



Appendix B – Technical note: Planning Application 160276: East Tullis energy From Waste – Response to Aberdeen City Council Environmental Policy Team

1. Introduction

1.1.1 This technical note has been prepared by Amec Foster Wheeler Environment & Infrastructure UK Ltd (Amec Foster Wheeler) on behalf of the Applicant, Aberdeen Recycling and Energy, in response to Aberdeen City Council Environmental Policy Team's consultation memo dated 24th April 2016 in relation to planning application 160276 East Tullis Energy from Waste (EfW).

1.1.2 Matters addressed in this technical note includes:

- ▶ Waste streams
- ▶ Freshwater Environmental Management Proposals
- ▶ Nature Conservation
- ▶ Air Quality
- ▶ Socio-economic
- ▶ Design and Access Statement
- ▶ Other

1.1.3 A response to landscape and visual matters is included in Appendix C.

1.2 Waste Streams

1.2.1 The consultation response in relation to the non-technical summary, ES Chapter 2 Project Description, Heat and Power Plan and the Design and Access Statement raises clarifications on acceptable waste streams, diversion of food waste and recycling of Incineration Bottom Ash (IBA).

- ▶ NTS: The consultation response seeks confirmation of the type of waste stream(s) to be accepted by the Proposed Development, as there are some inconsistencies between the submitted Environmental Statement (ES) Non-Technical Summary (NTS) and Heat & Power Plan in this regard.
- ▶ ES Chapter 2: The consultation response seeks specific clarifications regarding the acceptance of food waste by the Proposed Development.
- ▶ ES Chapter 2: The consultation response seeks clarification of the intended market for Incinerator Bottom Ash (IBA) which would be generated during the operation of the Proposed Development.

- ▶ Design and Access Statement: The consultation response seeks confirmation of the waste streams which would be accepted, and clarification that this would not include compostable waste.
- ▶ Heat and Power Plan: Consultation response seeks clarification of the “*high organic content*” within the waste which would be treated by the Proposed Development.

1.3 Acceptable Waste Streams

- 1.3.1 As set out in paragraph 2.1 and 2.2 of the submitted ES the East Tullos EfW would accept and treat non-hazardous residual municipal solid waste (MSW) collected by Aberdeen City, Aberdeenshire and Moray Councils within their administrative areas. Residual MSW comprises authorities collected waste left following source segregation. Source segregation includes all existing (and future) recycling schemes including the separate collection of food waste. Separately collected food waste or garden waste from the three authorities will not be accepted or treated at the proposed East Tullos EfW. Taking account of source segregation, there would be no pre-treatment of waste at the Development Site. The proposed is in compliance with SEPAs Thermal Treatment Guidelines 2014.
- 1.3.2 The East Tullos EfW has been sized based upon predicted waste arisings for the three authorities. This has taken account of increased recycling efforts and separate food waste collection, as well as ‘future proofing’ by recognising potential waste arisings from economic growth and projected housing growth. The ES recognises that should efforts to recycle result in less residual MSW, then the remainder can be sourced from local commercial/trade waste with a similar composition to household waste.
- 1.3.3 The NTS provides a summary of the proposal to treat residual MSW collected by Aberdeen City, Aberdeenshire and Moray Councils.
- 1.3.4 As detailed in the ES, the three authorities collected a combined 278,422 tonnes of household waste (including a small amount of commercial/trade waste) in 2014. In 2014, 42.2% was recycled and 161,000 of mixed untreated waste was sent to landfill. There has been a steady increase in recycling efforts and the forecast suggests that up to 60% recycling is achievable via kerbside recycling by 2020.

1.4 Food Waste

- 1.4.1 As stated above, the Proposed Development would only accept residual MSW, which does not include source segregated recyclables or biodegradable waste. The residual MSW could however include non-segregated recyclable or biodegradable waste.
- 1.4.2 The calorific value of projected waste stream as presented in Table 3.2 of the submitted Heat and Power Plan includes a 20% component of organic waste, however it is recognised that this component is likely reduce following ongoing improvement in the food waste collection schemes including public awareness campaigns. An element of compostable food waste and other organic waste would remain within residual MSW and would require thermal treatment, as by 2021 biodegradable municipal waste cannot be sent to landfill.

1.5 Incineration Bottom Ash (IBA)

- 1.5.1 The ES (paragraphs 2.7.19 - 2.7.21) sets out a range of possible end uses for IBA as a construction material and aggregate substitute. There are a number of suitable local aggregates markets and interests by local business including existing quarries were expressed during the pre-application consultation process. Specific IBA marketing and export contracts must be determined post-consent through competitive tendering or auction processes and therefore cannot be confirmed at this stage.

