

***Stirling Council : Supplementary Planning Guidance :  
Revised Policy & Development Guidance – ‘Housing in the Countryside’***

**POST-ADOPTION STATEMENT COVER NOTE**

**PART 1**

**To:** SEA Gateway, Scottish Government, Area 1 H (Bridge), Victoria Quay, Edinburgh, EH6 6QQ

**PART 2**

**A post-adoption SEA statement is attached for the PPS entitled:**

*Stirling Council : Supplementary Planning Guidance : Revised Policy & Development Guidance – ‘Housing in the Countryside’*

**The Responsible Authority is:**

Stirling Council

**PART 3**

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**Signature:** 

**Date:** 1<sup>st</sup> June 2010

## **POST-ADOPTION SEA STATEMENT**

### **Post-Adoption SEA Statement for:**

*Stirling Council : Supplementary Planning Guidance : Revised Policy & Development Guidance – 'Housing in the Countryside'*

*The Supplementary Planning Guidance has been adopted as an interim planning policy and guidance which will be a material consideration in the determination of planning applications.*

### **Adopted on:**

3<sup>rd</sup> February 2009

### **Responsible Authority:**

Stirling Council

This document (referred to here as the post-adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

### **POST-ADOPTION SEA STATEMENT : Availability of Documents**

**Website:** The full PPS as adopted, along with the Environmental Report and post-adoption SEA statement are available on the Responsible Authority's website at <http://www.stirling.gov.uk/index/services/planning/assessandplanning.htm>

**Office address:** The PPS, as adopted, along with the Environmental Report and post-adoption SEA statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at the principal office of the Responsible Authority:

Stirling Council, Planning, Regulation & Waste, Viewforth, Stirling, FK8 2ET

between the hours of 9.00 am and 5.00 pm, Monday to Friday.

## **POST-ADOPTION SEA STATEMENT :**

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## 1 Key Facts

The **Responsible Authority** is: *Stirling Council*

The **Title of the PPS** is: *Stirling Council : Supplementary Planning Guidance : Revised Policy & Development Guidance – ‘Housing in the Countryside’*

The **Purpose of the PPS** is: *To enable and regulate (according to various site criteria) an increase in the number of opportunities for the development of new housing, and conversions of existing buildings for residential purposes, in the defined ‘Countryside’ areas of Stirling. It covers new build houses, conversions, renovations, replacements, etc in the Countryside, but not town and village expansions. ‘Countryside’ is defined and mapped in the Stirling Council Local Plan.*

The **period covered** by the PPS: *This will be the interim period up to the adoption of the first Local Development Plan for the area.*

**Frequency of updates:** *It is not anticipated that the proposed policy will be updated. Any review is likely to be for the purposes of incorporation into the settlement strategy of the Council's first Local Development Plan. Consultants have been commissioned to prepare the siting and design guidance referred to in part 8(vi) of the ‘General Planning Criteria’ and a draft of this guidance is now with the Council.*

The **area covered** by the proposed PPS is: *The Stirling Council area outwith the Loch Lomond & The Trossachs National Park (c. 1073 sq kms).*

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**Date:** *1<sup>st</sup> June 2010*

## 2 SEA process

*Stirling Council : Supplementary Planning Guidance : Revised Policy & Development Guidance – ‘Housing in the Countryside’* has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report;
- Preparing an Environmental Report on the likely significant effects on the environment of the draft PPS which included consideration of:
  - the baseline data relating to the current state of the environment;
  - links between the PPS and other relevant strategies, policies, plans, programmes and environmental protection objectives;
  - existing environmental problems affecting the PPS;
  - the plan's likely significant effects on the environment (positive and negative);
  - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
  - an outline of the reasons for selecting the alternatives chosen;
  - monitoring measures to ensue that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report;
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the PPS;
- Committing to monitoring the significant environmental effects of the implementation of the PPS. This will also identify any unforeseen adverse significant environmental effects and to enable taking appropriate remedial action.

## 3 How environmental considerations have been integrated into the PPS and how the Environmental Report has been taken into account

3.1 The Strategic Environmental Assessment process indicated that there may be some adverse environmental effects following from the implementation of the proposed Policy. However, it was concluded that, because of the Development Plan, legislative and regulatory context within which the Policy would be adopted, significant adverse impacts upon designated or protected elements of the environment were unlikely. Other impacts upon elements such as landscape and biodiversity were more likely to occur, and these would be mitigated as far as possible by the careful application of development management processes and adherence to siting and design criteria – set out in general terms as an adjunct to the Policy, and to be adopted in more comprehensive and detailed form at a later date.

