Application No: N/09/00675/FUL

Proposed Development:

Commercial, Industrial and Municipal Waste Material Recovery and Renewable Energy Facility comprising Main Processing Building and Office Block

Site Address:

Land At Former Shanks & McEwan Site
251 Glasgow And Edinburgh Road
Coatbridge
ML5 4UG

Date Registered:

22nd June 2009

Applicant:
Shore Energy Ltd
c/o 'Findony'
Muckhart Road
Dunning
Pethshire
PH2 0RA

Agent:
Golder Associates (UK) Ltd
2nd Floor East, Sirius Building
The Clocktower
South Gyle Crescent
Edinburgh

Application Level:
Major

Contrary to Development Plan:
No

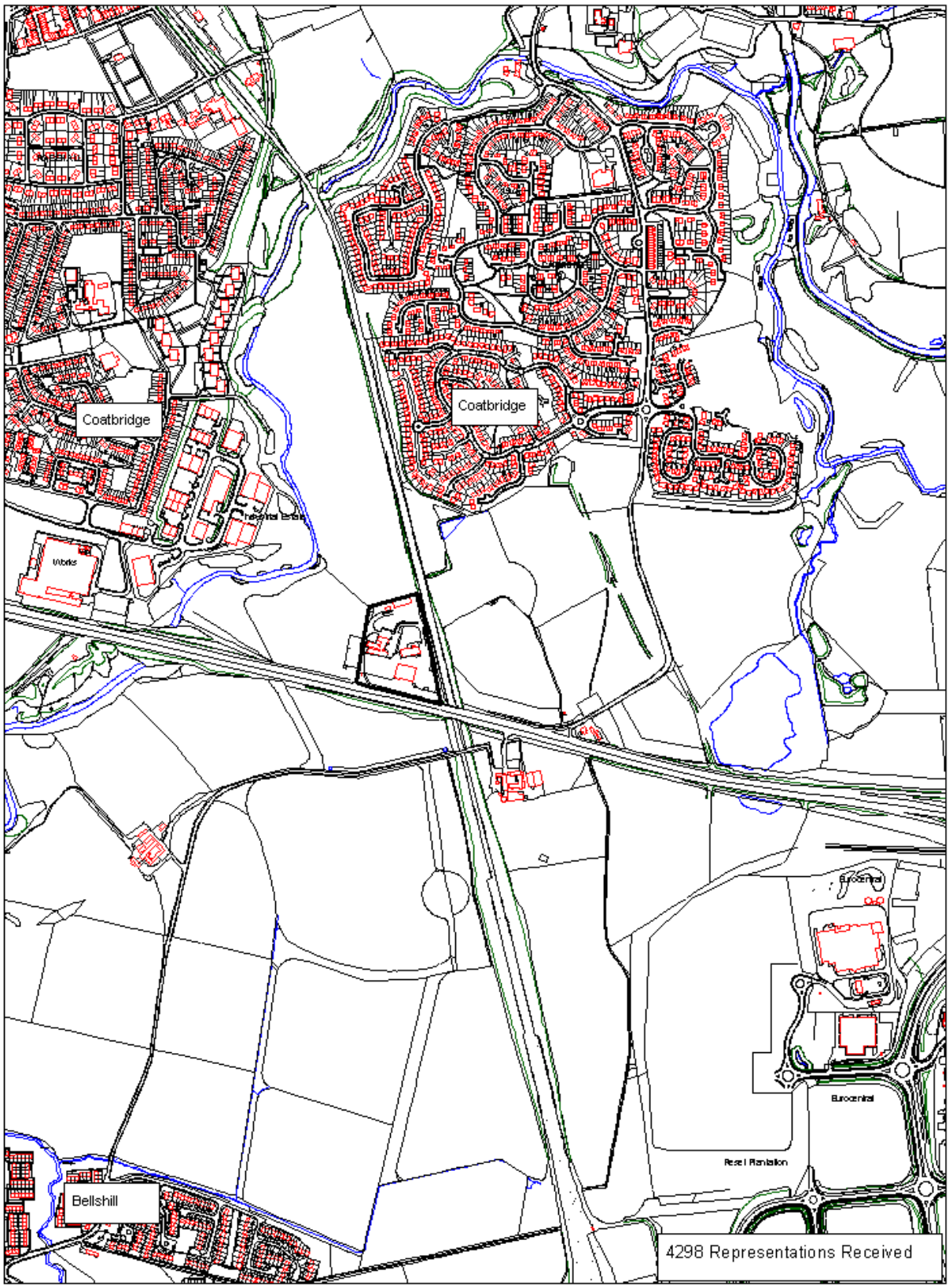
Ward:
010 Coatbridge South
James Brooks, Ian Ferrie, John Higgins,

Representations:
4298 representations received.

Recommendation: **Grant Subject to Conditions**

Reasoned Justification: The proposals are considered acceptable as they accord with the terms of the Glasgow and the Clyde Valley Joint Structure Plan 2000 incorporating the 4th alteration 2008 and the Monklands District Local Plan 1991, the National Waste Strategy (NWS) and Area Waste Plan (AWP) where it has been adequately demonstrated that the proposals are acceptable in terms of need, comply with the proximity principle and offer the best practicable environmental option (BPEO) for dealing with the identified waste streams. There was no objection from statutory consultees including the Scottish Government, SEPA, SNH, Scottish Transport, and Scottish Water or from other organisations such as SWT and RSPB. There was no objection from the respective NLC Services requested to comment on the application. The accompanying ES demonstrates that environmental impacts from the development would not be significant and it is agreed that the suggested mitigation measures can be controlled through appropriate conditions.

Despite the significant volume of representation received in regards to the application, it has been determined that the material terms of objections cannot be sustained. The proposals accord with the terms of the development plan and are acceptable when assessed against the NWS, AWP and other material considerations noted in the main report.



N/09/00675/FUL
Mr Jon Garvey
Land at Former Shanks & McEwan Site
251 Glasgow and Edinburgh Road Coatbridge
Commercial, Industrial and Municipal Waste Material
Recovery and Renewable Energy Facility comprising
Main Processing Building and Office Block

Proposed Conditions:-

1. That the development hereby permitted shall be started within three years of the date of this permission.

   Reason: To accord with the provisions of the Town and Country Planning (Scotland) Act 1997.

2. That the development hereby permitted shall not start until a Notice of Initiation has been submitted to the satisfaction of the Planning Authority.

   Reason: To accord with the provisions of the Town and Country Planning (Scotland) Act 1997.

3. That within 4 weeks of completion of all building works on site, of the development hereby permitted, a Notice of Completion shall be submitted to the Planning Authority.

   Reason: To accord with the provisions of the Town and Country Planning (Scotland) Act 1997, to monitor the development, to enable the Planning Authority to retain effective control.

4. That the development hereby permitted shall be carried out strictly in accordance with the approved details submitted as part of the application and no change to those details shall be made without prior written approval of the Planning Authority.

   Reason: To clarify the details on which this approval of permission is founded.

5. That unless otherwise agreed with the Planning Authority in consultation with SEPA, the amount of residual municipal waste treated in the energy from waste plant in any 12 month period shall not exceed 25% of the total municipal waste arisings from the potential feeder local authorities identified in the Environmental Statement produced in support of the development hereby approved.

   Reason: To ensure the operation of the development accords with Scottish Government waste policy in respect of municipal waste streams.

6. That unless otherwise agreed with the Planning Authority in consultation with SEPA, only residual waste (i.e. waste remaining after all practicable and reasonable efforts have been made to extract recyclable and, where appropriate, compostable material) shall be treated in the energy from waste part of the development hereby approved.

   Reason: In order to ensure that only residual waste is treated in the energy from waste plant in accordance with SEPA's Thermal Treatment of Waste Guidelines 2009 and Scottish Government waste policy.

7. That prior to the acceptance of any waste materials into the site, the Materials Recycling Facility must be fully operational. This facility shall be implemented in accordance with the approved plans prior to the operation of the development hereby approved and all waste going into the Energy from Waste plant shall, where appropriate, first be pre treated and sorted in the Materials Recycling Facility.

   Reason: To ensure the operation of the development accords with Scottish Government waste policy and accords with the principles of sustainable waste management.

8. That prior to the acceptance of waste materials at the site, the development hereby permitted shall be designed and constructed to enable the export of electricity to the national grid in accordance with the approved plans.

   Reason: To ensure that the plant is capable of exporting electricity to the national grid in accordance with Scottish Government policy and SEPA's thermal treatment guidelines on maximising energy recovery from such facilities.

9. That prior to the acceptance of waste materials at the site, the developer shall carry out ambient atmospheric monitoring in the locality of the proposed development. The monitoring shall include data on background levels of oxides of nitrogen and particulate material in the PM10 and PM2.5 size ranges in the area. The location, methodology, and survey period shall be agreed in writing by SEPA in consultation with the Planning Authority in advance of monitoring being undertaken.

   Reason: To enable SEPA and the Planning Authority to ascertain pre-operational air quality data at the locus, to ensure that relevant air quality standards can be met during the operation of the development in the interests of amenity.

10. That unless otherwise agreed in writing and before works start, the developer shall submit for approval a site traffic management plan that shall be designed to ensure that noise emitted from waste delivery vehicles is minimised. In particular this shall include provisions to ensure that waste delivery vehicles can enter and leave the waste processing building in a forward gear.

    Reason: To minimise noise impacts from the operation of the waste management facility in the interests of amenity.

11. That before any development commences on site, details of a Site Waste Management Plan shall be submitted to and approved by the Planning Authority in consultation with SEPA and implemented thereafter in accordance with the approved details during the construction of the development.

    Reason: To ensure best practice is adopted in dealing with waste during the construction phase of the development in accordance with Scottish Government policy.

12. That no development shall commence on site until a full site specific construction method statement (CMS) is submitted and approved by the Planning Authority, in consultation with SEPA. The CMS shall incorporate detailed pollution avoidance and mitigation measures for all construction elements potentially capable of giving rise to pollution including issues relating to the construction of the building, impacts on hydrogeology and disposal of contaminated land. Specifically the statement shall address the following and the construction of the development shall be carried out in accordance with the agreed details:

    - How contaminated land will be dealt with; treated and disposed of as necessary
    - Details of how disturbance to groundwater will be minimised, including any de-watering proposals
    - Details of the storage of construction fuels, materials, raw materials and by-production
    - Temporary SUDS measures
    - Dust mitigation methods.

    Reason: To protect the water environment from any damage arising from the construction and operation of this facility.

13. That BEFORE the development hereby permitted starts, unless otherwise agreed in writing with the Planning Authority, full details of the proposed surface water drainage scheme shall be submitted to and for the approval of the said Authority. For the avoidance of doubt the drainage scheme must comply with the requirements of the publication titled `Drainage Assessment : A Guide for Scotland, and any other advice subsequently published by the Scottish Environment Protection Agency (SEPA) or the Sustainable Urban Drainage Scottish Working Party (SUDSWP).
The post-development surface water discharges shall ensure that the rate and quantity of run-off to any watercourse are no greater than the pre-development run-off for any storm return period unless it can be demonstrated that a higher discharge is necessary to protect or improve any aquatic habitat at or near the site. SUDS shall still be provided even where discharges are proposed to public sewers notwithstanding any conditions imposed by Scottish Water.
If the area of ground illustrated for the SUDS is inadequate for the purpose, a revised layout drawing for this part of the proposed development shall be submitted to and for the approval of the Planning Authority prior to any works of any description being commenced on the application site, unless otherwise agreed in writing with the said Authority.

Reason: To ensure that the drainage scheme complies with best SUDS practice to protect adjacent watercourses and groundwater.

14 That the SUDS compliant surface water drainage scheme approved in terms of Condition 13 shall be implemented contemporaneously with the development in so far as is reasonably practical. Within three months of the construction of the SUDS, a certificate (signed by a Chartered Civil Engineer experienced in drainage works) shall be submitted to the Planning Authority confirming that the SUDS has been constructed in accordance with the relevant CIRIA Manual and the approved plans.

Reason: To ensure that the drainage scheme complies with best SUDS practice to protect adjacent watercourses and groundwater.

15. That prior to the start of development, a Travel Plan, that sets out proposals for reducing dependency on the private car shall be submitted to and approved in writing by the Planning Authority in consultation with Transport Scotland-Trunk Road Network Management Directorate. The Travel Plan shall identify measures to be implemented; the system of management, monitoring, review and reporting; and the duration of the plan and shall generally be in accordance with the Travel Plan Framework prepared by Arup and dated June 2009 as submitted with the application.

Reason: To ensure the operation of the development accords with the requirements of SPP (Consolidated) and PAN 75 Planning for Transport.

16. That prior to the start of development, a barrier shall be erected along the site's boundary with the A8 Trunk Road. Full details of its design and location along with a schedule of maintenance shall be submitted to and approved in writing by the Planning Authority, in consultation with Transport Scotland-Trunk Road Network Management Directorate.

Reason: In the interests of traffic and pedestrian safety at the locus.

17. That notwithstanding the provisions of the Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984, no advertisements shall be permitted adjacent to the A8 Trunk Road.

Reason: To ensure that there is no distraction to drivers on the trunk road network in the interests of road safety.

18. That prior to the start of development full details of any lighting proposed within the site shall be submitted to and approved in writing by the Planning Authority in consultation with the Roads Authority. The design of the lights shall incorporate downward reflectors in accordance with the biodiversity enhancement measures required under the terms of condition 19.

Reason: To ensure that there will be no distraction or dazzle to drivers on the A8 trunk road in the interests of road safety at the locus.

19 That prior to the start of works the Best Practice Measures for Wildlife and the Biodiversity Enhancement Measures detailed in Annex G (Ecology) of the Environmental Statement are fully implemented. These shall include the following mitigation measures:

Best Practice Measures

- a further survey for Otters undertaken prior to the commencement of works on the new discharge into the Calder Water if more than 12 months have elapsed since the date of the last survey on 13th March 2009. On completion of this survey, a full assessment of the potential impacts of the proposed works on otters shall be undertaken including detailed mitigation measures to avoid, reduce or mitigate any predicted negative impacts.

Biodiversity Enhancement Measures

- A programme to install bat boxes on the edge of the adjacent North Calder Water SINC woodland;
- Landscaping using native plant species
- Creation and maintenance of species rich grassland areas, and
- Downward reflectors to be installed on any artificial lighting to minimise impacts on bats and other wildlife.

Reason: In the interests of nature conservation within the site and surrounding area.

20. That BEFORE the development hereby permitted starts, a scheme of landscaping incorporating biodiversity enhancement measures and native tree planting shall be submitted to, and approved in writing by the Planning Authority, in consultation with SNH and NLC Ecology and it shall include:-

(a) details of any earth moulding and hard landscaping, boundary treatment, wild grass seeding and turfing;
(b) a scheme of native tree and shrub planting, incorporating details of the location, number, variety and size of trees and shrubs to be planted;
(c) an indication of all existing trees and hedgerows, plus details of those to be retained, and measures for their protection in the course of development
(d) a detailed timetable for all landscaping works which shall provide for these works being carried out contemporaneously with the development of the site.
(e) a management and maintenance scheme for these works

Reason: To enable the Planning Authority to consider these aspects in detail in consultation with SNH and NLC Greenspace (Biodiversity)

21. That all works included in the scheme of landscaping and native tree planting, approved under the terms of condition 20 above, shall be completed in accordance with the approved timetable, and any trees, shrubs, or areas of grass which die, are removed, damaged, or become diseased, within two years of the full occupation of the development hereby permitted, shall be replaced within the following year with others of a similar size and species.

Reason: In the interests of the visual amenity of the site, to mitigate adverse effects on views of the development from outlying residential areas and to benefit local biodiversity.

22 That BEFORE any works of any description start on the application site, unless otherwise agreed in writing with the Planning Authority, a comprehensive site investigation report shall be submitted to and for the approval of the said Authority. The investigation must be carried out in accordance with current best practice advice, such as BS 10175 : 'The Investigation of Potentially Contaminated Sites' or CLR 11. The report must include a site specific risk assessment of all relevant pollution linkages and a conceptual site model. Depending on the results of the investigation, a detailed Remediation Strategy may be required.

Reason: To establish whether or not site decontamination is required in the interests of the amenity and wellbeing of future employees and visitors to the waste management facility.

23 That any remediation works identified by the site investigation required in terms of Condition 22, shall be carried out to the satisfaction of the Planning Authority. A certificate (signed by a chartered Environmental Engineer) shall be submitted to the Planning Authority confirming that any remediation works have been carried out in accordance with the terms of the Remediation Strategy.

Reason: To ensure that the site is free of contamination in the interests of the amenity and wellbeing of future employees and visitors to the waste management facility.

24. That before the development hereby permitted is brought into use a revised parking and manoeuvring plan shall be submitted to and approved in writing by the Planning Authority. For the avoidance of doubt the revised parking plan shall demonstrate that a minimum of 50 on-site parking spaces can be provided at the site and all the parking and manoeuvring areas thereby approved shall be levelled, properly drained, surfaced in a material which the Planning Authority has approved in writing before the start of surfacing work and clearly marked out, and shall, thereafter, be maintained as parking and manoeuvring areas.

Reason: To ensure the provision of adequate parking facilities within the site.

