

FAO Fiona Simpson

Dear Fiona, It was good to meet with you and your team at the Grampian RTPI event last night. Sorry about what appeared to be a hijacking. It was not our intention and occurred as a result of the event format. From our perspective however, it was good that there was a clear and strong signal that NPF4 should acknowledge the part that District Heating Networks can play across Scotland in tackling many of the priorities of Scottish Government.

Hopefully, NPF4 will also act to facilitate the development of those networks as there is still a reluctance and suspicion, not just in the general public. The capture of discarded heat from significant energy sources is but another aspect, with Energy From Waste having historical problems of its own.

During our brief conversation after the event, I made mention of the apparent absence of the Chartered Institution of Wastes Management, from the lists of consultees for NPF4. Hopefully now that both ends of that chain are aware of the broken linkage, it can be re-established. I recall the fun we had in contributing to its predecessors!

I retain my professional contacts with CIWM, albeit now as a retired member and would like to offer a few comments from that perspective, for consideration for inclusion in your draft of NPF4

The history of the profession has evolved relatively rapidly in recent decades where Public cleansing and refuse disposal of the first half of the last century, evolved into waste management in the 70/80's, Resource management in the 90/00's with more recently, the concept of the Circular Economy being the prime focus. Unfortunately, public, professional and political opinions have not kept pace with an industry that has responded and tried to evolve.

The impact of this is that the industry is still regarded as a 'bad neighbour developer'. If we are to meet the challenges posed by the Circular Economy concept, then the industry is ready. The land-use Planning system, from the top down, needs to recognise that the industry is simply a vital part of an industrial materials handling sector suited to almost any industrial site. While almost any level of waste management facility can attract such level of concern, even mini recycling banks, the real blocker in the current system of change is in how Energy from Waste is regarded. Many members of the public can still recall the plumes of smoke etc., that came from some of the early disposal incinerators of the 50/60's

The revision of NPF4 could act to reset that memory and timeframe, by clearly bringing it in to modern day. Closely regulated, high tech, combined heat and power, Energy from Waste Plants are an essential part of any integrated Circular Economy based strategy.

As you will be aware, the proposed ban on landfill of biodegradable waste was recently delayed as a result of the absence of sufficient tertiary treatment within Scotland. That delay was caused to a great extent, by the lack of confidence of investors in the Planning system's ability to deliver permissions in the face of, at times, outright public hostility. NPF4 needs to recognise those issues and bring forward policies which facilitate the sort of developments required to deliver the Circular Economy and to protect Scotland's Resources for the benefit of the people of Scotland.

A consequence of these problems has been in the export of recyclate for reprocessing and refuse derived fuel. Recent import bans on recyclate in China/ India and other countries are now impacting in Scotland. Several northern European countries are imposing tax on imported refuse derived fuel for incineration. Both of those are Resources and money lost to Scotland's economy

NPF4 should provide the signals to investors that the need for such reprocessing is acknowledge and facilitated within the planning systems at al levels.

One example of such a change which will be required is within Structure and some local developments plans, where import of materials/ Resources (still regarded as 'waste') from outwith the plan area, is resisted or even banned. With the size of investment now required to make reprocessing facilities commercially viable, importing of waste from elsewhere in Scotland is almost inevitable to achieve those economies of scale. This particular aspect merits specific mention at the level of NPF4 to facilitate development of the Circular Economy in Scotland.

Thank you for taking the time to consider these points. I would be pleased to elaborate further should that be required. I have copied this email to the Chair of the CIWM Centre Council in Scotland for his information

With very best regards

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Chairperson
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