2. Freshwater Environmental Management Proposals

2.1.1 The following sections addresses comments 1 to 6 made on ES Chapter 7 Freshwater in relation to the Proposed Development and should be read in conjunction with the ES Chapter.

2.1.2 Comment 2, 3 and 5 request further considerations for potential construction and operational impacts on the East Tullis Burn, including runoff into the burn and how that might affect water quality and the existing and newly created habitats along the edges of the burn and the wetlands.

2.1.3 Potential impacts of the Proposed Development on the East Tullis Burn and the newly created habitats along the edges of the burn and wetlands have already been assessed in ES Chapter 7 Freshwater. Appropriate mitigation measures to protect against effects on downstream receptors have also been set out. The following sections provides additional clarifications.

2.2 Run-off rates into the East Tullis Burn

2.2.1 Potential effects of the construction phase of the Proposed Development on run-off are considered within Section 7.4 of the ES (Embedded Environmental Mitigation Measures). Proposed mitigation measures to manage these effects are outlined in paragraph 7.4.6 and in Table 7.9. Below is an excerpt from Table 7.9:

“Access routes and works areas (including laydown compounds) would be drained by appropriate Sustainable Drainage System (SuDS) methods for the Development Site, either through the use of infiltration or via controlled discharge to the East Tullis Burn Culvert following three stages of treatment. The precise treatment measures would be determined on commencement of construction works on the Development Site” (pg. 99, ES Chapter). The three stages of treatment would allow for the removal of silt, before discharge, as far as is practicable. “

2.2.2 For the operational phase, impacts of the Proposed Development on run-off rates are considered in the accompanying Flood Risk Assessment and Drainage Impact Assessment (FRA/DIA) contained in Appendix 7.A of the ES Chapter. The FRA/DIA outlines a site-specific SuDS drainage system that will limit discharges to the East Tullis Burn Culvert to greenfield rates. At present the site, as used to define the ES baseline, is served by a positive drainage system without SuDS treatment. The proposed drainage system would therefore see betterment on the existing situation, as discharge rates would be reduced and water quality treatment stages would be added. A summary of the proposed drainage system is also provided within paragraph 7.4.4 of the Freshwater ES chapter.

2.3 Water quality in the East Tullis Burn

2.3.1 Potential effects on water quality within the East Tullis Burn are considered within Section 7.4 of the ES Chapter. For the construction phase, Table 7.4 outlines the three stages of treatment that would be used to treat all runoff from the site. Furthermore, silt control measures (e.g. sediment fencing) will also be used as an additional measure. As a result, silt laden water would be not discharged from the site directly to the East Tullis Burn; rather, levels of silt will be managed to an acceptable level in order to avoid any effects on the East Tullis Burn.

2.3.2 For the operational phase, as outlined above, the site-specific SuDS system would provide three stages of treatment to all surface water run-off leaving the site. As outlined in ES Table 7.9, this would include the use of:

- 1) Filter drains;
- 2) Trapped gullies; and
- 3) A suds detention basin.

2.4 Impacts on the East Tullis Burn, newly created habitats and wetlands

2.4.1 Section 7.5 of the submitted ES also provided an assessment of the Proposed Development (construction and operations phases) on the East Tullis Burn, and concluded that there would be no significant effects as a result of the Project. As the East Tullis Burn is the pathway to the newly created habitats and wetlands, and there would be no significant effects on the East Tullis Burn as a receptor, it follows that there would be no significant effects on the newly created habitats along the edges of the burn and the wetlands.

2.4.2 As run-off rates would be restricted to the Greenfield rates, there would be a reduction in runoff rates and volumes from the site when compared to the baseline. Similarly, water quality treatment measures would be introduced in the new drainage system. The development would therefore be expected to result in environmental improvement relative to baseline conditions.

2.4.3 In addition, consideration of increased sediment run-off to the burn during the construction phase, and how this may affect the existing and newly created habitats are included in Section 7.4 of the ES. Paragraphs 7.4.1 and 7.4.2 outline and consider the potential for sediment generating activities associated with the Development. ES Table 7.9 then outlines the proposed mitigation measures that would be implemented in order to reduce the potential for increased sediment run-off to the ETB to an acceptable level. With regards to sediment, paragraphs 7.4.1 and 7.4.2 of the ES state the following:

“Silt fencing or similar in situ measures would be installed to prevent run-off from disturbed areas from entering the East Tullis Burn culvert.”;

Soil stockpiles on site would be located as far as practicable from temporary site drainage measures; with ditches installed adjacent to those stockpiles that are deemed to present a potential risk of run-off away from the Development Site. The surface of stockpiled soils would be smoothed with excavators to reduce potential for run-off generation. All stockpiles to be in place >3 months would be seeded to encourage stabilisation of topsoil. No silty water to be discharged directly into the East Tullis Burn culvert. Site specific methods to dispose of the stockpiles would be incorporated as appropriate. Where there remains the potential for this water to be leached off the Development Site additional control measures would be put in place, which may include emplacing sediment fencing or passing the silt-laden water through a Siltbuster® or similar.