25. That for the duration of the construction works one or more Site Notices, printed on durable material, shall be displayed in a prominent place at or in the vicinity of the development such that it is readily visible to the public; the Notice must accord with Schedule 7 of the Planning etc (Scotland) Act 2006 and must give details of the approved development, its address, details of the planning permission and information on where further information about the development can be obtained.

Reason To accord with the provisions of the Planning etc (Scotland) Act 2006, to monitor the development, to enable the Planning Authority to retain effective control.

Background Papers:

Representation Letters

Refer to Appendix A for list of names and addresses – this appendix is not part of this report but is available for viewing at the following locations:

Online on the Council's e-planning page - by entering reference 09/00675 in the search field at the following web address https://eplanning.northlan.gov.uk/Online/
Reception Desk at the Civic Centre, Motherwell
Floor 3 Reception, Fleming House, 2 Tryst Road, Cumbernauld G67 1JW

Refer to Appendix B for comments and responses

Consultation Responses:

Letter from BT received 6th July 2009.
Letter from Scottish Water received 10th July 2009.
Letter from SP Energy Networks received 13th July 2009.
Letters from The Scottish Government received 6th July and 17th July 2009.
Letters from Scottish Wildlife Trust received 21 July and 2nd September 2009.
E-Mail from RSPB received 14th July 2009.
Letter from Scotland Gas Networks received 17th July 2009.
Letter from Historic Scotland received 27th July 2009.
Memos from Protective Services received on 28th July and 6th October 2009.
Letter from Health and Safety Executive received on 30th July 2009.
Letter from JMP Consultants Ltd (Term Consultants to Transport Scotland-Trunk Road Network Management Directorate TS-TRNMD) received on 30 July 2009.
Letter received from Scottish Natural Heritage received 31 July 2009.
Letter from SPT received 6th August 2009.
Letter from Transport Scotland (TRNMD) received 24th August 2009.
Memo from Conservation and Greening received 20th August 2009.
Memo from Traffic and Transportation received 30th September 2009.
Letters from SEPA received 29th October, 5th and 19th November 2009

Contact Information:

Any person wishing to inspect these documents should contact Colin Marshall on 01236 616459

Report Date:

15th February 2010

Executive Summary

1. Site and Proposal

1.1 Planning permission is being sought for a Commercial, Industrial and Municipal Waste Material Recovery and Renewable Energy Facility at the former Shanks & McEwan Site, 251 Glasgow And Edinburgh Road, Coatbridge (A80).

2. Representations

2.1 A total of 4298 representations were received in respect of the planning application.

3. Assessment Summary

3.1 Section 25 of the Planning etc (Scotland) Act 1997 requires where making any determination under the Planning Act, regard is to be had to the development plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The assessment is ordered as follows:

Development Plan

- Glasgow and the Clyde Valley Joint Structure Plan 2000 incorporating the 4th alteration 2008
- Monklands District Local Plan 1991 (adopted 1995)

Material Considerations

- Finalised Draft North Lanarkshire Local Plan
- National Planning Policy and Guidance
- Environmental impacts identified in the Environmental Statement ES including:
  - Landscape and Visual Impacts
  - Air Quality
  - Land Quality
  - Hydrology and Flood Risk
  - Traffic
  - Noise
  - Ecology
- Consultations
- Representations

4. Development Plan

4.1 The site is not specifically identified in the structure plan although under the terms of Strategic Policy 9 a satisfactory case for the need for waste management facilities is required in terms of the Glasgow and Clyde Valley Area Waste Plan. In addition Strategic Policy 9 requires a detailed assessment of the proposed development in terms of specific locational criteria and that the impact of the development on existing infrastructure is acceptable.

4.2 Under the Adopted Monklands District Local Plan 1991 the proposed site is subject to multiple zoning as listed as follows:

- ECON 2 Existing General Industrial Areas
- ECON 5/7 Rehabilitation of Industrial Sites-Carnbroe (South)
- WDR 1 Landfill and Refuse Disposal
- CU1/5 Safety Restraint Areas-Landfill Gas

4.2 Whilst the proposed site area only extends to some 3.6ha (and as such under the 10 hectare threshold identified in the structure plan), it is considered that due to the regional function and operational requirements of the proposed waste management facility (in sourcing waste over a 30 mile radius of the site), the proposals are

considered to be of strategic significance and as such, the proposals are required to be assessed against the terms of Strategic Policy 9 including the AWP and other related policies. The application site is also zoned for industrial purposes in the current local plan.

4.3 The proposed development has been assessed against the Structure Plan and found to be in accordance with Strategic Policy 9 and therefore the Structure Plan. With regards to the local plan the site is allocated as an Existing General Industrial Area the proposed development is considered to be an industrial process. As such the proposed development is considered to be in accordance with the development plan

5. Material Considerations

5.1 North Lanarkshire Local Plan Finalised Draft - The relevant policies in the emerging state there is no general presumption in support of waste development. However such proposals need to be assessed under local environmental impact considerations, including the nature of the proposed working, impact on local communities, potential for long-term improvements to site appearance, site access and affect on traffic safety. There also has to be a demonstration of need for the facility. It is considered that the proposals would meet the terms of the above criteria as these issues have been addressed in the supporting ES information and there was no outstanding objection from consultation responses subject to conditions. As such it can be concluded that the proposals accord with the relevant policies of the Finalised Draft North Lanarkshire Local Plan.

5.2 National Planning Policy & Guidance - Following an assessment of the proposals it is considered that they would accord with the main aims and principles of national policy and guidance on waste management development.

5.3 Consultations – There are no outstanding objections from any statutory consultees, subject to conditions.

5.4 Environmental Statement – The proposed development is supported by an Environmental Statement that carefully assesses all of the impacts of the proposed development and where appropriate recommends mitigation measures. These can be covered by planning conditions.

6. Representations

6.1 **Objections:** The material terms of objections can be categorised under the following subject matters and a brief summary of the comments on each objection topic are included as follows: (a more detailed summary of the terms of objection with comments are considered in Appendix B attached to this report).

- **Pollution and Air Quality**
  SEPA and Protective Services had no objections to the proposals following consideration of the assessment on air quality impact information contained in the Environmental Statement. It was concluded that the proposals would not have a significant impact on air quality due to the operation of the proposed waste management facility.
- **Lack of Need, Contrary to Development Plan, NWS, AWP and National Policy**
  Following an assessment of the applicants supporting information it has been determined that the proposals are acceptable in terms of a need for the facility and is in accordance with the development plan, National Waste Strategy, Area Waste Plan and National Policy on waste management proposals.
- **Odour**
  As all of the waste management processes would be contained within a large building that would be subject to negative air pressures and filters, odour emissions would be adequately controlled. SEPA advised that adequate controls

over such problems would be controlled via their PPC permit regulations.

- **Noise**
  Noise impacts were not considered to be significant. Vehicle movements would be restricted to daytime operation restrictions imposed by a planning condition. Vehicles delivering waste would enter the building and doors would close automatically before waste is tipped at the MRF sorting hall. Plant operations would be over a 24 hour period however these would be contained within the building.
- **Traffic Impact**
  The ES acknowledges that traffic levels would increase as a result of the development however their impact would not be significant. Transport Scotland supported this conclusion and it was noted that not all waste delivery vehicles visiting the site would need to make use of the Shawhead interchange. In mitigation of potential, yet minor impacts, the operator has agreed to introduce an operational management plan that would encourage contracted waste delivery companies to avoid routes through residential and designated AQM areas.
- **Health Hazard and Proximity to Residential Areas**
  The ES specifically considered the likely impact of air borne particulates on sensitive receptors including local residential areas and schools. It was concluded there would be no significant impact on human health. SEPA and Protective Services had no objection in this regard subject to conditions.
- **Ecology and Wildlife Impacts**
  The ES has demonstrated that there would be no significant impact of natural heritage interests including protected species. Scottish Natural Heritage agreed with the conclusions of the ES and had no objection subject to conditions relating to standard protection measures for adjacent habitats and species including otters, bats and breeding birds. The proposals would introduce some biodiversity improvement measures that would be welcomed by the Scottish Wildlife Trust and SNH.
- **Waste Types**
  The facility would be able to deal with municipal, industrial and commercial waste streams. The developer has confirmed that the proposed pyrolysis technology can deal with industrial waste but is not suitable for dealing with chemical, medical, toxic or hazardous waste. Moreover the type of materials dealt with at the plant would be controlled by SEPA via the PPC permit regulations.
- **Site Selection and Proximity to Residential Areas**
  The application site was considered the most suitable for a development of this nature in terms of its size, long term commercial availability, appropriate industrial zoning, avoidance of green belt, immediate access to the primary road network, proximity to sensitive receptors, avoidance of conflicts with other existing on site uses (Eurocentral), and have minimal visual/landscape impact. The ES considered a comprehensive range of environmental impacts on sensitive receptors at and around the site, including the predicted impact on adjacent residential areas and concluded that such impacts would not be significant. Where some minor concerns were identified, mitigation measures are proposed to enable the development to be considered acceptable.
- **Lack of Public Consultation**
  The developer voluntarily held a public meeting and exhibition before the proposals were submitted and had previously distributed some 4,000 leaflets to local residents. The developer also attended a public meeting hosted by a local residents group.
- **Other Matters**
  The proposed pyrolysis process does not involve the incineration of waste despite the numerous claims made by objectors to the proposal. Whilst there was no specific emission data available for the proposed pyrolysis plant, the emission rates were assessed on an allowable worst case scenario basis and the ES considered data to be in compliance with the WID emissions limits set for such plants. SEPA were content that appropriate data would be provided during the PPC permit application. Any perceived loss of property value is not material to the consideration of a planning application. The previous year's accidental fire at the

tyre recycling depot had an unfortunate and detrimental impact on local residents due to emissions from the fire. Whilst concern over such an incident is understandable this event has no relevance to the current proposals. The developer may seek grant assistance for potential job creation. Some minor errors were noted in the supporting information in terms of the vehicle trip numbers however these were overstated rather than underestimated and would not have resulted in any alterations to the impacts covered in the ES.

6.2 **Support:** Two letters of support were also received. A letter of support was received from Scottish Enterprise who highlighted the economic importance of the proposed waste management facility and considered that the proposal represented an important sustainable alternative to landfill for waste arising from the commercial and industrial sector in the Lanarkshire region. Scottish Enterprise also considered the proposed facility would benefit Lanarkshire's economic performance.

6.3 Further supporting comments were submitted via the e-planning portal which in summary offers the following material points of consideration:

- The proposed Pyrolysis plant is not an incinerator (as generally considered by most objectors) as it does not include a combustion process but can be defined as the thermal decomposition of organic material through the absence of oxygen.
- Pyrolysis techniques produce a fraction of the waste of an incinerator.
- It is not a new untried technology (as suggested by others) but has been around for some time.
- Pyrolysis is 80% heat efficient; meaning 80% of the heat produced can be recovered and reused/put to some other use.
- This technology should be embraced and is a better alternative than sending waste to landfill

6.4 Despite the significant volume of representation received in regards to the application, the points of objection have been carefully assessed. It has been determined that the objections cannot be sustained and do not raise sufficient reason or concerns that would justify a recommendation that planning permission should be refused. Specific amenity concerns can be addressed and controlled via conditions.

7. Conclusion

7.1 It has been concluded that the proposals accord with the terms of the development plan and are acceptable when assessed against the NWS, AWP and other material considerations noted in the main report. The proposals are considered to be acceptable and it is therefore recommended that planning permission be granted subject to conditions.

APPLICATION NO. C/09/00675/FUL

REPORT

1. Site Description and Location

1.1 Planning permission is being sought for a Commercial, Industrial and Municipal Waste Material Recovery and Renewable Energy Facility at the former Shanks & McEwan Site, 251 Glasgow And Edinburgh Road, Coatbridge (A80).

1.2 The application site extends to some 3.6 ha in area and is bounded to the south by the A8 duel carriageway, which forms the main arterial road linking Glasgow to Edinburgh where it merges with the M8 at Newhouse some 3 km east of the site. To the immediate east, the site is bounded by a narrow linear woodland feature which runs parallel with the main Motherwell-Coatbridge railway line. To the north and west of the application site there is an area of scrubland that was previously part of the former Shanks and McEwan landfill site, which bounds the North Calder Water. Shawhead Industrial Estate and residential area are located 490m to the northwest. The residential area of Carnbroe is situated some 200m northeast of the site beyond the railway line and woodland area. (Refer to location plan).

1.3 The site is currently occupied by a tyre recycling business (Envirotyre) and vehicle courier service (Courier Connections) and access to the site is via an existing priority road junction off the east bound A8 dual carriageway. It generally consists of hard standing, exposed made ground and supports limited vegetation.

1.4 The landform of the surrounding countryside is undulating with woodland on a mound north-east of the site offering some screening from much of the Carnbroe housing area. The transport corridors of the A8 and railway offer strong linear features in the local landscape and the North Calder Water (designated a Site of Importance for Nature Conservation (SINC) by the Council) provides a green corridor valley feature between the site and the Shawhead industrial estate and outlying housing areas.

2. Proposed Development

2.1 The proposed development would involve the construction of a merchant operated (commercially open to all potential users) waste materials recovery and renewable energy generation facility for the treatment of non-hazardous waste from municipal, commercial and industrial waste stream sources. The proposed facility would be accommodated within one building and comprise 2 distinct sequential processes described in summary as follows.

- *Materials recovery and fuel preparation*. This first stage would mechanically treat municipal, commercial and industrial waste to extract recyclable material from the waste streams and reduce mass by driving off moisture, using state-of-the-art mechanical and heat treatment (MHT) technologies.

- *Pyrolysis and power generation with waste heat recovery.* The second stage of the plant is the renewable energy system. The pyrolysis process involves the thermal degradation of organic waste in the absence of free oxygen by the indirect application of heat to produce a combustible gas which, after suitable cleaning, is used as a fuel in an internal combustion engine (ICE) coupled to a generator, which then produces electric power. Heat energy, recovered from the ICE and other parts of the energy plant, is used as a heat source for the mechanical and heat treatment (MHT) stage of the process, which offers a sustainable energy production source.

2.2 The materials recovery element would have a capacity to process up to a maximum of 160,000 te (metric ton) per annum of non-hazardous (non special) commercial, industrial and municipal solid waste (MSW). Based on typical municipal waste analysis data it is

estimated that 20% (32,000 te) of all wastes would be recovered for recycling, and approximately 23% (36,800 te) of waste would consist of water, which would be evaporated or recycled. Approximately, up to 46% (73,600 te) would be converted to a refined biofuel, which would be further processed and utilised in the pyrolysis facility and an estimated 11% (17,600 te) of the remaining residual waste would need to be sent to a landfill site. However the actual process outputs would be determined by the composition of the inputs, therefore these figures are indicative and the processes shall ensure that landfill residue is minimised.

2.3 The renewable energy facility (pyrolysis process) would have the capacity to process 80,000 te per annum of refined biofuel, non-hazardous sludges and wastes that do not require pre-processing, and non-waste biomass. This facility would comprise 2 x 40,000 te per annum pyrolysis plants and gas engines. Based on a typical waste input analysis it is anticipated that the annual feed to the pyrolysis would comprise approximately:

- 73,600 te refined biofuel from the materials and fuel preparation facility; and
- 6,400 te waste and non waste biomass received directly into the pyrolysis units.

These proportions would be subject to the composition of materials received. Wastes that may be accepted at the renewable energy facility may include:

- Refined biofuel from the material recovery process
- Pre-processed refined biofuels imported to the site (potentially up to 20,000 te per annum to cover for variations in the quantity of bio-mass fuel) and;
- Non-hazardous (non-special) sludges

2.4 All waste processing would be undertaken within one large building that would also accommodate a waste water treatment plant for the treatment of process water and an electricity substation. The processes as describe above would require the provisions of 2 chimney stacks, each 27m in height positioned near to the centre of the east and west elevations of the building. The footprint of the building would cover approximately 17,100m² and would be industrial in character. The main building would extend to some 18m in height to roof eaves and the roof design would incorporate a shallow curve to minimise its overall height. An ancillary two storey office and entry/exit weighbridge control office, with respective footprints of 150m² and 18m² are also proposed. The colour of the external metal cladding finishes on the main and supporting buildings would be grey and blue.

2.5 The building would accommodate a waste reception area on the north elevation, homogenising store, waste processing area, recyclate separation and fuel preparation area to the southern end of the building. Two energy generation and heat recovery plant areas would be situated adjacent to the processing plant area. On the west elevation there would be a waste water treatment plant, bio-filter plant and sub-station which would be lower in height to the main building but with similar external design characteristics. The proposed facility would operate on the following basis.

