

# Construction of an Energy from Waste Combined Heat and Power Facility

## KEY INFORMATION

**Ward** North East

### Address

Land at Forties Road  
Baldovie Industrial Estate  
Dundee

### Applicant

MVV Environment Services  
Ltd  
Devonport EfW CHP Facility  
Creek Road  
Plymouth PL5 1FL

### Agent

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**Registered** 22 Dec 2016

**Case Officer** S Dorward



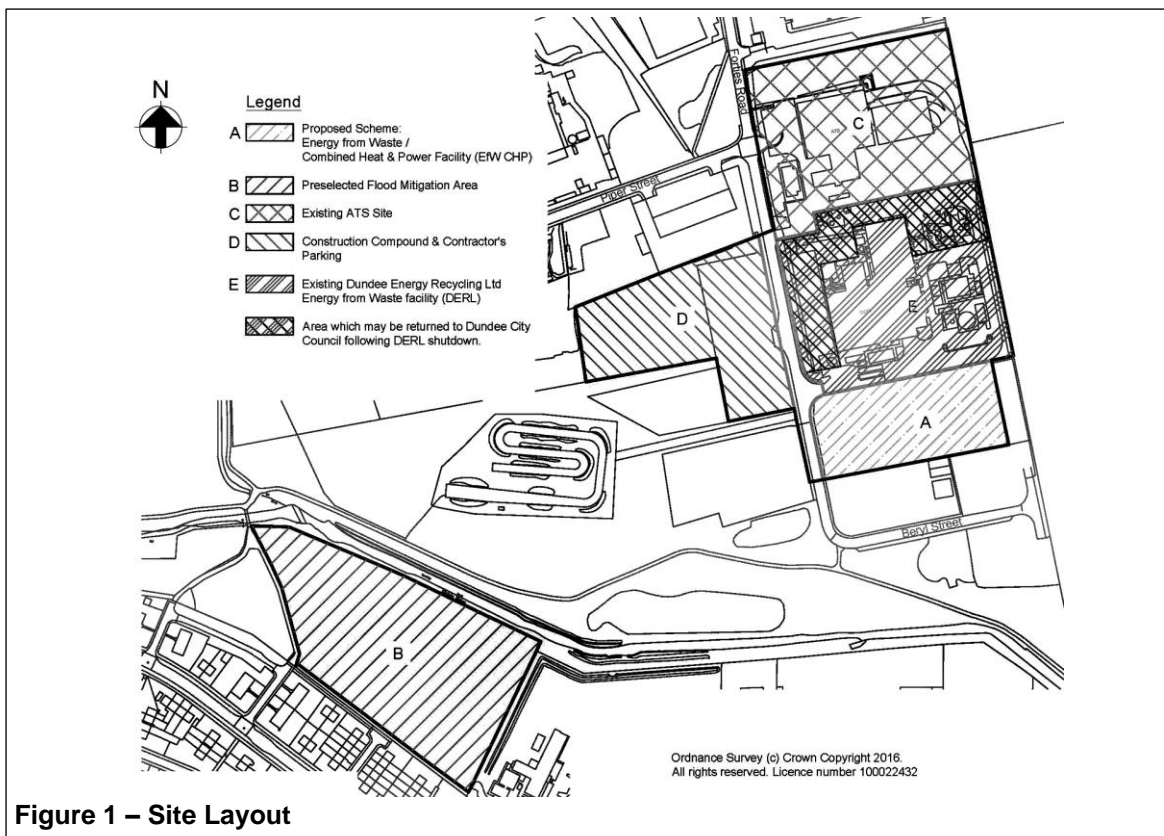
## SUMMARY OF REPORT

- Planning permission is sought for the construction of an Energy from Waste Combined Heat and Power Facility.
- The proposed development falls within Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 (as amended), as a waste disposal installation for the incineration of non-hazardous waste with a capacity exceeding 100 tonnes per day. The planning application is therefore accompanied by an Environmental Statement.
- The statutory neighbour notification procedure was undertaken. Two letters of objection have been received. A further letter of representation was received from Friends of the Earth which welcomes the proposals in principle.
- The proposal has also been advertised as a "bad neighbour" development, as listed within Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013.
- In accordance with Dundee City Council's scheme of delegation, this application is to be determined by the Development Management Committee as it constitutes a major development.
- More details can be found at <http://idoxwam.dundee.gov.uk/idoxpa-web/applicationDetails.do?activeTab=documents&keyVal=OGBVBPGCGP900>.

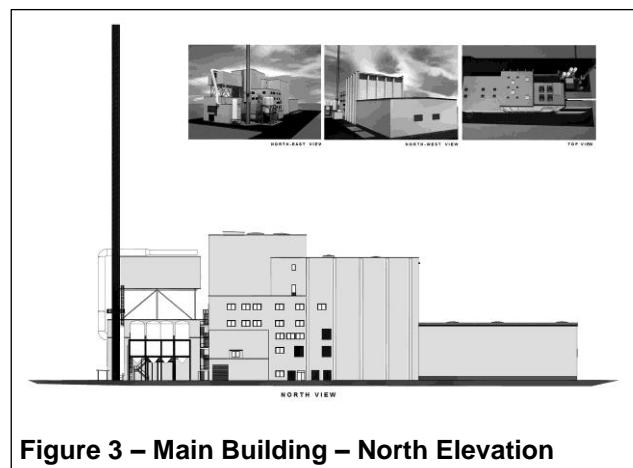
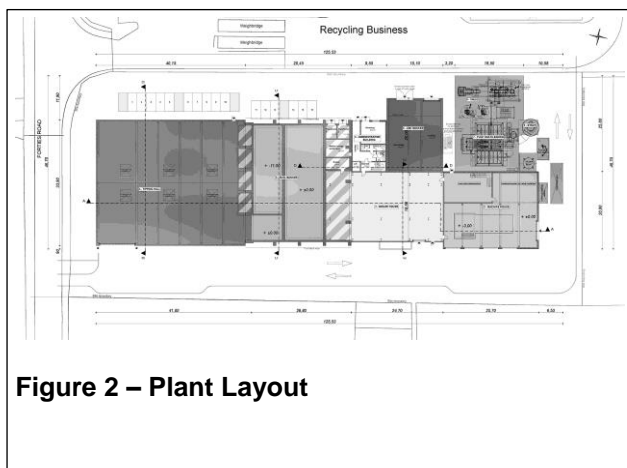
## RECOMMENDATION

The application complies with the relevant policies of the Development Plan and there are no material considerations of sufficient weight to justify refusal of the application. The application is therefore recommended for APPROVAL subject to conditions.