3.2 The SEA also suggested that the tested alternative approaches to rural housing development policy in accordance with SPP15 (now consolidated into SPP, 2010) would also be likely have environmental impacts, if to a lesser degree. Effects on Conservation Areas, biodiversity, and impacts on air quality and climate change arising from road traffic generation, etc could also occur. The policy is not a complete rural development strategy. It allows for a limited additional increment of house-building in the countryside, with most new housing development expected to continue to be directed towards the villages.

3.3 Policy amendments agreed by the Council on environmental grounds:

- Concerns were expressed during the consultation that the draft policy was too open-ended with regard to the scale of new building that may be permitted under some parts of the policy – particularly farm steading redevelopments. The SEA pointed to the potential for impacts on landscape quality and character. Partly to address this a ‘cap’ is now included in the adopted policy to limit the new-build development and

redevelopment potential of modern buildings and brownfield land attached to farmsteadings.

This amendment related to landscape impact issues, but also addresses concerns about dispersed drainage infrastructure. SNH in responding to the Environmental Report expressed particular reservations about the cumulative landscape impact of the potential policy outcomes, citing the example of the Perth & Kinross Council area where a similar planning policy has been in place for some time (and was in fact under review by that Council because of the visual impact of some of the outcomes). As a corollary to this SNH further expressed the view that it was difficult to assess potential outcomes without having the proposed siting and design guidance to hand. SEPA expressed worries at the risk to water quality from locating more development in areas where there is no communal drainage infrastructure.

- Concerns that some types of development opportunity could conflict with heritage conservation policies. Although Historic Scotland did not raise particular issues, other consultation responses, and the Assessment, suggested there is potential for conflict. Consequently a part of the draft policy giving encouragement for 'country houses' to be developed within designed garden landscapes is now removed and the 'general planning criteria' relative to heritage matters are expanded and clarified.
- Concerns that the forms of development permissible in Green Belt areas needed to be more closely defined. This resulted in the adopted policy having an additional part clarifying Green Belt objectives. This amendment addresses landscape and historic heritage concerns.

3.4 Other potential adverse effects identified through SEA:

3.5 The SEA has suggested some possible problem outcomes, eg in relation to increased road traffic, more development beyond the reach of 'public' drainage networks, more developments in buildings or at locations that have a biodiversity value, more developments affecting or in the vicinity of archaeological/historic heritage features, etc. The terms of the policy and in particular the associated 'General Planning Criteria' have been designed as far as possible to ensure that these issues are recognised and taken into account for each individual development proposal. It is accepted that much of the 'mitigation' of potentially adverse environmental effects will only be overtly addressed when the dedicated Siting and Design Guidance is available. (However, the determination of planning applications already involves an assessment of many, if not all, of the issues that will be covered in this Guidance. Existing planning policies already permit farm-steading conversions, and new dwellings in the countryside in some circumstances. The Council is not aware that it has been suggested that these policies are resulting in unacceptable environmental decline).

3.6 The Environmental Report and consultation responses highlighted road traffic generation and associated issues such as road safety and pollution as being a problem that would be exacerbated by a dispersed rural housing development policy. SPP15 (now consolidated into SPP, 2010) accepted that rural Scotland is always going to have development needs that cannot be susceptible to ideal 'sustainable' transport and other servicing solutions, and that some compromises will have to be accepted in this regard. It has also been argued that consolidating all housing into villages may generate just as much new traffic. (And having no new development in rural areas risks the viability of remaining local services, so that all residents would have to travel to larger service centres, thereby generating even more 'need to travel').

3.7 SEPA suggested that the policy risked encouraging more dwellings in areas at flood risk. This is not considered to be the case. As well as including a specific provision for the relocation of existing houses at flood risk, the new policy does not stand apart from the existing body of policy in the Local Plan restricting new development on flood plains and other areas at flood risk.

3.8 None of the Consultation Authorities suggested that the Environmental Report was not fit for purpose, nor that the Assessment it contained was inadequate overall.

#### **4 Reasons for choosing the policy and guidance as adopted in the light of other reasonable alternatives**

4.1 The policy approaches tested through the SEA were:

*Alternative 1 – To continue with the existing Development Plan Countryside constraint policies but to relax the criteria for farm-steading/other existing building group redevelopments in order to increase the number of new dwelling units achievable per site – by allowing development of adjacent more modern buildings and brownfield land.*

*Alternative 2 – To continue with the existing Development Plan Countryside constraint policies, but to enable more Rural housing through planned expansions of villages, especially those hosting local services (schools, shops, etc).*

These options both seek, to a greater or lesser degree, to cluster new housing at a relatively small number of locations. Allowing larger clusters outwith villages may enable them to attract some form of communal or 'public' transport, and perhaps have a communal drainage system. Village expansions will usually have access by local bus services and will link to the local treatment works for drainage purposes, as well as being (probably) within walking distance of such other services as the villages provide – shops, schools, pubs, churches, halls, etc.

