

FALKIRK

Local Development Plan²

Proposed Plan

Strategic Environmental Assessment Revised Environmental Report

Appendix 5: Record of Comments on the Environmental Report

September 2018



Falkirk Council

Table 1 - Environment Report Comments

Consultation Authority	Comment	Response
Historic Environment Scotland (HES)	We welcome the substantive and robust approach undertaken in support of the environmental assessment as presented in the Environmental Report. We note that this has been undertaken following a thorough baseline review of Falkirk’s environmental characteristics including a structured analysis of the area’s Cultural Heritage. We also note where proposals within the MIR have been thoroughly assessed against clear objectives identified following this baseline analysis. We particularly welcome where an emphasis on enhancement and mitigation measures is provided within the Environmental Report and welcome this as a means of improving the environmental performance of the plan.	Support welcomed
HES	We do, however, consider that the findings of the environmental assessment could be more clearly presented within the Environmental Report. In particular, we would recommend clearly delineating within the Environmental Report where individual sites may give rise to environmental effects. This is especially the case where new sites are being introduced into the plan.	<p>The sites causing environmental effects can be discerned by referring to the detailed SEA matrices at appendix 2 of the Environmental Report.</p> <p>In the Revised Environmental Report we have attempted to identify more clearly the discrete significant environmental effects associated with particular sites or growth areas.</p>
HES	We also consider that there is greater scope for identifying positive effects where applicable. We note that positive effects on Cultural Heritage caused by a renewed emphasis on town centres and place-making have not been substantively pulled into the headline findings at the start of the	Positive effects on cultural heritage caused by the policy approach

Consultation Authority	Comment	Response
	Environmental Report.	on town centres and place are mentioned in the Non-Technical Summary and the Revised Environment Report.
HES	We would also recommend providing a clear assessment of individual policies within the Environmental Report for the proposed plan.	This has been done within the Revised Environmental Report now that policies have been drafted for the Proposed Plan.
HES	We welcome where the introductory chapters of the Environmental Report clearly summarise the purpose of the Main Issues Report and its relationship to the SEA process. We would also recommend providing further information regarding consultation dates and timescales as part of these sections.	In the Revised Environmental Report further details regarding consultation dates have been inserted.
HES	We also consider that Sections 3 and 4 could more clearly pull through key policy messages set by other Plans, Programmes and Strategies and environmental issues identified within the Environmental Baseline document. We welcome the provision of this updated baseline document, and the robust analysis of Cultural Heritage issues presented within it. This document could, therefore, more clearly influence the analysis of the assessment findings presented later within the Environmental Report.	The key policy messages set by other plans, programmes and strategies and key environmental issues are clearly set out in the environmental baseline report. Repeating them within the main body of the Environmental

Consultation Authority	Comment	Response
		Report would, in our view, create unnecessary duplication.
HES	We welcome where the Cultural Heritage topic area has been scoped in to the environmental assessment within the report, and particularly support the thorough testing of proposals within the Main Issues Report against a clear Cultural Heritage objective within the Environmental Report findings.	Support welcomed.
HES	We note that thematic approaches rather than development plan policies have been assessed as part of this Environmental Report and, while we consider that this is appropriate in this instance, would recommend assessing individual policies as part of the environmental assessment for the Proposed Plan.	Assessment of policies has taken place within the Revised Environmental Report.
HES	We also note that those development plan allocations selected for inclusion within the plan have been assessed by group. While we understand that this approach may provide a more clear indication of the cumulative effects of the proposed housing strategy and its alternatives, we would recommend more clearly demonstrating where individual sites may give rise to environmental effects. This is especially the case within the summary of findings set out within the Environmental Report document.	Unpicking the environmental assessment matrices to provide an individual assessment for each development site in addition to a summary of cumulative effects would significantly increase the length of the Environmental Report and is not considered to be practical or proportionate to any benefit gained by reporting in this way.