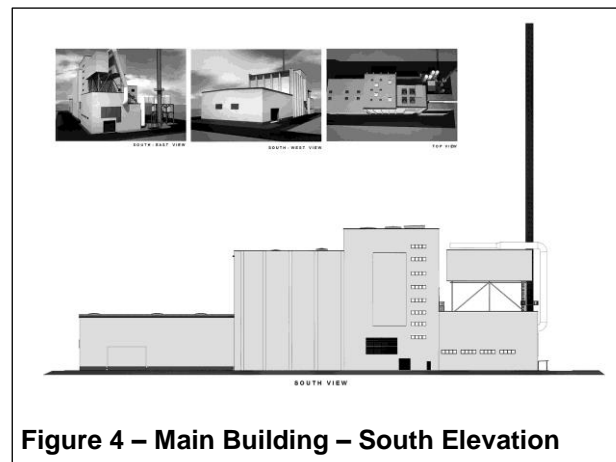
# 1 DESCRIPTION OF PROPOSAL



- 1.1 The application seeks planning permission for the construction and operation of an energy from waste combined heat and power facility, to replace the existing Dundee Energy Recovery Ltd (DERL) facility.
- 1.2 The main building and adjacent auxiliary buildings would provide floorspace amounting to 4,038m<sup>2</sup>. The proposed building would be a maximum height of 38 metres, with the exhaust stack 90 metres in height. Finishing materials are grey cladding. The Energy from Waste building would include a visitor facility, which is proposed to the north side of the building, providing meeting and educational space to allow interaction with the local community. The application proposes 15 car parking spaces with additional disabled access spaces and cycle parking. Parking will also be provided for a coach to allow school groups etc. to visit the site. SUDS arrangements are separate foul and surface water drainage systems. It is proposed to connect to the public water supply network.



- 1.3 An additional site area, measuring 19,800m<sup>2</sup>, is proposed to the west of the proposed facilities on the opposite side of the Dighty Water as a compensatory flood storage area. No details have been submitted for the design of this area. Excavation will be required to provide a volume of 11,121 cubic metres. The compensatory flood storage area is required to provide an area which could flood in extreme circumstances, to compensate for the capacity of the flood plain which would be lost by building the proposed plant on land which could flood.
- 1.4 The proposed development would have capacity to treat 110,000 tonnes of waste per annum, with throughput of 13.7 tonnes per hour. This capacity would also allow for some commercial and industrial waste generated in the Dundee and Angus area to be available for thermal treatment and to avoid landfill. The storage of delivered waste would be entirely within the Energy from Waste building and transported in enclosed vehicles.
- 1.5 The applicant determined that the prolonged use of the existing DERL facility and site is not practical or economically viable, and would require upgraded technology resulting in prolonged periods of shut down. The existing DERL facility does not operate in a combined heat and power mode. The new energy from waste facility building would be located to the southern part of the application site, currently used by Tayside Contracts as a recycling centre. This was seen as desirable for proximity to technical connections, proximity to the Michelin plant as a potential steam user, and access from Forties Road. The construction of a new facility to the south of the site would also allow the existing DERL facility to operate during the 3 year construction period. It is proposed that all waste management operations would take place in an enclosed building. The facility would also generate renewable energy sufficient to power and heat the adjacent Michelin factory, with any surplus heat capable of being used within the local residential area.
- 1.6 The proposed development would share some of the infrastructure associated with the existing DERL facility, such as the access and weighbridges, and some of the existing DERL buildings would be incorporated into the new facility. It has already been proposed to relocate Tayside Contract's recycling operations to Riverside Drive in Dundee, therefore the proposed site would be vacant. The applicant considers that the relocation would cause minimum disruption to the existing DERL facilities during construction. No buildings would be demolished as part of this planning application.



- 1.7 The proposed facility would manage residual waste arising primarily in the Dundee and Angus area. Residual waste is household waste which has not been recycled, re-used or composted. The project between Dundee City Council and Angus Council is a partnership to deal with residual waste from their areas and to comply with the Landfill Scotland Regulations (2003) as amended by the Waste (Scotland) Regulations 2012 and to fulfil the requirements of the Government's Zero Waste Plan, providing a long term solution for non-recyclable waste produced in their areas. The Waste (Scotland) Regulations introduce a ban on biodegradable municipal waste going to landfill from 1 January, 2021. An evaluation was undertaken by the partnership authorities to take into account the need to meet the new recycling targets and forecast population growth. This evaluation predicted that an energy from waste facility was required to manage a range of residual waste between 70,000

tonnes and 90,000 tonnes per annum from the two local authority areas. It is proposed that the new facility would become operational in 2020.

- 1.8 The applicants have stated that the new facility would be more efficient and reliable than the DERL facility. At present, residual waste arising in Dundee is delivered to the DERL facility. In Angus, some residual waste is landfilled and some is delivered to DERL.
- 1.9 As the application site exceeds 2 hectares, the capacity of the facility would exceed 25,000 tonnes per annum and the development also falls within Schedule 1 of the EIA Regulations, the proposals constitute a major planning application. The application is accompanied by an Environmental Statement. Documents submitted with the planning application and Environmental Statement include a Non-Technical Summary of the Environmental Statement, Planning Statement, Proposal of Application Consultation Report, Design and Access Statement, Transport Assessment, Heat Plan, Economic Impact Report and Stack Height Assessment. Additional submissions include flood and drainage assessments, WRATE (Waste and Resources Assessment Tool for the Environment) reports, to reflect the proposed waste to management solution, operational noise modelling, habitat regulations assessment and air quality modelling. An Environmental Permit under the Pollution Prevention and Control (Scotland) Regulations 2012 will also be required and has been submitted separately to SEPA.
- 1.10 In accordance with the Council's Scheme of Delegation, all Major Planning Applications must be reported to the Council's Development Management Committee.

## 2 SITE DESCRIPTION

- 2.1 The application site measures 8.14 hectares and relates to the site of the existing DERL facility to the north and west of the Michelin factory on Baldovie Road. The application site is made up of two separate areas. The first area for the new energy from waste facility is located on a brownfield site incorporating the existing DERL facility, and more specifically on land to the south previously used for recycling by Tayside Contracts. This area is currently undeveloped and surfaced with gravel, the boundary to the site is formed by high metal fencing. This area is within the Baldovie General Economic Development area as defined by the Adopted Dundee Local Development Plan (2014).



Figure 5 – Site Photo



Figure 6 – Site Photo

- 2.2 The second part of the application site, the compensatory flood storage area, is located to the south west of the proposed waste facilities, within designated open space which also forms part of the locally designated Wildlife Corridor, and is a Site of Importance for Nature Conservation (SINC) area.

- 2.3 The site is accessed from Drumgeith Road via Forties Road. There are trees within the application site boundary, located adjacent to the proposed Energy from Waste facility, and within the compensatory flood storage area. The existing DERL facility to the north of the site comprises four buildings to a maximum height of 29 metres and has two chimneys, one to 70 metres in height to the east and one to 20.3 metres to the west.
- 2.4 Surrounding land uses are predominantly industrial with some recreational. The buildings are of a large scale and the landscape includes the chimney stacks and two wind turbines adjacent at the Michelin site, which are constructed to a hub height of 85 metres and blade tip height of 120.5 metres. The application site is bound by Drumgeith Road to the north, the Michelin factory to the east, and an area of open space to the west. The Dighty watercourse lies to the south and is a wooded recreational route. Residential land uses lie beyond to the north, west and south of the site, comprising 2 to 3 storey terraced properties. The closest residential property to the south of the application site is at a distance of 324 metres on Balunie Drive. To the north, the closest property is on Montpelier Gardens, 210 metres from the application site boundary. Development would be situated to the south of the application site. Residential properties on Balunie Drive are located to the immediate south of the site boundary for the compensatory flood storage area.

