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<b>Client</b>	<b>Doveryard Limited</b>
<b>Site</b>	Oldhall
<b>Project</b>	ERF Standby Vent Stack NMA
<b>Title</b>	Planning Statement
<b>Issue Date</b>	04 January 2024

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## **Planning Statement**

### **Oldhall Energy Recovery Facility – Standby Vent Stack Non-Material Amendment Application**

**Doveryard Limited**

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## Executive Summary

The Oldhall Energy Recovery Facility (ERF) has planning permission for the construction and operation of a plant to recover energy from the treatment of residual waste. This is now well into the construction phase, including the completion of the erection of the facility's main exhaust stack.

The determination of the application for the facility's Environmental Permit is progressing well and is now at an advanced stage. As part of the determination process the Scottish Environment Protection Agency (SEPA) have requested that the operator provide a standby vent stack to manage air from within the facility during maintenance shutdown periods when the normal air management system is being worked on.

The proposed standby vent stack is designed to take air from within the buildings and release it above the main boiler hall during these maintenance periods. The top of the standby vent would be substantially below the height of the main exhaust stack - the proposed standby vent stack would be only 3m taller than the main boiler hall, compared to the main stack which is 30m higher than the hall.

Maintenance shutdowns are scheduled for 3-4 days per year.

## The Site and Proposed Amendment

### Site and Application Background

The Oldhall Energy Recovery Facility was approved initially under permission reference 19/00539/PPM, and subsequently successfully amended by a Section 42 application as permission reference 20/00819/PPM.

The facility is now at an advanced stage of construction.

The modest change is of a nature to have virtually no impact beyond the site boundary, and will have no effect upon the conclusions of any of the technical assessments carried out in support of either of the previously issued permissions for the main ERF site. As such it is hoped that they can be approved as a non-material amendment.

The required change is as set out below.

As work is well advanced it is hoped that this application can be determined as swiftly as possible.

### Proposed Amendments

It is proposed to add a standby vent stack which would be taller than the boiler hall (the tallest building) by 3m. It would be extended in the same materials, and in the same colouring.