2.6 Materials Recovery and Fuel Preparation: Waste delivered to the recovery facility would enter the purpose built building through mechanically operated doors, which would close automatically after vehicle entry at its northern elevation. The atmosphere within the building would be maintained at negative pressure, and air vented via the process of bio-filter to control odorous emissions. The supporting Environmental Statement (ES) advises that there are no undesirable emissions to atmosphere at this stage of the plant process as odour and dust are controlled by active air management systems (within the building) before being passed through a bio-filter to atmosphere. Waste materials would be tipped in a reception area and fed into a screen using a mechanical shovel. All bulky items then caught by the screen would be assessed, and materials such as concrete and rubble would be segregated for re-use off site. Some items may also be rejected and placed with the residual waste (waste that cannot be further recycled, reused or composted) destined for landfill. Wastes that would be suitable for further processing would be crushed or

shredded and mixed into the process feed which would be collected in a homogenising feed store. This feedstock of processed waste would be subject to a range of mechanical and physical separation processes. For example, plastics, ferrous and non ferrous metals would be sorted using conventional equipment such as magnetic separators and optical sorters. The unrefined biomass fuel may also contain glass, ceramics, grit and stones. Further processing by a density separator would then remove unwanted fuel contaminants that would then result in a highly refined biomass fuel.

2.7 Thermal Treatment and Renewable Energy Generation: The refined biofuel from the initial preparation process would be fed directly into the pyrolysis process, or first blended with imported biomass prior to the thermal treatment. Pyrolysis, as noted above is the treatment of material in a controlled atmosphere in the absence of oxygen. Typically the process requires temperatures of between 500-900°C to break down molecular bonds. This process produces char and synthetic gas (syngas). The char would be recycled and possibly utilised as a soil conditioner for off-site use. The syngas would be collected in two 200m³ storage tanks on site to provide heat for the pyrolysis units and to produce renewable electricity. The facility would generate a maximum output of 10 MW of electricity per annum subject to the composition of the received waste. 3 MW would be utilised by the facility and an anticipated maximum excess power of 7 MW of electrical power being exported to the national grid via one of several potential connection points close to the site. This would provide enough power to meet the annual demands of some 11,000 households. The supporting ES information advises the only emissions to atmosphere from the pyrolysis process are via the exhaust stack on the gas engine, which is required by law to meet the very stringent requirements of the Waste Incineration* Directive (WID) legislation considered by SEPA under the Pollution, Prevention and Control (Scotland) Regulations 2003 (PPC).

*The PPC regulations state that “whilst pyrolysis is not the incineration of waste, its control and regulation does fall under this SEPA Directive.”

2.8 Heat Recovery: Heat recovered from the gas engines would be transported via a system of internal pipe-work and used as a heat source in the mechanical and heat treatment process (MHT). It is estimated that approximately 143 MW of heat would be reused in the MHT process pre annum.

2.9 Residual Wastes: Residual wastes such as bulky material, gas bottles and large pieces of waste such as tree stumps or concrete blocks, or waste that cannot be recycled would be taken from the site for disposal as appropriate.

2.10 Process Outputs: Predicted solid process outputs for export from the site would include:

- 32,000te recyclates;
- 17,600te residual waste from the materials mechanical heat treatment process to landfill;
- 8,000te char from the pyrolysis and renewable energy plant.

This would result in a total of 57,600te of exported materials from the site

2.11 Drainage: Clean surface water runoff would be collected and discharged via a drainage pond to the North Calder Water. The drainage pond would be designed in accordance with the principles of SUDS criteria and shall be able to accommodate flood event equivalent to a 1 in 30 year return period. Process water discharges would be cleaned

2.12 Hours of Operation: It is proposed that the MHT process and renewable energy generation facilities would operate 24 hours per day, 7 days per week. Deliveries and removal of recyclable and residual waste destined for landfill would occur during 0700-1900 hours Monday to Friday, and 0700-1300 hrs Saturday. Deliveries and/or

export of materials would only occur outside these times in exceptional circumstances with the express permission of North Lanarkshire Council.

2.13 Employment: The applicant anticipates that there would be up to 50 full time jobs created by the proposed development with perhaps 4 teams of 5 staff operating on a shift rota basis to provide the required 24/7 operational requirements. In addition up to 30 staff may be employed for the core hours during Monday to Friday.

2.14 Traffic Generation: All waste material would be delivered to and removed from the site by road with all vehicles entering and leaving the site directly from the A8. As the A8 is dual carriageway, most vehicles would be obliged to pass under or through the Shawhead interchange, which is situated to the west of the site. The anticipated vehicle movements during the operational phase of the proposed development are as follows:

Daily Vehicle Movements (return journeys)

Day	Staff	Waste Deliveries	Waste Removal	Total
Mon-Fri	90	122	42	254
Sat.	40	80	38	158
Sun.	30	0	8	38

As noted above there would be two weighbridges on the site, one each for vehicles entering and leaving the site with associated control office. All waste delivery and removal vehicles would cross each weighbridge with loads recorded in accordance with SEPA's regulations.

2.15 The developer is to consider setting up a Liaison Group arranged with community representatives. This is to encourage dialogue and confidence over both the management and regulation of the waste management facility. It would be proposed that a representative from SEPA would be invited to such meetings.

3. Applicant's Supporting Information

3.1 In accordance with the requirements of The Environmental Impact Assessment (Scotland) Regulations 1999, the applicant has prepared an Environmental Statement (ES) to accompany the planning application for the development proposal. The submitted ES that accompanies this application includes assessments on the following topics:

- Need for the scheme in terms of: National Waste Strategy (NWS); Area Waste Plan (AWP); Municipal/Commercial/Industrial Waste Arisings; Waste Management Capacity within the Glasgow and Clyde Valley Area; Other Waste Management Facilities and Mass Balance (assessment of the proposals contribution to a sustainable waste management network for Scotland taking into account its strategic location for handling waste from surrounding areas and ability to utilise the plant as a renewable energy resource)
- Alternatives: Site Selection
- Existing Environment: The site and its surroundings
- Overview of the Proposed Development
- Best Practicable Environmental Option.
- Planning Policy Assessment
- Key Findings: Landscape and Visual Amenity; Air Quality; Hydrology and Flood Risk; Traffic; Noise; Ecology.
- The ES also included a list of Technical Annexes that provided further details information on Landscape and Visual Amenity; Air Quality; Land Quality; Hydrology & Flood Risk; Traffic; Noise and Ecology.
- The ES Volume 2 includes Graphics and photomontages which cross relate

to the above topics where required.

- The ES Volume 3 includes consultation responses from the Scoping Exercise.
- The ES also includes details of the applicant's pre-application public consultation exercise, which included an exhibition and public meeting. This was undertaken voluntarily as the application was submitted before the revised planning regulations requiring the statutory pre-application consultation PAC for major applications came into force on 3rd August 2009. The applicant issued an updated public consultation brochure to all of the individuals who had already commented on the proposals.

3.3 The application is also supported by a Planning Supporting Statement, Transportation Statement and Travel Plan Framework, Habitat Survey (Update) 2009, Consultation (Update) November 2009. A copy letter from Shore Energy Ltd to SEPA 4th November 2009 was also included in support of the planning application. This offered further clarification of Need; Compliance with Area Waste Plan (AWP); Waste volumes capable of treatment by thermal process and Compliance with Scottish Government's 25% cap on MSW)

3.4 The applicant also submitted an Independent Review of Emissions Impacts, which provides further details of the Pyrolysis technique to underline that it does not involve an incineration process.

4. Site History

4.1 The application site forms part of a larger area that has historically been subject to a variety of former industrial type uses including railway sidings (late 19th century), tramways (early to mid 20th century) and a slag works (mid 20th century). The site was also encompassed within the former Shanks and McEwan landfill operation, which ceased during the early 1970s. It is understood that waste materials deposited in this area comprised a mix of industrial, commercial and domestic wastes; however records are unavailable to confirm this. The former landfill site was subject to some basic restoration works that including tree planting, however the trees were felled in 2007. As noted above, the application site is currently occupied by a tyre recycling business (Envirotyre) and vehicle courier service (Courier Connections). The former landfill area, located north of the application site is currently vacant land and has a semi-derelict appearance. This area was subject to previous planning applications 07/02078/OUT and 09/00428/OUT, where planning permission for industrial and distribution was sought. However both these applications were refused planning permission. The most recent planning applications are listed as follows.

- 02/00597/FUL Erection of 20M High Telecommunications Mast and Associated Cabinet and Compound (Granted July 2002)
- 02/00963/FUL Formation of New Access to A8 Trunk Road (Granted August 2002)
- 07/00643/FUL Change of Use of General Industrial Area to Waste Transfer Station for Storage and Processing of Car Waste (Retrospective) (Granted August 2007**)**
- 07/02078/OUT Class 5 (General Industry) and Class 6 (Storage and Distribution) Development (In Outline) and Associated Works (Refused May 2008**)**
- 09/00428/OUT Class 5 (General Industry) and Class 6 (Storage and Distribution) Development in Outline (Refused June 2009 and now subject to an ongoing appeal to Scottish Ministers).

5. Development Plan

5.1 The proposals are considered to be of strategic significance and require to be assessed against the following structure plan policies.

Structure Plan

5.2 Under the Glasgow and the Clyde Valley Joint Structure Plan 2000 incorporating the Forth Alteration 2008 the proposals require to be assessed under Strategic Policy 9 (Assessment of Development Proposals) and other related strategic policies. Strategic Policy 10 would apply in the case of a departure (to be established or otherwise through Strategic Policy 9).

5.3 The Structure Plan recognises the aims of the Area Waste Plan (AWP) for Glasgow and Clyde Valley (2003). Strategic Policy 9A requires that waste management developments which exceeds the thresholds set out in Schedule 9 has been established in terms of SP9A(vi), its relationship to the requirements for waste management facilities as set out in the Glasgow and Clyde Valley Area Waste Plan 2003. (GCVAWP)

5.4 Strategic Policy 9B sets out that the location of the development is appropriate in terms of the need to: (i) safeguard and avoid the diversion or displacement of investment from locations identified in SP6; (ii)(a) promote Urban Regeneration by giving preference to the use of brownfield urban land rather than greenfield land or open space;(vi) promote sustainable transport by: (vi)(b) the application criteria for sustainable locational choices as set out in Schedule 3(a)(ii); (vii) implement the waste management hierarchy as defined in the National Waste Strategy and priorities indentified in the Area Waste Plan; (viii) avoid the risk of flooding from all sources throughout the relevant water and drainage catchment area and safeguard the storage capacity of the functional flood plain; (ix) avoid negative impact on Health and Safety; and (x) contribute to the implementation of the Air Quality Strategy.

5.5 Strategic Policy 9C states that appropriate provision has been made by the developer for: (i) the infrastructure or facilities required to make the development acceptable; (ii) the implementation or facilities required to make the development acceptable; (iv) the provision of sustainable urban drainage systems in accord with the relevant drainage strategy or assessment; and (vi) arrangements for the maintenance of measures under criteria 9C(i) to (iv) noted above.

5.6 Strategic Policy 6 (Quality of Life and Health of Local Communities) would be supported by: (d) improving or not being detrimental to Airdrie and Coatbridge as Environmental Improvement Priorities as listed in Schedule 6(d) and (f) promotes the provision of an integrated system of waste management facilities.

5.8 If the proposal fails to meet the criteria in SP9 it should be regarded as a departure and assessed against the relevant criteria of Strategic Policy 10.

Local Plan

5.9 Under the Adopted Monklands District Local Plan 1991 the proposed site is subject to multiple zoning as listed as follows:

- ECON 2 Existing General Industrial Areas
- ECON 5/7 Rehabilitation of Industrial Sites-Carnbroe (South)
- WDR 1 Landfill and Refuse Disposal
- CU1/5 Safety Restraint Areas-Landfill Gas.

5.10 The application site is zoned ECON 2 as an Existing General Industrial Area and confirms that under this policy the Council would prefer to ensure the industrial character of such areas are retained by; (1) allowing the continuation of industrial use where existing industrial premises and or land in these areas are redeveloped, unless this is proved to be impracticable due to poor ground stability, unsuitability of buildings, or of there are major benefits to the community from a change of use; (2) supporting the viability of existing industrial premises by allowing, in accordance with planning regulations, the subdivision of vacant factories to accommodate smaller industrial firms; and (3) by ensuring only wholesale or distribution outlets and not retail outlets operate in existing industrial premises.

5.11 Policy ECON 5/7 confirms that land covered by this zoning, (which partially covers the application site) is also industrial land, albeit that it may require ground rehabilitation works before it can be brought into such use.

5.12 Policy WDR1 is not considered relevant in this instance as the proposals do not involve any landfill activity at the proposed site.

5.13 Policy CU1/5 identifies that the proposed development lies within a Landfill Gas Area. Under this policy no development would be permitted within 250m of either operational or completed land-fill sites unless it can be demonstrated that the site poses no risk in this regard.

Material Considerations

5.15 **National Policy and Guidance:** These provide statements of Scottish Government policy on nationally important land use and other planning matters, supported where appropriate by a locational framework. NPF's and SPP's identify key priorities for the planning system.

National Planning Framework (NPF) 2004
National Planning Framework for Scotland 2 (NPF 2) 2008
National Waste Strategy 2003
Scottish Planning Policy and PAN 63 – Waste Management Planning 2002 are relevant
PAN 51 Planning, Environmental Protection and Regulation 2006
PAN 56 Planning and Noise 1999

5.16 Both the **National Planning Framework** and the **National Planning Framework 2** identify that the restoration of vacant and derelict land, including landfill sites offers important strategic opportunities for improving the environment and increasing biodiversity through the development of green networks and the expansion of urban, amenity and community. NPF 2 sets out targets to increase recycling or composting, reduction in landfill waste, sets a 25% cap on energy from waste plants at national and local level and requires such plants to achieve high energy recovery rates. It also seeks a revision of the NWS and would set targets for the amount of commercial and industrial waste sent to landfill. NPF2 also advises that planning authorities should facilitate a network of waste management installations to assist these targets to be met, taking opportunities to derive energy from waste and develop local heat networks where possible. NPF2 also states that other types of waste management plants should include recycling and composting, anaerobic digestion plants and relevant considerations should include the proximity principle, the transport network and the relationship of intermediate transfer and treatment installations to tertiary waste management installations. It recognises the advances in technology and accepts that modern treatment and transfer stations are contained facilities, which can easily be sited on industrial estates and where possible located close to the population centres they serve and new facilities should link with tertiary waste management installations in a “hub and spoke” arrangement.

5.17 **The National Waste Strategy Scotland**, (NWS) as published by SEPA in 1999, together with the Area Waste Plan 2003 (AWP) and the Best Practicable Environmental Option (BPEO) for the Glasgow and Clyde Valley Waste Strategy Area (GCVWSA), are material considerations, which relate closely to the policy context. The relevant national policy on how these should affect the land use planning system is expressed through Scottish Planning Policy. This policy guidance is also complemented by PAN 63 (Waste Management Planning)

5.18 The National Waste Strategy: Scotland established key principles which were included within the GCVAWP 2003. These are:

- The Waste Hierarchy
- The Proximity Principle and Self-Sufficiency
- The Best Practicable Environmental Option (BPEO)

The GCVAWP 2003 sets out an indicative list of waste management facilities for the Glasgow and Clyde Valley Joint Structure Plan Area in relation to the Best Practicable Environmental Option (BPEO). In this respect the following combination of indicative facilities were consider to offer the BPEO for the Glasgow and Clyde Valley Area.

- 2 Mixed-Waste Processing Facilities-combined capacity- 125,000te
- 4 Material Recovery Facilities-combined capacity-225,000te
- 4 Composting Facilities-combined capacity 95,000te

5.19 The GCVAWP 2003 acknowledges that the above noted facilities are indicative only as it was realised that contractual and/or operational arrangements may require a variable combination of a small number of large or numerous small-scale facilities. Moreover the requirements for these facilities were based on municipal waste only, and as such there is no allowance for the processing of industrial and commercial waste streams.

The AWP identifies that other appropriate waste-recovery technologies may have to be integrated into this framework after 2010 to enable landfill diversion targets to 2013 and 2020 to be achieved, including processes such as thermal treatment, anaerobic digestion, additional production of refuse-derived fuel, autoclaving, and other emerging waste-treatment technologies. The AWP envisages that by 2020, the 96% reliance landfill disposal (indentified in 1998) would be reduced to only 25%. In tonnage terms this represents approximately 650,000 tonnes of biodegradable waste being diverted from landfill across the waste strategy area by 2020.

5.20 **PAN 63 (Waste Management Planning 2002)** advises there may be significant planning, operational and economic advantages when waste management facilities are located close to where the waste arises. The Self Sufficiency and Proximity Principle is reinforced by stating that structure plan areas should seek to provide facilities to develop a waste management network to handle local waste but also states that the transportation of waste between Area Waste Plans may be considered sustainable only if a local waste facility in an neighbouring AWP is nearer to the waste source than the nearest waste facility located within the exporting Waste Plan Area.

5.21 The **Finalised Draft North Lanarkshire Local Plan 2009 (FDNNLP)** designates the area as EDI 1 A1 (Existing Industrial and Business Area) and EDI 2 A (promoting Economic Development and Infrastructure Industrial and Business Sites.

5.22 **ED1 A1** supports the continuing character of existing industrial and business areas, where appropriate by considering criteria listed under this policy. However as this proposed waste management facility can be regarded as an industrial use and therefore no assessment is required against the criteria.

5.23 **EDI 2 A** signifies that this section of land has been zoned as industrial use.

5.24 In addition, the FDNNLP requires that all proposed developments are assessed against the following policies:

DSP 1 Amount of Development sets out that any proposed development that does not form part of the Established Industrial Land Supply 2008 and that cannot be justified by demand assessment are considered as Development Plan departures and require to be justified in terms of both need and benefit under Structure Plan Strategic Policy 10.

