

# Torry Community Council

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15th May 2016

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

Dear Sir/Madam

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

At the meeting of Torry Community Council on 21st April 2016, it was agreed that we would submit a formal objection against the planned Incinerator (EfW plant) that is proposed to be located next to Torry.

We wish to object to the above application on the following key planning and environmental issues:

Firstly, this planned incinerator is contrary to the overarching national policies for Zero-Waste, and will lead to increases in carbon footprints and contribute adversely to climate change

Secondly, we are firmly of the view that this planned incinerator will be damaging to the environment not just of Torry but across Aberdeen and the North East, will be a loss of amenity, and damaging to the health and wellbeing of communities. We do not accept that there are any benefits that outweigh the loss of health, amenity, environment and wellbeing

Thirdly, we are very strongly of the view that the long term financial implications of building this incinerator are flawed and that the risk of unidentified and un-controllable capital and revenue spend could add to future debt burdens that the council tax payers of Aberdeen will have to pay.

In more detail, our 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 Local Development Plan. Attention should be given to reuse and recycling of all finite materials. This proposal can only lead to lower levels of recycling of many materials as they would be incinerated rather than reused. Our point is this...if all finite materials are reused and recycled, then what is left to burn?
- 2 The proposal to incinerate waste in one building from all of the North-East is contrary to Policy NE 10 and will lower air quality locally and across Aberdeen. Communities to the South of the River Dee experience 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 development proposal is contrary to Policies D1 and D6 and will add to evidenced traffic congestion and air-polluting diesel exhaust fumes near and on routes leading to this proposed site in and around Torry; the traffic assessment in support of the planning application concludes that the extra number of

weekly vehicles (up to 200 movements of unspecified size of vehicles) will not have any impact on the local network where as Wellington Road regularly experiences gridlock.

- 4 Torry is also known to have its own micro-climate. We consider that the baseline data used in support of the planning application is flawed as the data used is taken from Dyce (seven miles away). It is a well-known and established fact that temperature inversion is a North-East Coastal phenomenon creating a micro-climate in Torry (in particular) that traps gases and odours. We see this happening and know this locally as the haar!!
  
5. 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 11,000 plus 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 only some 300 metres from one of our local primary schools. Regulation and 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. As a consequence, we therefore have no confidence that the technology promised for the incinerator in this planning application can be up to the job of protecting public health and air quality.

We are of the view that the proposal to build an incinerator is critically flawed. Even though other nations are moving away from incineration, there is still enough capacity across Britain that is leading to over-capacity in existing incinerators in Britain as well as Europe, and all at a time as new processes to address reuse and recycling are gathering apace. We do not believe that the prospectus for an incinerator will create jobs (local or otherwise) and would hope that planning and environmental policy would be based on the Waste Hierarchy for Reducing and Recycling: Source. Institute of Local Self-Reliance 2014. The business strategy for job creation in waste management should take full advantage of the Circular Economy where there is evidence that many sustainable jobs can be created.

We remain unconvinced that sufficient scientific research has been undertaken on the long term effects of the release of all gases from incinerators, and point out that there are numerous experiences of the introduction and use of materials, pharmaceuticals and industrial processes where health implications were not considered at the time. We urge that extreme caution be exercised in this regard to protect future generations from potential long term harmful effects of the chemistry of combustion.

Lastly, the building of this incinerator at the foot of the Gramps can only make Torry and the south of the Dee areas a dumping ground for municipal, commercial and possibly hazardous waste from across the North East of Scotland, and further afield. We support the need for a Public Hearing to be convened to enable our concerns to be fully expressed. By reason of the clear deviation from National and Local Policies, and to meet local health and social needs of the local communities, we appeal to the Planning Committee and the City Council to refuse this application and any other applications to build an incinerator in or near any residential community in Aberdeen.

Yours faithfully,

David Fryer - Secretary  
For and On Behalf of Torry Community Council

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