Alternative 3, the eventually selected option, was the most likely to lead to a more dispersed pattern of housing development outwith the villages. Not having the advantages briefly stated

above, such a pattern was inevitably going to appear potentially more likely to have adverse effects on sustainable travel, on landscape, etc., and to seem to pose the possibility of affecting water quality or of leading to development in areas at flood risk.

4.2 The Council, in seeking to adopt the proposed Policy, had a political, social and economic agenda. It wished Stirling Council to be seen to be embracing the principles of SPP15, the then current Government planning policy statement on rural development. The issue was not whether a more relaxed policy towards rural development outwith villages would be adopted, but which such policy would be adopted; i.e how 'relaxed' it would be. The Perth & Kinross Council policy was presented by Councillors as the model aspired to. Some of the weaknesses and potential pitfalls of that policy were recognised and an attempt made to avoid them.

4.3 When placed in the context of the full range of environmental protection policies contained in the Development Plan and those operated and overseen by SEPA, Scottish Water, SNH, HS, etc, it is considered that the adopted policy – as modified following the Strategic Environmental Assessment and consultation - can be implemented without an unacceptable impact on the Stirling environment in the broadest sense. The reasonable policy alternatives would be unlikely to avoid adverse environmental impacts completely.

4.4 A number of comments were received during the consultation period that specifically referred to the Environmental Report, although most were related to the draft policy. Comments on the ER are summarised below, with a brief indication of whether and how the adopted policy took account of the comments. Many comments, particularly from the Consultation Authorities, were about details of the assessment process. The Council was made aware of all these comments (by means of transcripts, not summaries) when the amended policy was presented with a recommendation that it be adopted.

## Housing in the Countryside : SEA Environment Report : Consultation responses

<b>Comment</b>	<b>Commentator</b>	<b>Account taken</b>
<p>Although "housing in the countryside" may have dire consequences in terms of road safety and vehicle kilometrage, I see no specific reference to either in the text you have provided.</p> <p>Surely, potential developers and purchasers ought to be made aware - at an early stage - of the dangers associated with direct access to high-speed roads and the steps that they may be required (perhaps through a "condition") to ameliorate them.</p> <p>the road environment is the most dangerous environment encountered by practically everyone on a daily basis, and the rural road environment is particularly dangerous Should not the Environmental Report make this crystal clear? Should not there be some reference to the form that mitigation might take? Or is the road not considered part of the environment in this context?</p>	<p>Accident Unit Manager Central Scotland Roads AIU</p>	<p>The Policy does not sit separately from others in the Development Plan. All planning applications will be considered by the Council's Roads officials in terms of access, safety, etc.</p>
<p>The consultation paper, the information about the SEA and the criteria make no reference to the historic environment, either in relation to landscape setting or in relation to the archaeological potential of sites and buildings which may be eligible for redevelopment. I have major reservations about a number of elements of the proposed criteria and policies as currently proposed.</p> <p><u>General</u> Where a building is redundant but well capable of being incorporated into a new dwelling then I have no problem. I have serious concerns over the use of the term 'minimal remains' in the site selection criteria. Such sites have ceased to be abandoned houses and are to be regarded rather as archaeological sites. A heap of stones in a field is not in my opinion a suitable candidate for the use of the term 'replacement'. I would recommend that if a building or structure is already roofless on the First Edition OS map it should not be considered eligible for a replacement house. Applicants should provide a history of the site.</p> <p>Avoidance of conflict with other policies in the Development Plan There are existing policies which give protection to archaeological sites through the Structure and Local plans. As preservation in situ seems unlikely to be achievable in many of these cases it should be possible, although not always acceptable, to deal with archaeological potential by the use of archaeological conditions which require an archaeological response varying from evaluation to full excavation to a watching brief. However, this will represent an additional expense, which in some cases could potentially affect the financial viability of a single house development, but which would be best addressed by avoidance of the archaeologically sensitive area/structure.</p> <p>Standing building recording (SBR) should be carried out where the extant remains are of sufficient historic or architectural interest to merit recording prior to their demolition or conversion. This is particularly the case with old mill remains but could apply to other early farmsteads.</p> <p>Traditional building materials in re-useable condition on any site to be re-used wherever possible and</p>	<p>Archaeology Officer, Stirling Council</p>	<p>The General Criteria do have reference to the historic environment. Historic Scotland did not raise these issues. Two of the General Criteria relate to statutorily protected buildings and monuments, and known and potential archaeological interest, building recording, and the need to involve Historic Scotland and/or the Council's Conservation Officers and Archaeologist.</p> <p>The policy was amended to exclude encouragement for 'country houses' to be established in designed gardens/policies where the original house has been demolished.</p> <p>The policy incorporates the phrase 'substantial visible evidence of the structure of the original house above ground level' in relation to replacement houses.</p>