Consultation Authority	Comment	Response
		Technical Report 2 – Site Assessment of the Proposed Plan provides a site by site analysis of positive and negative environmental effects.
HES	We particularly welcome the emphasis on mitigation and enhancement measures presented throughout the Environmental Report documents and consider that provides an effective means of improving the environmental performance of the plan.	Support welcomed.
HES	While we are broadly content with the outcomes of the assessment presented within the Environmental Report, we consider that opportunities have been missed to demonstrate where the proposals may give rise to positive effects on the historic environment. These include through a renewed emphasis on place-making, tourism opportunities and town centres included within the Main Issues Report.	The positive environmental effects on cultural heritage of our policies and proposals related to these areas have been highlighted in the Revised Environmental Report and Appendix 2.
Scottish Environmental Protection Agency (SEPA)	General Comments - We are content that the Environmental Report (ER) provides a satisfactory general assessment of the likely significant environmental effects of the Falkirk Local Development Plan Main Issues Report (MIR). Subject to the detailed comments below we are generally content with the assessment findings.	Comment noted.
SEPA	General Comments - We are satisfied that our scoping report comments have been taken into account in the preparation of the ER and welcome the response of Falkirk Council to our comments in Appendix 4 – Record of Scoping Comments.	Comment noted.
SEPA	Environmental Assessment - We note that flood risk has been identified as a significant effect and Flood Risk Assessments (FRAs) have been proposed as mitigation measures for a number of	This has been done.

Consultation Authority	Comment	Response
	sites, following our advice from the Call for Sites response provided in 2016. New information is now available and as a result the flood risk for some sites has changed. We have therefore revised our previous comments as appropriate in our MIR response, and would recommend that the Council updates the environmental assessment accordingly. Please refer to Appendix 1 – Flood risk comments of our MIR response for details (changes highlighted in yellow).	
SEPA	Environmental Assessment - Please also note, as part of the MIR response, our comments in relation to flood risk, protection/enhancement of the water environment and co-location for new sites (i.e. sites we have not commented on before for LDP2) and sites where there has been a change of boundary since the Call for Sites consultation. We would expect the Council to take these comments into account for the preparation of the Proposed Plan and revised ER.	Comment noted. This has been done.
SEPA	Environmental Assessment - It is not clear if the information from the Flood Risk Management Plans has been taken into consideration as part of the assessment as the baseline report refers to these still to be published. See our comments to the baseline information below for more details.	The baseline report will be updated. Flood Risk Management Plans have been taken into account in the Proposed Plan and the assessment.
SEPA	Monitoring - Paragraph 6.2.3 – we are content with the Council’s intention to use monitoring procedure already in place for monitoring the LDP. We are satisfied with this approach as it is in line with paragraph 4.49 of PAN1/2010 – SEA of Development Plans.	Support welcomed.
SEPA	Environmental Baseline Report - We note that some updates have been made to the baseline information since the first publication as part of the Scoping Report, however more up to date information was available at the time of the ER publication. It would have been useful if the Council took the time to review it as this may have been useful for the environmental assessment. While we support a proportionate approach and understand that the Council cannot keep up to date with live updates, it is important that the information is as up to date as possible at the time of assessment. We have therefore highlighted some areas where the Council could update their records and consider implications for the LDP.	Resource availability has curtailed our ability to comprehensively review the environmental baseline. However, we have made updates where these have been specifically flagged up by