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### 3 POLICY BACKGROUND

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- 3.1 The following plans and policies are considered to be of direct relevance:

#### **TAYPLAN STRATEGIC DEVELOPMENT PLAN 2012-2032**

Policy 1: Location Priorities

Policy 2: Shaping Better Quality Places

Policy 6: Energy and Waste/Resource Management Infrastructure

#### **DUNDEE LOCAL DEVELOPMENT PLAN**

Policy 3: General Economic Development Areas

Policy 7: High Quality Design

Policy 29: Low and Zero Carbon Technology in New Development

Policy 34: Locally Important Nature Conservation Sites

Policy 35: Protected Species

Policy 36: Open Space

Policy 38: Trees and Urban Woodland

Policy 39: Major Waste Management Facilities

Policy 41: Flood Risk Management

Policy 42: Sustainable Drainage Systems

Policy 44: Air Quality

Policy 45: Land Contamination

Policy 47: Environmental Protection

Policy 55: Accessibility of New Developments

Air Quality and Land Use Planning Supplementary Guidance

#### **SCOTTISH PLANNING POLICY, PLANNING ADVICE NOTES AND CIRCULARS**

Scottish Planning Policy, 2014

Zero Waste Plan, 2010

SNH Tayside Landscape Character Assessment, 1999

PAN 51 Planning, Environmental Protection and Regulation, 2006

PAN 33 Development of Contaminated Land, 2000

PAN 75 Planning for Transport, 2005

- 3.2 There are no other plans, policies and non-statutory statements that are considered to be of direct relevance.

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## 4 SITE HISTORY

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- 4.1 Planning permission D20059 allowed the construction of an energy to waste plant, Dundee Energy Recovery Limited (DERL), approved by Tayside Regional Council in 1996.
- 4.2 Proposal of Application Notice 16/00543/PAN for an energy from waste combined heat and power facility was submitted and agreed in June 2016. Two rounds of public exhibitions have been held in two locations within the programme of community consultation.

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## 5 PUBLIC PARTICIPATION

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- 5.1 Three letters of representation have been received in relation to the proposals. The first from Friends of the Earth states that they welcome the proposals in principle and make positive suggestions for taking the proposals forward. The second letter of representation has been received from the Dundee Re-use and Resource Centre, who raise concerns in relation to recycling and the re-use of materials, and the definition of “residual” waste. They have requested that conditions be added to the proposals. The third letter is a letter of objection, received from a neighbour to the application site, raising concerns in terms of chemicals released into the environment and public health.

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## 6 CONSULTATIONS

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- 6.1 **SEPA** – has no objection to the proposed development subject to conditions being attached to planning permission. SEPA supports the recovery of energy from waste materials, diverting waste from landfill, in line with waste hierarchy and the aims of the Zero Waste Plan. SEPA also support the use of waste materials as a resource to provide combined heat and power to the Baldovie facility and potentially for the wider site. They highlight that the development supports the Scottish Government’s climate change targets to reduce carbon emissions.
- 6.2 **The Head of Community Safety and Protection** – has recommended planning conditions in terms of air quality and land contamination to ensure that the development poses no risk to the environment or public health.
- 6.3 **Transport Scotland** – has no objection to the application.

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## 7 DETERMINING ISSUES

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- 7.1 **Section 25 of the Act provides that an application for planning permission (other than for a national development) shall be determined in accordance with the development plan unless material considerations indicate otherwise.**

### THE DEVELOPMENT PLAN

The provisions of the development plan relevant to the determination of this application are specified in the Policy Background section above.

**APPROVED TAYPLAN 2012**

- 7.2 **Policy 1: Location Priorities** – states that the principal settlements within the region have the potential to accommodate the majority of development in the region and make a major contribution to the regions economy. Dundee is identified as a Tier 1 principal settlement.
- 7.3 **The proposal therefore satisfies Policy 1 of the approved strategic TAYplan.**
- 7.4 **Policy 2: Shaping Better Quality Places** – requires that climate change resilience and resource efficiency is built into the built environment, that new development is integrated with the existing community and transport links and that waste management solutions are incorporated into development proposals to contribute to the aims of the Scottish Government's Zero Waste Plan. New designs and layouts should take cognisance of Scottish Government's Designing Places and Designing Streets. The material submitted by the applicant has demonstrated that the proposals comply with the above; the site is well located and integrated, waste management is central to the application and the proposals would comply with the policy statements.
- 7.5 **The proposal therefore satisfies Policy 2 of the approved strategic TAYplan.**
- 7.6 **Policy 6: Energy and Waste/Resource Management Infrastructure** – requires development proposals to demonstrate that all decisions on proposals for waste management facilities have been justified in terms of:
- land take requirements for infrastructure;
  - proposals should support the Zero Waste Plan and waste/resource management hierarchy;
  - proximity of resources;
  - anticipated effects to the environment;
  - sensitivity of landscapes;
  - impacts of grid connections and infrastructure;
  - cumulative impacts in relation to scale and massing, including existing infrastructure;
  - impacts to neighbouring authorities; and
  - consistency with the National Planning Framework.
- 7.7 The development proposals have taken all the above factors into account within the Environmental Statement and associated documents submissions. It is demonstrated that the proposal complies with Policy 6 requirements, as discussed in more detail within this report.
- 7.8 **The proposal therefore satisfies Policy 6 of the approved Strategic TAYplan.**

**DUNDEE LOCAL DEVELOPMENT PLAN**

- 7.9 **Policy 3: General Economic Development Areas** - supports proposals for Class 4, 5 and 6 developments with designated areas. Uses of a wider industrial nature such as car showrooms, wholesaling and scrap yards may be permitted where:

- there would be no detrimental impact on neighbouring land uses or residential amenity;
- there would be no unacceptable traffic impact; and
- the scale of development would be appropriate for the area.

7.10 Other uses within these areas will not be supported.

7.11 The proposed Energy from Waste facility is industrial in nature and the scale of development is appropriate to the area and surrounding buildings. It has been demonstrated that there would be no detrimental impact upon neighbouring land uses or residential amenity and there would be no adverse impacts in terms of traffic and road safety.

7.12 **The proposal satisfies Policy 3.**

7.13 **Policy 7: High Quality Design** - requires all development to contribute positively to the quality of the surrounding environment, with reference to climate change adaptation. The design and siting of development should respect the character and amenity of the place and improve connectivity. Proposals should also incorporate new landscape and planting works appropriate to the development. Proposals should also:

- consider and respect site topography and any surrounding landmarks, views or skylines;
- contribute to a sense of identity by developing a coherent structure of streets, spaces, and buildings that are accessible and respect the existing building lines;
- the design should complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours;
- existing buildings, streets and spaces should create safe accessible inclusive places for people which are easily navigable particularly on foot, bicycle and public transport and designed with future adaptability in mind; and
- existing buildings, structures and natural features that contribute to the local townscape should be retained and sensitively integrated into proposals.

