



Dundee Civic Trust
'Encouraging the Best'

Chairman: Tom Devaney,
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21st September, 2010.

Scottish Government
The Energy Consents and Deployment Unit,
4th Floor, 5 Atlantic Quay,
150 Broomielaw,
Glasgow G2 8LU

Dear Sir,

Dundee Renewable Energy Plant.

On behalf of Dundee Civic Trust, I submit the following comments on the application by Forth Energy for the construction of a Renewable Energy Plant at Dundee Harbour.

The Trust is supportive of moves towards renewable energy which contribute significantly to the reduction in the emission of greenhouse gases, and welcomes the Scottish Government's ambitious targets in this regard. It is unfortunate that these targets do not seem to be backed up by a clear national strategy as to how and where the related infrastructure is to be provided, nor does there appear to be clear local or port-related land use strategies to accommodate this infrastructure, as exemplified by the recent completion of private residential development immediately adjacent to the Plant.. Accordingly, the Trust has major concerns regarding this particular proposal, as detailed below.

The Process.

It is disappointing that the decisions on probably the largest and most controversial project in the City for many years are to be determined in Edinburgh and not by Dundee City Council. We understand that the Electricity Act requires that a public local inquiry be held should Dundee City Council object to the proposal. The Trust asks that the Ministers exercise their discretion on this matter to ensure that such an inquiry be held even if the Planning Authority does not object, so as to provide the greatest possible scope for local views to be heard and considered.

The Local Context.

The selected site is within the Port area, on the river front immediately east of recently constructed private residential development. Adjacent is the Central Waterfront development area, an ongoing project intended to restore the link between Dundee City Centre and the River Tay, to house an offshoot of the prestigious Victoria and Albert Museum and to attract substantial private investment to the City over the next 25-30 year

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period. To this end, Central Waterfront has already attracted substantial Scottish Government funding and has a high national priority for future funding, and the Trust is concerned that this key local and national project could be prejudiced by the close proximity of the proposed Plant.

The Design.

Although the application documents include design sketches, the applicants do not appear at this stage to be prepared to commit themselves to the high quality of design which the large scale of the buildings and the prominent location of the site would demand. This is considered to be a crucial omission from the application as it is difficult if not impossible to properly assess the visual impact without this information. This omission warrants deferral of a decision until it has been submitted and has been the subject of further public consultation and comment. If not submitted, the application should be refused.

Another important omission is the absence from the photomontages of the plume which is to be visible beyond the site boundary for 79% of daylight hours. This is a very important factor in assessing the visual impact of the Renewable Energy Plant.

The Environmental Effects.

Irrespective of the detailed design, the Trust is concerned about the scale of the buildings and the effects upon the City's overall waterfront aspect, and the environment of the residential areas lying immediately north of the Port and to the immediate west of the Plant in particular, the latter only recently promoted by Forth Ports. The consultant's report makes it clear that there is a significant and detrimental impact upon the local residential areas lying to the north due to the scale of the development. In this regard, the proposal is in contravention of policy 26 of the Dundee Local Plan, which seeks to avoid such detrimental effects.

The consultants also report that the Plant will give rise to significantly increased levels of dioxins in the City Quay development. Whilst this is estimated to fall within currently acceptable levels, experience teaches us that acceptable levels of dangerous substances invariably fall with the passage of time.

The Trust has a concern over the longer term availability of raw materials from Europe and North America, as it is to be expected that these sources will wish to move away from fossil fuels to biofuels too, and retain these materials for their own use to an increasing extent. If by that time local supplies have become more readily available, the proposed location does not lend itself to substantially increased numbers of heavy vehicles accessing the Port through the Central Waterfront area, and thus the case for this location is significantly diminished. If also the use of waste wood were to be increased as a result of scarcity of wood pellets, there would be an increase in the levels of dangerous substances emitted.

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Conclusions.

In the absence of firm design proposals and the visual effects of the plume, the Trust requests that consideration of the application be deferred until such information has been subject to public consultation and comment.

Should the Scottish Government be of a mind to consider the application despite the above, then the Trust would request that a public local inquiry be held before any decisions on the application are made.

If consent is to be granted, it should be conditional upon;

- the detailed design being reserved for a future decision following further public consultation and comment,
- the proportion of fuel arriving by road transport shall not exceed 15% as currently proposed,
- the number of heavy goods movements shall be restricted to not more than 23 per day as currently proposed.

Yours sincerely,

Tom Devaney, Chairman.

N.B. Should you have any queries on this submission, please contact

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