Dependant on the foundation type that is chosen for the new buildings, there may be a requirement to carry out piling. With respect to sediment disturbance, piling works generally result in less disturbance (and less generation of sediment laden run-off) than alternative excavation-based foundation installation methods.

The requirement for all of the measures above would be detailed and secured in a single CEMP, or similar document.”

2.4.4 This demonstrates that there will be no significant impacts on the East Tullis Burn or any existing or newly created habitats as a result of increased sediment laden-runoff during the construction phase of the Proposed Development.

2.4.5 As noted earlier in response to Comment 2, run-off rates under the operational phase of the Project will be limited to Greenfield rates. Water quality treatment will also be incorporated into the new drainage system, to include the removal of sediment as far as possible. For this reason, there is minimal scope for negative impacts on existing and newly created habitats as a result of the operational phase of the Proposed Development. The Proposed Development would provide betterment on the existing site in terms of run-off rates and water quality.

2.5 Culvert Diversion

2.5.1 As stated in ES Chapter 7 Freshwater, the proposed culvert diversion is to be undertaken as part of the demolition works and site remediation by current landowner. The demolition has already obtained prior approval and the culvert diversion will be subject to a separate planning application. This culvert diversion would take place 2016/17 prior to the construction phase of the Proposed Development, which is programmed for 2018 (approximately). The design of the culvert diversion

will be confirmed as part of a separate planning application, however in terms of designed capacity it will likely comprise a like-for-like replacement of the existing culvert. The proposed route would see roughly 200m of the culvert being diverted in a dogs-leg around the Development Site. This would therefore be a highly localised change, with the culvert remaining unchanged upstream and downstream of the site.

- 2.5.2 The culvert diversion has been assumed as part of the future baseline, against which the environmental impacts of the Proposed Development are assessed. Specific consideration of the construction phase of the culvert diversion is outwith the scope of the EIA undertaken for the Proposed Development, as reported in the submitted ES.

2.6 Cumulative Effects

- 2.6.1 Comment 6 relates to cumulative effects arising from the Proposed Development in combination with the consented Aberdeen Harbour Expansion development at Nigg Bay and the associated proposal to relocating the discharge point for the East Tullos Burn. It also states that consideration should be given to impacts on water quality and volumes, wetlands/habitats, and timings of developments.
- 2.6.2 As noted above, the East Tullos Burn culvert diversion is scheduled for 2016/17 subject to separate planning permission and should be completed well in advance of the construction timescales for the Proposed Development (circa 2018). The culvert diversion does not form part of the Proposed Development and is as such, outwith the scope of the EIA. Accordingly, the future baseline in the ES Chapter assumes that the culvert diversion will be in place by the time of the Proposed Development. Impacts associated with the construction phase of the culvert diversion would need to be considered within relevant planning documents to support a separate planning application for the culvert diversion.
- 2.6.3 As proposed rates of discharge to the culvert would be reduced to Greenfield rates, detrimental impacts in terms of flow rates and volumes, sediment laden run-off and water quality would be mitigated against. The assessment of these effects concludes negligible impact and not significant effect on water quality or flood risk issues in the East Tullos Burn as a result of the Proposed Development. As the East Tullos Burn is the main pathway to its associated wetlands/habitats, it can also be concluded that the Proposed Development would have negligible impact on these receptors.
- 2.6.4 With regards to the Aberdeen Harbour Expansion development, the Aberdeen Harbour Expansion Project Volume 2: Environmental Statement Chapter 8: Flood Risk and Surface Water (November, 2015) concludes in Section 8.6 that both the construction and completed phases of the harbour development would have negligible significant effects and negligible residual effects on fluvial flood risk and surface water quality. Moreover, by virtue of distance from the Proposed Development Site to the Aberdeen Harbour Expansion development (circa 1km), the potential for combined effects on water quality and volumes would be negligible. As both would individually have negligible impacts on water quality and flood risk to the East Tullos Burn and its associated wetlands/habitats, there is therefore negligible potential for cumulative impacts to occur.
- 2.6.5 In terms of carrying out the culvert/discharge point works at the same time, Table 3.2 Indicative Construction Programme of the Aberdeen Harbour Expansion Project Environmental Statement (November, 2015) indicates that intake and outlet diversions to the East Tullos Burn are scheduled to be completed between Q4 2016 and Q1 2017. There may be potential to carry out the culvert diversion at the same time, but this would need to be confirmed as part of site remediation and clearance works which are not within the scope of this planning application.