7.14 It is considered on balance that site topography, views and skylines have been respected in the proposed design and the proposed location of the development. Building height, materials, scale, massing and finishes would be in keeping with the existing structures on Forties Road and would not compromise the residential neighbourhoods of Douglas to the south or Whitfield to the north. The new stack at 90 metres in height will be 20 metres higher than the existing DERL stack. Although rendering the visibility of the proposed development more prevalent throughout the Zone of Theoretical Visibility (ZTV), the effects are considered to be minor. The proposed stack is viewed against the existing Michelin turbines which rise to a maximum height of 120.5 metres to blade tip.

7.15 The Environmental Statement includes a Landscape and Visual Impact Assessment (LVIA), including a photomontage to show the impact of the proposed building and chimney stack from a number of viewpoints. The scoping opinion advised that the EIA should consider representative viewpoints and determine the value of existing landscape features within a 2km study area. ZTV plans have been produced to show the area over which the proposed scheme would be potentially visible, with and without the proposed stack. The ZTV has been used to inform visual receptors and verify viewpoints, looking at the sensitivity of the receptor and the magnitude of change (impact).



- 7.16 Scottish Natural Heritage (SNH) has compiled a Landscape Character Assessment across Scotland, which is currently under review. The urban extent of Dundee has not been assessed, however the northern extent of the study area falls within the Tayside Lowland Regional Character Area.
- 7.17 Assessment of the impact on the landscape and visual amenity during construction and operation of the proposed energy from waste facility has been assessed with regard to the sensitivity of the identified receptors. The Environmental Statement (ES) predicts effects ranging from minor to negligible during construction, with moderate effects at viewpoints from Balunie Drive and the Dighty Green Circular, where more open view of construction activities are attainable. During the operation of the proposed waste facility plant once complete, effects are considered by the ES to range from negligible to minor, again with a moderate impact from the viewpoints of Balunie Drive and the Dighty Green Circular. The proposed plant would be viewed as part of the existing industrial area and would not be uncharacteristic.
- 7.18 With regard to the provision of the compensatory flood storage area to the south of the Dighty and south west of the proposed plant, an area of 8,860m<sup>2</sup> would be excavated. The proposed flood storage area is located within the Wildlife Corridor and has been previously planted. The area is managed by Dighty Connect, a local nature conservation group. No details have been provided for the design of the compensatory storage area. The applicant proposes to work with the Dighty Connect Group to develop an acceptable detailed design. A planning condition is proposed to ensure that design details would be agreed and implemented to the satisfaction of the planning authority.
- 7.19 Policy 7 also requires all developments with a construction cost of £1 million or over to allocate at least 1% of construction costs for the inclusion of art projects in publicly accessible places, or places within the development. A planning condition is proposed to ensure that a scheme of public art is agreed and thereafter installed.
- 7.20 **Subject to a condition the proposal would satisfy Policy 7.**
- 7.21 **Policy 29: Low and Zero Carbon Technology in New Development** - requires that, for specified developments, carbon emissions will be reduced. A statement is required to demonstrate that 15% of carbon emission reduction standards set by the Scottish Building Standards (2007) will be met through the installation and operation of low and zero-carbon generating technologies.
- 7.22 The fabric of the proposed building would incorporate insulation and energy management systems to minimise the waste of energy and to maximise the energy for use by adjoining industrial users and for distribution in the national grid. The application states that it would comply with the relevant building standards in regard to the installation and operation of zero and low carbon generating technologies.
- 7.23 An appropriate condition is proposed that would ensure that a statement is submitted in accordance with the terms of Policy 29.
- 7.24 **Subject to a condition the proposal would satisfy Policy 29.**
- 7.25 **Policy 34: Locally Important Nature Conservation Sites** - states that development which could have a significant effect on the conservation interests associated with Local Nature Reserves, Sites of Importance for Nature Conservation or Wildlife Corridors will only be permitted where:

- an ecological or similar assessment has been carried out which details the likely impacts of the proposal on the conservation interests of the designation;
  - any negative impacts identified are mitigated without affecting the integrity of the designated area; and
  - it has been demonstrated that there are no other suitable sites that could accommodate the development.
- 7.26 The area required for the compensatory flood storage is located within the designated Dighty Wildlife Corridor and Site of Importance for Nature Conservation. An Ecological Impact Assessment including a Phase 1 Habitat Survey has been undertaken. The aim of this assessment was to assess the baseline of ecological features of the site, identify all potential effects and any mitigation required, and also identify appropriate enhancement measures. A number of biodiversity enhancement measures are proposed which seek to ensure that the proposal would not have any significant detrimental impacts on local ecology.
- 7.27 An addendum to the ecological impact assessment was undertaken to include the flood alleviation compensatory storage area. This identified habitat types as low density broadleaved plantation woodland and natural semi-improved grassland. The non-native flora species of Giant Hogweed and Himalayan Balsam were also identified within the flood alleviation area.
- 7.28 Enhancement measures proposed include the planting of native berry-bearing species along the banks of the Dighty, the creation of up to four artificial kingfisher burrows along the banks of the Dighty and the Fithie Burn, and the removal and eradication of invasive species such as Himalayan Balsam and Giant Hogweed, along the banks of the Dighty and Fithie Burn. The Environmental Statement states that the proposal would not have any significant effects on the conservation interests associated with the Wildlife Corridor.
- 7.29 The compensatory flood storage area has been previously planted and the area maintained by Dighty Connect. It is therefore proposed that conditions are appended to require further details for the design of the compensatory storage area and to ensure that landscaping and replanting is undertaken within the compensatory flood storage area in consultation with Dighty Connect and to the satisfaction of the planning authority.
- 7.30 It is considered that the information presented in the Environmental Statement is sufficient to demonstrate that the applicant has considered the impact on sensitive ecological receptors and that no other suitable sites could accommodate the development. The removal of the non-native species is welcomed by SEPA and should be done in line with best practice. Appropriate planning conditions are proposed for the removal of the non-native species and additional enhancement measures. A planning condition is also proposed to ensure that no tree works or vegetation site clearance would be undertaken during the active bird breeding season.
- 7.31 **Subject to a condition the proposal would satisfy Policy 34.**
- 7.32 **Policy 35: Protected Species** - states that development proposals which would have a likely significant effect on a European protected species will not be supported, unless:
- there is no satisfactory alternative; or
  - the development is required for public health or safety or other imperative reasons in public interest, including social, economic or environmental.

Development proposals which would be detrimental to the maintenance of the population of a European protected species will not be supported. Proposals that would likely have an adverse effect on a species protected under the Wildlife and Countryside Act 1981 (as amended) will not be supported unless there is no other satisfactory solution.

