

Portmoak Community Council

Robin Cairncross - Secretary
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16th October 2018

Chris Smith
Lead Officer - Planner
Environment, Enterprise & Communities Directorate
Economy, Planning and Employability Services,
Development Management,
Fife Council,
Kingdom House,
Kingdom Avenue,
Glenrothes,
Fife, KY7 5LY

Dear Chris

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.

Notice of objection.

Portmoak Community Council welcomes the opportunity to respond to this application. It thanks Fife Council for granting an extension of the time allowed to comment.

This project received approval in principle from Fife Council on 15th August 2018, reference (16/03661/EIA). The Community Council has considered its response to the recent application for an Energy Recovery Facility (18/02342/ARC) and wishes to **object**. It does so for the following reasons.

1. **Lack of strategic approach.** There is 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 as recommended in Planning Advice Note 63. It is understood that Fife Council has already committed to transfer the bulk of its waste for incineration to a plant commissioning elsewhere in the central belt.
2. **The facility represents an overcapacity.** It is unclear whether this facility represents a sustainable national strategy of energy from waste and whether within a Scottish context, where a number of similar facilities are planned or are commissioning, it represent an overcapacity. No evidence is presented that makes plain that this facility is required.
3. **Risk to human health.** Since the application for planning in principle was considered (16/03661/EIA) the Community Council has been made aware of new scientific studies which link small particulate matter (PM) to adverse effects on human health. There is increasing evidence that fine (PM2.5) and ultrafine (PM0.1) particulate matter plays a more significant role than previously thought. It is not clear that the report lodged with the in principle application took

PM2.5 and PM0.1 into consideration in reaching its conclusions. The CC also notes, and associates itself with, SEPA's objection on air quality grounds to the proposal to reduce the stack height of the main Energy Recovery Facility (ERF) from 95m to 80m. These are matters that require further evaluation before approval can be considered.

4. **Need for mitigation measures along the B9097 and the approaches to the development site.** While the interests of *natura* have been thoughtfully considered those of humanity (individuals who live and work along B9097 or who visit the national nature reserves including the Heritage Trail and RSPB Loch Leven) have not. The single award of £100,000 requested by Perth and Kinross Council will not mitigate the issues arising from the expected increase in traffic. Much more needs to be done to ensure road safety for all.

The Community Council notes that at its full council meeting held on 27th August, Perth and Kinross Council resolved to amend its new Local Development Plan to ensure that there was due consideration of route action plans, where applicable, and specifically the need for traffic mitigation when any future developments on or near A977, the B9097 and the A911 are being considered for approval. The amendment also requested

“the inclusion of a paragraph that asked for consideration to be given to the effects that developments outwith Perth & Kinross, such as the Westfield site in Fife have on our own road network, which may change the requirements for traffic mitigation on roads in Kinross-shire.”

This amendment was approved unanimously. The Community Council strongly supports this decision by Perth and Kinross Council. Mitigation measures are essential. It believes that Fife Council, working in partnership with Perth and Kinross Council, should now pursue a revised road contribution.

5. **Approval of a Phasing Plan outstanding.** The CC notes that approval of matters specified in Conditions of the PPiP can be discharged on a phased basis in accordance with the phases set out in a Phasing Plan submitted and approved in terms of Condition 5 (Condition 2). However, no overall phasing plan, which would include each component of the masterplan, has been submitted. The current application cannot be considered until there is an approved phasing plan.
6. **Establishment of Community Liaison Group.** This Community Council seeks to participate in this Group, notes that the developer appears to have taken no action so far to establish the group and believes that it should be established shortly.

Yours sincerely

Robin Cairncross
Secretary
Portmoak Community Council

Cc

Ward Councillors: M Barnacle; C Purves; W Robertson; and R Watters.
Portmoak Community Council Members.