3. Nature Conservation

- 3.1.1 An overview of the impact assessment carried out in Chapter 8 Nature Conservation of the ES is provided in comments 1 to 9 and requests for clarifications are summarised under comments 10 to 15.

- 3.1.2 In relation to overview comment 2, it is important to note that the ES concludes that, taking account of embedded and other proposed mitigation, the construction and operational phases of the Proposed Development would result in Negligible and Not Significant effects on nature conservation interests, including protected species. In respect of predicted air quality effects, the assessment within the ES also concludes that such effects on designated sites would be Negligible and Not Significant.
- 3.1.3 In relation to comment 8, it is important to note that likely air quality effects arising at designated sites during the operational phase of the Proposed Development were included in the assessments. ES Table 11.16 details those sensitive ecological receptors considered in the air quality assessment and the results of the assessment are contained in Tables 11.36 to 11.38 and tables 11.40 and 11.41. The significance of these effects is discussed in Chapter 8 of the ES.
- 3.1.4 Comment 16 relates to planning conditions covering pre-construction surveys, ES mitigations to be incorporated into a Construction Environmental Management Plan, and the production of a Construction Method Statement. These matters are in line with the proposed mitigations stated in the ES and summarised in ES Chapter 15 and are welcomed.

3.2 Comment 10: Ecology survey area

- 3.2.1 Habitats outside the northern boundary of the Development Site were mapped and are illustrated on Figure 3.1 of Appendix 8.A to the ES. The remaining areas up to 50m from the Development Site boundary are of negligible ecological value, including roads, and built-up industrial areas. As such, the absence of ecological surveys in these areas would not compromise the conclusions reached in Chapter 8 of the ES.

3.3 Comment 11: East Tullis Burn

- 3.3.1 The Development Site drains to the East Tullis Burn, which rises near to Redmoss Road, around 2km southwest of the Development Site, before flowing through a culvert below the East Tullis Industrial Estate. The culvert passes directly beneath the Development Site and emerges as an open watercourse approximately 500m to the north east of the Development Site, on the northern side of the Aberdeen to Dundee railway line. It then flows in a broadly eastwards direction for around 1.25km before discharging into the coastal waters of Nigg Bay. Owing to distance the nearest open watercourse section of the East Tullis Burn to the Development Site is considered to lie outside the zone of influence for direct effects on aquatic fauna. Consequently it was determined that indirect effects would be more appropriately dealt with in ES Chapter 7 - Freshwater Environment. Further clarifications regarding the East Tullis Burn are provided in Section 3 above.

3.4 Comment 12: St. Fittick's Open Space

- 3.4.1 St Fittick's Open Space (Community Park) is not a nature conservation designation as defined in Table 8.2 of the submitted ES and as such was not included in ES Chapter 8 - Nature Conservation. St Fittick's Open Space is located over 500m from the Development Site and is considered to be outside the zone of influence for direct effects. Indirect effects on wetlands and water environments (via the East Tullis Burn) were considered in Chapter 7 and further comments have been provided in section 3 above.
- 3.4.2 In terms of the potential for adverse effects on St Fittick's Open Space via effects on the water environment, embedded mitigation during construction and operation including the development and adherence to a Drainage Management Plan (refer to ES Section 7.4) would manage silt run-off to an acceptable level. This mitigation has been designed to avoid effects on the East Tullis Burn and accordingly, avoid effects on the wetlands and surrounding habitats and species of St Fittick's Open Space.

3.5 Comment 13: Tullos Hill Local Nature Conservation Site

- 3.5.1 It is acknowledged that the ES in error stated that the distance to the Tullos Hill Local Nature Conservation Site (LNCS) is 240m rather than the correct 42m. However, the correct location in relation to the Development Site is shown on ES Figure 8.2.
- 3.5.2 Tullos Hill LNCS is a relatively large site comprising a mixture of terrestrial habitats, including broadleaved woodland, rank neutral grassland, scrub, woodland, bracken, acid grassland and dry heath. The ES concludes that no direct effects are anticipated on the LNCS or the habitats it is designated for, and this conclusion would be unchanged when considering the correct distance. Of note, the correct location of Tullos Hill LNCS was applied to the assessment of air quality effects as per Table 2.4 in ES Appendix 11.A, which concluded negligible effects on the designated sites and not significant impacts.
- 3.5.3 In summary it is considered that the error relating to the exact distance of the LNCS from the Development Site would not have altered relevant conclusions presented in the ES.

