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**Co-location standing advice for planning authorities**

**February 2025**

This document will be reviewed approximately six months from the date of publication. Any comments or suggestions on the content should be emailed to lorna.maclean@sepa.org.uk and will be considered as part of the review.

# Co-location standing advice for planning authorities

## Context for this standing advice

This standing advice from the Scottish Environment Protection Agency (SEPA) applies to development proposals in the vicinity of SEPA authorised activities (see the appendix for a definition of vicinity). As well as providing advice for planning applications it provides useful guidance for site appraisals for proposed development plan site allocations. It is primarily for planning authorities and local authorities’ environmental health teams.

Introducing new sensitive receptors within the vicinity of existing authorised activities has the potential to raise health, safety and wellbeing issues. In line with NPF4 policy 23 the planning authority should carefully consider whether significant effects are likely due to the nature of the proposal or its location. While SEPA authorisations set proportionate controls to protect the environment and human health reflecting the surroundings at the time of the authorisation, these cannot be retrospectively adjusted to take account of new planning consents. Although SEPA regulates activities that could lead to pollution, there may be residual impacts outwith the site boundary, even if best industrial practice is applied.

Where a development proposal is in the vicinity of authorised activities, planning authorities should consider the potential for negative impacts resulting from the interaction of the proposal and the authorised activities. The planning authority should consider the need for any amendments to the development proposal to minimise or avoid any potential negative impacts. There may be cases where the actual location of a development proposal makes it incompatible with the existing authorised activities due to inadequate buffer distances between the two.

Potential negative impacts can include odour, noise, and dust, as well as air quality impacts from harmful pollutants such as fine particulate matter (PM2.5), non-methane volatile compounds (NMVOCs), Nitrous Oxides (NOx), ammonia (NH3) or Sulphur Dioxide (SO2).

Typical examples of activities where there is a risk of residual off-site odour and noise impacts are waste management facilities, intensive livestock production and industrial processes. This [search tool](https://find-authorisation-information.sepa.org.uk/) on SEPA’s website provides information on authorised activities. [The Scottish Pollutant Release Inventory (SPRI)](https://www.sepa.org.uk/environment/environmental-data/spri/) can also be used to find information about SEPA authorised activities and most councils will keep a record of the recycling and waste management facilities in their area.

The effects of residual off-site noise and odour impacts depends on a range of factors including the source of emissions, meteorological conditions and the sensitivity of the receptor. Data from The Environment Agency’s complaints database has provided an indication of how far offensive odour can travel from authorised activities, these distances are provided in the appendix. We recommend consultation with your Environmental Health Officer for development proposals within these distances to determine whether a detailed assessment is necessary.

This standing advice is applicable to all scales of development proposals which could potentially be impacted by existing authorised activities. It aims to set out the co-location issues that should be considered to take informed decisions without the need to request advice on this issue from SEPA. As this is a matter on which the planning authority must make an informed decision, we will **not object** to a development proposal in this situation. This advice along with any provided by your environmental health colleagues should be taken into consideration when determining the application.

We will continue to provide bespoke advice for other issues within our remit for development proposals which fall within our consultation thresholds set out in the [triage framework](https://www.sepa.org.uk/media/560848/sepa-triage-framework-and-standing-advice.pdf#:~:text=In%20March%202021%20we%20issued%20a%20triage%20framework,regular%20liaison%2C%20helped%20us%20to%20clear%20the%20backlog.).

**Key points**

* The planning authority in consultation with their environmental health colleagues should consider the potential for negative impacts resulting from the interaction of a proposed sensitive development and existing SEPA authorised activities.
* In line with NPF4 policy 23 where there is risk of significant environmental impacts and/or adverse effects on health to the users of a development proposal from an authorised activity, one or more of the following assessments may be required: an air quality, Noise/Odour Impact Assessment, Health Impact Assessment.
* Mitigation measures may enable a development proposal to be acceptable from a land-use perspective, such as locating buildings as far as possible from the authorised activity and/or sound insulating buildings.
* Even with the use of best industrial practice and mitigation, it is possible that there will be residual noise or odour some distance from the site. The planning authority should consider whether the proposed development at the site will be a suitable use of the land.
* Existing facilities should not have unreasonable restrictions placed on them because of development permitted after they were established. For example, if sensitive receptors are introduced closer than they currently are to an odorous process, there may be significant upgrades to abatement equipment required to ensure the new receptors are adequately protected. These can take years to investigate and install and may ultimately be cost prohibitive to the existing business.
* Where the operation of an existing development could result in a development suffering from noise pollution, the developer (or “agent of change”) should be required to provide suitable mitigation.
* Where there is risk of impacts to the users of a development proposal from an authorised activity, we recommend the developer contacts the operator of the authorised activity to discuss potential issues which could arise from the proposed co-location. It may also be appropriate to involve SEPA in these discussions.

