

**SCOTTISH
NATURAL
HERITAGE**



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Your ref: 06/01427/FUL

Our ref: CNS/DC/P&K/CW33588

2 August 2006

- 3 AUG 2006

Dear Mr Williamson

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997

CONSULTATION ON AN APPLICATION

**RE: PROPOSED DEVELOPMENT OF AN ENERGY FROM WASTE PLANT
TOGETHER WITH A MATERIALS RECLAMATION FACILITY, ASSOCIATED
INFRASTRUCTURE AND LANDSCAPE WORKS; LAND AT BINN FARM,
GLENFARG FOR SITA UK**

Thank you for your letter of 27 June 2006 consulting Scottish Natural Heritage (SNH) on the above planning application.

BACKGROUND

The proposal includes the development of an Energy from Waste (EfW) Plant and Materials Reclamation Facility (MRF). The EfW would be capable of generating electricity to meet the needs of approximately 7,900 homes. The MRF will separate and pack recyclable materials. Landscape mitigation would include planting areas of native woodland around the development site. The proposed site is next to the Binn Burn, and close to a number of other waste management facilities currently operating at Binn Farm.

SNH POSITION

SNH does **not object** because there is no likelihood of adverse impacts to important natural heritage interests. However, there are natural heritage interests of local importance, and the proposed development may have an impact on these. SNH advises Perth & Kinross Council, to consider the following before determining this application.

Chairman: Andrew Thin

Chief Executive: Ian Jardine

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SNH APPRAISAL OF THE LIKELY IMPACTS OF THE PROPOSAL ON THE NATURAL HERITAGE INTERESTS

Landscape and Visual Impacts

SNH is content with the design of the EfW and MRF buildings, their location and landscaping proposals. The condensation plume from the EfW chimney is likely to be the most visible feature of the proposal, but currently there is insufficient information to assess the visual impact. The Ochils Landscape Character Type (LCT) is largely rural in character, and the condensation plume will introduce a feature that has more in common with the Carse of Forth. It is likely to be perceived as dominating and 'industrial' in the rural location of the Binn Valley. Rising to an estimated maximum 223m above ground level (153m + 70m) this feature might have an influence over a wide area and impact upon the existing key characteristics.

The ES states that a condensation plume will be an intermittent feature of the EfW plant. However, when visible, it is likely that the condensation plume will be an eye-catching and dominant element in both local and longer views. We acknowledge that the proposed development is a recycling/reclamation facility and that condensation plumes are an energy efficient by product. However, they can be interpreted as smoke and give the impression of a polluting, industrial facility. The impact of the plume should be assessed for sensitive receptors such as AGLVs, popular walking routes and viewpoints - both locally and in the Lomond Hills Regional Park. It could also have an adverse impact upon the visual amenity of well-used local roads and from tourist and commuter routes.

Para 8.3.1 in the ES ('Visual context') predicts the theoretical visibility of the 'physical structure of the proposed development' and confirms that the estimated ZVI (figure 8.2) does not include the condensation plume.

CONCLUSION

SNH advises Perth & Kinross Council that further information should be submitted to assess the landscape and visual impacts of the condensation plume. SNH recommend that the following information be provided:

1. An additional Zone of Visual Influence (ZVI) from 100m above ground level. This would be equal to (approximately), the height of the stack (70m) + the average condensation plume length (26m).
2. Additional ZVI from 160m above ground level. This would be equal to (approximately), the height of the stack (70m) + (90m), the mid-point between the average plume length (26m) and maximum plume length (153m).
3. Additional information to help us to understand how wide and dense the plume will be at different heights and in different conditions. For example, a thin, wispy 26m plume is completely different from a dense, 'bushy' plume many metres wide and 100m tall (note: max length is estimated to be 153m).

This information could include photographs of EfW plants currently operating elsewhere in Scotland or UK.

Note: The ZVIs will need to take into account the general visibility of the top of the condensation plume. In the absence of specific guidance regarding the visual impact assessment of this type of development we recommend that the applicant refers to Table 17 "Recommendations for ZVI in Relation to Overall Height" on page 59 of SNH Commissioned Report FO1 AA303A – "Visual Assessment of Windfarms: best practice" (2002). The report, which is available on the SNH website, notes the expected threshold radius of visual assessment for different turbine heights and SNH considers that this can be adapted for the stack+plume scenario. The guidance indicates a need for a 30km radius ZVI for 100m height turbines. We recommend a 25km radius for the ZVIs requested in 1 and 2 above.

Please let me know if you need any further information or advice from SNH in relation to this proposal. I would be grateful if you could let us know of your Council's decision in due course, or of any further changes to the proposal that would be relevant to our interests.

Yours sincerely



Colin Castle
Area Officer
Tayside and Clackmannanshire