

N I G G C O M M U N I T Y C O U N C I L

A B E R D E E N

Nicholas Lawrence,
Aberdeen City Council,
Enterprise Planning & Infrastructure,
Business Hub 4,
Marischal College,
Broad Street,
Aberdeen.

Date:- 26th April 2016

Ref. **Planning Application 160276**
Erection of Energy from Waste facility

Dear Nicholas,

Due to the sheer volume and complexity of the documents supporting this application, Nigg CC have not been able to study nor discuss the application in full detail within the imposed representation deadline.

In the interim, we wish to make the following observations / objections relating to the above application with possible additional observations to follow :-

We are concerned at the level of important statements, throughout the supporting documents which contain words such as :- possibly, maybe, could be, should be, potential, suggested etc. All of which leaves these statements indecisive and open to individual interpretation.

We feel that the content of some statements, and some of the conclusions made in support of this application, indicates a contradiction to UK government guidelines as highlighted in the (Feb.14) "DEFRA" report - '**EFW, A Guide to the Debate**' on matters relating to "**Site Selection**", "**Efficiency of Use**", "**Set-up Cost**", "**Visual Impact**" and "**Environmental Impact**".

Please reply to -

Mr. Alan Strachan
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Nigg, Aberdeen
AB12 3JN
Telephone [REDACTED]

Mr. James Brownhill
Vice Chairman
Nigg Community Council
The Lodge, Charleston
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Mrs. Jenny Gall
Secretary
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Lochinch Cottage, Charleston
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03 MAY 2016

`Environmental Statement` Vol 3. (Site Selection)

We wish to question the criteria used in the site selection process and on the conclusions made. Based on the “quantitative matrix” used, having so little points difference between them, we are of the opinion that a new and more detailed assessment should have been carried out on all, or at least, the short listed sites prior to determining a preferred site.

`Heat and Power Plan`

On page 11, sec 2.4 it states :-

“A fixed route has not been established, - no specific agreements have been made”

On page 12 :-

Reference is made to river and railway crossings which can prove `technically challenging and expensive`. The pipeline has to be routed along public highways, and should, `Avoid buried utilities`. This would have direct bearing on cost and installation time. Supply to existing buildings may require modifications to existing heating systems. Connection costs would depend on age and complexity of systems.

On page 18 :- Overview of Surrounding Area.

`Proposed development is expected to provide electricity or heat to properties within up to 15km of the facility. Page 21 shows overview of area within proposed EFW plant.

On page 26 :- Proposed Network Route.

`At this stage, no detailed discussions have been had with individual consumers`.

On page 29 :- Summary

`Through a phased development approach there is potential for heat supplied by the Proposed Development to be used in supplying or interlinking with existing heat networks operated by Aberdeen Heat and Power Ltd`.

In all of the above, there is a sense of negativity, with no end user discussions, no agreements, no estimated costings being shown.

It has been intimated that to operate the EFW plant efficiently, the ideal, would be to have the end user as close to the plant as possible. Why therefore would you need to show maps / plans, which show supplying premises up to 15km distant from the EFW plant. ???

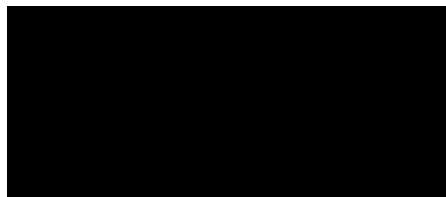
In addition, there is no indication as to who would foot the costs of supply. ??? Would it be the councils, the owners / tenants, or are these costs covered by government grants. ???

In order to supply the plant with the daily tonnage of required waste, we suggest, that the daily stated number of vehicle movements has been underestimated and would incur an even greater number of waste vehicles onto the surrounding roads which are currently listed as the most polluted in the country.

As the aim is to cease landfill and increase recycling, it is reasonable to assume, there will be a reduction in the available tonnage of general waste needed to keep the EFW plant operating efficiently. If correct, additional waste would have to be sourced from out-with the area, adding to even more vehicles and pollution in the area.

May we respectfully request, that these points be addressed and clarified prior to any further permissions or decisions being granted.

Yours faithfully,



Alan Strachan - chair
(for and on behalf of Nigg CC)

cc. Cllr's / N. Cooney / A. Finlayson / S. Flynn