Consultation Authority	Comment	Response
		consultees,
SEPA	Environmental Baseline Report, Water - The reference to the second round of River Basin Management Plan (RBMP) being expected to be published at the end of 2015 and the Flood Risk Management Plans being due to be published in 2016 (See Table 8). We hope that the new information was taken into consideration when carrying out the environmental assessment and the Council simply forgot to update the baseline information accordingly.	Comment noted. This has been updated in the baseline report. The information has been taken into account in the assessment.
SEPA	Environmental Baseline Report, Water - 3.3 The water section refers to classification up to 2014. The 2015 information is available in the Scotland Environment Website. Please note that we are testing a new system for gathering information for the LDP directly from our GIS system and would be happy to discuss it/test it with the Falkirk Council. We are intending to provide the Council with further information in relation to the water environment which could be used to inform the Proposed Plan development requirements. Please see our response to the MIR for further details.	Comment noted. The baseline report has been updated
SEPA	<p>Environmental Baseline Report, Waste - We note that the Main Issue 11 proposes to remove the safeguarding of site 97 for additional landfill capacity. We have therefore consulted our specialists in relation to capacity data and they have provided the following comments which may be of help.</p> <p>Table 4.6 on Page 24 is correct and aligns with the published data for Falkirk except for the business waste generated in 2012. We think that there may have been a mistake as there was an update to this data in Sept 2015 so the numbers may have been taken from the report before that date. Our published report has the following for 2012 = 126,972 tonnes.</p> <p>Page 24: “There were 33 operational waste management sites with the Council area in 2013 with an annual capacity of 3,356,030 tonnes”. This statement is correct according to our published data. It could be updated for 2014 and 2015 as follows:</p>	The Environmental Baseline Report will be updated as required.

Consultation Authority	Comment	Response
	<p data-bbox="439 357 1659 421"><i>“2014: There were 32 operational waste management sites with the Council area in 2014 with an annual capacity of 3,385,730 tonnes</i></p> <p data-bbox="439 456 1686 520"><i>2015: There were 32 operational waste management sites with the Council area in 2015 with an annual capacity of 3,342,730 tonnes”</i></p> <p data-bbox="439 555 1671 810">Page 25: “The requirement for the Forth Valley area in Table 1 of the Regional Capacity Table, is currently for an additional 200,000 tonnes of waste management infrastructure capacity in the Forth Valley area. The rolling 10 year landfill capacity for the Forth Valley area at December 2012 was over 3.4 million tonnes. The rolling 10 year landfill capacity requirement is for 2.7 million tonnes.” The 2013 SPP data (Table 1), as published on the SGov website, reports an additional 110,000 tonnes of additional capacity required for the Forth Valley, not 200,000 tonnes as given above. It is unclear where this figure has come from.</p> <p data-bbox="439 852 1682 959">We recommend that this paragraph is updated for 2014 data when the information on SPP data is published by the Scottish Government (SEPA has provided the data to the Scottish Government but it has not been published yet). We will be happy to assist you with this task.</p> <p data-bbox="439 1000 1666 1145">Please note that we publish landfill capacity data in Spotfire format. In this tool you can select the landfill sites and capacity table tab, and then use the filters on the left hand side to select the years and local authorities of interest (ctrl click to select >1 LA). You can also see a breakdown by insert, hazardous and non-hazardous landfill types:</p> <p data-bbox="439 1187 1370 1219">http://www.sepa.org.uk/data-visualisation/waste-sites-and-capacity-tool/</p> <p data-bbox="439 1260 1621 1327">The Spotfire tool shows that there was 2.77 million tonnes of total remaining capacity in the Forth Valley area as at 31 Dec 2014. Please note that while 2015 landfill capacity data is</p>	