DSP 2 Location of Development sets out that planning permission for new

developments may be granted if they are consistent with the policy's locational criteria.

DSP 3 Impact of Development sets out that development proposals out-with any requirements for Traffic, Retail or Environmental Impact Assessments require assessment in terms of their impact on social or environmental infrastructure of the community. The nature of this particular development requires stringent assessment in this regard. The ES was submitted to report on the significance of the environmental impacts on the surrounding established residential areas, local SINC and effect of potential pollution from the plant to the wider area.

DSP 4 Quality of Development sets out criteria that should form part of any Development Management Assessment. This seeks to ensure that development would only be permitted where high standards of site planning and sustainable design are achieved.

6. Consultations

6.1 **SEPA** had no objections subject to conditions covering:

- the need to meet the Scottish Government's target on thermal treatment of municipal waste;
- the requirement to separate and identify all residual waste;
- the need to meet the Scottish Government's waste policy and principles of sustainable waste management;
- SEPA's Thermal Treatment Guidelines;
- additional ambient air quality monitoring to ensure the development meets SEPA's PPC regulations and local AQMA standards;
- additional noise prevention measures;
- Site Waste Management requirements;
- Surface Water Drainage and Construction Method Statement.
- SUDS scheme

6.2 **Transport Scotland-Trunk Road Network Management Directorate** had no objection to the proposed development subject conditions covering:

- A requirement by the developer to submit a Travel Plan that sets out proposals to reduce dependency on the private car in accordance with Scottish Government policy;
- Further details of a barrier that would prevent encroachment of the A8 Trunk Road;
- A restriction in any advertising adjacent to the A8 Trunk Road;
- Further details of any proposed lighting columns at the site

6.3 **JMP Consultants Limited** (Term Consultants to Transport Scotland Trunk Road Network Management Directorate TS-TRNMD), assessed the submitted Transportation Assessment, which forms part of the ES on behalf of TS-TRNMD. They considered the identified impacts from the additional vehicle trip generation, air quality, and noise and vibration from road traffic and concluded that from an environmental standpoint the percentage increase in traffic generation as a result of the development is likely to cause only minimum increases in the amount of traffic that currently use the trunk road network.

6.4 **Scottish Water** had no objection but recommended that a totally separate drainage system should be provided with the surface water discharging to a suitable outlet that should be subject to a sustainable urban drainage system (SUDS).

6.5 **Scottish Power Energy Networks** advised that a substation and underground cables were located within the development site. As the developer had yet to contact SP they had no option but to object. This objection may be considered as a holding objection until

the developer makes contact with SP.

6.6 **Scotland Gas Networks** advised there were no gas mains within the vicinity of the site.

6.7 **Historic Scotland** (HS) undertook an appraisal of the submitted ES in terms of their own remit and concluded that there are unlikely to be any significant impacts on the historic environment assets of national importance. Consequently HS had no objection but did suggest the Council's Conservation and Archaeology Services should advise on the likely impacts and mitigation proposed for any unscheduled or unrecorded archaeology.

6.8 **Health and Safety Executive** had no comments on the ES.

6.9 **The Scottish Government** (Climate Change Division) had no objection and noted from the ES that appropriate mitigation measures would be introduced to minimise potential noise and air quality impacts during the construction and operation of the plant.

6.10 **Scottish Natural Heritage** (SNH) has no objection to the proposed development subject to a list of conditions covering the following aspects:

- ensuring that the best practice measures for protecting otters and bats and enhancing their respective habitats as suggested in the ES are implemented including provision of bat nesting boxes, introduction of native plant species, creation of rich grassland areas and ensuring that site lighting columns are fitted with downward reflectors;
- ensuring that development impacts on breeding birds are minimised through compliance with the Wildlife and Countryside Act 1981 (as amended).
- Ensure that the mitigation measures to address landscape and visual impact measures as indicated in the ES are implemented;

6.11 **Strathclyde Partnership for Transport** (SPT) had no comments.

6.13 **The Scottish Wildlife Trust** had no objection to the proposals and welcomed the Best Practice Measures for Wildlife and for Biodiversity Enhancement as noted in Annex G Ecology of the ES. SWT's main concern is the possible pollution of the North Calder Water either during construction or in periods of unusually heavy rainfall, but note that all works must comply with SEPA's PPC guidelines and trust that this would ensure adequate protection of this watercourse though the incorporation of a SUDS pond. It was suggested that the SUDS pond be designed to enable it to make a positive contribution to biodiversity by making this as large as practicable to enable margins to be planted with appropriate native species to give cover for insects and birds.

6.14 **BT** had no objection.

6.15 **The RSPB** had no comment.

6.16 **Traffic and Transportation** had no objection to the proposals subject to a condition requiring the developer to provide adequate parking facilities at the site and further details that demonstrate that all waste delivery vehicles would have sufficient turning facilities within the site and waste tipping hall.

6.17 **Greenspace (Ecology and Landscape)** advised that whilst there were no nature conservation designations on the site it was adjacent to a SINC. Earlier concerns that there was no adequate phase 1 survey available were resolved by the developer who undertook an up to date Habitat Survey Report and submitted this in support of the proposals. NLC Greenspace had no objections subject to a condition requiring that before the development starts, a landscape scheme shall be submitted for the approval of the planning authority in consultation with NLC Greenspace and the landscape specification should meet both visual impact issues and offer improvement to local biodiversity.

6.18 **Protective Services** had no objection to the proposals subject to conditions covering the following aspects;

- Site investigation survey
- Further ambient air quality monitoring

6.19 **Geotechnical** had no objections subject to a condition requiring that a detailed site drainage scheme be provided that included provision for SUDS

7 Representations

7.1 A total of 4298 representations were received in respect of the planning application. The majority of these consisted of 8 different pro-forma type letters with separate signatories which raised objections to the proposals. Most of these pro-forma type objections were submitted by local resident group MRAPP (Monklands Residents Against Pyrolysis Plant). A letter of objection was received from Monklands Glen Community Council which although not counter signed by other individuals advises that it represents the views of 500 households and residents in the South Airdrie area. It was noted that 152 of the pro-forma objections had no address or the address was illegible and as such could not be formally acknowledged. Other representations consisted of individual letters, emails and comments made on line via the e-planning portal. Some representations were duplicates (9) of previously submitted objections. A letter of objection was also received from Elaine Smith MSP. All of the material terms of objection have been fairly summarised under topic headings noted in Appendix B to this report.

7.2 However there were 2 representations submitted in support of the proposals.

A letter of support was received from Scottish Enterprise who highlighted the economic importance of the proposed waste management facility and considered the proposals represented an important landfill diversion sink for waste arisings from the commercial and industrial sector in the Lanarkshire region. Scottish Enterprise also considered the proposed facility would benefit Lanarkshire's economic performance in terms of:

Support Summary

- **Productivity:** reduced waste management and transportation costs due to local companies making use of the facility;
- **Competitiveness:** assist corporate responsibility of businesses in meeting their zero landfill ambitions and assist them to offer greener products and services. Businesses seeking to manage their carbon contribution or "footprint" can make reductions by diverting waste from landfill to local based waste treatment facilities by reducing the distance waste has to travel.
- **Renewables:** provision of low carbon recovered material streams, and renewable electricity and heat.
- **Economic opportunity**: £50M investment in the local economy with 50 new jobs and wider supply chain opportunities.

Further supporting comments were submitted via the e-planning portal which in summary offers the following material points of consideration:

- The proposed Pyrolysis plant is not an incinerator (as generally considered by most objectors) as it does not include a combustion process but can be defined as the thermal decomposition of organic material through the absence of oxygen.
- Pyrolysis techniques produce a fraction of the waste of an incinerator.
- It is not a new untried technology (as suggested by others) but has been around for some time.
- Pyrolysis is 80% heat efficient; meaning 80% of the heat produced can be recovered and reused/put to some other use.

- This technology should be embraced and is a better alternative than sending waste to landfill.

7.3 The material terms of objections can be categorised under the following subject matters.

Objection Summary

- Pollution and Air Quality
- Lack of Need, Contrary to Development Plan, NWS, AWP and National Policy
- Odour
- Noise
- Traffic Impact
- Health Hazard and Proximity to Residential Areas
- Ecology and Wildlife Impacts
- Waste Types
- Site Selection and Proximity to Residential Areas
- Lack of Public Consultation
- Other Matters

A more detailed summary of the terms of objection is provided in paragraph 14 and details of the objections are attached as Appendix B.

Planning Assessment

Section 25 of the Town and Country Planning (Scotland) Act 1997 provides that where, in making any determination under the Planning Act, regard is to be had to the development plan, and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan for the area comprises the Glasgow and the Clyde Valley Joint Structure Plan 2000 (Approved 2008) and the Adopted Monklands District Local Plan 1991 (adopted 1995).

The Glasgow and the Clyde Valley Joint Structure Plan 2000

8.0 Under the Glasgow and the Clyde Valley Joint Structure Plan 2000 incorporating the fourth alteration 2008, the proposals require to be assessed under Strategic Policy 9 (Assessment of Development Proposals) and other related strategic policies. Strategic Policy 10 would apply in the case of a departure (to be established or otherwise through Strategic Policy 9). The criteria referred to in SP9 and SP10 are complementary, and the fulfilment of one criterion does not over-ride the need to satisfy the others.

8.1 **Strategic Policy 9A** of the 2000 Structure Plan recognises the aims of the Area Waste Plan (AWP) for Glasgow and Clyde Valley Area 2003. Under the terms of SP9A(vi), waste management proposals exceeding the 10 hectare threshold indicated in Schedule 9 would be considered to be of strategic significance and a satisfactory case for the development would need to be established in terms of its relationship to the requirements for waste management facilities set out in the Glasgow and Clyde Valley Area Waste Plan. Whilst the proposed site area only extends to some 3.6ha, it is considered that due to the regional function and operational requirements of the proposed waste management facility (in sourcing waste over a 30 mile radius of the site), the proposals are considered to be of strategic significance and as such, need to be assessed against the AWP. The application included information to demonstrate that the development would accord with the aims of the AWP and this was considered in detail by SEPA through the consultation process.

8.2 As noted above SEPA initially objected to the proposals as they considered that the developer had not provided sufficient information to justify a need for the proposed waste treatment plant under the terms of the NWS and AWP. The outstanding need issues raised by SEPA (refer to paragraph 6.1 above) were subsequently addressed by the developer and SEPA formally withdrew their objection subject to the conditions as noted

above. As such it is considered that the proposals accord with the terms of SP9A(iv) in terms of its potential to accord with the AWP.

8.3 **Strategic Policy 9B** sets out that the relative location of the development is appropriate in terms of the need to:

(i) Safeguard and avoid the diversion or displacement of investment from the development locations indentified in Strategic Policy 1, 5, 6 and 8.
(ii)(a) Promote Urban Regeneration by giving preference to the use of brownfield urban land rather than Greenfield land or open space.
(vi)(b) Promote sustainable transport by the application of criteria for sustainable locational choices as set out in Schedule 3(a)(ii).
(vii) Implement the waste management hierarchy as defined in the National Waste Strategy and priorities indentified in the Area Waste Plan.
(viii) Avoid the risk of flooding from all sources throughout the relevant water and drainage catchment area and safeguarding the storage capacity of the functional flood plain.
(ix) Avoid negative impact upon Health and Safety
(x) Contribute to the implementation of the Air Quality Strategy

8.4 With regards to **SP9B(i)** above it can be noted that the proposals involve the development of a waste management facility at an existing partially derelict industrial site located south of Coatbridge.

- South Coatbridge is listed as a priority urban renewal area under Schedule 1(b) of Strategic Policy 1 (Strategic Development Locations) where the aim is to encourage urban renewal in such areas.
- The Airdrie/Coatbridge area is also identified in Schedule 5 as a core economic development area under Strategic Policy 5 (Competitive Economic Framework).
- Under the terms of Strategic Policy 6 (Quality of Life and Health of Local Communities) the proposed development has the potential to provide local employment opportunities within Airdrie and Coatbridge, which are both indentified in Schedule 6(a) as preferred areas for further industrial and business development. Strategic Policy 6 also promotes the provision of an integrated system of waste management facilities.
- SP8 (Sustainable Development of Natural Resources) sets out a framework for the sustainable development of minerals, forestry and woodland, agriculture, renewable energy, use of water resources and environment related tourism. The proposed waste management facility is not located within an area that would contrain the sustainable development of such resources.

It is considered the proposals would not be contrary to **SP9B(i)** as the proposed development would not displace, but possibly result in, an investment in the potential development locations noted under SP1, 5, and 6. Moreover the proposals would accord with SP6 as the development has the potential to contribute to an integrated system of waste management facilities as noted by SEPA. The proposals would not restrict the sustainable development of natural resources and as such complies with SP8 in this respect.

8.5 The proposals would involve the redevelopment of an existing industrial site, which is considered to be partially derelict. As such the proposals would result in an element of Urban Renewal and would not significantly encroach or impact on Greenfield land or open space. As such the proposals are considered to be in accordance with **SP9B(ii)(a).**

8.6 Under **SP9B(vi)(b)** the location of a new development needs to be appropriate in terms of promoting sustainable transport by the application of criteria for sustainable locational choices as set out in Schedule 3(a)(ii) where new waste management facilities should consider *where possible*, dedicated haul roads provided by the developer or use of rail transport. Generally, SP3 (Strategic Management of Travel Demands) seeks to promote the sustainable development of the Glasgow and Clyde Valley Structure Plan area

through the selection of sustainable locations for development that reflect their purpose and function and relative transportation needs. Schedule 3(a)(i) sets out a hierarchy of preference of accessibility for bulk goods and freight movement as follows:

- Directly from railhead or port
- Short road haul to rail head or port
- Trunk Road Network

As noted above, the site is already accessed directly on to the A8 trunk road and the developer proposes to continue to use the existing access. It is considered that developing a rail link from the adjacent railway would now be impracticable given the relatively small site area and the large building footprint. The developer has provided estimates of the additional volumes of traffic that would access the site from the A8 trunk road as a result of the development and these were considered relatively insignificant and acceptable to Transport Scotland. It is therefore considered that the location of the site is sustainable as the continued use of the existing access directly onto the A8 trunk road network would be acceptable under the Hierarchy of Accessibility noted in Schedule SP3(a)(i).

8.7 **SP9B(vii)** requires that the location of the development is appropriate in terms of the need to implement the waste management hierarchy as defined in the National Waste Strategy (Prevention-Reuse-Recycling-Other Recovery-Disposal) As noted above SEPA had no objection to the proposal in terms of its compliance with NWS, and AWP, and considered the proposal offers a BPEO and would comply with the proximity principle. SEPA consider that the proposal has the potential to help deliver sustainable waste management in North Lanarkshire and surrounding areas given its scale, location relative to transport networks and its potential to assist in a move away from landfill and towards energy recovery. As such it is considered the proposed location of the waste management facility is appropriate in terms of the need to implement the waste management hierarchy as defined in the National Waste Strategy and assist in meeting the priorities of the GCV Area Waste Plan. As such the proposals fully accord with SP9B(vii).

8.8 **SP9B(viii)** requires that the location of the development is appropriate in terms of the need to avoid flooding. The ES included a study of the proposals impact on the area. The FRA indicated that pluvial flooding (from rainfall) is the only source of flooding that may affect the site or areas off-site. The FRA identified that the increase in surface water run off from the site as a result of the development would, in the absence of mitigation, increase the risk of flooding from surface water runoff on the North Calder Water. The potential significance was considered to be moderate and the report advised that mitigation measures would be required to reduce this impact. The mitigation measures would include the provision of a SUDS scheme.

8.9 Whilst Geotechnical agreed with the submitted FRA that the existing site was at low flood risk, it was considered that the developer should have submitted a drainage plan to demonstrate that a SUDS design, consistent with an industrial development could be provided. It is noted that the site is served by an existing attenuation pond and this would be adapted or redesigned by the developer to provide an appropriate SUDS scheme in agreement with Scottish Water and SEPA. It is therefore considered that a SUDS scheme of an acceptable design could be accommodated within the site and that this provision may be covered by a condition of any planning permission. The location of the proposed development is therefore considered acceptable under SP9B(viii) as appropriate attenuation measures could be provided at the site to avoid the risk of flooding.

8.10 Under the terms of policy **SP9B(ix)** the location of the development needs to be appropriate to avoid negative impacts on Health and Safety issues associated with the construction and operation of the proposed development. As noted above the Health and Safety Executive had no comments to offer on the Environmental Statement and Protective Services had no objection subject to further site investigations works being undertaken as it was considered the information submitted with the ES was not site

specific. This could be covered by a condition of any planning permission. It is therefore considered that the location of the development would be appropriate in terms of SP9B(ix).

8.11 Under the terms of **SP9B(x**) the location of the development needs to be appropriate in terms of the need to contribute to the implementation of the national Air Quality Strategy (AQS). It is noted that there were no objections from SEPA or Protective Services in respect of potential impacts of the development on air quality. SEPA considered that the proposed waste management facility would be capable of meeting their PPC permit requirements but would require the developer to undertake further monitoring in the area to support any subsequent PPC application to SEPA. Protective Services considered the proposals would not impact on the designated AQMA at Whifflet or Chapelhall. As such it is considered that the location of the development would not compromise the aims of the AQS or SP9B(x).

