

Portmoak Community Council

Malcolm Strang Steel, Chairman
Greenhead of Arnot, Leslie, Fife KY6 3JQ
chair@portmoak.org
Tel: 01592 840459

16th October 2018

Mr Kevin Stewart MSP
Minister for Local Government, Housing and Planning
St Andrew's House
Regent Road,
Edinburgh EH1 3DG

Dear Mr Stewart

18/02342/ARC: Application for the approval of Matters Specified in Conditions - Condition 2 plus the discharge of Conditions 10 (Datum Point), 13 (Landscaping) and 18 (Noise Assessment), solely in relation to the Energy Recovery Facility (and associated Auxiliary Energy Centre) component of the Westfield Restoration and Regeneration Project, as approved in principle under permission reference: 16/03661/EIA.

You may recollect that I wrote to you on 19th October last year to ask you to call in the In Principle planning application 16/03661/EIA made to Fife Council. This you declined to do, and the application was duly approved on 15th August this year. The developer has now lodged an application (18/02342/ARC) for the removal of conditions so far as relating to the Energy Recovery Facility proposed in the In Principle application. The Community Council has objected to this application. A copy of its letter to Fife Council is enclosed.

You will see that the first two grounds of concern in the Community Council's objection letter relate to the strategic requirement for the proposed waste management facility which is a matter for government rather than the Fife Council. They reflect a concern that, within a Scottish national context, There is already sufficient provision for the disposal of waste without this proposed facility. The Community Council is aware that:

- Planning Advice Note 63 informs Waste Management Planning;
- energy from waste is not a renewable energy source, does contribute to greenhouse gas emissions, does replace energy derived from fossil fuels and does contribute to a zero waste society;
- the facility will have an electricity generating capacity of 23.7 MW;
- the Developers state their proposed facility has a capacity to process up to 250,000 tonnes of controlled waste per annum;

- SEPA confirmed that 175,000 tonnes of waste was incinerated in Scotland in 2017;
- a further seven or so similar sites are planned or are being commissioned elsewhere in Scotland;
- Fife Council has already committed to transfer the bulk of its waste for incineration to a plant elsewhere in the central belt;
- there are as yet no confirmed waste streams to support this facility; and
- Scotland exports a significant amount of different types of waste to both England and to a variety of international destinations of which an uncertain amount may be suitable for domestic incineration.

There appears to be a lack of a strategic approach to this development by both the Developer and Fife Council. In particular waste streams, quantities and their origins have not been identified. It is unclear whether commissioning this facility represents a sustainable national strategy of energy from waste.

Can you please explain the current government strategy for waste management in Scotland and how there is a requirement for the proposed facility within that strategy.

I look forward to hearing from you.

Yours sincerely

Malcolm Strang Steel, Chairman Portmoak Community Council

Cc

Chris Smith, Lead Officer - Planner (Fife Council)

Michael Barnacle, Callum Purves, Willie Robertson and Richard Watters, Ward Councillors (Perth and Kinross Council)

Claire Baker, Murdo Fraser, Dean Lockhart, Alex Rowley, Mark Ruskell, Liz Smith, Alexander Stewart (Members of the Scottish Parliament).

Enc Formal Objection by Portmoak Community Council to Fife Council.