Consultation Authority	Comment	Response																														
	<p>available in this tool, the SPP 2015 data analysis is not available yet for comparison.</p> <table border="1" data-bbox="443 392 1684 751"> <thead> <tr> <th data-bbox="443 392 712 580">Local Authority</th> <th data-bbox="712 392 864 580">Year</th> <th data-bbox="864 392 1077 580">Number of Sites</th> <th data-bbox="1077 392 1301 580">Annual Landfill Capacity (tonnes)</th> <th data-bbox="1301 392 1473 580">Total Waste Landfilled (tonnes)</th> <th data-bbox="1473 392 1684 580">Remaining Capacity as at 31 December (tonnes)</th> </tr> </thead> <tbody> <tr> <td data-bbox="443 580 712 624">Clackmannanshire</td> <td data-bbox="712 580 864 624">2014</td> <td data-bbox="864 580 1077 624">3</td> <td data-bbox="1077 580 1301 624"></td> <td data-bbox="1301 580 1473 624"></td> <td data-bbox="1473 580 1684 624"></td> </tr> <tr> <td data-bbox="443 624 712 667">Falkirk</td> <td data-bbox="712 624 864 667">2014</td> <td data-bbox="864 624 1077 667">9</td> <td data-bbox="1077 624 1301 667">1,042,400</td> <td data-bbox="1301 624 1473 667">352,426</td> <td data-bbox="1473 624 1684 667">2,775,213</td> </tr> <tr> <td data-bbox="443 667 712 710">Stirling</td> <td data-bbox="712 667 864 710">2014</td> <td data-bbox="864 667 1077 710">4</td> <td data-bbox="1077 667 1301 710">100,000</td> <td data-bbox="1301 667 1473 710"></td> <td data-bbox="1473 667 1684 710"></td> </tr> <tr> <td data-bbox="443 710 712 751">Grand total</td> <td data-bbox="712 710 864 751">2014</td> <td data-bbox="864 710 1077 751">16</td> <td data-bbox="1077 710 1301 751">1,142,400</td> <td data-bbox="1301 710 1473 751">352,426</td> <td data-bbox="1473 710 1684 751">2,775,213</td> </tr> </tbody> </table>	Local Authority	Year	Number of Sites	Annual Landfill Capacity (tonnes)	Total Waste Landfilled (tonnes)	Remaining Capacity as at 31 December (tonnes)	Clackmannanshire	2014	3				Falkirk	2014	9	1,042,400	352,426	2,775,213	Stirling	2014	4	100,000			Grand total	2014	16	1,142,400	352,426	2,775,213	
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SEPA	<p>Appendix 2 – Detailed Assessment Matrices - In general we note that where the issue relates to presenting a policy in different way (incorporated with others or on its own), the assessment resulted in neutral effects. This is the case, for example, for Main Issue 1 – Making Better Places – Policy and Guidance and Main Issue 2 – Green Network – green infrastructure and new development. While we agree that in terms of comparison there is a neutral effect, the policies and guidance could lead to significant effects and therefore we would expect this to be covered in the assessment of the policies as part of the revised ER. We will provide comments on the Adopted Plan policies in due course.</p>	Comment noted.																														
SEPA	<p>Appendix 2 – Detailed Assessment Matrices – Employment Locations – Grangemouth Investment Zone - We welcome the proposed land contamination remediation for a number of sites (e.g. Development of the Earlsgate Park, Glensburgh, South Bridge Street, Grangemouth Docks 1-3 & 5, Bo’ness Road North & South and Wholeflats Road (087- 090, 128,162,190, 200-202) sites could have a cumulatively significant positive effect on soil (through remediating historic contamination). In particular, please note our comments in the MIR response in relation</p>	Comment noted, this will be amended in the revised environmental report.																														

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	<p>to site 91- Wholeflats Business Park because according to our records it is 357m from an historic airfield. We recommend that the Falkirk Council Environmental Health (Contaminated Land Officer) check the Council's historic maps. If the site does lie within the boundary of the former airfield then there may be the potential for radioactive contaminants.</p>	
SEPA	<p>Appendix 2 – Detailed Assessment Matrices – Employment Locations – Grangemouth Investment Zone - Page 79 – We note the comment that any new Carbon Capture and Storage Power Station in Grangemouth should ensure its feed stock is not delivered by road to mitigate significant negative effects on air and material assets. We assume the alternative would be transport by water. The environmental effects would have to be considered for this aspect as well.</p>	<p>Comment noted, this will be amended in the revised environmental report.</p>
SEPA	<p>Issue 7 – Town Centres - Falkirk Town Centre - The description explains that retaining the Falkirk Gateway as a commercial centre in the network of centres would lessen the positive environmental effects on population and human health, air, climatic factors, material assets and cultural heritage described in the preferred option. The score is exactly the same, however we note a slight change of colour to show the difference.</p> <p>The option in Grahamston and East End clearly identifies air quality issues due to the Air Quality Management Area (AQMA) but no mitigation is proposed for this in the mitigation column.</p>	<p>The scoring and colour coding of both options are meant to be identical.</p> <p>We have noted in the Revised Environmental Report that significant negative effects on air are only likely to be capable of mitigation through action to improve air quality in the Town Centre, through the Air Quality Management Plan. Improvement may</p>