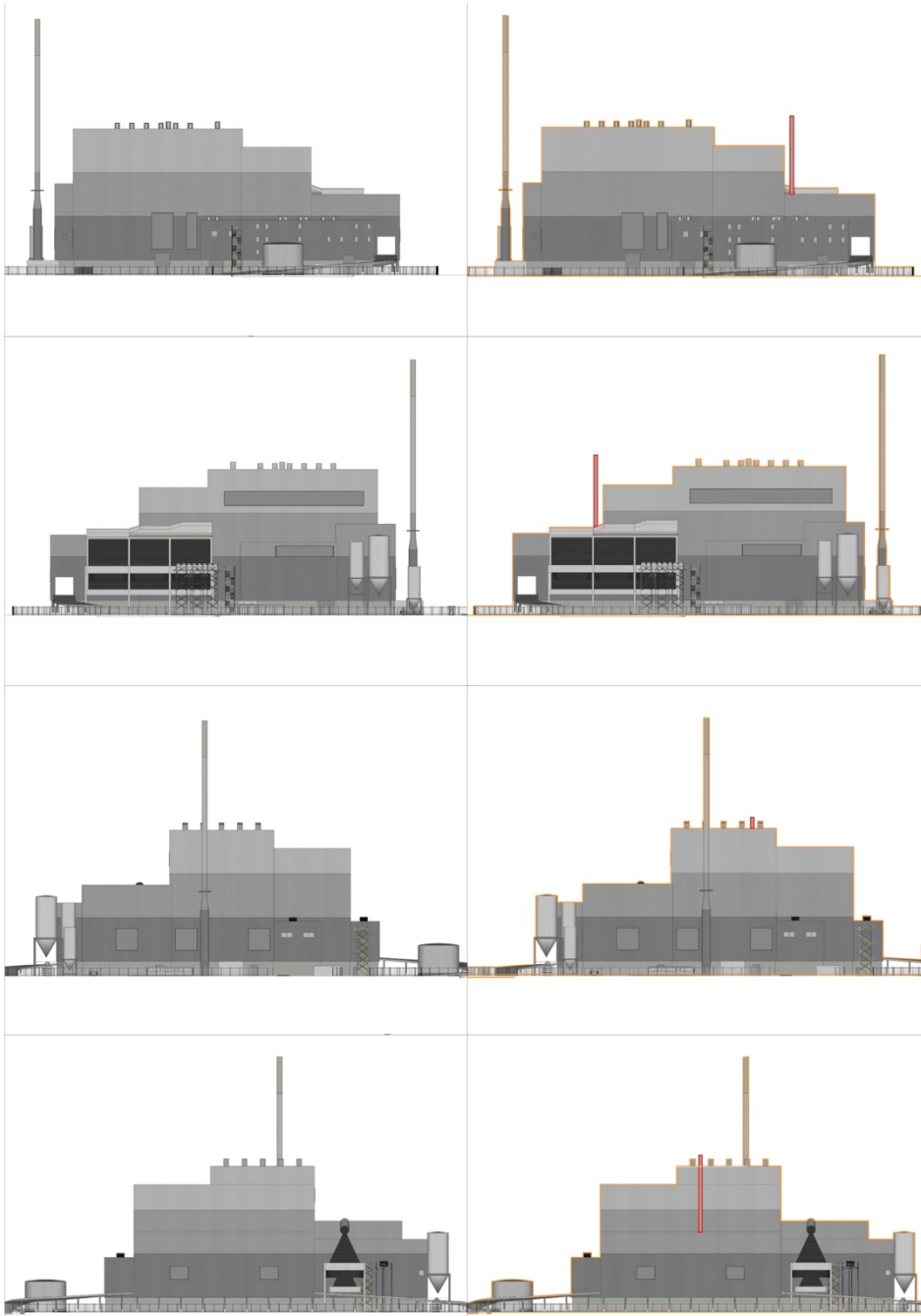


Figure 1 Comparison of approved (left) and proposed (right) elevations. A red outline on the 'proposed' images shows the flue extension, with the orange line outlining the approved facility

## Environmental Impacts

### Introduction

The proposed change is of a modest scale, and its likely impacts are discussed below.

The only change proposed is the addition of a standby vent stack, to reach a height of 3m above the highest building – the boiler hall. It will be the same in colour as the approved and built (27m taller) main stack.

As such the only technical discipline that was assessed in the approved planning permission that could be affected is the landscape and visual effects study.

### Landscape and Visual Impact

The landscape and visual impacts of the facility, including its tallest structure the main exhaust flue, were considered as part of the initial planning application and subsequent application to extend the stack height. The matters assessed are for taller structures than that which forms the current proposed development, and as such their conclusions assess a taller structure than this application – giving conclusions which can be read across to this application.

For context the findings of this former study are presented below.

The original planning application was supported by a comprehensive Landscape and Visual Impact Assessment, which considered the impacts of the structure, including a 60m high flue, upon the surrounding townscape and countryside.

The assessment concluded that;

*'The overall conclusion is that the proposed development is acceptable in landscape and visual terms and would be absorbed into the local landscape character with minimal effects. The high level of woodland and tree cover present around the application site provides screening for the proposed development within the coastal plain landscape. The development would be visible from certain viewpoints/locations within the local area above this vegetation but would always be seen within the context of similarly prominent but generally larger industrial sites, and/or more prominent wind energy/electricity pylons. The proposed development would thus be a limited extension of existing landscape and visual features.*

*The proposed development would be compliant with the relevant policies identified in the policy section of the LVIA.'*

In support of this planning application a full review of the impact of the (now approved) 10m flue extension was carried out by the same team that assessed the original proposals, with a view to

determining whether the proposed development would have any significant impacts. The review is presented as an appendix to this document. The terms of reference and conclusions of the report are set out below.