- 7.33 Surveys were carried out for bats, birds, otters and water voles. The habitat survey identified the Baldovie Waste Recycling and Waste Processing Plant, to the west of Forties Road, as possessing low bat potential, and an emergence survey was therefore undertaken. No bats were recorded. Several species of bird were observed within the surrounding site environment, including a potential kingfisher nest burrow. A peregrine falcon has also historically been identified. The majority of bird territories are located nearer the Dighty and open space to the west of the site, and within the site boundary of the proposed compensatory flood area. There have been no records of otter within 2km of the application site since 1995. Evidence of otter activity including spraints has been recorded along the Dighty. No underground holts have been identified but several potential otter couches, above ground, were recorded. No evidence of water vole activity was recorded and it was considered that the habitat on site has become unsuitable for the species.
- 7.34 No further survey work is required as no protected species are evident on site. The presence of spraints and potential couches indicates that otters may have traversed the site. As the proposals allow the Dighty and Fithie Burn to remain unimpeded, this would allow otter to maintain passage through the area. The mitigation measures for enhancement to remove non-native species, encourage native berry-bearing species and create artificial kingfisher burrows is welcomed.
- 7.35 **The proposal satisfies Policy 35.**
- 7.36 **Policy 36: Open Space** - presumes against the change of use of a site identified as open space to anything other than another open space use unless it can be established that the site no longer has a potential value as open space of any kind. The Council may set this requirement aside if satisfied that:
- the proposal is consistent with a masterplan, strategy or programme approved by the Council or compensatory open space of equal benefit will be provided; or
  - proposals affect only a lesser part of the site and are ancillary to it or result in improved amenity value on the remainder of the site.
- 7.37 There is a presumption that new development should contribute to the enhancement and connectivity of open space and habitats as part of the wider green network.
- 7.38 The proposed development includes the formation of a compensatory storage flood area to the west of the Energy from Waste facility, on land which is designated open space, and within the Wildlife Corridor.
- 7.39 It is considered in this instance that there would be no loss of open space, the use of the area as a flood mitigation compensatory storage area would have no impact in terms of Policy 36. The area will not be wet under normal conditions.
- 7.40 **The proposal satisfies Policy 36.**
- 7.41 **Policy 38: Trees and Urban Woodland** - seeks to ensure that new development contributes to the expansion of tree planting and woodland development where appropriate and must ensure the survival of existing healthy mature trees through sensitive site layout both during and after construction.

- 7.42 There are a number of trees to the boundary of the application site adjacent to the proposed Energy from Waste facility, and a number within the compensatory flood storage area. The applicant proposes to excavate the compensatory storage area and this would likely result in the loss of some trees. Planning conditions are proposed to ensure that should any trees require to be removed, that satisfactory procedures are undertaken and that tree protection measures are in place.
- 7.43 **Subject to a condition the proposal would satisfy Policy 38.**
- 7.44 **Policy 39: Major Waste Management Facilities** - states that new waste management facilities should be located in General Economic Development Areas in the first instance, unless the proposals are consistent with an approved strategy. Development which meets the above requirement may be permitted where:
- there is no detrimental impact on neighbouring land uses or local residential amenity;
  - there is no unacceptable traffic impact; and
  - the development would not have an adverse effect on the integrity of any Natura site.
- 7.45 The Scottish Government launched the first “Zero Waste Plan” in 2010. The principle behind the plan and Scottish Planning Policy “Planning for Zero Waste” is wasting as little as possible and recognising that every item and material is a resource. The Policy seeks to support the achievement of sending no more than 5% of Scotland's annual waste to landfill by 2025 and help deliver infrastructure at appropriate locations.
- 7.46 The provision of the proposed energy from waste facility is consistent with the Planning for Zero Waste policy and would contribute to the reduction in landfill. The facility would be located within a General Economic Development Area, which is favoured, and would not have any effect on the integrity of any Natura sites. It is considered that there would be no adverse impact on residential amenity or traffic and road safety, as discussed below.
- 7.47 **The proposal satisfies Policy 39.**
- 7.48 **Policy 41: Flood Risk Management** - supports development where:
- sufficient flood defences exist or are part of a strategy;
  - flood defences would be maintained for the lifetime of the development and would not increase the risk of flooding elsewhere;
  - water resistant materials and construction is used where there is potential flooding effect; and
  - the finalised scheme would not result in a land use which would be more vulnerable to flooding.
- 7.49 There is a presumption against development on previously undeveloped land in medium to high risk areas, and against the development of civil infrastructure in high risk areas. A flood risk assessment is required for any development within the medium to high risk category. Area with a low to medium flood risk probability will be suitable for most development.
- 7.50 Parts of the application site are located on the functional flood plain of the Dighty Water and are at risk of a 0.5% Annual Probability (AP) (1:200) flood. There are also parts identified at being at risk of pluvial (rainwater) flooding. A number of events have occurred in the general

area in recent years, including September and December 2009, October 2012 and January 2016.

- 7.51 A Flood Risk Assessment (FRA) has been undertaken. It is proposed to raise the development platform to a level equivalent to the estimated 0.5% AP (1:200 flood), including an allowance for climate change and freeboard allowance. The applicants estimate that a volume equivalent to 716 cubic metres of flood water would be displaced by the creation of a raised platform. SUDS for the development would also be located in the floodplain which would need to be protected, displacing a further 1,344 cubic metres of floodwater during a 1:200 flood (2,060m<sup>2</sup> of displaced storage in total). There is no available ground adjacent to the proposed Energy from Waste facility to provide compensatory storage to replace the lost floodplain storage volume.
- 7.52 The compensatory storage is therefore proposed on the site upstream, to the west of the proposed energy from waste facilities on the opposite bank of the Dighty, with an excavation volume of 11,121 cubic metres. The applicants have calculated that the maximum volume capability would be 2,525m<sup>2</sup> at the 0.5% AP (1:200) flood level, which is greater than the 2,060 cubic metres lost to the development platform and SUDS. No mechanical devices, eg pumps or sluices, are proposed for the operation of the compensatory storage area.
- 7.53 The FRA advises that further flood protection measures may be required on site to protect the fuel bunker and an area of the machine house located below ground and also to prevent potential contamination of floodwaters. It is understood that any loss of floodplain storage will be replaced by the volume provided within compensatory storage. The site access at Forties Road has previously flooded and was dealt with through the use of sandbags. This is a temporary measure and SEPA recommend that an evacuation plan is produced for any significant flooding. An appropriate condition has been proposed. A condition is also proposed to include the submission of a site specific Construction Environment Management Plan (CEMP), which would address any dewatering (removal of ground water) required during construction.
- 7.54 SEPA is satisfied that the pre and post development modelling undertaken demonstrates that the development would not be at a significant risk of flooding and that there would be no increase in risk elsewhere as a consequence of the development providing the compensatory storage is provided as detailed in the FRA. Planning conditions have been recommended to ensure that a satisfactory compensatory storage area is agreed and provided. A condition is also included to require an updated FRA should the development result in any further loss of the flood plain.
- 7.55 **Subject to conditions the proposal would satisfy Policy 41.**
- 7.56 **Policy 42: Sustainable Drainage Systems** - requires surface water treatment by sustainable urban drainage to specified standards in relation to floor level, flood risk and water enhancement. A Sustainable Urban Drainage System (SUDS) should be designed so that in a 1 in 200 year rainstorm event, plus an allowance for climate change, flooding will not be higher than 300mm below floor level. Proposals are encouraged to adopt an ecological approach.
- 7.57 A drainage strategy has been submitted which aims to ensure that there would be no increase in surface water flows to the existing Scottish Water sewer and that there would be sufficient storage to attenuate flows. No drainage currently exists for the site, meaning that an entirely new drainage design proposal is required, along with relevant connections to the Scottish Water network. Separate foul and surface water drainage systems are required. It is proposed that surface water is conveyed from the site and connected into the existing Scottish Water network. The rate of discharge is to be agreed. The surface water drainage

system would be designed in accordance with the principles of sustainable development, bearing in mind the 1:200 year flood event for the Dighty Water. The proposed foul drainage to the site would be conveyed to a single low point by gravity and discharged into the existing Scottish Water foul sewer located to the west of the site. Scottish Water has informed the applicant that there is sufficient capacity in nearby treatment works to service foul demands from the proposed development. Surface water would be managed on site.