<p>appropriate in the new development Not against the principle of recycling of traditional building materials but their source should be identified to ensure that it is appropriate for them to be taken from other ruined buildings or stone dykes etc</p> <p>New Houses in Open Countryside</p> <p>a) Located within an established landscape garden. 'The proposed house should be located on the site of the former house.' It should be noted that such houses were often of huge importance and have a long history. There could be a requirement for archaeological excavation and or 'standing building recording' depending on the particular circumstances of the case.</p> <p>Replacement and Renovation of Single Houses</p> <p>a) ii abandoned or ruinous. This is potentially the definition of an archaeological site. This is not a house replacement but is effectively the creation of a new development on an archaeological site. I object to this as it stands.</p> <p>b) Substantial ruin - same as a). May require SBR depending on demolition or conversion, and interest of building</p> <p>Conversion, redevelopment or replacement of farm steadings and other non-domestic buildings</p> <p>a) may require SBR b) SBR but an issue with re-use of footprint of adjacent derelict buildings. Again these may count as archaeological sites.</p>		
<p>I understand the purpose of the consultation is to seek views on the Council's preferred revised policy text and on the likely significant environment effects associated with this change of policy. The new policy approach reflects the Council's aim of responding to the Scottish Government's aspirations for increasing rural housing development as expressed in SPP15, PAN 72 and PAN 73, and results in a significant relaxation of the restrictions on rural housing development sites in terms of number and scale across Stirling Council's Development Plan area. The environmental impacts of this change of policy are addressed through the Environmental Statement submitted along with the revised policy.</p> <p>The SEA is a clear and easy to read document which includes the required SEA steps. The assessment would benefit deeper consideration of the likely impacts and mitigation. The proposed siting and design guidance may provide mitigation for the main landscape impacts but, in its absence, we believe the likely landscape impacts may have been underestimated and the resulting mitigation may be insufficient.</p> <p>We understand that the policy proposed for adoption in Stirling is based on that produced by Perth and Kinross Council in 2005. You may be aware that Perth and Kinross Council is at the moment reviewing this policy, and to this end have recently consulted SNH over the SEA scoping document. The reason for the review is the level of concern over the implementation of the policy, and the outcomes resulting from it, which have included high levels of adverse impact on landscape character and significant cumulative landscape impacts.</p>	<p>Scottish Natural Heritage</p>	<p>The Council wished to change its planning policy as a matter of urgency. Preparation of the detailed Siting &amp; Design Guidance in tandem with the policy was not feasible. The assumption seems to be made throughout these comments that until the Guidance is adopted, unsuitable siting and inappropriate and low quality designs will be accepted.</p> <p>The Green Belt review also involved appointing consultants and could not be accommodated in the same period. The policy continues to presume against inappropriate developments in Green Belt areas.</p> <p>The adopted policy is an interim policy. There is the opportunity for further amendment during the current Local Development Plan process.</p>

Reference is made to possible changes to the development allowed in green belt areas. While the supporting information makes it clear how this would operate, it might be better to review the housing in the countryside policy in relation to green belts through the Green Belt review about to begin, and which SNH is supporting

It would be useful to see further definition of some of the criteria that could be open to interpretation by developers and the Council alike. For example, it is not clear how Criterion 2 – “New houses to be designed and sited in a manner appropriate to the Countryside and sympathetic to their setting” – might be interpreted and could lead to challenge over its implementation. Equally, it is not clear what is meant by criterion 4 “New houses in groups and infill situations to be sited and designed to ensure an appropriate ‘fit’ with the group”. Local design guidance should also apply to these criteria. Without the design guidance it is not clear how these criteria help the policy to meet objectives (ii), (iii) and (v).

In general, the assessment over simplifies impacts and presents somewhat relaxed mitigation measures. It is important to identify residual impacts and to look at how or if these can be addressed.

Detailed Comments:

The relaxing of this policy is likely to impact negatively on the ability of Stirling Council to meet its stated aim of becoming “Carbon Neutral” by increasing the personal transport requirements of the population in order to reach essential services, employment, commercial and recreation destinations. This issue is recognised through the assessment of environmental objectives, but does not make it onto the list of environmental objectives. It is not assessed through the SEA approach and therefore no mitigation is identified.

