



CAMBUSLANG
Community Council

25 Burn Terrace
Cambuslang
G72 7DN

Ms Pauline Elliott
Head of Planning & Building Standards
South Lanarkshire Council
Montrose House
Montrose Crescent
Hamilton
ML3 0AA

5 October 2017

Dear Ms Elliott,

OBJECTION REGARDING PROPOSED WHISTLEBERRY ROAD WASTE TREATMENT PLANT - PLANNING APPLICATION : HM/17/0260 (registered 9 June 2017)

I am writing on behalf of Cambuslang Community Council (CCC) to register our objection to this proposed development. Cambuslang Main Street is situated approximately 7 kilometres to the northwest of the Whistleberry Road site, and many people in our community have expressed their concerns about the potentially harmful impact that this development might have upon the health and general well-being of our community and that of our neighbours closer to the development site.

Our objections are as follows.

1. **Wholly inadequate consideration has been given to alternative schemes.**

In paras. 4.6 and 4.7 of the Planning Application, the Proposer states (quote),

4.6 The EIA Regulations (Ref 4.1) states that an Environmental Impact Assessment (EIA) should include: "An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effect".

4.7 The EIA Regulations do not expressly require the Applicant to study alternatives; however the nature of certain developments and their location may make the consideration of alternative sites a material consideration. Moreover, case law indicates that the EIA regulations do not require an assessment of alternatives.

In fact, Scots Law has recently been brought into compliance with European Law by implementing the European Directive 2014/52/EU on Environmental Impact Assessment regulations. Article 5(1) of these states (quote),



Where an environmental impact assessment is required, the developer shall prepare and submit an environmental impact assessment report. The information to be provided by the developer shall include at least:

(a); (b) ... ; (c).....;

d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;

It is further stated in the EU Directive that the requirements of Article 5(1) are **mandatory**, and no reference is made to any case law exceptions allowed under European Law jurisdiction. These EU Law requirements apply to all Planning Applications submitted after 16 May 2017.

CCC consider that the minimal discussion of practical alternatives as presented in paras. 4.8 – 4.10 of the Proposer's EIA is wholly inadequate. One practical alternative which attracts wide public support and which should have been studied in detail by the Proposer is enhanced recovery and recycling of waste along with anaerobic digestion of non-recyclable organic waste.

2. Lack of integrated, efficient energy from waste plan.

Scottish Planning Policy (see 'Waste Management Infrastructure Requirements, 2013') confirms that a goal of the Government's Zero Waste Plan is to recover electricity and heat from waste sources which cannot be reused or recycled. It further recognises that thermal treatment facilities when appropriately developed can be part of the plan. Para 7.26 of the 2013 Infrastructure Requirements reads,

7.26 Both documents refer to the policy approach on plant efficiency and heat planning. Planning Authorities should require and consider a Heat and Power Plan submitted by the developer.

The Planning Application as submitted is for a Combined Heat and Power (CHP) Plant, but there is no actual plan for the utilisation of the surplus heat generated. The euphemism employed by the Proposer, is that the CHP is 'enabled'. In reality, the so-termed 'Hamilton Energy Recovery Facility Heat and Power Plan' is quite literally a pipedream awaiting financing for the steam/hot water distribution network. No timescale is indicated or list given of interested customers. The potential impact of creating the distribution network is not assessed in the EIA.

Lastly, without a firm plan to utilise the surplus heat generated the proposed waste treatment facility cannot be considered to be meeting the Scottish Government's Zero Waste Plan. Valuable heat energy will be generated then wasted.

3. Insufficient details are provided on the actual waste treatment technologies that the development will employ.

Although it is not surprising to read that the final selection of the technologies to be employed will be made closer to the implementation phase, it is unacceptable that the Proposer has nowhere presented any verifiable evidence based on either their own experience or that of others in planning, developing, constructing, commissioning, operating and maintaining facilities similar to those proposed. There is considerable controversy around the operational performance and environmental impact of so-called advanced thermal treatment facilities of the type proposed. The Proposers should provide an evidence base of successful projects along with an analysis of problems that have arisen in some schemes (such as the Dargavel plant near Dumfries) with an explanation on how such problems will be avoided.

4. The Proposer's expertise and experience pertinent to the proposed development are not presented.

It is clearly of paramount concern that the developer can demonstrate unambiguously that they have the necessary range of skills to undertake of project of this nature. As noted in the preceding paragraph, the Planning Application does not provide any details of major projects in the field of waste treatment or management that the Proposer has actually undertaken so that their competence is impossible to judge. Proceeding without such checks would be risky.

5. The potential adverse effects on air quality by emissions from the development have been derived only by computer modelling of air dispersion from the exhaust stack.

This has been done without any supporting evidence being presented on the accuracy of this process taking into account model predictions and actual measurements at similar operating facilities. Furthermore, the detailed analysis is restricted to a radius of about 2 kilometres around the site with no assessment of pollutant fallout in other inhabited locations which might also be affected. From literature consulted by CCC, it would appear that the emissions flume from waste plant stacks can impact locations up to 8-10 kilometres from the source.

6. The stack height proposed is a visually obtrusive 90 metres without any detailed justification for this large size.

Bearing upon this issue is the Proposer's discussion of 'downwash (see para. 9.31 – 9.33 of the EIA). It is stated that downwash is only significant when building heights are greater than 30-40% of the stack height. In this instance, the building height will be a maximum of 21 metres. This implies that the stack height could be in the range 54-70 metres to avoid downwash. The effect of a much reduced stack height on the pollutant emissions air dispersal should be investigated.

We urge you not to go ahead with consideration of planning approval without considering these objections.

Yours faithfully,



David Thomson
Chair, Cambuslang Community Council

cc.

Cllr John Bradley

Cllr Ann Le Blond

Cllr Margaret Walker

Clare Haughey MSP

Gerard Killen MP

Liisa Hepworth, Halfway Community Council

Hamilton Energy Recovery Action Group