Consultation Authority	Comment	Response
		be achievable through the plan's wider sustainable transport policies, but more likely in the longer term through cleaner vehicle technologies.
SEPA	Issue 7 – Town Centres - District and Local Centres- No air mitigation measures proposed despite the significant negative effects identified.	See above.
SEPA	Issue 10 – Energy - Heat Networks - We note the significant negative effects in relation to air and welcome the mitigation proposed to word the new energy development policy appropriately so that any new heat sources developed to serve potential new heat networks do not adversely impact on the air quality within Grangemouth AQMA to mitigate significant negative effects on air. We are intending to provide comments on the Adopted Plan policies to reflect new guidance and help the Council with the revisions. A separate response will be submitted in due course.	Comment noted.
SEPA	Issue 10 – Energy - Low and Zero Carbon Generating Technology - 4.8 The assessment states: 'The enforced deployment of Low and Zero Carbon Generating Technology (LZCGT) in all new development could have a cumulatively significant positive effect on material assets (through increasing capacity to generate energy from renewable sources) however, almost counter intuitively, this will not lead to a proportionate reduction in the production of greenhouse gasses from new development as the policy requires a proportion of overall energy efficiency savings required through building standards to be met through provision of LZCGT. Therefore new buildings will be less energy efficient than they would have been without this policy and with the required proportion increased from 10% – 15% the revised policy will exacerbate this effect'. We would welcome further clarification on this comment. We also note that the text in page 64 of the MIR issue 10 actually refers to an increase to 12% rather than 15%.	Reference should be to a 12% reduction rather than a 15% reduction. In terms of the effect of the LZCGT policy, the Revised Environmental Report clarifies that this policy will have no overall effect on climactic factors since the LZCGT requirement is part of the existing

Consultation Authority	Comment	Response
		emissions reduction requirement, rather than additional to it.
SEPA	Issue 11 – Onshore Gas, Minerals and Waste - Onshore Gas and Minerals - We note the negative score for the onshore gas and minerals for all the SEA topics, however we consider that there could be more significance which still has to be determined. Please note our comments in MIR Response and note that we will provide comments on the Adopted Plan policy RW03 which we would expect to be taken into account for the policies environmental assessment in the revised ER.	The policy specifically precludes development which causes significant adverse impact on the environment, so it is reasonable in our view to conclude that the policy will not cause any significant negative environmental effects.
SEPA	Issue 11 – Onshore Gas, Minerals and Waste – Waste - We agree with the assessment. Please see our comments on this issue in the MIR response and note our comment on capacity and landfill data in Section 3 of this response. We will also provide comments on the Adopted Plan policy RW08 which we would expect to be taken into account for the policies environmental assessment in the revised ER.	Comment noted.
SEPA	Appendix 4 – Record of Scoping Comments - Page 13 - The response to our comments in relation to linking the effects and the measures states: ‘For the purposes of the environmental assessment of the Main Issues Report a best case/worst case scenario methodology has been used i.e. significant negative environmental effect are still noted as significant even if mitigation is possible in an effort to encourage mitigation within the Proposed Plan. For example if a site could have an impact on protected species effects are noted as significant and negative. These effects can be reduced to non-significant if appropriate mitigation is included at Proposed Plan stage’. We are satisfied with this approach (also applied to significant positive effects) as it makes the process more transparent and shows what the impacts are if mitigation/enhancement is	Comment noted.