7.58 Appropriate planning conditions are proposed to ensure that SUDS design, construction and maintenance would be satisfactory to Dundee City Council and Scottish Water.

7.59 **Subject to a condition the proposal would satisfy Policy 42.**

7.60 **Policy 44: Air Quality** - states that there is a general presumption against development proposals that could significantly increase air pollution or introduce people into areas of elevated pollution concentrations unless mitigation measures are adopted to reduce the impact to levels acceptable to the Council. The Council's latest Air Quality Action Plan sets out current objectives and actions to help improve air quality. Planning applications that have the potential to be detrimental to air quality, or those which introduce new exposure to areas of existing poor air quality should be accompanied by an air quality assessment of the likely impact of the development. Supplementary Guidance to the Dundee Local Development Plan (2014) on Air Quality and Land Use Planning has been produced to determine when an assessment of potential impact is required.

7.61 An air quality assessment has been submitted along with four addendums to the report, to provide an assessment of the potential air quality and health issues associated with emissions to air from the proposed Energy from Waste facility. Detailed atmospheric dispersion modelling has been used by the applicant to predict the likely process contributions, and cumulative contributions, to ground level pollution concentrations as a result of the development. The applicant also undertook a 12 month monitoring survey of nitrogen dioxide NO<sub>2</sub> at 11 locations to characterise the receiving environment and baseline pollutants; a traffic survey; a dispersion modelling assessment of road traffic emissions; a construction dust assessment; and a human health risk assessment. The results of the dispersion modelling were assessed using Environmental Protection UK (EPUK)/Institute of Air Quality Management (IAQM) guidance and the assessment takes into account the Dundee Air Quality Management Area (AQMA). The human health risk assessment submitted concludes that the maximally exposed individual would not be subject to any significant carcinogenic risk or non-carcinogenic hazard, arising from exposure via both inhalation and the ingestion of foods. The applicant has indicated that the existing incineration plant and proposed new Energy from Waste plant would not operate at the same time.

7.62 The Council has a statutory duty to work towards achieving the National Air Quality Strategy objectives for Local Air Quality Management (LAQM) pollutants. These pollutants are nitrogen dioxide (NO<sub>2</sub>), fine particulate matter (PM<sub>10</sub>), sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO), benzene, lead (Pb) and 1, 3-butadiene. The proposed development has the potential to emit all but the final pollutant listed. The proposed development is located within the Air Quality Management Area which encompasses areas where the annual mean objectives for NO<sub>2</sub> and PM<sub>10</sub> are currently being exceeded.

7.63 The potential impacts of the proposed Energy from Waste plant on air quality were considered in light of the existing air quality, the sensitivity of the receiving environment, local topography, including nearby buildings and wind turbines, meteorology and the impact on sensitive receptors. The key considerations for assessing the overall significance of the impacts of the proposed development on air quality are whether the effect would:

- lead to a breach or significant worsening of an EU limit value?
- lead to a breach or significant worsening of an AQ objective?
- interfere significantly with the implementation of actions within the AQ Action Plan?
- lead to a significant increase in emissions, degradation in air quality or increase in exposure below the level of an AQ objective?

7.64 The construction phase is expected to take approximately 35 months. The Transport Assessment submitted with the application recommends that a construction traffic management plan is developed and implemented in order to mitigate the effect of the construction traffic on Drumgeith Road in terms of both air quality and road safety following discussions with both the Community Safety & Protection and Roads Divisions.

7.65 Overall, the impact of the development on air quality is judged to be insignificant and there would be no breach of the EU Limit values or any statutory air quality objectives at any of the nearby sensitive locations. It is proposed to apply planning conditions to any permission granted to ensure that there would be a minimum stack height of 90 metres, that no waste shall be incinerated at the proposed plant until the existing DERL facility ceases to operate, that a construction traffic management plan is implemented, and that the Construction Environmental Management Plan is revised.

7.66 The proposed development would comply with Dundee City Council's supplementary guidance on air quality and the Air Quality Action Plan, with the addition of planning conditions. A condition is also recommended to ensure that the proposed development follows a decommissioning plan at the end of its life.

7.67 SEPA has no objection in relation to potentially granting consent under SEPA's regulated regimes. Planning conditions are recommended in relation to operational overlap between the existing DERL facility and the new plant, preparation of a site specific Construction and Environment Management Plan, and removal of non-native invasive plant species. The proposal will fall within the remit of the Pollution Prevention and Control (Scotland) Regulations 2012 - Part A permit, within Schedule 1 - sector 5.1 activities - Incineration and co-incineration of waste. PAN 51 'Planning, Environmental Protection and Regulation' states that "when SEPA comments on a planning application and is also the environmental regulator, it should assess the land use aspects of the planning application to clarify whether, on the information available at the time, the proposed development is potentially capable of being consented under the licensing regime." In this case, SEPA consider that based on the information available at this time, the proposed activity would potentially be granted consent for a Pollution Prevention and Control (PPC) permit.

7.68 **Subject to conditions the proposal would satisfy Policy 44.**

7.69 **Policy 45: Land Contamination** - states that the development of potentially contaminated brownfield or statutorily identified contaminated land will be considered where:

- a site investigation is submitted establishing the nature and extent of contamination; and
- the Council is satisfied that remediation measures proposed for the development would adequately address contamination risks.

7.70 Previous investigations at the site have identified the presence of asbestos fibres within made ground materials which could pose a risk to construction workers. Elevated ground gases (methane) have been identified and elevated levels of soil contaminants including

metals, total petroleum hydrocarbons, sulphate, chloride and volatile organic compounds. Further information is required with regard to land contamination. Additional site specific information based on the substances intended to be used, produced and released at the site may also be needed for the purposes of the PPC application.