8.12 Under the terms of **SP9C** appropriate provision needs to be made by the developer for:

(i) Infrastructure: The proposals involve a redevelopment of an exiting industrial estate that is already adequately serviced.
(ii) Transport: The proposed development would use existing access arrangements and the developer is to submit and implement a green transport plan.
(iii) The development would have no significant impact on environmental resources as it is already in use for industrial purposes.
(iv) The proposals include a SUDS provision
(v) ICT connection is not applicable
(vi) Appropriate maintenance measures would be provided for i-iv above
(vii) There are no archaeological resources at this former landfill site.
(viii) Community Growth Area requirements are not applicable
(ix) The buildings would be designed to meet energy conservation requirements

8.13 It can be concluded that the proposals accord with the terms of policy SP9A,B and C of the Structure Plan

Monklands District Local Plan 1991

9.0 As the proposals would involve the redevelopment of an existing semi-derelict industrial site it is considered that the proposals are entirely consistent with the terms of policy **ECON 2** Existing General Industrial Areas and **ECON 5/7** Rehabilitation of Industrial Sites-Carnbroe (South) as detailed at paragraphs 5.9 to 5.11 above.

9.1 With regards to policy **CU1/ 5 Landfill Gas :** The ES Annex C Land Quality provides a detailed assessment on potential ground condition issues and acknowledges that previous uses of the site (including the former landfill operations) would require further ground investigations before construction works started at the site. The ES advises that appropriate Environmental Management Plan including method statements would need to be employed to assure Health and Safety plans are assured during the course of such investigation works. Such measures are controlled via environmental regulations and it is considered that safety at the site would not be compromised if these are adhered to. Protective Services had no objection to the proposals in this regard subject to conditions. As such it is considered that appropriate site investigations measures would be required before any development took place and such measures would render potential contaminants and potential sources of residual landfill gases inert and safe to enable the development to proceed.

9.2 It can be concluded that the proposals accord with the development plan policies noted above.

Material Considerations

10.0 Material considerations not already covered by development plan policy must be assessed to establish whether they outweigh the development plan. These would include:

- The Finalised Draft North Lanarkshire Local Plan 2008 (FDNLLP):
- National Policy and Planning Advice Notes, in particular those relative to waste management development.
- Environmental impacts including: Landscape and Visual Impact; Air Quality; Land Quality; Hydrology and Flood Risk; Traffic; Noise and Ecology issues which were all subject to an Environmental Impact Assessment as reported in the Environmental Statement;
- Consultation Responses
- Representations

10.1 The *Finalised Draft North Lanarkshire Local Plan 2008 (FDNLLP):* designates the area as ED1 A1 Existing Industrial and Business Areas and EDI 2 Promoting Economic Development and Infrastructure Industrial and Business Sites.

EDI 1 A1 and 2A: This proposed waste management facility is considered as an industrial use and therefore no assessment is required against the criteria.

All development proposals are subject to assessment against Strategic Policies DSP 1, DSP 2, DSP 3 and DSP 4 as follows:

DSP 1 – Amount of Development: As this proposal relates to a site that forms part of the Established Industrial Land Supply it would accord in principle to this policy.

DSP 2 – Location of Development: This policy sets out that planning permission for new developments may be granted if they are consistent with the policy's locational criteria. In this respect the proposed development meets the criteria as it involves the reuse of existing industrial land.

DSP 3 – Impact of Development: This policy sets out the development proposals, out-with any specific requirements for Environmental Impact Assessments require to be assessed in terms of their impact on economic, social and environmental infrastructure of the community. The proposals were subject to an Environmental Impact Assessment and the significance of the identified impacts was included in the accompanied Environmental Statement.

DSP 4 – Quality of Development: An appraisal is required to be carried out of the existing character and features of the site and its setting including; identity, connections, landscape, biodiversity, heritage or amenity valve.

10.2 These policies state there is no general presumption in support of waste development but such proposals would need to be assessed under local environmental considerations, the nature of the proposed working, restoration and aftercare (this aspect is not relevant in this instance), impact on local communities, potential for long-term improvements to site appearance, site access and affect on traffic safety, demonstration of need for the facility and potential use of alternatives to road transport. It is considered that the proposals would meet the terms of the above criteria as these issues have been addressed in the supporting ES information and there was no outstanding objection from SEPA, Transport Scotland, Scottish Government, Health and Safety Executive, SNH, SWT, RSPB, Scottish Water, Scottish Power, Protective Services, Geotechnical, Greenspace (Ecology) and Landscape subject to the respective conditions suggested by each party as noted above. As such it can be concluded that the proposals accord with the relevant policies of the Finalised Draft North Lanarkshire Local Plan.

11.0 *Scottish Planning Policy (Consolidated – Waste Management Section) SPP*: In terms of assessing waste management proposals, current national planning policy is

expressed through SPP complemented by PAN 63 (Waste Management and Planning) covering good practice in policy making through the development plan system and decision making through the development management process system. The SPP supports a wide range of waste management technologies and applies policy direction to specific waste streams or installations. The SPP supports installations which include the thermal treatment of waste as a renewable energy source which comply within the relevant PCC permit requirements issued by SEPA. The SPP advises that Modern waste management infrastructure is designed and regulated to high standards and is similar to other industrial processes. Locations which are appropriate for industrial or storage and distribution uses are therefore also appropriate for many waste management installations. The SPP advises that buffer zones of 250 metres may be appropriate for operations involving thermal treatment but this should be assessed in a site by site basis. In terms of development management process the SPP states that consideration should focus on the proposals ability in delivering appropriate infrastructure to meet Business Waste Framework Objectives, and the requirements of Area Waste Plans. With the regulation of such facilities resting with SEPA consideration of applications for waste management facilities should focus on whether the development itself is acceptable rather than on control of the processes or waste streams involved, consider only the aspects of operations enforceable under planning control to minimise impacts on the environment, transport network and local communities, and secure decommissioning or restoration to agreed standards.

11.1 It is considered that the proposals would accord with the main aims and principles of the above noted national policy and guidance on waste management development. The proposals are considered to concur with the terms of the development plan, and with the NWS and AWP. SEPA are content that the supporting information provided by the developer adequately demonstrates need for the facility; its compliance with the AWP; and that the waste volumes capable of treatment by the thermal process would comply with the Scottish Government's 25% cap on MSW. The energy from waste facility will also help divert waste from landfill and thereby reduce greenhouse gas emissions from landfill. In addition the proposed facility would also create a new source of energy therefore reducing its own energy demands to operate the plant. The plant is also capable of feeding excess electric power to the National Grid via underground connections. Given these factors the proposals are considered to be in line with the requirements of Scottish Planning Policy and PAN 63.

Environmental Statement

12.0 *Landscape and Visual Impacts*: The ES provides a report which assesses the anticipated impacts landscape and visual impacts.

12.1 The ES acknowledged that the proposals would have a slightly adverse impact on visual amenity as the new large scale building would increase the prominence of industrial development on the site and this be viewed by a number of high sensitivity visual receptors including viewpoints from some residential areas situated to the north of the site. The ES notes that the suggested planting mitigation measures would take several years to establish and become effective but over the longer term this would help to soften the appearance of the building in the landscape and effectively screen lower elevations of the building and activities on site.

12.2 SNH advised they were content with the conclusions of the landscape and visual assessment of the proposed development and had no objection to the proposals on the grounds of its landscape and visual impact subject to a condition requiring that the mitigation measures suggested in the ES are fully implemented. SNH also considered such additional planting works would be in line with recommendation 18 of the Strategic Planning Study Technical Report TR/NLC/01- A8/M8 Corridor which suggests measures to introduce high quality landscape in this area including landscape improvements linked to planning permissions to contribute to the protection and enhancement of the Green Network and should also provide

landscape and habitat enhancement for nature conservation.

12.3 Greenspace (Ecology and Landscape) had similar views to SNH and recommended that any landscaping/tree planting works should incorporate plant species/habitats that would enhance biodiversity. It is also considered that whilst the proposals would introduce a large industrial building to this site, its impact would be acceptable subject to the mitigation planting works which would over time further reduce the building's impact and assist in the improvement of the A8/M8 corridor as noted by SNH.

12.4 Taking these factors and comments into account, it is considered that whilst the proposed building would be fairly prominent, its visual impact would not be unacceptable at this industrial site. There was no objection from SNH or NLC Greenspace provided the suggested landscape mitigation measures are implemented at the site. Moreover, the existing site is characterised by its semi-derelict appearance where there are existing industrial buildings and large tracts of unused or damaged hardstanding on the site. The proposals would remove all of the old industrial buildings and areas of remaining hard standing and replace these with a modern industrial unit with associated peripheral landscaping works that would over time reduce its impact. Additional planting works may also provide improvements to the edge of the A8 corridor as noted by SNH. The proposals are therefore considered acceptable it terms of its visual impact.

12.5 A*ir Quality:* Most waste management facilities can have an impact on air quality in terms of emissions of process particulates, dust and odour and need to include appropriate design elements to minimise emissions to atmosphere within acceptable limits. It is considered that the ES has included a reasonable and acceptable assessment of the likely or predicted effects of the proposed development on local air quality and its scope, methodology and findings are summarised and assessed as follows.

12.6 In terms of the study methodology, the ES considered a study area measuring 3km x 3km centred on the proposed development site. A number of sensitive receptors were identified in the study area including residential, schools and a local hotel, and these were explicitly included in the assessment. Two of the Council's designated AQMAs, Whifflet, Chapelhall were also included in the ES study area. The ES examined in detail the predicted impacts on air quality from the operational process, ground level pollutant concentrations, road traffic, and odour emission and construction dust. Whilst the ES had no specific emission data for the pyrolysis plant (as the final technology selection is subject to commercial negotiation) emission rates were conservatively assumed to be based in compliance with the Waste Incineration Directive (WID) emission limits. (As noted previously, whilst pyrolysis is not the incineration of waste, its regulation falls under this directive and would be thoroughly assessed by SEPA during the PPC permit process). The ES recommended that mitigation measures be introduced by the developer to ensure that all site-traffic would enter the site from the adjacent trunk road network (A8) with and that site vehicle traffic management measures be introduced by the developer to avoid routes which pass through the indentified AQMAs and other sensitive receptor areas. The ES also identifies that impacts from the construction phase may be mitigated by following good practice under the terms of a construction method statement to minimise and control levels of dust from the construction process.

12.7 The ES concludes that whilst the proposed development would give rise to some atmospheric emissions from both the operational process activities and from road traffic associated with the development, these potential increases in emissions would not be significant as a result of the development and that there would be no breach of air quality objectives or environmental assessment levels. Furthermore, the ES advised that appropriate controls would be put in place to ensure that process emissions would need to comply with prescribed limits set through SEPA's PPC permit regulations. In addition no significant adverse impacts on human health were reported in the ES. Overall the ES concludes that no significant adverse impacts are predicted as a result of the development and advises that these findings are in line with Government studies into the environment and health effects of waste management developments.

12.8As noted above that SEPA had no objection to the proposals subject to conditions. They considered the proposals are capable in principle of meeting their PPC regulatory regimes subject to the outcome of ambient atmospheric monitoring to demonstrate the development would meet their Waste Incineration Directive (WID) technical requirements. As noted, the developer would be required to undertake monitoring over a sufficient period agreed by SEPA to provide reasonable reassurance that relevant air quality standards can be met. The location and methodology of the monitoring would be agreed with SEPA in advance of it being undertaken. It is considered this technical requirement could be covered by a planning condition.

12.9In addition Protective Services had no objection to the proposals and concurred with the conclusions of the ES Annex B Air Quality that the AQMAs of Chapelhall and Whifflet would not be affected as a result of the waste management facility going ahead.

12.10 It should also be noted that the all of the waste management process operations would be accommodated within one large building. The atmosphere within the building would be maintained at negative pressure, and air vented via the process of bio-filter to control odorous emissions. The supporting Environmental Statement (ES) advises that there are no undesirable emissions to atmosphere at this stage of the plant process as odour and dust are controlled by active air management systems (within the building) before being passed through a bio-filter to atmosphere. The ES acknowledges that atmospheric emissions would be generated by both the mechanical and heat treatment (MHT) technologies and the pyrolysis processes via the two stacks. The principle emissions would be combustion gases from the gas engines however a number of other pollutants may be generated depending on the waste material processed. However as previously noted all emissions from the plant would be controlled under SEPA's PPC permit regulations and the plant would need to comply with WID emission limits also assessed, monitored and controlled by SEPA.

12.11 Taking all of these matters into account it can be concluded the proposed development would have no significant impact on local air quality standards subject to the proposed development's compliance with SEPA's PPC regulations.

12.12 *Land Quality:* The ES includes an assessment on Land Quality where an intrusive investigation undertaken immediately north and west of the site identified the presence of domestic and industrial waste from the previous landfill operations however the full extent of land filling beneath the application site is uncertain. As such it is considered that appropriate further ground investigation works would need to be considered and this aspect could be covered by a condition of any planning permission.

12.13 The ES assessment considered traffic generation, distribution, waste management facility generated trips (including staff visits), waste imports and exports, hours of operation, trip generation. A comparison of existing and proposed traffic levels (including operational and construction) was also considered. The ES concluded that the traffic volumes associated with the proposed waste management facility were minimal when compared by the existing industrial uses at the site. The impact and mitigation of the effects of the traffic are discussed within the Air Quality assessment section of the ES. Notwithstanding this assessment, the developer has recently advised that their operational site management plans would require that all contracted waste delivery vehicles should use the primary road network.

12.14 The TS considered the impact of development in terms of its scale, access arrangements, pedestrian and cycle accessibility, public transport accessibility, bus and rail travel, vehicular access, and parking provision. The TS assessed the proposal against national and local transport policies, including the then SPP17-Planning for Transport, PAN 75: Planning for Transport, and North Lanarkshire Transport Strategy. The TS provided an assessment of traffic impact which included

observed traffic conditions of the existing industrial uses at the site and compared these against estimates of generated trips due to the proposed waste management facility. Staff trips and waste input and outputs were also taken into account, along with the hours of operation. The TS acknowledged that the existing accessibility for non-motorised vehicles to enter and leave the site is restricted but notes that the developer is to implement a Travel Plan, despite this not being a formal requirement for this development. This would encourage non-car modes of travel including a shuttle bus that would connect with key transport interchanges such as Coatbridge Sunnyside train station etc. This and other facilities would accommodate access to the site by means other than the private car and in accordance with current transport planning policies. The TS also concludes that the net increased traffic associated with the redevelopment of this existing industrial site will result in a negligible increase in the A8(T) traffic volumes and as such there is no significant traffic impact.

12.15 A Travel Plan Framework (TPF) was also provided in support of the planning application. The TPF identifies the measures and facilities that the developer, as the single operator of the facility to encourage non-car access and reduce the development's potential reliance on single occupancy car trips generated by the development. The TPF acknowledges that the site is not easily accessed by other transport modes such as cycling or walking from existing bus routes. The TPF envisages that a dedicated shuttle bus service would be provided by the developer to enable visitors and staff to access the site other than by private vehicle. The bus would link up with the existing bus and train networks. The promotion off public transport services, in-house car sharing and the general promotion of the health and environmental benefits of walking, cycling would also be encouraged through staff management measures. The Travel Plan adoption would then be continually monitored to determine its effectiveness and value with additional measures considered to encourage staff to adhere to its targets of reducing dependency on single occupancy car travel.

12.16 As noted in the consultation responses, there was no objection from Transport Scotland, JMP Consultants Limited (Term Consultants to Transport Scotland Trunk Road Network Management Directorate TS-TRNMD), or from the Traffic and Transportation Section subject to conditions.

12.17 It is therefore considered that the proposed development would not result in any significant increase in traffic volumes on the trunk or local road network as a result of the development and that adequate measures would be implemented by the developer to encourage alternative travel modes to and from the site via a Travel Plan Framework as required by a condition of any planning permission. The developer's intention to encourage contracted waste delivery vehicles to use the primary road network can be noted and it is considered such management provisions would further minimise such impacts on residential areas and traffic routes which pass through the designated AQMAs noted above. However this would be a voluntary undertaking by the developer as it could not be effectively controlled by a planning condition.

12.18 *Noise:* The ES included an assessment on noise impact from the development. (Refer to Volume 1 Annex F of the ES). A noise impact assessment of a proposed development of an adjacent site was carried out in July 2008 and as part of this development falls within the application site, this previous assessment was considered relevant in terms of baseline noise data collected at that time. Ambient noise readings within the locality were also measured and these are considered to be suitably recent to be representative of the ambient noise climate. The ES recognises the policy context of such studies under the terms of PAN 56: Planning and Noise, the emerging policies of the FDNNLP on waste development, SEPAs Horizontal Guidance for Noise, British Standards 4142 for assessment of industrial noise affecting mixed residential areas and BS 5228 which relates to noise and vibration control during construction.