Consultation Authority	Comment	Response
	not applied. We however recommend making this approach clearer in the main text of the ER and would like to discuss with the Council how this is going to be achieved in the next stage of the plan.	
SEPA	Appendix 3 – Detailed Monitoring Proposals - We note the comment in relation to Climatic Factors – Climate change projections: ‘Once an adequate understanding of the impacts of future climate change and measures to improve resilience to it is achieved, detailed monitoring proposals will be able to be formed’. Please note that SEPA is currently developing a new SEA guidance on climatic factors, in addition to the 2010 Consideration of Climatic Factors within SEA (already available at http://www.gov.scot/Publications/2010/03/18102927/0). The new guidance intends to be more tailored to local issues which may help with detailed monitoring proposals.	Comment noted.
SEPA	Appendix 4 – Record of Scoping Comments - We also note in Page 14 ‘The majority of mitigation measures are likely to be incorporated into site schedules within the LDP2 Proposed Plan. This kind of table may work better within the revised environmental report’. We agree and look forward to view the revised ER in due course.	Comment noted. Mitigation measures are listed within the Revised Environmental Report, along with information on how they are to be incorporated into the Proposed Plan.
Scottish Natural Heritage (SNH)	Summary of likely future changes to environment without the plan - We agree with the summary of likely future changes to the environment in the absence of a reviewed and updated Local Development Plan (LDP).	Comment noted.
SNH	Assessment of Significant Environmental Effects - Overall Vision - Paragraph 2 (Predicted Environmental Effect) on page 20 notes that the growth strategy will lead to increased traffic growth, use of natural resources and increased pressure of environmental infrastructure. While it will be impossible to completely avoid or mitigate these effects, the mitigation set out in paragraph 3 (Enhancement and Mitigation) appears unlikely to help Falkirk achieve the Vision of	Comment noted. Reference to these policy approaches is added to the mitigation section.

Consultation Authority	Comment	Response
	<p>a sustainable place. There are a number of policy approaches included in the MIR that would help to mitigate effects but these are not included here, e.g. active travel infrastructure, updated policy approach to renewables and so on.</p>	
SNH	<p>Assessment of Significant Environmental Effects - CSGN and Falkirk Greenspace - Paragraph 3 (Enhancement and Mitigation) on pages 26 and 27 sets out a requirement for appropriate assessment in relation to a number of opportunities. The requirement for appropriate assessment will be informed by Habitats Regulations Appraisal (HRA) and our advice at this stage is that preceding stages of HRA should be carried out before need for appropriate assessment is established. For proposals and project-specific caveats and mitigation, this will mean that applications should be accompanied by reports to inform HRA to allow Falkirk Council to undertake HRA.</p> <p>This would apply to assessment of sites under Main Issue 5 (pages 33 to 54) and Main Issue 6 (pages 54 to 58) unless connectivity with Natura 2000 sites has already been confirmed in the HRA Record for LDP1 for sites that are carried forward unchanged in proposed extent and use from LDP1 to LDP2.</p>	<p>Comment noted. The HRA has informed the identification of connectivity with natura 2000 sites, and the inclusion of mitigation wording in the Proposed Plan.</p>
SNH	<p>Assessment of Significant Environmental Effects - Protected Habitats - Paragraph 3 (Enhancement and Mitigation) on page 30 includes consultation with SNH as a stage in designing in acceptable mitigation. As the topic in this section is local protected sites, our Service Level Statement¹ process should be followed and the guidance on our website should be used in place of consultation.</p>	<p>Comment noted.</p>
SNH	<p>Assessment of Significant Environmental Effects - Main Issue 9: Infrastructure - The Grangemouth Flood prevention scheme should be accompanied by a project specific report to inform Habitats Regulations Appraisal (paragraph 3, page 62) that will allow Falkirk Council to demonstrate it can be carried out without adverse effect on site integrity.</p> <p>This would apply to assessment of sites under Main Issue 10 (pages 64 to 65), particularly</p>	<p>Comment noted. The Grangemouth FPS, although referenced in the Proposed Plan, is not formally identified as a proposal.</p>