- 7.71 Planning conditions are proposed in order to seek additional information before any works start on site. A condition would also seek that a remediation strategy would be fully implemented and verified before the development is brought into use, to ensure that a site is provided that would be suitable for the development.
- 7.72 **Subject to conditions the proposal would satisfy Policy 45.**
- 7.73 **Policy 47: Environmental Protection** - requires that all new development that would generate noise, vibration or light pollution is required to demonstrate that it can be accommodated without an unsatisfactory level of disturbance to the surrounding area. New development in close proximity to existing sources of noise, vibration or light pollution will need to demonstrate that it can achieve a satisfactory level of amenity without impacting on the viability of existing businesses or uses.
- 7.74 The Environmental Statement has presented measurements of existing noise levels and calculations have been undertaken to assess the noise arising from the proposed facility, traffic and construction works. The ES concludes that the energy from waste facility has been designed in such a way that it would not generate levels of noise, vibration or light pollution that would lead to an unsatisfactory level of disturbance on the surrounding area or adversely impact upon the viability of existing businesses or land users.
- 7.75 It is considered that in terms of the operations and activities to be undertaken at the site, that noise control measures would be enforced by SEPA in terms of their permit requirements. The enforcement of any noise issues at construction stage would also fall to be controlled by Environmental Health. As such no conditions are recommended at the planning stage in respect of noise from the site.
- 7.76 **The proposal satisfies Policy 47.**
- 7.77 **Policy 55: Accessibility of New Developments** - promotes access to all modes of travel and priority to sustainable modes of travel including walking, cycling and public transport. Development proposals are required to:
- incorporate facilities on site for walking, cycling and public transport networks including road/junction improvements and cycle parking, development without direct links will not be supported;
  - incorporate measures to permit access to public transport networks within no more than 400 metres from the centre of the development;
  - have no detrimental effect on the capacity or functioning of the existing road or rail networks;
  - ensure that safe and adequate provision is made for road freight and waste access, loading and unloading; and
  - comply with Dundee City Council's road design standards Streets Ahead.
- 7.78 A Transport Assessment has been submitted with the application. The Transport Assessment concludes that the application proposals provide good quality connectivity and



high levels of accessibility within and around the development site. It is considered that the development proposals would have no significant detrimental impact on the operation of the surrounding transport networks.

- 7.79 It is recommended that conditions are attached to any planning permission granted to require details of all proposed vehicle accesses, provide a footway adjacent to the site, agree details for any access no longer required, implement a Travel Plan within one year of the development opening and provide a disposal route for road surface water. A Vehicle Access permit will be required for work adjacent to the public road. Appropriate planning conditions are proposed.
- 7.80 Transport Scotland has no objection to the application.
- 7.81 **Subject to conditions the proposal would satisfy Policy 55.**
- 7.82 **It is concluded from the foregoing that the proposal complies with the provisions of the development plan.**

## **OTHER MATERIAL CONSIDERATIONS**

- 7.83 The other material considerations to be taken into account are as follows:

### **A - VIEWS OF OBJECTORS**

- 7.84 Representation has been received from Friends of the Earth Tayside which on balance welcomes the development of the energy from waste proposals as a more efficient facility than the existing DERL plant. The letter asks how it is intended to take forward the opportunity to develop a district heating scheme, and the promotion of increased recycling is brought to question as the proposed facility gives the option to incinerate household waste. Dundee City Council's compliance with the Waste (Scotland) Regulations 2012 is brought into question in terms of compliance with the Waste Hierarchy, to ensure that reasonable steps are taken to remove recyclable materials before the incineration of residual waste. It was observed that the proposals should comply with the waste strategies of the partner local authorities. However, neither Council has an up to date strategy. Friends of the Earth Tayside are keen to see evidence that local authorities are working with SEPA and the Scottish Government to ensure an appropriate level of provision is made in the future.
- 7.85 A representative of the Dundee Re-use and Resource Centre has also submitted comments to the planning application, querying what is meant by residual waste and what is included, raising concern that recyclable goods are sent for incineration rather than being re-used. Concerns are also put forward in relation to pollution. It was requested that the points raised are treated as objections unless conditioned. These points have not been conditioned as they would not be relevant to the works involved for the proposed development.
- 7.86 A neighbour to the application site has submitted a letter of objection, concerned that any increased emissions would be a health concern.
- 7.87 The queries in regard to pollutants and health have been addressed within the main body of the report, and it is considered that the proposed facility would be acceptable in terms of environmental pollution and public health. A Pollution Prevention Control (PPC) permit will be required prior to the operation of the development. The potential of a district heating scheme and supply of heat to the adjacent Michelin plant are not part of this planning application, but are confirmed as future intentions of the applicants.

- 7.88 In relation to the queries raised in relation to waste strategies and the waste hierarchy, it is confirmed that both partner authorities are bound to comply with the Waste (Scotland) Regulations and aim to provide a long term solution to deal with residual waste from their areas. Both partner authorities intend complying with the Charter for Household Recycling in Scotland and follow the guidance contained in the National Code of Practice, with Dundee City Council signing the Charter in June 2016 and rolling out a revised service meeting the Charter guidelines from April this year, whilst Angus Council signed the Charter in February 2017 and intend to develop a transition plan for future consideration. Revised strategies to meet these requirements and policy documents are currently under review in both authorities.
- 7.89 **The concerns of the objectors are not supported.**
- 7.90 **It is concluded from the foregoing that the material considerations are not of sufficient weight to justify refusal of the planning application in this instance.**

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## 8 CONCLUSION

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- 8.1 The proposal satisfies the requirements of the Development Plan. There are no material considerations that would justify refusal of planning permission. Therefore, it is recommended that planning permission be granted subject to conditions.

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## 9 RECOMMENDATION

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- 9.1 It is recommended that consent be GRANTED subject to the following conditions:
- 1 Prior to the commencement of any works on site details of a scheme of public art to be provided shall be submitted to the Council for written approval. Thereafter, the approved scheme of public art shall be installed prior to the completion of the development hereby approved.
  - 2 Prior to the commencement of any works on site, a Sustainability Statement demonstrating the extent to which the development will meet the requirements of Policy 29 of the Adopted Dundee Local Development Plan (2014) shall be submitted for the approval of the Council and the works shall be completed in accordance with the approved Statement.
  - 3 Prior to the operation of the development hereby approved, removal of the Invasive Non-native Species (INNS) Giant Hogweed and Himalayan balsam (referred to as Indian balsam in ES vol.2) shall be undertaken in line with the NetRegs best practice guidance. The INNS shall be replaced with suitable species (in consultation with SNH) so as not to leave bare ground and an ongoing maintenance plan shall be provided, for the prior approval of Dundee City Council as planning authority.
  - 4 Prior to the operation of the development hereby approved, further details with regard to ecological enhancement as recommended within the Environmental Statement hereby approved shall be agreed with Dundee City Council in relation to the planting of native berry-bearing species and creation of kingfisher burrows along the banks of the Dighty. Thereafter the agreed details shall be fully implemented.
  - 5 Prior to the commencement of any works on site, further details shall be submitted for the design of the compensatory storage area, to be developed in line with the Flood

Risk Assessment dated 13 December 2016. No building shall take place within the compensatory storage area. Thereafter these details shall be fully implemented.