Assessing alternatives against SEA Objectives - Habitat replacement should be seen as a last resort. Loss of habitat should be recorded as a negative impact and while habitat creation is to be welcomed, replacement by other “habitats” such as gardens would not mitigate the impacts to the extent of the impact becoming neutral.

The section on human health should include access and recreation impacts. Not all countryside is “accessible” countryside and impacts on existing and new inhabitants should be addressed. These impacts might be positive where the new population might, for example, add weight to the need for core paths to be developed.

Under Soil and Water Assessment, it would be useful to have some reference made to the sensitivity of water catchments, especially the Tay, Teith and Endrick. How would we know when environmental limits for the Special Areas of Conservation had been exceeded, e.g. nitrate levels, sedimentation or pollution from construction etc.?

Under Air Quality and Change Assessment, it is not clear how the assessment has taken into account the contribution to climate change objectives when increase in private transport is likely to arise from more dispersed settlement patterns.

Mitigation:

The policy does not make reference to modification or conditioning of proposals which could affect environmental resources protected by statute.

Reference is made to the “oversight” of Agencies. While we will be happy to comment on Major developments or

As indicated in the ER, very broad assumptions have to be made about cumulative transport-generated environmental impacts. What is being assessed is a policy that may lead to developments of unknown number in unknown locations, for households of unknown size, composition and lifestyle. There is really no way of knowing whether any particular new house in the countryside will generate more or less traffic than a house in a nearby village.

With individual new houses, true habitat replacement is unlikely to be achievable. Gardens in a rural setting may reasonably be expected to provide a good, if different, habitat to what they replace.

Presumably SNH make known to SEPA any specific thresholds applicable to SACs. If SEPA cannot detect or measure a change then is it significant?

The policy does not override policies (or legislation) already affording protection to environmental resources.

<p>proposals that could potentially affect statutorily designated sites, it is unlikely that we could comment on individual housing proposals. Rather we would expect the Council to use a robust policy framework to ensure that important natural heritage features would be protected.</p> <p>We are not sure that the level of mitigation proposed offsets adverse impacts in such a straightforward way. For example, there is no evidence yet that the siting and design guidance would cancel out a negative impact on biodiversity loss (see Table A-i).</p> <p><b>Monitoring:</b> It would be helpful if you were able to expand on the monitoring proposals and indicate how and when the policy would be amended if significant impacts resulted from its implementation. Given the potential for significant landscape impacts, details on the monitoring of impacts on landscape character would be advisable.</p> <p><b>Biodiversity:</b> It is not clear why all these alternatives “increase potential for some developments being close to designated sites”. We might argue that only alternatives 2 and 3 have this impact. It is also unclear why only “village expansions may impact adversely on local biodiversity” when any green field or brown field development has this potential. There is no evidence that the siting and design guidance would provide adequate mitigation for loss of biodiversity. We are also not convinced that loss of biodiversity will be mitigated by the development of new gardens – these could consist of concrete slabs and decking rather than trees, shrubs and flower beds.</p> <p><b>Air and climatic factors</b> This section should include some assessment of the impact of increasing private transport, particularly on the ability of the Council to meet its own stated aim of becoming “Carbon Neutral”. For example, you might consider the level of development and where should this be in order to ensure that new sustainable communities are created, with access to essential services and supporting public transport. No reference is made to carbon dioxide as a greenhouse gas.</p> <p><b>Landscape</b> Without the siting and design guidance, the impacts on landscape character should be scored more negatively. The design guidance will only mitigate impacts effectively if it is produced to require high standards and if it is implemented rigorously. In our view, too great a weight has been placed on the performance of the as yet unwritten siting and design guidance for it to form effective mitigation.</p>		<p>See section 5 below.</p> <p>The ER points out the ubiquity of riverine SACs. Several villages straddle or are next to such sites – and their STWs discharge into them. Village expansions are likely to be as large or larger than additions to building groups, etc. They therefore have the potential to impact on greater areas of greenfield land – and therefore on such biodiversity as that land harbours.</p>
<p>I have reviewed the Environmental Report on behalf of Historic Scotland and should make clear that this response is in the context of the SEA Act and our role as a Consultation Authority. It therefore focuses on the environmental assessment, rather than the contents of the policy.</p> <p><b>General Comments</b> I welcome that the comments we provided on the Scoping Report on 24 October 2008 have been taken into account during the preparation of the Environmental Report. My focus in reviewing the Environmental Report is on the potential for significant environmental impacts on the historic environment that may arise from the policy.</p> <p>The Environmental Report is well presented and clearly considers the environmental implications of the policy. It provides a clear account of the steps undertaken during the environmental assessment process and presents</p>	<p>Strategic Environmental Assessment Team Leader Historic Scotland</p>	<p>Noted</p>