Consultation Authority	Comment	Response
	proposals at Grangemouth Docks and for the Carbon Capture and Storage facility allocated by National Planning Framework 3 (NPF3).	
SNH	Proposals for Monitoring - We agree with the monitoring proposals set out on page 69 of the Environmental Report.	Support welcomed
SNH	<p>Appendix 1 – Environmental Baseline Report - We recommend that paragraph 2.1.1 is updated by the addition of the Wildlife and Natural Environment (Scotland) Act 2013. This scope of this Act includes issues relevant to preparation of the LDP, including protected species and invasive non-native species.</p> <p>In addition to the Scottish Forestry Strategy we recommend that Scottish Government’s Control of Woodland Removal Policy is also included as a relevant national policy.</p>	Comment noted. The baseline report has been updated.
SNH	Appendix 2 – Detailed SEA matrices - Main Issue 1: Making Better Places – Policy & Guidance - The assessment of both preferred and alternative approaches notes that environmental effects are unlikely. Considered alongside the assessment of Main Issue 1: Making Better Places – Communities and Place, we believe that this assessment requires review. A consolidated policy should, as noted in paragraph 3.02 of the MIR, improve the response to design and placemaking issues with associated environmental benefits.	We remain of the view that consolidation of design policies alone is unlikely to have any associated environmental benefits, this will simply allow developers to have one point of policy reference rather than several. Nonetheless, in the Revised Environmental Report, the new placemaking policy PE01 is assessed as having significant positive effects across a

Consultation Authority	Comment	Response
		range of environmental areas.
SNH	Appendix 2 – Detailed SEA matrices - Main Issue 2: Green Network – Green Infrastructure and New Development - The assessment of both preferred and alternative approaches notes that environmental effects are unlikely. In reference to paragraph 3.19 of the MIR, which states that the preferred approach will provide a more integrated approach to opportunities, we consider that the preferred approach is likely to have positive environmental effects.	We remain of the view that consolidation of guidance relating to green infrastructure alone is unlikely to have any associated environmental benefits, this will simply allow developers to have one point of policy reference rather than several.
SNH	Appendix 2 – Detailed SEA matrices - Main Issue 2: Green Network – Protected Habitats - As this issue relates to local designated sites, consultation with SNH should not be relied on as mitigation.	Comment noted.
SNH	Appendix 2 – Detailed SEA matrices - Main Issue 4: Existing Housing Land Supply and Stalled Sites - The assessment of both preferred and alternative approaches notes that environmental effects are unlikely. While we agree with your assessment on positive and negative effects associated with development at these particular sites no longer occurring, de-allocation of these sites cannot be considered alone. While there are difficulties in predicting secondary effects of de-allocating sites, the requirement to allocate other sites to meet needs must be considered as part of the assessment of this issue.	The environmental effects of allocating alternative sites to meet needs cannot be meaningfully assessed without knowing which sites are proposed. The assessment of these effects is most meaningfully undertaken under main issue 5.

Consultation Authority	Comment	Response
SNH	Appendix 2 – Detailed SEA matrices - Main Issue 7: Town Centres – Falkirk’s Network of Centres - We agree with the assessment of the preferred and alternative approaches. However, an important positive effect of the preferred approach for population and human health would also be the increase in activity that is generally associated with a reduction in car use.	Comment noted.
SNH	Appendix 2 – Detailed SEA matrices - Main Issue 10: Energy – Low Carbon Energy - The assessment of the alternative approach is neutral for all SEA topics as sites would be developed in the absence of relocation of the Carbon Capture & Storage (CCS) proposal. This alternative appears to be closely related to Main Issue 6: Employment Locations – Grangemouth Investment Zone, which itself was assessed as having a range of positive and negative environmental effects. We are therefore unclear on the neutral outcome for this issue.	This alternative is attempting to look at the effect of developing a CCS plant within the INEOS site rather than at Grangemouth Docks. Are there any additional effects of developing a CCS plant there over and above the effects of development already planned at INEOS? Our assessment is that there will be no additional effects over and above those already identified in Main Issue 6. Therefore a neutral effect has been recorded.
SNH	Appendix 3 – Detailed monitoring proposals - In general, we agree with the detailed monitoring proposals set out in Appendix 3. However, our comments above on HRA requirements apply to the rationale for Natura 2000 sites set out in this Appendix.	Comment noted.
SNH	Appendix 4 – Record of scoping comments - We note and welcome the handling of our scoping	Support welcomed.