3.6 Comment 14 & 15: Water quality impacts

Tullos Hill LNCS, Tullos Wood, East Tullos Burn and habitats downstream

- 3.6.1 The consultation response requests that due to the potential for water quality impacts, potential effects on the neighbouring Tullos Hill LNCS, Tullos Wood, East Tullos Burn and habitats downstream (i.e. wetland and surrounding habitat/species) should be included in the assessment.
- 3.6.2 We note SEPA has accepted the conclusions of Chapter 7 and Chapter 8 of the submitted ES relating to water quality and wetlands, and have confirmed no objection to the Proposed Development.
- 3.6.3 In terms of potential adverse water quality effects on the East Tullos Burn, embedded mitigation during construction and operation, including the development and adherence to a Drainage Management Plan (refer to Section 7.4 of the submitted ES) would manage water quality to an acceptable level in order to avoid any effects on the East Tullos Burn and accordingly, avoid effects on the wetlands and surrounding habitats and species of East Tullos Burn. There is no hydrological connectivity between the East Tullos Burn, Tullos Hill and Tullos Wood, and these receptors would also be protected from any run-off pollution events through the adoption of mitigation measures set out in Section 7.4 of the ES. This includes the preparation and adherence to a Drainage Management Plan and a Construction Environment Management Plan.
- 3.6.4 We consider that the technical assessment provided in ES Chapter 8 is adequately robust with regard to potential adverse effects on these sites, and in combination with the mitigation measures set out in ES Chapter 7 and the further clarifications provided under section 3 above, it is not considered that there will be any significant adverse effects on these features.

Water impacts comments (15a,b,c)

- 3.6.5 The consultation response requests consideration of water quality of wetlands, discharge and increased water volumes on function of wetlands and the impacts from the diversion of the East Tullos Burn culvert.
- 3.6.6 These matters have been addressed in detail in section 3 above and in ES Chapter 7 Freshwater. We also note that SEPA has raised no concerns regarding the conclusions of Chapter 7 and Chapter 8 of the ES relating to water quality and water volumes.
- 3.6.7 In terms of water quality effects during the construction and operational phases, embedded mitigation (refer to Section 7.4 of the submitted ES) would manage silt run-off to an acceptable level to avoid any effects on the East Tullos Burn. In the absence of significant effects on water quality of the East Tullos Burn, it is not considered that there would be a pathway for residual adverse effects on aquatic ecological features, including wetland and riparian vegetation, as a

result of changes in water quality, particularly in view of the distance from the East Tullos Burn which appears as a surface water features 500m downstream of the Proposed Development.

- 3.6.8 In terms of water volumes and run-off rates, with the preparation of and adherence to a Drainage Management Plan in addition to the embedded mitigation (refer to Section 7.4 of the ES), the water volumes would be maintained to within the existing Greenfield limits. In the absence of significant effects on water volumes, it is not considered that there would be a pathway for residual adverse effects on aquatic ecological features, including wetland and riparian vegetation, due to changes in water volumes.

Air quality impacts on East Tullos Burn, St Fittick's open space, wetlands and surrounding habitat and Tullos Hills,

- 3.6.9 As noted above, St Fittick's Open Space (Community Park) is not a nature conservation designation as defined in Table 8.2 of the submitted ES and as such was not included in ES Chapter 8 - Nature Conservation nor Chapter 11 Air Quality. Ecological sites identified for consideration within the air quality assessment (ES Appendix 11.A) as per applicable guidance included internationally and nationally-designated ecological sites (i.e. SPAs, SACs, SSSIs, Ramsar sites and NNRs) within 15 km of the Proposed Development, and locally-designated ecological sites within 2 km of the development (e.g. LNRs, ancient woodland etc) have been assessed. Tullos Hill LNCS was included in the air quality assessment (see Appendix 11.A and Section 8.3 of the ES) and the predicted air quality effects would be negligible and not significant as per section 8.5.
- 3.6.10 We also note that SEPA has accepted the conclusions of ES Chapters 7, 8 and 11 relating to air quality, wetlands and associated habitats, and has confirmed no objection to the Proposed Development
- 3.6.11 Furthermore, as set out in Section 5 below, East Tullos Burn, St. Fittick's Open Space, wetlands and surrounding habitats all lie to the east of the Tullos Primary School receptor. The assessment concludes for this receptor that predicted air quality effects would be negligible and not significant. Concentrations would be similar to or lower than those predicted at the school for these areas located further east and would therefore be negligible and not significant.