<p>these in a logical structure. I am therefore content with the assessment.</p>		
<p>Subject to the comments below, SEPA considers that the Environmental Report provides a succinct and clear assessment of the potential significant environmental effects of the Stirling Council: Supplementary Planning Guidance: Revised Policy &amp; Development Guidance- "Housing in the Countryside". SEPA also considers that the comments provided in its scoping response have largely been taken into account in the preparation of the Environmental Report.</p> <p><b>Detailed Comments</b></p> <p>SEPA welcomes the use of SEA objectives. As stated at scoping stage in relation to the proposed objective for water SEPA would have welcomed reference to the requirement to maintain and enhance not only the "quality" of the water environment but the requirement to achieve "good ecological status" which includes water quality, water quantity, ecology/habitats and physical impacts (including culverting and engineering of water courses).</p> <p>SEPA notes the alternative policies considered in the assessment and is content with the approach</p> <p>SEPA welcomes the clear and transparent approach to the assessment, supported by the use of objectives and assessment matrices with full use of commentary boxes explaining the likely effects and the link to mitigation measures. SEPA welcomes the summary of conclusions drawn from the detailed assessment matrices.</p> <p>SEPA also welcomes the reference in the Environmental Report to assumptions and difficulties encountered during the assessment process.</p> <p>SEPA supports the comparison of alternatives and the discussion of the relative effects of each policy and their key differences but it is noted that a mathematical comparison "score" was used, symbols were combined and that a neutral effect may reflect that benefits and negatives are judged likely to balance out. Please note that the Scottish Government SEA toolkit advises against elaborate scoring or weighting in the assessment or to "add up" scores across the assessment. The toolkit also states that it is not appropriate to offset negative and positive effects in order to determine likely significance. SEPA would particularly advise that effects on water and soil should not be grouped together.</p> <p>In relation to the detailed assessment results for "water" in Table A -iii SEPA agrees that negative effects are likely to result from Alternatives 1 and 3 in relation to water quality due to impacts from waste water generated from development and the likely need for private waste water treatment facilities. Relaxation of development in the countryside has the potential to increase the risk to the water environment due to lack of adequate waste water treatment infrastructure. Alternative 3 provides for a general relaxation of development in the countryside so more development is likely to be brought forward under this policy and negative effects on water quality are likely to be more significant for Alternative 3, depending on the location of the development and the sensitivity of the receiving environment.</p> <p>Other impacts on the status of the water environment due for example to physical impacts including culverting and hard engineering of watercourses are also likely to be more significant for Alternative 3. Mitigation measure should also refer to the need for Drainage Impact Assessments and compliance with the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (CAR) (as amended). The mitigation measure proposed in Table A-i in relation to the phasing of village expansions to ensure adequate waste water treatment capacity is in</p>	<p>Senior Planning Officer (SEA) SEPA</p>	<p>'Quality' was intended to encompass the wider definitions used in the SEPA classifications and River Basin Management Plans.</p> <p>Noted. The 'score' was not used in any decision-making.</p> <p>The General Criteria make it clear that if proposals exceed the capacity of infrastructure to service them, they will not be supported. Where there are no services, planning consents are conditioned to ensure that adequate provision is made.</p>

place should also be included in the mitigation section for effects on water environment.

Development in the countryside, depending on its location could be at risk from flooding including the conversion or rebuilding for residential use which could introduce a more flood sensitive use. A relaxation of constraints for development in the countryside (particularly Alternative 3) is likely to generate more development proposals with potential flood risk. Therefore there is potential for some negative effects and clear mitigation measures should be identified that will ensure that the proposed policy will contribute to sustainable flood management and avoid encroachment onto flood plains. However, SEPA welcomes the general criteria in the policy that allows for relocation of individual houses already at flood risk and this may result in some positive effects. The primary mitigation measure in relation to flood risk is avoidance and reference should be made to flooding policies and the potential need for a Flood Risk Assessment for proposed new development that is itself at risk from flooding or that could potentially increase the risk of flooding elsewhere.

In relation to the detailed assessment Table A-iv and effects on “reducing impacts on climate change”, SEPA considers that the effects for all Alternatives are unlikely to be positive and should be described as neutral. Although all Alternatives allow for potential re-use of existing buildings and recycling of materials the policy also allows for the new build in infill situations and generally will result in an increase in traffic related emissions. It would also be appropriate to include measures such as potential for low carbon and sustainable living in the mitigation section.

