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Abemethy
Perthshire
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15th May 2009

The Registrar
SEPA
Strathearn House
Broxden Business Park
Perth
PH1 1RX

Dear Sir / Madam,

Proposed Waste Incineration Plant: Binn Farm, Glenfarg, Perthshire

I am writing in relation to the application for a PPC Licence for the waste incineration plant proposed for construction and operation at Binn Farm, Glenfarg and urge SEPA to reject this application on the following grounds.

In my view, incineration should now be among the last technology options that should be considered for the processing of waste, when there are practical alternatives (such as digestion) that are not so harmful to the environment. The crude concept of incineration simply belongs to another era, before the current awareness of climate change and the dangers from toxic emissions from incineration plants.

Even if it is somehow deemed acceptable to permit a further incineration plant despite the availability of more benign alternatives, the location of this proposed plant could scarcely be more inappropriate. Energy efficiency is a major component in national and international policies to tackle climate change, yet this plant will make grossly inefficient use of the vast heat resource it will create.

There is no serious or credible prospect at all of any industrial, horticultural or agricultural heat use of any significance emerging at this isolated rural location and any suggestion otherwise from the developers is (at best) misleading. A plant of this type should only be considered for licensing if it is properly integrated into its local area as a waste to energy (including heat) plant.

If any such new plants must be permitted, it should be mandatory that they should be located close to proven heat use sites, in industrial process use and/or for district heating/cooling systems supplying commercial and domestic properties. Given the far greater awareness of the urgency of changing how we treat our environment, it would be a gross error to licence a waste incineration plant at this site when the plant itself will waste precious heat on a massive scale. Locating a plant away from an urban location also means that electrical system losses effectively dilute the benefit of the plant power output and inevitably drives the requirement for further electricity network infrastructure.

A new plant of this type, if such must be allowed, belongs in an urban location: closer to large scale heat use locations, closer to the centres of demand for the plant's electricity output and closer to the centres of the waste-creating population.

The use of a rural location, away from the centres of waste creation, also leads to pollution on a huge scale from trucks, as the only means of conveying thousands of tons of waste per year to the plant. The existing waste facility at Binn Farm already leads to large scale heavy vehicle pollution, as trucks bring waste from as far away as the Highlands. This should not be perpetuated and more sustainable solutions should be driven through the licensing system by SEPA.

I therefore urge SEPA to reject this application as an ill-considered "solution" to waste management in Perth and Kinross – it is simply the wrong type of plant in the wrong location and the environment will suffer greatly in all manner of ways should it proceed.

Yours faithfully