Cumulative Effects

- 3.6.12 Request for consideration of cumulative effects from neighbouring proposed development at Nigg Bay for the new harbour in regards to East Tullos Burn and potential effects to the wetlands and surrounding habitats and the marine environment. This point is more adequately addressed in relation to ES Chapter 7 and further comments have therefore been provided under section 3 above.

4. Air Quality

Information gap

- 4.1.1 Comment raised as to the meaning of paragraph 11.2.86 of the ES: "*It is considered that there are no significant information gaps.*"
- 4.1.2 The meaning of this sentence is that there are no information gaps that have any significant effect upon the undertaking or conclusions of the air quality impact assessment.

East Tullos Burn, Wetlands and associated habitats

- 4.1.3 Consideration of potential dust and air quality impacts on St Fittick's Open Space and surrounding wetlands and habitats have been requested.

- 4.1.4 With regard to dust effects during construction, the Development Site lies some 500 metres to the south-west of the nearest open watercourse point of the East Tullos Burn and St Fittick's open space. At this distance the likelihood of any significant effects arising is extremely remote, especially given the incorporation of appropriate dust mitigation and control measures through a Construction Environmental Management Plan and the extent and duration of potential dust-generating activity during the construction period.
- 4.1.5 With regard to potential air quality effects during the operational phase of the Proposed Development, the East Tullos Burn open watercourse and St Fittick's open space area lies to the east of Tullos Primary School, which is identified as a receptor in the assessment. The scale of predicted air quality effects on Tullos Primary School is negligible and not significant, so with these areas located further east and at greater distance from the Development Site it is anticipated that concentrations would be similar to or lower than those predicted at Tullos Primary School, and would therefore be negligible and not significant.

5. Socio-economics

- 5.1.1 The socio-economic matters raised in the consultation response relate to impacts on the visitor attractiveness of specific receptors from predicted or potential landscape and visual effects. This section of the technical note therefore takes account of the landscape and visual clarifications provided above, as well as all other relevant information previously submitted.

Tullos Hill, Kincorth Hill and St Fittick's Community Park.

- 5.1.2 A combined assessment was presented in ES Chapter 14 Socioeconomics for Loirston Country Park and Tullos Hill (including Tullos Hill Local Nature Conservation Site), as these named recreational sites overlap but have different boundaries such that it would not be logical to provide separate assessments for each of these sites. However, the Kincorth Hill area of Loirston Country Park is assessed within Chapter 11 – LVIA of the submitted ES as experiencing Not Significant visual effects, so as per the socio-economic assessment methodology detailed in ES section 14.2.10, Kincorth Hill would, if viewed in isolation, be scoped out of the tourism and visitor attractiveness assessment. For this reason the assessment of potential effects on Loirston Country Park / Tullos Hill provided in ES Table 14.11 clearly focuses on assessing potential effects at Tullos Hill and its immediate surroundings, where Significant visual effects are predicted to occur.
- 5.1.3 The assessment in ES Table 14.11 takes account of the methodology set out in ES Table 14.5 and concludes a Low magnitude of change would result at Loirston Country Park - Tullos Hill, taking account of the type of this recreational receptor (a local open space), visitor purpose and visitor numbers in combination with predicted visual effects. The assessment in regards to recreational attractiveness concluded a slight/moderate effect and not significant impact. If the magnitude of change was assessed as Medium, the assessment conclusion would be a moderate effect, which would remain not significant in EIA terms.
- 5.1.4 In relation to St Fittick's Community Park, based on the methodology and thresholds detailed in ES Table 14.5 it was considered that based on the combination of factors set out above the predicted magnitude of change on the recreational attractiveness of this receptor would be Low. Even if more weight were applied to the predicted visual effects rather than visitor numbers, recreational value and recreational experience, the conclusion would be a Moderate effect which would remain not significant in EIA terms.

Cumulative effects

- 5.1.5 The consultation response states that cumulative effects from the Proposed Development in combination with the proposed Aberdeen Harbour Expansion – Nigg Bay development have not been assessed. Similar comments was provided by the consultee regarding the assessment of cumulative landscape and visual effects.