It is not clear if the potential for cumulative effects from the policies have been considered in the assessment. There is potential for cumulative effects on that water environment from the relaxation of housing development in rural non-sewered areas. Piecemeal development in areas at risk of flooding could have a cumulative and synergistic effect on catchment flood risk in the SPG area. These flooding events are likely to increase in frequency and intensity with predicted climatic changes. Consideration should be given to flood risk avoidance and the need for further assessment as key mitigation measures.

The SEA Statement should therefore clearly identify the mitigation measures required for the Alternative chosen and how they will be taken forward as the SPG is implemented. Unless this is clearly identified there is a risk that the measures will not be adequately implemented and the adverse effects will be realised. One of the most important mitigation measures to consider is the way in which the policy itself can be modified as a result on the environmental assessment process.

**Monitoring**

Please note that it is a requirement of the Act to monitor significant environmental effects of implementing the SPG and that the monitoring procedures must allow the Responsible Authority to identify at an early stage any adverse unforeseen effects and undertake appropriate remedial action. The monitoring regime should also assess the effectiveness of mitigation measures and manage any uncertainty encountered in the assessment process.

Monitoring should therefore be carried out to identify adverse effects resulting from rural housing development and it may also have a component to demonstrate how this development is compliant with the SPG policy and criteria.

The Council has planning policy policies to ensure FRAs are used wherever necessary, flood risk areas are not chosen for development, and watercourse management does not include culverting.

While not noted separately, potential cumulative effects (e.g. on landscape) were considered. Measurable effects of small-scale dispersed developments are almost by definition cumulative, given the difficulty of detecting environmental effects of individual developments.

There is an opportunity to amend the policy during the Local Development Plan preparation process.

See section 5

<p>Monitoring indicators that could be considered include monitoring the extent of floodplain affected by rural development, the extent of relocation of rural housing already at flood risk, changes to water body status resulting from rural development, the percentage of new rural development using low carbon technology and energy efficiency/energy conservation measures, the percentage of rural development located on brownfield land.</p>		<p>All these are covered by the monitoring in place except: Water body status – reliant on SEPA monitoring; Low-carbon development – all new development will now be required to satisfy at least Building Standards regulations.</p>
<p>The council's own Environmental Assessment Report has found that the present proposal is the worst of all those considered, and only weak mitigating factors have been identified.</p> <p>Overall, the ER clearly highlights the many environmental shortcomings of the proposed amendments,</p> <p>It is concluded:-  <i>Alternative 3, which is the policy approach being examined by the Council, apparently fares worst in terms of potentially adverse impacts upon Biodiversity, Cultural Heritage and Landscape.</i></p> <p>One significant omission from the ER is an explicit analysis of what are called "Cumulative, synergistic and secondary environmental effects". The report implies this has been done, but its certainly not clear to us.</p>	<p>Strathblane Community Council</p>	<p>The assessment is of a policy with unpredictable outcomes. The assessments of the draft policy and reasonable alternative policies rely on many assumptions and are not regarded as robust enough to be a sole determinant of future policy. The Council is not obliged to select the best environmental option.</p>
<p><b>Comments on the Strategic Environmental Assessment</b></p> <p>While some transport issues are considered (e.g. the impact of traffic growth on pollution, Table A-iv), other aspects do not appear to have been referenced and therefore considered, in particular 'Population and Human Health' issues (Table A-ii) such as:</p> <ul style="list-style-type: none"> <li>• Road safety (which affect 'opportunities to enjoy safe residential environments')</li> <li>• Opportunities for walking and cycling to access facilities / services (which affect 'opportunities for sustainable lifestyles')</li> <li>• Supporting public transport services (which affect 'safeguard living environments across the community' by helping to support the continuation of public transport services for the benefit of the wider community)</li> </ul> <p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• Roads, Transport and Land Services cannot recommend adoption of the policy because it encourages a dispersal of housing development which is contrary to national, regional and local transport objectives that seek to reduce the need to travel and to support access by public transport, cycling and walking.</li> <li>• The concerns of the level of dispersed development could be reduced, although not eliminated by: <ul style="list-style-type: none"> <li>○ Minimising the number of new houses permitted (e.g. 5% of annual housing allocation for the Stirling Council area)</li> <li>○ Only allowing new development within an agreed walking distance of public transport provision / local services</li> </ul> </li> <li>• Where new development were permitted it would need to: <ul style="list-style-type: none"> <li>○ Address road safety concerns in terms of: <ul style="list-style-type: none"> <li>▪ Entering and leaving properties</li> <li>▪ Increased levels of traffic around homes</li> </ul> </li> </ul> </li> </ul>	<p>Roads, Transport and Land Services, Stirling Council</p>	<p>SPP15 accepted that rural developments could not always be serviced by sustainable transport modes. Nowhere does the policy suggest that road safety concerns can be set aside relative to proposed new houses.</p> <p>If the Roads service persuades the Council of the virtues of such constraints on the operation of the 'Housing in the Countryside' policy, then an amended policy can be proposed through the Local Development Plan process.</p>