12.19 The ES concluded that the noise environment at the nearest sensitive receptors is currently dominated by road traffic using the A8. The ES predicts that operational rated noise levels at the nearest receptors would be at least equivalent to the lowest existing background noise levels at the locus and that noise management via the application of Best Available Techniques (BAT) also controlled and agreed with SEPA would be adopted by the developer to minimise operational noise levels from the facility. The BAT would include:

- The selection of inherently quiet plant where appropriate
- Ancillary plant equipment would be positioned to cause minimal noise disturbance and acoustic enclosures provided for all fixed plant where appropriate.
- All vehicles and plant would be fitted with effective exhaust silencers and maintained in good working order.
- Operators of waste delivery vehicles (out with the control of the developer) would be encouraged to use vehicles with modern reversing alarms which are directional and short range in nature. It is envisaged that this type of alarm would become a standard fitment as waste vehicle fleets are modernised.
- Machines/plant in intermittent use would be shut down in intervening periods between operations or throttled down to a minimum.

12.20 It is noted that the ES assessed the worst case operational noise levels and concluded that these would be compliant with the relevant guidance and associated Standards, as most of the sources would be enclosed within the purpose built building. Other on site sources of noise such as waste delivery vehicles and their reversing alert systems are expected to be insignificant in the existing noise environment.

As noted above, SEPA and Protective Services had no objection to the proposals in terms of potential noise nuisance from the proposed waste management facility. Given the factors, it is considered that noise impacts from the plant operations would be within acceptable levels.

12.21 *Ecology:* The ES also provided a detailed assessment of potential ecological impacts resulting from the redevelopment of this existing industrial site. (Refer to Annex G and G-1 of the ES). The report included desk and field studies, Extended Phase 1 Habitat Survey, Otter, Bat, and Badger Surveys, Assessment of other protected species breeding bird assessment and a non-breeding bird survey. These studies were supplemented by the submission of a further Phase 1 Habitat Survey October 2009 to cover a part of the site where the installation of a surface water pipe is proposed. This was requested by the Greening Section during the course of the consideration of the planning application as this part of the site boundary connects directly with the North Calder Water and valley. The report recognises the importance of ensuring the proposed development would not infringe current legislation and national policy guidance which set out to protect natural heritage interests as noted in the Wildlife and Countryside Act 1981, Nature Conservation (Scotland) Act 2004, Conservation (Natural Habitats,&c.) Regulations 1994 (as amended)(Habitat Regulations), NPPG 14 Natural Heritage, Planning Advice Note 60: Planning for National Heritage. The report also included assessment under the terms of the respective natural heritage protection policies in the current development plan and emerging local plan. The report also identified opportunities for biodiversity enhancement as part of the proposed design and layout of the site including a program to install bat boxes, native tree planting areas to serve both biodiversity and screening functions and areas of natural grassland where possible. Downward reflectors over any lighting columns are also suggested. The report concludes that due to the existing industrial uses, the site supports very limited vegetation. It is of a very low importance and rarity for nature conservation in that the site is not of international, national, regional, or local nature conservation value. As such it was considered that significant adverse effects to biodiversity within the development site and surrounding brownfield habitat (former landfill area to the north) and SINC would not occur as a result of the proposed

development, provided best practice measures for wildlife are followed during construction and operational phases. The recent habitat survey covering the surface water drainage link area had no locally or nationally rare or protected species or grassland habitat of high conservation value. It was recommended that in developing this strip of land, best practice measures should be adopted to minimise direct disturbance to the vegetation, particularly the woodland areas and tree felling should be kept to a minimum with no mature trees being felled.

12.22 SNH had no objection to the proposals subject to conditions noted at paragraph 6.11 above. The Greening Section (Ecology and Landscape) had no objections subject to condition noted at paragraph 6.17 above. The Scottish Wildlife Trust (SWT) had no objection and welcomed the biodiversity enhancement measures proposed by the developer. The RSPB had no comment to offer.

12.23 Given the conclusions noted in the ES and the responses from SNH, Greening Section, and SWT it is considered that the proposals would have no significant impact on ecological receptors at the site or on the surrounding area. It is considered that the proposed biodiversity enhancement measures proposed by the developer would offer some improvements to the local ecological resources and that the development would have no significant impact on the adjacent SINC (North Calder Water).

Consultations

13.0 (i) **SEPA** had no objections subject to conditions identified in paragraph 6.1. Where appropriate these matters have been included as recommended conditions. SEPA considers the proposals accord with the National Waste Strategy, National Waste Plan and Area Waste Plan. SEPA also advised that the proposals are capable in principle of meeting their PPC regulatory regimes subject to the outcome of ambient atmospheric monitoring to demonstrate the development meets Waste Incineration Directive (WID) technical requirements. This requirement could be covered by a condition of any planning permission.

(ii) **Transport Scotland**-Trunk Road Network Management Directorate had no objections subject to conditions requiring the approval of a Travel Plan and provision of an improved barrier along the site boundary with the A8 Trunk Road. These requirements could be covered by a condition of any planning permission.

(iii) **Scottish Water** had no objection subject to a condition that a new drainage system be agreed with them and that this should include a SUDS scheme. This can be covered by a condition of any planning permission.

(iv) **Scottish Power Energy Networks** advised their objection would be removed provided the developer contacts them in respect of any connections to SP plant infrastructure. This is covered in standard advisory noted issued with any planning permission.

(v) **Scottish Natural Heritage** had no objection subject to conditions to ensure that adverse impacts on otters, bats and breeding birds are minimised. In addition a condition requiring additional screen planting along the northern boundary of the site is requested. These matters can be covered by conditions

(vi) **RSPB** offered no comment

(vii) **Traffic and Transportation** had no objection subject to conditions requiring adequate car parking provisions and demonstration that all waste delivery vehicles have sufficient turning facilities within the site and building. This can be covered by condition of any planning permission.

(viii) **Greenspace (Ecology and Landscape)** had no objection subject to conditions requiring additional planting scheme along the northern boundary of the site and that this scheme incorporates biodiversity enhancement measures. This can be covered by a planning condition.

(ix) **Protective Services** had no objection subject to conditions requiring a detailed ground contamination survey and additional air quality monitoring as

suggested by SEPA. There was no objection to the proposal from Waste Strategy. It is considered the outstanding matters over ground conditions and additional air quality monitoring can be covered by conditions of any planning permission.

(x) **Geotechnical** had no objection subject to conditions requiring further details of a site drainage scheme with an appropriate SUDS scheme and attenuation measures to minimise flooding events. It is considered this requirement can be covered by a condition of any planning permission.

Representations

14.0 The material terms of objection have been summarised and comments on each point of objection are provided in Appendix B attached to the main report. However the matters raised by the objectors along with a brief response can be summarised under the following headings:

Points of objection: Pollution and Air Quality

Comment: These matters have been considered in the ES and have been the subject of detailed assessment by SEPA and the Council's own Pollution Control Section. It is considered that the via controls imposed by SEPA via their license regime and proposed planning conditions the proposed facility will be designed and will operate in such a way as to minimise impacts on pollution and air quality.

Points of objection: Lack of Need, Contrary to Development Plan, NWS, AWP and National Policy

Comment: These matters have been assessed as part of the ES and supporting information supplied by the applicant. In addition to my assessment of these matters, SEPA and the Council's own Pollution Control Section have considered and offered comments. It is considered that the proposed development complies with development plan and national policy and that a case for the need for the development has been made in terms of the NWS & AWP.

Points of objection: Odour

Comment: The ES assessed the odour impacts from the operational processes and concluded these would not be significant and within acceptable limits. All process operations would take place within the proposed building with odours being controlled by negative air pressures within the building with air circulating in the building being filtered before release to the external atmosphere.

Points of objection: Noise

Comment: The ES assessed the noise impacts from the operational processes and concluded these would not be significant and within acceptable limits. All process operations would take place within the proposed building with noise levels being mitigated as a result.

Points of objection: Traffic Impact

Comment: The ES provided a detailed assessment of traffic impacts associated with the development and concluded that the development could be accommodated within the trunk road network. It is considered that the traffic impacts are within acceptable limits. My assessment of this aspect of the development has been supported by the Trunk Road Authority and the Council's own Traffic and Transportation Section.

Points of objection: Health Hazard and Proximity to Residential Areas

Comment: The ES provided a detailed assessment of potential impacts from

potential pollutants from the process and from increased traffic levels. It concluded there would be no significant impacts on sensitive receptors including local residential areas and schools. SEPA and Protective Services had no objection to the proposals in this regard.

Points of objection: Ecology and Wildlife Impacts

Comment: The ES considered potential impacts of the proposed development on ecology and wildlife in the local area and concluded that such impacts would be not be significant. The ES recommended that various biodiversity measures be introduced and it is considered these can be covered by conditions. My assessment of these aspects has been supported by SNH, SWT and the Council's own Greening Section.

Points of Objection: Waste Types

Comment: The ES advises that the pyrolysis facility would be able to deal with municipal, industrial and commercial waste streams. The proposed technology would be capable of dealing with industrial waste but is not suitable for dealing with medical, toxic or hazardous waste. Overall, the type of materials dealt with at the plant would be controlled via the PPC permit. The ES advises that no chemical products would be processed at the site.

Points of Objection: Site Selection and Proximity to Residential Areas

Comment: The developer advised that application site was selected as it was the most suitable for a development of this nature in terms of its size, long term commercial availability, appropriate industrial zoning, avoidance of green belt, immediate access to the primary road network, proximity to sensitive receptors, avoidance of conflicts with other existing uses (Eurocentral), visual/landscape impact. The ES considered a comprehensive range of potential environmental impacts on sensitive receptors at and around the site, including adjacent residential areas and concluded that such impacts would not be significant. Where there are some minor concerns, mitigation measures are proposed to enable the development to be considered acceptable. It is considered that the site is appropriate for this type of facility and it has been concluded that environmental impacts would not be significant as a result of the development. My assessment in this regard is supported through the responses offered by SEPA, SNH, Transport Scotland and the Council's own Protective Services, Transportation, and Greening Sections, who raised no objection to the proposals subject to conditions.

Points of Objection: Lack of Public Consultation

Comment: The developer undertook a voluntary public consultation exercise that included the distribution of 4,000 leaflets to local residents and held a public exhibition before the application was submitted. The developer also attended a public meeting with members of local residents association. Given the volume of public objection to the proposals, it is clear that local residents are fully aware of the details of the proposals.

Points of Objection: Other Matters

Comment: As noted previously, the proposed pyrolysis process does not involve the incineration of waste. Whilst there was no specific emission data available for the pyrolysis plant, the emission rates were conservatively assumed and were considered by the ES to be in compliance with the WID emissions limits. SEPA were content that such data would be provided during the PPC permit application. Any perceived loss of property value is not material to the consideration of a planning application. The unfortunate impact caused by the previous accidental fire at the tyre

recycling depot is not relevant to this planning application. The developer may seek grant assistance for potential job creation. Some minor errors were noted in the supporting information in terms of the vehicle trip numbers however these were overstated rather than underestimated and would not have resulted in any alterations to the impacts covered in the ES.

14.2 Despite the significant volume of representation received in regards to the application, it has been concluded that the material terms of objections cannot be sustained and do not raise sufficient reasons to justify a recommendation that the proposals be refused planning permission.

14.3 In contrast to the significant volume of objection noted in Appendix B there were two letters of support for the proposals as noted at paragraph 7.2 above. Following consideration of these comments, it is generally agreed that this waste management facility would offer a range of economic benefits as suggested by Scottish Enterprise in terms of productivity, competitiveness, use of renewable energy resources, investment and employment opportunities.

14.4 With regard to the other supporting comments, it is agreed that a pyrolysis plant is not an incinerator but as noted above its regulation and control would fall under the WID Directive Regulations which also covers incinerators. It is also agreed that the proposed pyrolysis process would offer benefits in terms of its efficiency and ability to reduce the volumes of waste going to landfill. SEPA also considered that the proposed waste management facility has the potential to assist in dealing effectively with commercial, industrial and municipal waste streams under the terms of the NWS and AWP requirements. These supporting comments noted at paragraph 7.2 above are in line with the planning assessment.

Conclusions

15.0 The proposals are considered acceptable as they accord with the terms of the Glasgow and the Clyde Valley Joint Structure Plan 2000 incorporating the 4th alteration 2008 and the Monklands District Local Plan 1991, the National Waste Strategy and Area Waste Plan where it has been adequately demonstrated that the proposals are acceptable in terms of need, comply with the proximity principle and offer the best practicable environmental option (BPEO) for dealing with the identified waste streams. There was no objection from statutory consultees including the Scottish Government, SEPA, SNH, Scottish Transport, and Scottish Water or from other organisations such as SWT and RSPB. There was no objection from the respective NLC Services requested to comment on the application. The accompanying ES demonstrates that environmental impacts from the development would not be significant and it is agreed that the suggested mitigation measures can be controlled through appropriate conditions.

15.1 Despite the significant volume of representation received in regards to the application, the points of objection have been carefully assessed. It has been determined that the objections cannot be sustained and do not raise sufficient reason or concerns that would justify a recommendation that planning permission should be refused.

15.2 It has been concluded that the proposals accord with the terms of the development plan and are acceptable when assessed against the NWS, AWP and other material considerations noted in the main report. The proposals are considered to be acceptable and it is therefore recommended that planning permission be granted subject to conditions.

15.3 There has been a request for a site visit and hearing from the developer and from local residents group MRAPP.

Appendix B: Terms of Objection and Response

Key: Point of objection noted in **bold**
Response to objection noted in plain text.

A Pollution/Air Quality Issues

1. **Air quality is already confirmed as poor in this area.**

   An Air Quality Assessment is included in Annex B of the Environmental Statement. The ES concluded that the cumulative levels of emissions from the plant and increased traffic levels at sensitive locations as a result of the development would be well below the Air Quality Strategy objectives or environmental assessment level guidelines. As noted above Protective Services had no objection to the proposal in terms of its likely impact on air quality. It is therefore considered that whilst air quality is relatively poor given the designated AQMA, the proposed development would not have a significant impact on existing air quality levels.

2. **There will be unacceptable health risks from air-borne particles emitting from the chimney stacks on not only local neighbourhoods but also to**

the outlying areas and in particular to young children in schools and nurseries which are located close to the site.

The ES provided a full assessment on emissions from the proposed facility and considered such an impact on sensitive receptors such as residential areas and schools. The ES concluded that whilst there would be air-borne particulates emitted from the two stacks these would be within acceptable standards, subject to filtering processes and controlled by SEPA regulatory controls and monitoring as required as part of the PPC permit. SEPA had no objection to the proposals as they considered the proposed facility would be capable of meeting their PPC permit requirements. It is considered the proposals would not have a detrimental impact on local air quality.

3. **Due to the variety and origins of waste that would be dealt with at the site, the applicant cannot give accurate or safe predictions of these emissions. Airborne dioxins could have serious cumulative implications for families in Monklands, where there are very high asthma rates.**

   The ES considered a full range of emission particulates in accordance with environmental assessment guidelines for such proposals. As noted at comment at A1 above the ES concluded that air quality would not be unacceptably compromised as a result of the proposed development. As noted previously, SEPA and Protective Services had no objection in terms of air quality issues and did not raise objections over the ES study methodology.

4. **The increased level of traffic will also raise vehicle emissions in an area, which has poor air quality, which has already been identified as an area for improvement.**

   As noted in the main report, there would be a slight increase in the number of vehicles entering and leaving the site although this % increase was considered insignificant in terms of its impact on existing air quality standards. Air quality “hot spots” have been identified by the Council at Whifflet and Chapelhall, however it was considered by Protective Services that the proposed facility would not have an impact on these designated AQMAs. The developer has advised they would introduce an operational traffic management plan that would encourage contracted waste delivery vehicles to avoid such areas.

5. **The proposed commercial (for-profit) operation is not clean or green. Burning (or heating) of waste causes pollution and is not a solution to meeting landfill targets.**

   The proposed waste management facility would need to operate on a commercially viable basis. However as it includes a materials recovery facility, which would be self sustaining in terms of producing renewable energy as part of the process and feed excess electrical power to the national grid, it is considered to be “green” in terms of its function and purpose. As noted above the pyrolysis process offers a reasonable and acceptable method of dealing with commercial, industrial and municipal waste streams that may otherwise have been sent to landfill sites, which are considered a less favourable method of disposing of waste. Some emissions would be produced by the process however these would be at acceptable levels and subject to SEPAs PPC regulatory controls.

6. **The local community would support eco-friendly solutions for waste but Shore Energy’s proposals are commercially driven and their proposals are not green or clean. Support for this plant gives the wrong message to our children.**

Refer to comment at A5 above. The proposals embrace a technology which offers a best practicable environmental option (BPEO) for dealing with the identified waste streams and is in line with Government policy on waste management.

7. **The site has been identified as an Air Quality "hot spot" by North Lanarkshire Council and the proposal will only increase air and noise pollution.**

   The application site is not included within the designated AQMA at Whifflet, which is located about 1km from the site boundary. The ES concluded that the development would not result in a significant increase in noise levels as most of the mechanical processes would take place within the proposed building.

8. **The site is only 400m from the nearest houses in Carnbroe and the proposals will lead to increases in smell, noise and a reduction in air quality.**

   The ES considered odour, noise and air quality impacts on all sensitive receptors including residential areas and local schools and concluded these would impacts not be significant and adequately controlled. All processes would take place within the large building which would operate at negative air pressure and all emissions subject to filter processes to standards required by SEPAs PPC permit regulations.

