

THE COCKBURN ASSOCIATION

THE EDINBURGH CIVIC TRUST

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Lesley McNeil
Consents Officer
Scottish Government

01 April 2010

Dear Lesley McNeil

Scoping document: Bio-mass Plant, Leith Docks, Edinburgh

The Association has discussed the draft plans in some detail and wishes to make the following comments.

We are supportive of the general principle of bio-mass as a method of 'green' energy production provided the whole life-cycle of the supply chain is taken into consideration. Bio-mass, to be effective, depends on a continuous supply of newly cut trees, which in turn depends on continuous replanting. The supply must be local, to avoid wasteful energy costs in transportation. At present we see no evidence to suggest that southern Scotland's forests can meet the demand envisaged, or that replanting is taking place at the scale required. The location, in a docks, instead suggests that the supply will be by sea from Scandinavia and the Baltic, which would then have environmental impacts on those countries, and in shipping, which is still generally oil powered. We could be much more supportive, therefore, of a proposal which was geared to matching local demand with local raw material supplies.

However, if the supply chain were to switch from foreign sea-borne supplies to local land-borne ones in future, Leith Docks could hardly be in a worse location to accept regular lorry-borne supplies by road; again, an indication that the strategic thinking has not been carried out on the long-term implications of such a project.

The proposed location in Leith Docks would also severely affect the current Local Plan for Edinburgh and the strategies endorsed in the current Regional Structure Plan to meet a significant part of Edinburgh's future housing need from high density developments on brownfield land in the Docks. These strategies include the

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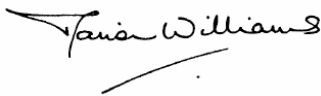
proposed tram link, school provision, parkland and retailing. Siting a large bio-mass generator in such a location would be completely counter-productive to those well-considered strategies. It would also contradict Forth Ports own masterplan for the Eastern Docks area, which we attended presentations on less than two years ago, and which was recently granted planning permission. This envisaged no freight traffic into the Eastern Docks at all within ten years, with marinas and recreational uses prominent. A major industrial use continuing in such a location would jeopardise the whole logic and integrity of that masterplan.

We are also concerned by the potential visual impact a 100m high waste chimney, and its potential smoke plume, would have on the city's skyline policy. Such a structure would be highly visible from numerous vantage points around the city, and is unlikely to be a thing of beauty. This aspect would need to be considered very carefully, with photo montages and such like from the main viewpoints and vistas within the city.

The Association believes that if there is a sustainable economic case for a bio-mass generator in East Central Scotland, then the logical place to locate it is at a refurbished Cockenzie Power Station, or one of the other coal-fired power stations on the Forth Estuary which is nearing the end of its useful life. There the National Grid infrastructure is already in place to receive the generated power, as well as the chimneys to remove the waste gases, and such a facility could be provided much more economically, with fewer environmental consequences.

We hope these comments are useful, and thank you for the opportunity to comment at this early stage in the project.

Yours sincerely

A handwritten signature in black ink that reads "Marion Williams". The signature is written in a cursive style with a long, sweeping underline.

Marion Williams
Director