<ul style="list-style-type: none"> <li>o Ensure good pedestrian access to public transport provision / local services, particularly routes to schools</li> <li>o Support public and community transport provision in the area, and where applicable sustainable transport initiatives, including park and ride.</li> </ul> <p>It is suggested that Transport Planning be consulted at the scoping stage of an SEA being undertaken by the Council.</p>		
<p>The SEA Environmental Report accepts that the assessment of an enabling planning policy such as the new Housing in the Countryside Policy as opposed to site (or small area) specific proposals is rendered speculative because the actual locations where opportunities may be taken up will depend to an extent of the choice made by individual farmers and landowners.</p> <p>It is clear that it has been extremely difficult for the SEA Environmental Report to actually measure or attach values to the potential impacts of the new policy, that broad assumptions have been made to allow any measurement to take place and that there is considerable doubt as to the impact of the policy.</p> <p>The Report concedes that many if not most of the effects are not amenable to monitoring of sufficient sophistication to allow comparisons of the effects of the alternative planning strategies.</p> <p>Notwithstanding these difficulties the Report has endeavoured to attach values to the new Housing in the Countryside policy and to two alternative policy options. In spite of these shortcomings the Report concludes that the proposed Housing in the Countryside Policy compares relatively unfavourably with two less radical policy options.</p> <p><b>Measures to prevent or mitigate any adverse effects</b>  The Report recognises that the new policy will not seek to override the established systems of environmental protection. There is presently a strong protective framework in place through legislation and national and local planning and other policies backed by Agency oversight.</p> <p>The new policy will sit alongside the existing environmental protection policies which are already in place and which can be reinforced by additional design guidance to mitigate any adverse impact.</p> <p>It will be the function of the detailed policy framework and associated general development criteria and design guidance to minimise adverse impacts.</p> <p><b>Social and Economic Benefits</b>  The SEA is exactly what it says it is and represents an assessment of the environmental impact only. Of necessity, therefore, the SEA must be extremely broad brush in its execution and any attempt at a precise scientific assessment must be spurious.</p> <p><b>Conclusions</b>  The Council's SEA Environmental Report is to be welcomed as a necessary part of policy formulation which will assist the Council greatly when they reach their decision on the new policy.</p> <p>The Report represents a commendable attempt to measure the environmental impacts of three policy options</p>	<p>John Warren (Planning Consultant)</p>	<p>Noted</p>

and draws attention to the severe limitations of the exercise.

Although the proposed Housing in the Countryside Policy compares relatively unfavourably with two less radical policy options, it has been acknowledged that the policy change is only affecting a small margin of overall development activity.



## **5 Monitoring and mitigation**

5.1 Preparatory stages for the Local Development Plan (LDP), replacing the Structure Plan and Local Plan, have commenced. The Main Issues Report has been published. It is considered that adopting the proposed new policy as Supplementary Planning Guidance and monitoring its implementation during the run-up to the new Plan will enable Members to consider whether further review is appropriate before it is incorporated into the new Plan. References in the policy to SPP6 and PAN84 (reduction of CO<sub>2</sub> emissions from new buildings) are already superseded by the Climate Change Act and the Scottish Government's determination that the Building Standards regime will be the main influence on the carbon balance of new buildings.

5.2 As indicated, the Siting and Design Guidance is now with the Council in draft. Public consultation will follow and this adjunct to the policy should be in place later this year.

5.3 All applications received that fall to be determined with reference to the interim policy and guidance are monitored by means of the Council's existing computerised application management system. Simple outcomes – applications approved, refused, withdrawn – can be determined individually and cumulatively. The system can be linked to a mapping tool to assess the geographic spread of outcomes. Applications are assigned to the different sections of the policy so that the frequency of new-build houses, conversions, replacements, brownfield redevelopments, etc can also be followed. Developments approved are granted planning consents conditioned as appropriate to ensure satisfactory road access, drainage provision, etc, thereby hopefully avoiding adverse environmental impacts as far as possible. The use of planning conditions can also be monitored. The intention is also to take before and after photographs to assist in judging individual and cumulative landscape impact – but to date none of the dwellings so far approved have been constructed (no doubt due to the economic recession).

n.b. In the first year following adoption of the policy, 43 dwellings were approved in the Countryside. The average over a recent 5-year period was 40 approvals per annum (with not all of these resulting in the construction or creation of a new dwelling).