9. **The use of this industrial site should be restricted to a storage/distribution as this would have less environmental impact on the area. The sorting and storage of waste would be unsightly, cause unpleasant smells, vermin and danger of pollution through accidental fires. The waste management plant will constantly discharge fumes to the atmosphere to the detriment of air quality for residents in surrounding housing areas, which include schools, care homes and sheltered housing areas. The proposals will generate HGV movements through Greenend, Sikeside and Carnbroe. The pyrolysis plant may be capable of dealing with plasma waste products and it is therefore possible hospital waste may be processed. If approved, would additional waste streams be controlled? Refusal of this application does not render the site incapable of beneficial use. Given an improved economic situation the site could be used for other uses.**

   The site is zoned as an industrial site and forms part of the industrial land supply and as noted the proposal is not considered contrary to the terms of the development plan and need not be restricted to a storage/distribution depot. In any event distribution depots (depending on their scale) could incur far higher traffic movements. The sorting of waste would take place from within the large building where vehicles delivering waste would enter and doorways would then close automatically. Unpleasant smells would be contained within the building by negative air pressure and subject to filtering before emitted to atmosphere. All waste sorting would take place within the building therefore vermin infestation is unlikely. The plant would be designed and constructed to meet current building standards in terms of fire prevention measures. As noted above emissions from the plant would be within acceptable limits with no significant impact on sensitive receptors. Additional traffic would be generated however most of this would gain access to the site via principle road network. The developer has advised that they would introduce an operational management plan as a best practice to encourage contracted waste delivery vehicles to avoid secondary road networks and areas subject to the AQMA designations where appropriate. The proposed

pyrolysis plant is a technology that is not suitable for dealing with medical, toxic or hazardous wastes and the developer would be restricted to the waste types approved by SEPA via their PPC permit regulations. As noted previously the site is zoned for general industrial use and it is considered that the site is capable of supporting other industrial based land uses.

10. **The developer is suspected of not including a sufficient level of information in respect of possible emissions from the proposed waste management plant. Such plants should be located well away from housing areas.**

    The proposed pyrolysis process does offer a renewable energy resource as described above. Pyrolysis is not another term for incineration where combustion takes place in the presence of oxygen. Pyrolysis takes place in an air starved environment so that burning does not take place. The ES has demonstrated that emissions would be within acceptable standards controlled and regulated by SEPA. The ES also concludes that there would be no significant impacts on health as a result of the development and the findings of the assessment are consistent with Government Studies into the environmental and health impacts of waste management developments.

11. **The applicants have tried to promote this development as a Renewable Source of Energy but it is considered this incinerator is likely to cause additional air pollution which can cause serious harm to respiratory systems.**

    The proposed pyrolysis process does offer a renewable energy resource as described above. Pyrolysis is not another term for incineration where combustion takes place in the presence of oxygen. Pyrolysis takes place in an air starved environment so that burning does not take place. The ES has demonstrated that emissions would be within acceptable standards controlled and regulated by SEPA. The ES also concludes that there would be no significant impacts on health as a result of the development and the findings of the assessment are consistent with Government Studies into the environmental and health impacts of waste management developments.

12. **This proposal must be rejected because the potential noise, pollution and health concerns far outweigh any economic benefits for the area.**

    Scottish Enterprise has supported the proposals on its economic benefits to the local and larger economy and it is considered the proposals would offer some contribution to the economy. The ES concludes that impacts on noise, air quality and general health standards would not be significant and are acceptable. Given these factors the proposals are considered to be beneficial to the local economy with no significant impact on the environmental issues as reported.

13. **As a resident from Orchid Grove I request that the planning for the proposed incinerator does not go ahead as the value of our homes has dropped enough without having a dark stinking cloud hanging over us and more importantly our 2 kids which will be inhaling the toxic fumes every day of their life at home and eventually when they start school.**

    The proposed waste management facility would not emit “dark stinking clouds of smoke” or cause any significant impact on air quality in the area or on sensitive receptors such as residential areas and schools. As noted it is considered the plant would be adequately designed to meet SEPA’s PPC permit regulations that control such operations.

14. **I live in the area into which particulate pollution can be expected to fall from the proposed incinerator's 27m stack. This was made obvious by the recent tyre fire on the site where the smoke travelled to my garden and beyond. These and other unseen pollutants can easily concentrate to dangerous levels.**

    The accidental fire at the tyre recycling depot clearly resulted in significant smoke and pollution which fell on adjacent housing areas. It is considered the emissions from this fire are not comparable with the proposed waste management facility. The ES demonstrates that emissions would be within acceptable standards as required via SEPAs PPC permit regulations.

15. **There is no way of measuring a cumulative effect of this pollution especially if it's added to the already high levels of bad air quality in this area.**

    The ES has addressed cumulative impacts via an environmental impact assessment. In the case of each of the range of pollutants considered, the cumulative levels of pollution that are predicted to occur at sensitive receptors are all well below Air Quality Strategy objectives or environmental assessment level guidelines. (Section 4.1.2) These limits are fully explained within the Air Quality Assessment. In most cases the emissions from the facility were assessed to be at a level that is below the background level air quality. This is due to the controls proposed for the facility.

16. **In a House of Lords enquiry on 14th April 1999, Environment Minister Michael Meacher said, "Incinerator plants are the source of serious toxic pollutants: dioxins; furans; acid gases; particulates; heavy metals; and they all need to be treated very seriously. There must be absolute prioritisation given to human health requirements and protection of the environment. I repeat the emissions from incinerator processes are extremely toxic. Some of the emissions are carcinogenic. We must use every reasonable instrument to eliminate them altogether." I therefore object to such a plant being placed so close to residential housing, schools and other area of high or sensitive population.**

    Whilst the statement offered by a former Environment Minister can be noted, this refers to incineration plants and was issued more than 10 years ago. As noted the proposal does not involve incineration of waste materials.

17. **It strikes me as ludicrous that an incinerator should be placed beside one of the most busy stretches of the M8, smoke billowing across the carriageway surely is a hazard. To suggest as has been done at the public meeting that the public would not see the smoke is quite frankly ridiculous. If the smoke from chimneys could not be hidden during World War Two then how does Carnbroe suddenly differ?**

    As previously noted the proposed waste management facility does not involve incineration and although the some emissions will be released to atmosphere these would be subject to filter controls and within acceptable standards controlled SEPA under their PPC permit regulations.

18. **The health and safety assurances offered in support of the facility are not proven as the ES refers to parameters such as "no significant adverse effects are predicted, and unlikely. Even small health risks are unacceptable.**

    The ES acknowledges that there would be some impacts as a result of the proposed development. Current Air Quality Strategy and Objectives allow for

a permissible amount pollutants from such developments and provided such objectives are reached they are deemed to be compliant with industry standards on Air Quality. The ES concludes that the impact on health would not be significant and in line with AQS.

B *Lack of Need, Contrary to Development Plan, NWS, AWP and National Policy Issues*

1. **There is no local need for a plant of this type or size-the community should employ the preferred options of reduce, re-use and recycle before resorting to Pyrolysis (incineration). This proposal does not address or promote waste minimisation.**

   The proposed development is to provide a regional waste management facility and its main purpose is to process industrial, commercial and industrial waste streams that may be sourced within a 30 mile radius of the site as well as locally sources waste streams. It therefore offers a facility that has the capacity to deal with waste at a regional scale and could (depending on waste procurement contracts) deal with locally sourced waste. The National Waste Strategy advocates the principles of a waste hierarchy where the order of preference for managing waste proceeds through: Prevention>Reuse>Recycling>Other Recovery>Disposal. It is considered that the facility fits within this hierarchy as it offers other recovery facilities through the MRF process and disposal facilities for residual waste that could not be prevented, reused or recycled by other means. As noted above SEPA considered the proposals was in accordance with the terms of the NWS, and AWP and agreed that a need for such a facility had been demonstrated.

2. **The proposed commercial (for-profit) operation is not clean or green. Burning (or heating) of waste causes pollution and is not a solution to meeting landfill targets.**

The proposed waste management facility offers a sustainable method of dealing with waste and would assist in reducing the volumes of waste currently sent to landfill as agreed by SEPA. As noted in the ES the impacts on air quality would not be significant and within regulations controlled under SEPAs PCC permit regulations.

3. **Municipal and Commercial waste, sourced from 13 local authority areas will be processed here and odours, vermin and noise will result and the health of Monklands residents will suffer.**

   As noted above the proposed waste management facility has a capacity to source commercial, industrial and municipal waste from up to a 30 mile radius of the site. No waste disposal contracts have yet been agreed but municipal waste could be sourced from other local authority areas. The ES advises that impacts on air quality, odours and noise would not be significant. All of the waste tipping and sorting processes would take place within a building and no raw waste would be stored outside. As such vermin infestation is unlikely.

4. **Pyrolysis incineration does not promote reduce, reuse or recycle hierarchy, which are keys to good waste management. The plant would leave residual waste that would require to be landfilled.**

   As noted above the proposed waste management facility fits within the waste management hierarchy as it offers other recovery facilities through the MRF process and disposal facilities for residual waste that could not be prevented, reused or recycled by other means. It is accepted that some residual waste such as bulky materials, gas bottles and large pieces of waste such as tree stumps or concrete blocks, or waste which cannot be recycled will be transported to a landfill site, however the volumes would be significantly less as a result of the facility. The Pyrolysis process produces char and syngas. The char material, derived from the superheated waste would be recycled and can be used as a soil conditioner for off-site use/sale.

5. **This is not a local solution. Monklands would become a dumping ground for the waste from 14 other local authorities, which would be transported to the plant on a round the clock basis.**

   It is clear that the proposed development offers a regional rather than a local solution to dealing with large quantities of waste sourced from up to 30 mile radius of the site. Whilst the facility would process waste over a 24 hour, 7 days per week period, actual deliveries and removal of recyclable and residual waste destined for landfill would occur during 0700-1900 hours Monday to Friday, and 0700-1300 hrs Saturdays.

6. **Monklands will be burdened with a disproportionate number of waste management sites. This proposed waste management plant does not address or promote waste reduction.**

   Whilst there are a number of other existing and proposed waste management facilities in the Monklands Area they vary in terms of their size and function but all contribute to the integrated network of facilities needed to deal with the volumes of waste streams from industrial, commercial and municipal sources. The need for new facilities which adopt new sustainable technologies is encouraged by the Scottish Government's policy aims to move away from a reliance on landfill sites. SEPA considered that the need for a further waste management facility was acceptable and had no objection to the proposals as the developer was able to demonstrate there was a need for a facility of this type and capacity to meet the waste volumes of the AWP area.

7. **Similar waste management plants have been approved in Greengairs and Bargeddie, so why the necessity for an already well served area?**

   A similar position can be adopted in regards to the existing facilities at Bargeddie, and the consented but not yet developed EfW incinerator proposed at Drumshangie. The Bargeddie facility treats mixed source segregated recycled material and inert waste. The proposed pyrolysis facility does not look to treat either of those waste types. Whilst the proposed EfW is an incinerator capable of dealing with 300,000 te of all waste types per annum (if developed), the Scottish Government has imposed a 25% limit on the proportion of municipal waste collected by Local Authorities that can be incinerated as they wish to encourage other more sustainable waste management technologies. The developer has advised that nationally, local authority recycling is currently running at 34% average, leaving over 40% still to be dealt with (assuming 25% of this volume is incinerated). North Lanarkshire has a higher than average recycling rate, but is land filling around 140,000te of municipal waste each year. Glasgow has a below average recycling rate of 20% but is land filling almost 300,000te of municipal waste each year. Clearly there is a substantial quantity of municipal waste that requires to be disposed of despite successes by Local Authorities promoting reduction, reuse and recycle policies. Moreover, the Scottish Government's target is to eventually reduce municipal landfill to 5% and as a result more waste treatment facilities will be required. In addition to municipal waste streams, the proposed pyrolysis facility would be able to accept commercial and industrial wastes. Details demonstrating the need for the pyrolysis facility have been agreed by SEPA. The need assessment did take into account other waste management facilities (including the consented EfW plant at Drumshangie/Greengairs capacity) and still demonstrates a need for the proposed pyrolysis facility. The need for new facilities is also consistent with Scottish Government Policy to move waste away from landfills.

8. **The Scottish Parliament declared in June 2009 that "there should be no necessity for any large scale waste to energy plants to be built in Scotland and that re-use, reducing waste creation and recycling are the best way forward".**

   It is assumed this declaration was made when the Scottish Government released its emerging Zero Waste Plan for Scotland for public consultation. The Scottish Government is developing a new Zero Waste Plan for Scotland which is expected to be published this year. It is anticipated this will provide direction and guidance on key waste management issues which will set targets on prevention, reuse, recycling and composition, and set targets on energy from waste and landfill. This notwithstanding, the proposed pyrolysis facility may be considered as a medium scaled facility with a capacity of 160,000 te when compared with the much larger scale EfW Incinerator proposed at Drumshangie with its 300,000te capacity.

9. **The proposals are contrary to the Structure Plan and Local Plan, National Waste Strategy, Area Waste Plan and National Policy on waste management proposals.**

   The proposals are not contrary to the Structure Plan or Local Plan as assessed above. The proposals are also considered to be consistent with the aims of the National Waste Strategy, Area Waste Plan and current National Policy on waste management development.

C Odour Issues

1. **The operation of the development would lead to unacceptable levels of noise, odours and increased vermin as food waste would be processed at this plant.**

   As noted above the ES assessed potential noise, and odour impacts from the operational processes and concluded these would not be significant and within acceptable limits. All process operations would take place within the proposed building which would abate such noise emissions. Odours would be minimal due to negative air pressures within the building with vents filtered before release to the external atmosphere. Whilst the building would be accessed by large vehicles, doors would close automatically which would keep noise levels to acceptable levels. Vermin would be unlikely as no waste materials would be stored externally.

2. **A fire at this site in 2008 caused dreadful odours and debris for days and as such I object to the proposed incinerator.**

   The proposal does not involve incineration as noted previously. The accidental fire at the tyre processing plant did cause significant levels of smoke, debris and pollution, however the proposed pyrolysis process will not result in similar emissions.

3. **Waste products being incinerated at this plant will expel nasty and toxic fumes into the air around Carnbroe.**

   The ES examined a full scope of particulates that may be released to atmosphere via the stacks associated with the development. It was however concluded that satisfactory controls would be provided to ensure that air quality standards would not be compromised. As noted SEPA had no objection as they considered the proposed development is capable of meeting their PPC permit regulations.

4. **Local residents near Shore's plant in Liverpool have made complaints. Further to this the prevailing wind direction in the area of this proposed site is south westerly; all pollutants from this incinerator will be blown across the residential area of Carnbroe.**

   In response to this particular objection the developer offered the following comment: "*The plant in Huyton, (Liverpool) is not run by Shore but by Orchid Environmental. We understand that there were a number of objections to odour in the early period of operation but that these have been substantially reduced by alterations to the building and adjustments to the process. In Carnbroe if we receive consent, we will be developing a new building and it will be properly insulated to minimise the opportunity for odour escape. Furthermore, we will ensure that all the improvements to the process achieved by Orchid and more are incorporated into our process, so that the opportunity for odour escape is minimised".* It is considered that the building would be of an appropriate design to ensure any odour emissions from the facility are appropriately controlled. The ES included data to demonstrate predicted annual mean concentrations and the short term maximum 1-hour mean concentrations of various particulates that may be expected to be emitted from the facility. Whilst the data acknowledges that some particulates may fall over existing residential areas, the annual mean and short term maximum predicted levels would not be significant even when considered against the most stringent of benchmarks used for assessing such data. For example $PM_{2.5}$ (ultra-fine particles) have not yet been formally adopted into national legislation ie The Air Quality (Scotland) Regulations and are not

currently considered in the Local Air Quality Management (LAQM) framework but have been considered in the ES. As concluded by the ES, whilst the proposed development would give rise to atmospheric emissions from both process activities and road traffic associated with the development, the assessment of the significance of these emissions, in line with appropriate guidance, indicates that no exceedences of air quality objectives or environmental assessment levels would occur as a result of the development. Neither SEPA or Protective Services raised any objection in respect of air quality impacts.

D Noise Issues

1. **Noise from reversing vehicles (including audio-warnings) and a 24 hour day site operation will be a nuisance for homes nearest to the site.**

   The noise from reversing vehicles (including audio warnings) was considered in the ES however this aspect was not considered to be significant. Waste delivery vehicles would only operate during normal working hours as noted and not over a 24 hour period as suggested. Delivery vehicles would also enter the building and doors would close automatically. Audible warnings would eventually be replaced as waste delivery fleets are renewed.

2. **Noise from vehicles and site operation etc. as it might be 24hrs-7days a week.**

   As noted previously whilst the plant's processing facilities would operate continually over a 24 hour period, 7 days a week, these operations would be situated within a building. No waste delivery vehicles would operate outwith the agreed periods for delivery.

E Traffic Impact Issues

1. **Waste deliveries from a 30 mile radius will increase traffic volumes at the Shawhead junction, which are already heavy.**

   The proposal will generate addition traffic however this is not considered to be by a significant amount. Transport Scotland had no objection to the proposals as the % increase in traffic using the A8 would not be significant in terms of the number of vehicles using the A8. Not all delivery vehicles would need to use the Shawhead junction, which would also lessen the perceived impact.

