresses requirements of high standard of design, requirements of distinctiveness taking account of function and context, and enhancement to site and setting.

### **Policy D6 – Landscape**

This policy requires development proposals not to: result in significant adverse effects on landscape character or sense of place; obstruct important views of Aberdeen's townscape; adversely affect recreational or woodland resources; result in urban sprawl; and to avoid significant adverse impacts on landscape elements "*which contribute to local amenity*".

In relation to D6, the proposal has been subject to a landscape and visual impact assessment and whilst it is evidently a large structure it does not

directly impact on important views of the city landscape. It will not result in significant adverse landscape effects nor will it result in significant adverse impact on landscape elements which contribute to local amenity or a sense of place. The surrounding terrain and urban landscape assists in minimising the impact on skylines from the development. The proposals also comply with revised pLDP policy D6.

**Traffic Congestion.** This section of the letter also refers to traffic congestion arising from the development. A traffic statement and impact assessment have been produced that demonstrates a net increase in traffic at the busiest time of 9 vehicles per hour on a road that typically experiences over 1200 vehicle movements per hour. Indeed, daily weekday variation on the road can be as much as 200 vehicles per hour, meaning that the projected change will be barely detectable within the natural fluctuations in traffic numbers. There will be a small number of additional HGVs accessing the site from the south. These will bring the waste from Aberdeenshire and Moray Councils, however this will be no more than 2/hour on average.

It should also be noted that the application takes no account of the current waste-related activity in East Tullos/Wellington Road where Aberdeen City Council already delivers approx. 30,000 tonnes per year into the existing Waste Transfer Station adjacent to the proposed EfW site, all of this material is then taken out of the site in articulated heavy goods vehicles. These HGVs currently drive north along Wellington Road and through the two Air Quality Management Areas (north Wellington Road and Market Street). This proposal takes away that requirement. These considerations have not been taken into the assessment presented in this proposal meaning that the worst case scenario has been applied and that this does not demonstrate any significant impact on traffic flows on Wellington Road.

The adoption of vehicles with significantly lower emission standards to those currently in operation (driven by European legislation) means that whilst there may be some additional Aberdeen City Council refuse vehicles passing through the Air Quality Management zone at the north end of Wellington Road, there is unlikely to be any increase in overall emissions. It should also be noted that many large or heavy goods vehicle movements will be directed south from East Tullos to the Western Peripheral Route and therefore will not pass through the area designated as having air quality issues.

**Meteorology.** Reference is also made to meteorological issues. The baseline meteorological data is indeed gathered at Dyce, however, this is then used to populate models that take account of known meteorological conditions and effects associated with the local landforms (e.g. Tullos Hill to the south and the coast). The assessment is as comprehensive as possible and undertaken to the highest possible standards. It will, of course, be subject to detailed scrutiny by specialists at SEPA who are best equipped to make judgements on this matter.

The letter makes reference the 'temperature inversion' effect. This phenomenon has been modelled and it is evident that any inversion will

actually reduce the likelihood of emissions reaching ground level close to the site. The height of the stack and buoyancy of gases as they leave the stack at a higher temperature means that they will be higher than any inversion likely to occur in this locality. As a result, the boundary effect caused by the inversion then allows emissions to disperse at a higher level.

Reference has also been made locally to the haar, a coastal effect that often results in low cloud forming along the coast. The theory underlying dispersion modelling states that the maximum impact from a high stack on ground level air quality occurs during unstable, weather conditions when portions of the plume can be drawn towards ground level due to strong vertical turbulence. The haar is a phenomenon that only occurs in stable conditions, similar to the inversion layer effect described above and as such the same premise applies, air quality at ground level is less likely to be affected during haar conditions than when there is turbulent airflow.

### **Policy CF1 – Existing Community Sites and Facilities**

The letter refers to development on existing Community Sites and Facilities, however the proposal is not on such a site, indeed there are no new community sites or facilities located in the south of Aberdeen. It is not clear therefore how this is relevant to the application. The letter refers to concern about potential impacts on residential homes and schools in the south of the city. These impacts are listed as being health and odour related; these have been considered in specific impact assessments in the planning application and no detrimental impacts have been identified.