## What needs to be considered?

Development proposals can introduce sensitive receptors (such as housing, schools or hospitals) and other land uses where human activity takes place (such as employment development) to areas close to SEPA authorised activities. We regulate activities at these places through authorisations which include conditions relating to offsite emissions (such as odour, noise, air quality pollutants, flies, or dust) if there is a risk of those emissions impacting on receptors. However, due to the nature of some authorised activities, even with the use of best industrial practice, mitigation and odour/noise abatement techniques, it is possible there may be residual impacts outwith the site boundary for some distance. Such impacts may not necessarily represent non-compliance with the authorisation and therefore cannot be controlled by SEPA. Maintaining an adequate buffer zone between SEPA authorised activities and sensitive land uses such as homes is vital to achieving the outcomes set out in NPF4 policy 14 and policy 23. The higher the risk of emissions from an authorised activity which could have a negative impact to sensitive receptors, the greater the buffer zone required. It is important the planning authority fully understand these risks.

It is therefore important that the planning authority mitigates against residual impacts to receptors from emissions by fully considering whether:

* It is appropriate for the development proposal to be sited adjacent to an authorised activity.
* It is compatible with existing and proposed adjacent land use.
* There are adequate buffer zones between the sites or incorporated within the layout of the proposed development.

We recommend that the applicant discusses the development proposal with the operator of the authorised activity and SEPA. The developer must consider the potential for impact from residual emissions such as noise and odour arising from the existing authorised activity. The proposal should not result in the operator of the existing authorised activity being non-compliant with its authorisation (which could result from an escalation in complaints from the public, for instance, if SEPA considers that associated evidence warrants a review of its authorisation and imposition of more stringent conditions). Any potential environmental issues must be identified and any mitigation or avoidance that will remove identified issues, must be outlined as part of the planning application and delivery of these should be secured by appropriate planning mechanisms.

An air quality and/or noise impact assessment may be required to ensure the risk of impact from authorised activities is understood and that adequate buffer zones and other appropriate mitigations are identified and maintained.

## Policy context

**NPF4 policy 23 - Health and safety**

**Policy intent:** To protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.

* Development proposals which are likely to have significant adverse effects on air quality or are likely to raise unacceptable noise issues may require an air quality or Noise Impact Assessment.
* The agent of change principle applies to noise sensitive development. This means that developers are required to consider whether there could be a significant adverse effect on future occupiers of a development proposal from any nearby source(s) of noise such as an industrial use. Where significant effects are likely, the developer will need to factor suitable mitigation measures into their planning application.

**NPF4 policy 12 - Zero waste**

**Policy intent:** To encourage, promote and facilitate development that is consistent with the waste hierarchy.

* Policy 12 requires an adequate buffer zone between development proposals for waste infrastructure and facilities and sensitive uses such as homes.

**NPF4 policy 14 - Design, quality and place**

**Policy intent:** To encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

* Policy 14 supports development proposals where they are consistent with the 6 qualities of successful places (healthy, pleasant, connected, distinctive, sustainable and adaptable). Well-designed developments that are free from air or noise pollution will help achieve successful places.

## Further guidance

The guidance listed below provides advice on relevant assessment methodology for odour and noise assessments.

* [[SEPA’s Odour Guidance 2025](https://www.sepa.org.uk/media/h4ocmt2z/sepa-odour-guidance-2025.docx)](https://www.sepa.org.uk/media/154129/odour_guidance.pdf).
* [Guidance on the assessment of odour for planning by Institute of Air Quality Management (IAQM).](https://www.the-ies.org/sites/default/files/reports/odour-guidance-2018.pdf)
* The UK environment agencies have produced advice on noise impact assessments- [Guidance - Noise and vibration management: environmental permits.](https://www.sepa.org.uk/media/591420/guidance-noise-and-vibration-management-environmental-permits-july-2021.pdf)

## Appendix

**Initial screening assessment and distance from potential odour emission source**

We recommend an initial screening assessment is carried out for development proposals within a set distance of the following types of existing development:

Landfill – 2km

Biowaste (e.g. SEPA authorised composting, anaerobic digestion, sewage sludge treatment) - 1.5km

Farming (e.g. SEPA authorised intensive agriculture processes) – 1km

Food & Drink (SEPA authorised processes) – 1km

Waste treatment – 0.5km

The distances are taken from Environment Agency data and roughly correspond to the 75th percentile of odour reports by sector**.**

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