- 6 Prior to the commencement of any works on site, a scheme of landscaping indicating the siting, numbers, species and heights (at time of planting) of all trees, shrubs and hedges to be planted, and the extent and profile of any areas of earth mounding, on the flood mitigation area shall be developed in conjunction with Dighty Connect and submitted for approval in writing by this Planning Authority. The scheme as approved shall be implemented within the first planting season following the completion or occupation of the development, whichever is the sooner.
- 7 No tree works or vegetation site clearance shall be undertaken on site during the bird breeding season (from 1st March to 31st August inclusive).
- 8 Before any works start on site of the proposed energy from waste combined heat and power facility, the developer shall submit, details and specifications of the protective measures necessary to safeguard the trees on the site during development operations, as per BS:5837. This Planning Authority shall be formally notified in writing of the completion of such measures and no work on site shall commence until the Planning Authority has confirmed in writing that the measures as implemented are acceptable. The protective measures shall be retained in a sound and upright condition throughout the development operations and no building materials, soil or machinery shall be stored in or adjacent to the protected area, including the operation of machinery.
- 9 Further details shall be submitted with regard to any tree felling required for the prior approval of Dundee City Council as planning authority. Thereafter works shall be undertaken as agreed and as per BS3998: 2012. Prior to felling, the trees shall be checked for any European protected species or nesting birds and if discovered the work shall cease and the developer will liaise with Dundee City Council as Planning Authority and appropriate organisations.
- 10 Prior to the commencement of any works on site, details shall be submitted for an evacuation plan for the development for the prior approval of Dundee City Council as planning authority, should there be a significant level of flooding. Thereafter the plan shall be implemented in accordance with the approved details.
- 11 Prior to the commencement of any works on site, a site specific Construction Environment Management Plan (CEMP) shall be developed in consultation with SEPA and submitted for the prior agreement of Dundee City Council as Planning Authority. The revised CEMP shall include the IAQM's highly recommended mitigation measures as appropriate and shall also address any dewatering required during construction. Any mitigation identified shall be fully implemented thereafter.
- 12 Should any further loss of floodplain be identified, a revised Flood Risk Assessment shall be prepared and submitted for the prior written approval of Dundee City Council and SEPA. Any recommendations contained within the revised Flood Risk Assessment shall thereafter be implemented prior to occupation of the development hereby approved.
- 13 Prior to the commencement of any works on site, a detailed surface water drainage/ SUDS design including drawings, calculations, full modelling, simulation results, design risk assessment, signed Dundee City Council Design and Independent Check Certification, and where appropriate SEPA comments shall be submitted to the Council for written approval. Thereafter, all works approved by virtue of this condition shall be carried out prior to occupation of the development hereby approved.

- 14 Prior to the commencement of any works on site, maintenance responsibilities along with a maintenance schedule for the surface water drainage system/ SUDS features shall be submitted to the Council for written approval. Thereafter, all works approved by virtue of this condition shall be carried out for the lifetime of the development.
- 15 Prior to the commencement of any works on site, evidence of Scottish Water approval for the proposed drainage system for the development hereby approved shall be submitted to the Council for written approval.
- 16 Prior to the commencement of any works on site, details of measures proposed to manage surface water run-off from the site during construction shall be submitted to the Council for written approval. Thereafter, all works approved by virtue of this condition shall be carried out prior to construction works commencing on any part of the development hereby approved.
- 17 The operational overlap between the existing plant and the new plant should be minimised, taking into account commissioning and decommissioning periods. The new energy from waste combined heat and power plant, shall not incinerate waste at the same time as the existing waste incinerator (DERL) facility.
- 18 The stack hereby approved as part of the waste incineration project shall be constructed to a minimum height of 90 metres.
- 19 Prior to the commencement of any works on site, a Construction Traffic Management Plan shall be devised and the details submitted to the Council for approval in writing. Thereafter the approved plan shall be implemented during the construction phase of the development.
- 20 Within 12 months of the cessation of the operations hereby approved, a scheme for the demolition and removal of the development from the site shall be submitted to the Council for approval in writing. The scheme shall include:
  - a details of all structures and buildings which are to be demolished;
  - b details of the proposed reuse of any buildings to be retained;
  - c details of the means of removal of materials resulting from the demolition and methods for the control of dust and noise;
  - d the phasing of the demolition and removal; and
  - e details of the restoration works and the phasing of the restoration works.
- 21 Development shall not begin until the further risk assessment proposed in the submitted Geotechnical and Geo-environmental, Interpretative Report - ARUP, 20th January 2017, is completed and, if necessary; a remediation strategy to deal with any contamination at the site has been submitted to and approved in writing by the planning authority. This must include more detailed assessment of the groundwater environment as recommended by SEPA. The remediation strategy shall contain proposals to deal with contamination to include:
  - i the nature, extent and type(s) of contamination on the site;

- ii measures to treat/remove contamination to ensure the site is fit for the use proposed and does not contain any significant pollution linkages;
  - iii measures to deal with contamination during construction works; and
  - iv verification of the condition of the site on completion of decontamination measures.
- 22 Before first use of the facility, the remediation strategy shall be fully implemented and a verification report with relevant documentation demonstrating that the objectives of the remediation strategy have been achieved shall be submitted to and approved by the planning authority.
- 23 Details of all proposed vehicle accesses including proposed road markings must be agreed prior to any works on site and the access must be formed and constructed to Dundee City Council standards and specifications.
- 24 A footway must be provided to Dundee City Council specifications on the Forties Road frontage of the site. Details of the footway must be agreed prior to any works on site.
- 25 Any existing accesses that are no longer required as part of the proposed development must be made good as footway to Dundee City Council specifications. Details of these alterations must be agreed prior to any works on site.
- 26 A Travel Plan must be in place and agreed with the Local Authority within one year of the development opening.
- 27 Prior to the commencement of any works on site, the applicant shall provide a disposal route for road surface water to the satisfaction of Dundee City Council which discharges to a system publicly maintained/maintainable by the relevant authority.
- 28 Before first use of the facility a scheme shall be submitted, and agreed with the Local Authority within one year of the development opening, for the reduction external lighting on the facility between the hours of 23:00 and 06:00.

## REASONS

- 1 In the interests of enhancing the amenity and environmental quality of the development.
- 2 In order to demonstrate that the new development will meet the required carbon emissions reduction standards in the interests of the environment.
- 3 In the interests of visual amenity and to ensure a satisfactory standard of local environmental quality.
- 4 In the interests of visual amenity and to ensure a satisfactory standard of local environmental quality.
- 5 In the interests of visual amenity and to ensure a satisfactory standard of local environmental quality.
- 6 In the interests of visual amenity and to ensure a satisfactory standard of local environmental quality.
- 7 In order to comply with the Wildlife and Countryside Act (1981).

- 8 To protect those trees which are of significant amenity value to the area and which would ensure a satisfactory standard of appearance of the development.
- 9 To ensure that the proposed development has a satisfactory external appearance in the interests of the visual amenity and ecological preservation of the area.
- 10 In the interests of flood prevention and public safety.
- 11 In the interests of flood protection.
- 12 In the interests of flood protection.
- 13 In the interests of flood protection.
- 14 In the interests of flood prevention and visual amenity.
- 15 In the interest of flood protection.
- 16 In the interests of flood protection.
- 17 To meet Air Quality requirements.
- 18 To meet Air Quality requirements.
- 19 In the interests of road safety and to meet Air Quality requirements.
- 20 To ensure that the site does not become derelict and in the interests of environmental quality and public health.
- 21 In the interests of providing a site suitable for the proposed development.
- 22 In the interests of providing a site suitable for the proposed development.
- 23 In the interests of vehicle and pedestrian safety.
- 24 In the interests of vehicle and pedestrian safety.
- 25 In the interests of vehicle and pedestrian safety.
- 26 In the interests of promoting sustainable transport.
- 27 To ensure an appropriate and publicly maintainable system is provided.
- 28 In the interests of environmental protection.