- 5.1.6 In line with the scoping methodology provided in ES section 4.2.10, effects on the visitor attractiveness of recreational receptors located within 2km of the Development Site requires to be assessed only where receptors are predicted to experience significant visual effects or significant effects on the setting of historic assets. As set out above, 'individual' significant visual effects from the Proposed Development would only occur at:
- ▶ Loirston Country Park – Tullos Hill; and
 - ▶ St Fittick's Community Park.
- 5.1.7 Appendix C identifies the potential for Significant cumulative 'in combination' visual effects with the proposed Aberdeen Harbour Expansion – Nigg Bay development on these receptors. For the reasons detailed above and in ES Table 14.11, Significant visual effects were not predicted to result in significant effects on visitor attractiveness. It is acknowledged that the two developments would appear in combination in some directional views from the receptors, however taking account of the receptor characteristics as local open spaces, visitor purpose and visitor numbers, it is considered there would be a Low – Medium cumulative magnitude of change and therefore not significant cumulative 'in combination' effects on the recreational attractiveness of these two receptors.
- 5.1.8 Appendix C identifies that the following receptors would experience 'cumulative' significant visual effects largely due to the proposed Aberdeen Harbour Expansion – Nigg Bay development, rather than the Proposed Development:
- ▶ Aberdeen to Dundee Railway Line; and
 - ▶ NCR1 (Greyhope Road / St Fittick's Road)
- 5.1.9 Taking account of the characteristics of these receptors, visitor purpose and predicted visual effects it is considered there would be a Medium cumulative magnitude of change and not significant cumulative effect on the recreational attractiveness of these receptors.

Girdleness Lighthouse

- 5.1.10 A 2km study area was defined and consulted on for both the LVIA and the Historic Environment assessments undertaken for the Proposed Development. Following a request from the Aberdeenshire, Moray and Angus Archaeological Service, Girdleness lighthouse was also included within the assessment provided in ES Chapter 13 Historic Environment. No comments were provided during EIA scoping with regards to the LVIA study area.
- 5.1.11 In ES Chapter 13 Historic Environment, the Stage 2 - 3 assessment provided in Tables 13.5 and 13.6 notes that Girdleness lighthouse is not open to the public and that ground level views of the Proposed Development from this receptor would be screened by intervening topography. The assessment provided in ES Chapter 13 therefore concludes that the Girdleness lighthouse would experience a low magnitude of visual change and therefore a Not Significant effect on the setting of this historic asset. This receptor was a result not considered further in the socio-economic assessment as per the methodology set out in section 14.2.

6. Design & Access Statement

6.1 Planning Assessment

- 6.1.1 The consultation response concludes that the Proposed Development accords with Aberdeen LDP policies B11, R3, R4 and R5, meets needs identified within the Aberdeen LDP Proposed Plan (2015), represents a "long term viable solution" to waste management challenges, would be located on a site reserved for the proposed Energy from Waste usage, and would provide community resources through heat and power generation. These conclusions are welcomed.

6.2 Impacts and Monitoring

- 6.2.1 The consultation response seeks clarifications regarding multiple potential impacts from the Proposed Development (including both adverse and beneficial effects) and suggests that no attention has been given to monitoring or evaluation.
- 6.2.2 As stated in section 1.1 of the document, the submitted Design & Access Statement (DAS) must be read in conjunction with all other submitted documents, including the submitted ES which fully considers likely significant impacts and details proposed mitigation and monitoring measures. The specific purpose of the DAS is set out in section 1.2.1; this purpose accords with Regulations 13(4) and 13(5) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, as amended. Therefore it is respectfully submitted that the overall planning application submission including the submitted ES does appropriately identify and assess potential environmental and amenity effects, as well as identifying relevant proposed mitigation and monitoring measures and providing all other information relevant to the determination of the planning application for the Proposed Development.
- 6.2.3 The consultation response seeks clarification of potential improvements to Core Paths and their proximity to the Development Site. Existing Core Paths within a 2km radius of the Development Site are detailed on ES Figure 12.3A. The nearest adopted Core Path follows the footpaths along Greenbank Crescent/Greenwell Road within East Tullos Industrial Estate. With the exception of proposed enhancements to landscaping along parts of the Development Site boundary there are no proposals as part of the Proposed Development to improve Core Paths.

6.3 Proposed Materials and Lighting

- 6.3.1 The consultation response seeks additional details regarding proposed construction materials, lighting, resource usage and potential use of efficiency measures during the operational phase of the Proposed Development.
- 6.3.2 Proposed materials and a lighting strategy are outlined in Sections 5 and 6 of the submitted DAS. Due to its scale and massing these sections of the DAS appropriately focus on explaining the external appearance of the Proposed Development, and in section 6.1.2 the need for night-time lighting to celebrate the design features of the Proposed Development is explained. Section 7.1 of the submitted DAS confirms that “a BREEAM Pre-Certification and Certification Assessment remain to be prepared in order to gain full BREEAM certification for the proposed development”, and the Applicant expects that any planning permission granted for the Proposed Development would include standard planning conditions requiring the submission and approval of detailed material specifications (including proposed surfaces/finishes) and lighting proposals prior to the commencement of development. As such the Applicant respectfully submits that it is neither necessary nor proportionate to require the submission of detailed information regarding these technical matters at this stage of the planning process. In relation to any potential use of recycled aggregates, these and other construction materials would need to be determined post-consent by appointed contractors.