Whereas the original LVIA had the potential to identify significant landscape and visual effects, it is not considered that the relatively limited increase in stack height has such potential, and therefore no significant effects are anticipated. As a result, a simplified and more focussed report was prepared in the form of a Landscape and Visual Appraisal (LVA), carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment (3rd Edition), published by the Landscape Institute and Institute of Environmental Management and Assessment.

The conclusions of the report are presented below.

#### *Landscape Effect Summary*

*It is concluded that the potential for additional landscape effects as a result of the proposed stack increase would be very limited and it is not considered this additional negative effect would be sufficient to the increase the level of effect already permitted.*

#### *Visual Effect Summary*

*The assessment of visual effects at the chosen viewpoints illustrates the limited level of visual change between the permitted stack and proposed taller stack. Changes in the composition of views caused by the permitted stack and associated ERF buildings are generally restricted due to the context of other tall elements and industrial features in views, and woodland/tree screening. The addition of the increased stack height would be a limited addition to the overall visual effect of the ERF as a whole. It is not considered that this effect would be sufficient to raise the level of visual effect at any of the identified viewpoints in the previous LVIA, when considering combined or cumulative effects.*

#### *Conclusion*

*The baseline for assessment is the permitted ERF development, including the original 60 m tall stack. Therefore, assessment judgements are not made on the basis of a 70 m stack, but on the limited 10 m increase in stack height. The illustrations contained within (the accompanying) report indicate the limited level of visual change that the proposed increase in the stack height would have as a red band. An example image of Viewpoint 12 is included below.*



Figure 2 Viewpoint 12

*The landscape effect of the proposed stack is considered to be very limited due to the lack of landscape components lost from the site due to the proposed stack increase, and the part industrial nature of the inherent LCA concerned. The additional level of landscape effect is therefore considered to be negligible.*

*The level of additional visual effects identified at each of the viewpoints used would be limited to between minor and negligible, and range across the study area. These proposed effects are unlikely to be perceived by the general public as the proposed stack is very similar to the permitted stack. The increase in stack height would be difficult to perceive as it is a limited increase as shown by the figures included in this report.*

*Good professional practice means that consideration has also been given to the combined or cumulative effect of the proposed stack increase in conjunction with the permitted ERF development. However, the level of additional effect caused by the proposed stack increase would not be sufficient to cause any increase in the overall level of effects identified in the original LVIA in a combined/cumulative scenario for either landscape or visual effects.*

This review considered the impact of the additional 10m increase in height of the main flue stack, and concluded the effect was negligible. The increase was approved. The proposed standby vent stack is

27m lower than the full height of the stack (now approved and built) and as such the conclusions of the LVIA are valid for considering the likely effects of the proposed development.

As the main stack height increase was considered to have a negligible effect it is reasonable to conclude that the addition of the standby stack will have a lesser effect – and therefore will also at worst have a negligible effect.

A photograph which shows the same viewpoint above with the approved main stack built is included below for context, and reassurance that the approved development looks as assessed. The proposed standby vent stack will be indistinguishable from the main boiler hall, which itself is substantially shorter than the approved main vent stack – visible below to the left of the red crane.



Figure 3 As built view from Viewpoint 12



## Planning Policy

The Oldhall Energy Recovery Facility was approved initially under permission reference 19/00539/PPM, and subsequently successfully amended by a Section 42 application as permission reference 20/00819/PPM. At the time the facility was considered to be fully compliant with policy.

There have been no material changes to planning policy in the intervening period, and as such it is remains the case that the facility itself would remain compliant. As a modest alteration to the facility with no significant unacceptable impacts it follows that the proposed development itself complies with planning policy.

## Summary

The proposed development provides for the addition of a standby vent stack for managing air from the main buildings one the 3-4 days of the year when scheduled maintenance is carried out, and is specifically to satisfy the requirements of SEPA for granting the Environmental Permit.

The impacts of the change are likely to be minimal and do not affect the purpose or scope of the approved facility's operation.

There are no significant environmental effects anticipated from the proposed development, and it is hoped that the Planning Authority will approve the Non Material Amendment change positively and without delay.