2. **The proposals would lead to large vehicles travelling through Carnbroe village to the detriment of road and health safety.**

   The TS demonstrates that waste delivery vehicles would generally make use of the principle road network. The developer has agreed to introduce a operational management plan that would encourage contracted waste delivery companies to avoid routes through residential areas and avoidance of the designated AQMAs.

3. **There would be further increases in traffic volumes on the A8, in addition to the potential extra traffic generated by an approved office development at Eurocentral, which is located ½ mile from the application site.**

   As noted above transport Scotland had no objection to the proposals in terms of the additional vehicles using the A8 as the increase would not be significant.

4. **The M8/A8 is too busy especially during rush hour.**

   As per 3 above.

5. **Transportation of waste, with its noise, pollution and emissions will increase as a result of this plant.**

   As noted in the ES, the development would result in increased traffic and associated noise and emission levels, however these would not be to any significant level when measured against current background levels.

6. **There are no associated proposals to upgrade the existing access to the site. This is short sighted and dangerous.**

   There are no proposals to upgrade the current access arrangements to the site from the A8. These are considered acceptable for the continued use of the site and are acceptable for the proposed use. As noted there was no objection on this matter from Transport Scotland.

F Health Hazard and Proximity Issues

1. **The proposed plant is too near residential areas, where there are 4 schools and nurseries in the immediate area. Wind-borne pollution from the process is known to cause serious health problems.**

   The ES has examined the issues relating to wind-borne pollution from the proposed plant operation and from additional traffic generation. It was concluded that there would be no significant impact on sensitive receptors including residential areas and schools. As such it is considered that the proposed plant would be located far enough away from such receptors as no significant impacts are predicted.

2. **Pollutants from this plant are known to be harmful to health, especially young children. There are no known safe levels of dioxins and furans, and experts refer to "tolerable" and "acceptable" levels. A waste management plant in Corby was proven to cause birth defects.**

   A health impact assessment is included in Section 5 of Annex B of the Environmental Statement. This assesses the potential for impacts on human health from process activities and from road traffic. It concludes that there will be no significant impacts on human health as a result of the development and that the findings of the assessment are consistent with Government Studies into the environmental and health impacts of waste management.

3. **The possibility of fire breaking out in this area would have an unacceptable impact on not only Coatbridge, Airdrie, but outlying areas, including possible traffic disruption of the busy M8.**

   There is no reason to believe that the buildings and processes will be any more susceptible to fire than any other industrial operation. In the unlikely event that there is a fire there is no reason to believe that there will be any greater disruption than would normally be the case with fires.

4. **The cumulative effect could cause major health problems in years to come. Monklands already has a reputation for ill health and we should be improving health standards, not adding to the problems.**

   As noted previously the proposed waste management plant does not include an incineration process and cannot be compared with the impact caused by the accidental fire at the tyre recycling depot. As with most buildings of this

scale it would need to comply with the building standards regulations on fire prevention before it is brought into operation.

5. **The proposal will lead to increased noise levels during the 8.00am to 10.00pm working hours.**

   Cumulative impacts on air quality were considered in the ES in terms of the emissions from the processes and additional traffic generation. It was concluded there will be no significant impacts on human health as a result of the development and that the findings of the assessment are consistent with Government Studies into the environmental and health impacts of waste management.

6. **I wish to object to this proposal not least because I have not been provided with any facts or information on the health risks such an operation might have on residents.**

   The ES was available for public inspection either in hard copy available in Council offices or via the Council's e-planning portal. With some 4300 representations received in regards to the proposals it is clear that this information was readily available. The ES as previously noted reported that there would be no significant impacts on health as a result of the development.

G *Ecology and Wildlife Issues*

1. **There would be a loss of amenity to the community and there would be harm to wildlife in this area including protected species such as otters, kingfishers, badgers, bats, deer, foxes and buzzards, which is unacceptable. The destruction of these species and habitats will send the wrong message to children.**

   The ES has demonstrated that there would be no significant impact of natural heritage interests including protected species. Scottish Natural Heritage agreed with the conclusions of the ES and had no objection subject to conditions relating to standard protection measures for adjacent habitats and species including otters, bats and breeding birds. The proposals would introduce some biodiversity improvement measures that would be welcomed by the Scottish Wildlife Trust.

2. **The flora and fauna of the area will suffer as will farming activities in the district and the North Calder Water and Woodhall Lochan will be exposed to pollution.**

   The ES Annex G and G.1 provided an assessment of impacts on local ecology and concludes that emissions from the proposed plant would have no significant impact on sensitive receptors including the outlying SINC provided best practice measures for wildlife are followed during construction and operational phases.

H *Waste Type Issues*

1. **Reading up on some of the chemicals that will be processed the site will be a major accident waiting to happen, most of the chemicals ar highly volatile in other words Coatbridge could turn into the new Hiroshima disaster.**

   No chemicals would be processed at the site. It is assumed the objector has misunderstood the content of the ES where a list of potential pollutants was included as part of the assessment on air quality. As noted above the impact

on air quality was not considered to be significant.

2. **This proposal is unnecessary and will discourage recycling; something that North Lanarkshire does well.**

   The proposal does not discourage recycling indeed it increases levels of recycling by extracting difficult materials out of residual waste streams and making them available for recycling. As noted above the SEPA consider that the developer has demonstrated a need for the facility under the terms of the AWP which promotes an integrated network of waste management facilities.

3. **I understand that it's not just domestic waste they will be burning.**

   The facility would be able to deal with municipal, industrial and commercial waste streams. The process would not involve incineration as suggested.

4. **When I spoke to the representatives from Shore Energy at the public meeting in Shawhead and asked where the waste would come from to be recycled and incinerated -pyrolysis is just a softer term for burning and incinerating, they told me that the waste would be brought in by truck from all over the country and perhaps even England.**

   Pyrolysis is not another term for incineration. Combustion takes place in the presence of oxygen whereas pyrolysis takes place in an air starved environment so that burning does not take place. It is a different and much cleaner process. The developer has not at any stage suggested that waste would be brought from England.

5. **What's to stop Shore from expanding into medical, toxic or industrial waste?**

   The proposed technology can deal with industrial waste but is not suitable for dealing with medical, toxic or hazardous waste. The type of materials dealt with at the plant would be controlled via the PPC permit or by planning condition if appropriate.

I *Site Selection/Proximity to Residential Areas.*

1. **The proposed plant would be too near homes, not just Carnbroe and Shawhead**

   The ES has considered a comprehensive range of environmental impacts on sensitive receptors at and around the site, including adjacent residential areas and concluded that such impacts would not be significant. Where there are some minor concerns over such impacts the ES recommends that mitigation measures are introduced as part of the proposals to enable the development to be considered acceptable. As noted above there was no objection from SEPA, SNH, Transport Scotland or Protective Services in regards to these conclusions. The proposals are also consistent with the terms of the development plan as the site is zoned for industry and the accords with the NWS and AWP as advised by SEPA. The site is located more than 250m from the residential area of Shawhead and 200m from the southern edge of Carnbroe. Whilst the current local plan generally suggests that a 250m “buffer zone” be maintained between residential areas and waste disposal/recycling sites, exceptions can be considered acceptable where it has been demonstrated that such waste management proposals would be beneficial to amenity, safety and the environment. (Refer Policies MIN 1 Mineral Extraction and WDR 1 Landfill and Refuse Disposal). Taking these matters into account it is considered that the site is situated far enough away from residential areas as there would be no significant environmental impact

on them and the proposals would offer an acceptable and sustainable method for dealing with the targeted waste streams.

2. **The owners of Eurocentral were unwilling to sell or lease a site to Shore Energy as they considered such a bad neighbour use was unacceptable in this industrial park. Why then should a bad neighbour development be acceptable to the families of Carnbroe and Shawhead?**

   The developer advised that the Eurocentral development accommodates almost entirely Class 6 developments and is focussed on distribution uses, plus a printing press, a hotel and developing offices. This site marketing focus adopted by Eurocentral precluded agreement to allow a "bad neighbour" waste management facility within the Eurocentral campus. The term "bad neighbour development" stems from the current planning regulations, where development proposals that may potentially have wider impacts on amenity require to be advertised in the local press. This proposed development has been subject to appropriate advertising as required by the planning and EIA regulations and it has been concluded in the ES that the potential environmental impacts associated with this "bad neighbour development" are not significant and would not be detrimental to the amenity of outlying residential areas. Therefore this site is considered appropriate for a development of this type.

3. **There are many industrial sites that are not close to rural housing areas that are better suited for a waste management plant.**

   The ES provided an assessment on site selection criteria and advises that a range of alternative sites were considered. This included Faskine, Eurocentral, Prologis, Dunalastair, Newhouse and the former Shanks and McEwan site. The application site was considered the most suitable for a development of this nature in terms of its size, long term commercial availability, appropriate industrial zoning, avoidance of green belt, immediate access to the primary road network, proximity to sensitive receptors, avoidance of conflicts with other existing uses (Eurocentral), visual/landscape impact.

4. **I am also extremely concerned that NLC is considering this application when owners from the Eurocentral area "are unwilling to either sell or lease sites to Shore for their proposed use, which they consider to be a 'bad neighbour', development" (ref: Shore energy). On this basis I would propose that this bad neighbour development would be wholly unacceptable to be sited next to a residential area, if it's not suited to a commercial area then it is certainly unacceptable to the families of Shawhead and Carnbroe.**

   Refer to comment I.2 above.

5. **When Shore considered all the sites available, one of the main elements was that it should not be near to residential areas. Why then did they choose Carnbroe and Shawhead?**

   Refer to comment I.3 above.

J Public Consultation

1. **Shore Energy had no public meetings in Carnbroe to inform us, and the called "A Greener future for Carnbroe" leaflet was not distributed to every home and lots of people didn't receive it.**

   This objection is considered to be inaccurate as is demonstrated by the narrative in Volume 1 Section 2.3 of the Environmental Statement on Public Consultation. The developer has advised that 4,000 leaflets were distributed inviting local people to the exhibitions on the 13th and 14th May 2009. In addition the developer attended a public meeting at the request of Gerald Somers the Chairperson of Greenend & Sikeside Tenant and Residents Association and Chairperson of Coatbridge Federation of Tenants & Residents. This was held on 28th May 2009 and was attended by 36 residents and two Councillors. As is evident by the volume of representation received in regards to the proposal it is clear that local residents are fully aware of the details of the proposal.

K Other Matters

1. **This proposal will undoubtedly affect the value of our homes.**

   Issues over perceived loss of property values are not material to the consideration of any planning application.

2. **The fire that happened 2yrs ago to which tyres got burnt was an absolute nightmare for the residents of Carnbroe let alone an incinerator getting put right on our door step.**

   It is noted that local residents were affected by the accidental fire at the tyre recycling depot, however as noted above the proposed development would not involve any incineration process and it would be erroneous to compare the previous impacts of the tyre depot fire with the proposed development.

3. **Burning waste is not the solution and North Lanarkshire should be well aware that it would be wrong to bring yet another incinerator into our area.**

   The proposed development does not include an incinerator.

4. **This proposed plant is not a recycle plant, it is an incinerator by another name.**

   As described above and in detail in the planning application, the plant would take waste, mechanically process it to remove recyclate and moisture and then will turn the residue into a gas to be passed through gas engines to make renewable energy. It is not an incinerator.

5. **I would ask if Shore Energy is receiving any grants/money/assistance for this plant from NLC, Scot Govt, European Community?**

   The developer has advised that no grants have been received at this stage, however if planning permission is granted they would be pursuing grant assistance that may be available for job creation in particular.

6. **If Shore Energy have supplied over 80 docs, to support their application-are each and every one of these being challenged by experts? Where is the published info/ research which shows that without a doubt, such plants are without danger to health?**

The proposals were subject to an Environmental Impact Assessment which enabled an Environmental Statement to be submitted along with the planning application. It is considered that the ES offers a competent assessment of the impacts in accordance with the Environmental Impact Assessment (Scotland) Regulations 1999. This information has been considered by SEPA, Transport Scotland, SNH and Protective Services, who raised no issues in respect of methodology used in assessing the impacts. Such assessments are considered as a best practice of informing and allowing Planning Authorities to consider the significance of such impacts before determining such proposals.

7. **I believe that it is contrary to the spirit of North Lanarkshire Council's local area waste plan and the National Waste Strategy in general to consider such a proposal.**

   North Lanarkshire falls within the Glasgow and Clyde Valley Area Waste Plan area. The AWP envisages a mixed waste processing facilities (the first stage of the proposed process) and anticipates that technologies "such as thermal treatment, anaerobic digestion, additional production of refuse-derived fuel, autoclaving, and other emerging waste-treatment technologies" will be required post 2010 to allow 2013 targets to be achieved. The proposal as noted includes the production of fuel and thermal treatment as prescribed. SEPA considered these aspects of the proposal and considered they complied with the NWS, NWP and AWP.

8. **Lack of Environmental Impact Assessment.**

   The planning application was accompanied by an Environmental Statement which was prepared in accordance with the EIA regulations.

9. **There are several fundamental flaws, burning plastics, tyres and other discarded goods is not included in promote waste reduction first and foremeost, followed by reuse and recycling policy, as stipulated in North Lanarkshire Council's sustainable solutions to waste management, neither is it clean energy.**

   The proposal does not involve the burning of plastics, tyres and other discarded goods. The proposed plant may accept such waste but these would be subject to the MRF and pyrolysis process, which as noted does not involve burning or incineration. The thermal treatment of biomass by pyrolysis is confirmed renewable energy process under the Scottish Renewables Order.

10. **I draw your attention. to the recent release 11 June 09 GREENS WIN HOLYROOD VOTE AGAINST "LANDFILL IN THE SKY" -announcement from Jas Mackenzie, Media & Comms, Scot Parliament, Edin Tel: 0131 348 6360, Mobile 0799 933 074 - a full transcript of the recent successful amendment is avail (passed by 65 votes to 54) "there should be no necessity for any large-scale waste-to-energy plants to be built in Scotland + that reuse, reducing waste creation and recycling are best way forward."**

    This statement relates to the emerging Zero Waste Plan (ZWP) that underwent its public consultation process last November and is expected to be approved this year. As previously noted, the Zero Waste Plan intends to limit the number of large scale energy from waste incinerator developments and the developer has advised this is why the current proposals involve a pyrolysis process solution. This is not a proposal for an incinerator. The technology takes residual waste (that is waste after the householder has

extracted whatever they can at home) and then mechanically sorts that waste to remove residual recyclable material, such as plastic bottles, metals, inert materials such as glass, grit, stones and ceramics and to remove, clean and recycle water from the waste. What is left is mixed biodegradable waste – particularly food – and some micro-contaminants. This final residue is taken and turned into renewable energy in the form of a syngas by the pyrolysis process, thereby saving fossil fuels such as coal, oil and gas. The developer considers this process would also be in line with the emerging ZWP.

11. **There are several inconsistencies in relation to the supporting information. 0r example the information on vehicle trips suggests the facility would accept far more waste than the maximum proposed capacity of 160,000 te pre annum.**

    The developer has accepted that these vehicle trip tables submitted as part of the TS overstate the number of vehicles likely to be visiting the site. However as part of the agreed scope of the assessment, the developers were asked to estimate hourly movements of vehicles to the site by Transport Scotland. As the developer did not know the custom and practices of potential customers, including the capacity of such vehicles, these hourly estimates also include an element of contingency to ensure that peaks can be assessed and handled by the facility. Even at these higher figures, Transport Scotland has already assessed the impact of the proposal on the adjacent A8 and has considered that impact to be minimal and acceptable. Notwithstanding this, the planning application is made for handling up to 160,000te of waste and up to 20,000te of additional biomass. Should planning permission be granted, a planning condition would effectively limit the site capacity to these figures, therefore any 'over delivery' would be dealt with as a potential breach of the permission. Tonnages of waste entering the site are also the subject of returns to SEPA as part of the PCC permit regime and are therefore verifiable and enforceable by the Planning Authority.

12. **There was no data provided on actual pyrolysis technology proposed at this site.**

    As noted above, no specific emission data for the pyrolysis plant were available since the final technology selection is subject to commercial negotiation, therefore the emission rates were conservatively assumed to be based in compliance with the WID emissions limits. The ES includes relevant emissions data for the plant in Table B.2. The ES advises that in reality the emissions from the bio-filter stack will be process air only and emissions are considered in terms of oderous emissions only and were assessed as falling within acceptable limits of the WID limits.

13. **The ES is inadequate as it fails to rely on a flawed model for justification of need as noted by the NLC Waste Strategy response of 29th July 2009.**

    The developer provided additional information to SEPA in terms of demonstrating a need for the facility under the terms of the AWP. SEPA as noted above withdrew their initial objection to the proposals.

14. **Lack of benefit as it appears to need more energy to run it as it produces.**

    The proposals included information on a Heat and Power Plan that was considered acceptable to SEPA as they require such facilities to demonstrate they would be energy efficient under the requirements of the PPC permit regulations.

Whilst a significant number of objections have been received, having assessed and given the content of these due consideration, they do not raise sufficient reason to recommend that the application be refused.