6.4 Adaptability and Future Proofing

- 6.4.1 The proposed technology is considered to provide the most flexible waste treatment solution given changing waste compositions. The proposed building materials have been carefully selected to suit the climatic conditions of the application site and to minimise maintenance costs. In regards to site design, the outline drainage design as presented in ES Chapter 7 and Appendix 7.A incorporate climate change allowance.

Typos and Corrections

- 6.4.2 The consultation response identifies some typographical errors and provides presentational comments. These are noted, however it is not considered that the identified typographical and grammatical errors or suggested minor changes to the presentation of maps and diagrams merit a resubmission to the DAS. An addendum to the DAS is being prepared separately in order to reflect

design changes, so any key clarifications considered essential for the interpretation of the full DAS can be noted within this.

- 6.4.3 The consultation response seeks confirmation of what UFI Ltd (map on page 5) stands for – United Fish Industries Ltd, an adjacent landowner.
- 6.4.4 The consultation response seeks confirmation of what figure is being referred to in Section 2.2 (page 6) of the DAS. This reference is to the Ordnance Survey map of the Development Site's location, shown on the same page. The title of this map should be '*Development Site Location Plan*' but was erroneously titled '*Accident Assessment Area*'.
- 6.4.5 The consultation response seeks confirmation of what SGN stands for – as per section 2.2.3, Scottish Gas Networks plc.
- 6.4.6 The consultation response seeks confirmation of which layout and design option from the design iteration process is the preferred design. As outlined in section 4 of the DAS, the preferred design was Option 8 based on Site Layout Option 11 - Variant 3 as reflected in the submitted application drawings.

7. Other clarification matters

7.1 SGN (formerly Scottish Gas Networks and Scotia Gas Networks)

- 7.1.1 The consultation response sought clarification of what SGN stands for following inconsistency with submitted documentation.
- 7.1.2 According to financial and company information publicly available on the SGN website (<https://www.sgn.co.uk/About-SGN/Financial-information/>), Scotland Gas Networks plc (the landowner of the Development Site at the date of submission of this planning application) is a wholly owned subsidiary of Scotia Gas Networks Limited. Scotia Gas Networks Limited is also the sole parent company of Southern Gas Networks plc, and has other subsidiaries. In 2014 Scotia Gas Networks Limited rebranded as SGN, which is the single public facing brand that Scotland Gas Networks plc, Southern Gas Networks plc and other subsidiaries now operate under.
- 7.1.3 To summarise, SGN can be referred to as Scotland Gas Networks and Scotia Gas Networks. However, in addition the Development Site address is stated on the Scottish E-Planning mapping address system as Scottish Gas Networks.

7.2 Considerate Construction Scheme

- 7.2.1 The consultation response questions whether the construction of the proposed East Tullos EfW would utilise the Considerate Construction Scheme. Use of this specific scheme would depend upon whether the appointed Principal Contractor is registered with it. However, in line with standard public sector construction procurement practice this will strongly be encouraged and considered in the evaluation of bidders.

7.3 Traffic Numbers & Impacts

- 7.3.1 The consultation response states that discussion of traffic numbers within the ES paragraph 2.8.6 should be cross referenced with any transport assessment provided, as the traffic could result in greater congestion. The consultation response in relation to the Design and Access Statement seeks clarification of the impact on traffic numbers as a result of third party waste collection.
- 7.3.2 ES Chapter 2 is a descriptive chapter and the technical assessment are set out in ES Chapter 6 to Chapter 14. A detailed technical assessment of potential traffic and transport effects is provided in ES Chapter 9 – Traffic and Transport and is supported by Appendix 9.A Transport Statement. The transport assessment provides a breakdown of predicted traffic numbers from the construction and operational phases of the proposed East Tullos EfW. The Transport Statement concludes following an assessment of existing, future anticipated traffic increases along with cumulative traffic

overall traffic impact on the local highway network would be negligible. The EIA concludes no significant effects.

- 7.3.3 As noted under Section 2 of this Appendix, the ES recognises that should efforts to recycle result in less residual MSW, then the remaining waste capacity can be sourced from local commercial/trade waste with a similar composition to residual MSW. Any vehicle numbers associated with such waste sources would be offset by a reduction in residual MSW delivery vehicles.

8. Conclusion

- 8.1.1 This technical note has addressed all clarifications and further environmental information sought by Aberdeen City Council's Environmental Policy Team regarding planning application 160276 (East Tullos Energy from Waste), with exception of landscape and visual matters that are addressed separately in Appendix C.

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