It is evident that the letter demonstrates a lack of confidence in the Council and SEPA, we are working to address this through extensive communication work with the community including the establishment of a Stakeholder Group and arranging study visits to relevant, comparable facilities. We will continue to provide as much information on the proposals as possible.

### **Commentary to Leaflet Opposing the Energy from Waste proposal**

The leaflet highlights a range of issues, many of which are addressed above. The remaining points are addressed as follows:

**Issue:** Over development in the south of the city

**Commentary:** Development in the south of the city has been mapped out through the Local Development Planning process. The Adopted LDP of 2012 was reviewed and a new, pLDP was agreed by Council in 2015. This Plan is now being considered by the Scottish Government and is now a material consideration for all planning applications. The Planning Authority now considers each application as it comes forward in relation to the plan and also takes account of other permitted developments. As the applicant for this proposal we have in the various Environmental Impact Assessments considered both the effects of this proposal and any other relevant permitted or known future developments in the area. The assessments and associated

mitigation proposals do not indicate that there will be any significant adverse effects in the south of the city from the proposals.

**Issue:** Torry is the dumping ground of Aberdeen

**Commentary:** The proposed EfW will not have adverse impacts in Torry, indeed, the ability of the plant to supply heat into a District Heating network will deliver benefits to the community, especially for those currently living in fuel poverty. The proposal also returns derelict land to beneficial use and provides employment and skills training opportunities. The opportunity to provide stable and competitively priced heat to local businesses also helps to sustain vibrant businesses in south Aberdeen, thereby providing other future employment opportunities.

**Issue:** History of bad neighbours

**Commentary:** Regulation of EfW facilities is very strict and SEPA has significant powers to ensure the plant has no adverse impacts on the community or environment. The EIA carried out for the proposals demonstrate that the facility would result in negligible and not significant odour effects beyond its site boundary. The EfW can be closed down in the event of problems, thereby ensuring any issues can be addressed immediately. There are many EfW facilities in the UK and Europe that can be seen to operate without adverse impacts on the local community; a visit by the Stakeholder Group to the Lincoln EfW facility where members of the local liaison group attended demonstrated this to be the case.

**Issue:** Don't trust the City Council or SEPA

**Commentary:** Throughout the process the City Council team has made widespread efforts to engage widely with the community and to take a professional and measured approach to the project, ensuring that the most detailed and comprehensive studies and assessments have been undertaken to ensure that there will not be adverse impacts from the development. The Council has engaged Professor Robert Jackson to act as a bridge to the community. Professor Jackson is an independent specialist who has been key to the improvements seen by the local community in the management of issues of odour from the Wastewater Treatment Works and is scrutinising this application and providing specialist analysis to the community. In relation to SEPA, as outlined above, we have explained that a different regulatory regime applies to EfW and that SEPA have much stronger and more direct powers. SEPA has provided examples where they have taken action to close down poorly performing facilities, notably, a prototype gasification facility in Dumfries.

**Issue:** Don't believe that the Council will deliver heat system to benefit locals

**Commentary:** The application includes a heat plan that sets out a feasibility study demonstrating that the location can support a district heating system. The feasibility study details a phase 1 of the plan will link together public buildings (including the local swimming pool and primary schools) and social housing blocks and tenements. This will create a spine of heat pipes from which other connections, including individual houses, can be made (Phase 2). Further opportunities then exist to connect to the existing heat network operated by Aberdeen Heat and Power and other major heat uses such as further education and retail facilities. Should approval be given for the facility, there would be an approx. 5 years to develop the initial phase of the heat delivery infrastructure.

**Issue:** Site selection

**Commentary:** An extensive site selection exercise has been undertaken looking at many sites across the city, starting with the requirement that the facility is developed on appropriately zoned land. It is evident that many potential sites are in private ownership and not available as the preferred development is high-quality office development rather than more industrial uses. This reflects the predominant business environment in Aberdeen. As a result, the number of deliverable sites was few and the East Tullos the best available option. The selection exercise shows that there are no reasons why the site which scored the highest when assessed against selection criteria could not be successfully developed in planning terms.