Consultation Authority	Comment	Response																												
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Persimmon Homes East of Scotland	<p>Main Issue 6 covers the strategic environmental assessment of: Sustainable Community Growth – Braes Rural South – Wallacestone, Redding and Reddingmuirhead. FC’s preferred development option is for no further housing development beyond existing commitments at Redding Park and Hillcrest (sites 031 and 056), other than infill and redevelopment opportunities which may arise.</p> <p>In assessing this preferred option FC has scored this option as identified in the table below. Alongside this is how the Council has scored the reasonable Alternative 1 option at Standrigg Road.</p> <table border="1" data-bbox="443 687 1686 959"> <thead> <tr> <th>Effect</th> <th>Annotation</th> <th>Preferred</th> <th>Standrigg Road</th> </tr> </thead> <tbody> <tr> <td>Significant negative</td> <td>--</td> <td>4</td> <td>3</td> </tr> <tr> <td>Negative</td> <td>-</td> <td>3</td> <td>4</td> </tr> <tr> <td>Neutral</td> <td>N</td> <td>0</td> <td>1</td> </tr> <tr> <td>Unknown</td> <td>?</td> <td>0</td> <td>0</td> </tr> <tr> <td>Positive</td> <td>+</td> <td>3</td> <td>5</td> </tr> <tr> <td>Significant positive</td> <td>++</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>The environmental assessment for the Standrigg Road alternative provides a much more positive impact than the preferred option. If, for a more understandable comparison, a simple numerical approach is given to the scoring (significant negative = -2, significant positive = +2, and so on), then the following scores demonstrate the value of each option.</p> <ul style="list-style-type: none"> • Preferred Option = Score of -8 on environmental grounds. • Alternative 1 = Score of -5 on environmental grounds. 	Effect	Annotation	Preferred	Standrigg Road	Significant negative	--	4	3	Negative	-	3	4	Neutral	N	0	1	Unknown	?	0	0	Positive	+	3	5	Significant positive	++	0	0	<p>This is an interesting analysis, however, using this methodology assumes that a positive effect on the environment (reinforcing the habitat network) cancels out the impact of a negative effect on the environment (increased noise from road traffic). Quite clearly this is not the case and is one of the reasons why we have not used a numerical methodology for noting environmental effects.</p> <p>The analysis is also made under the incorrect assumption that the Standrigg Road site is an alternative to developing the Hillcrest and Redding Park sites. This is not the case, the development of</p>
Effect	Annotation	Preferred	Standrigg Road																											
Significant negative	--	4	3																											
Negative	-	3	4																											
Neutral	N	0	1																											
Unknown	?	0	0																											
Positive	+	3	5																											
Significant positive	++	0	0																											

Consultation Authority	Comment	Response
		<p>the Standrigg Road site is an alternative to promoting no further growth over and above the Hillcrest and Redding Road sites as clearly explained in paragraph 4.34 of the MIR</p> <p>Therefore even using the flawed suggested alternative assessment methodology the Standrigg Road alternative would produce a cumulative negative score of -13 rather than the -8 of the preferred option.</p> <p>Clearly the Standrigg Road alternative provides a much more negative impact than the preferred option.</p>
Grangemouth Chemical	We note with concern that the PADHI+ system has been replaced by a new planning web app which as stated by Falkirk Council “does not appear to have the ability to record the numbers of	Comment noted.

Consultation Authority	Comment	Response
Cluster Companies (GCCC)	historic consultations or the results of those consultations. The Council may have to consider developing its own monitoring system.” Consequently it is requested that Falkirk Council advise us as to the implications of this deficiency and in particular whether it could lead to the possibility of the cumulative development of small sensitive sites within the vicinity of chemical installations.	
GCCC	Table 4.24. It is noted from this table that as at 2013 there were 8972 persons within the revised Major Hazard Consultation Distances at the CalaChem site in Grangemouth. We restate our support to the intention to carry forward the existing policy on major hazards and pipelines with adjustments as necessary to comply with all the relevant regulations.	Comment noted
Wallace Land Investments (WLI)	<p>Environmental assessment of site 131 Bensfield Farm – Biodiversity - Development of the site would have a positive impact on biodiversity ...through reinforcing broadleaved woodland habitat... Development will also reinforce and enhance existing areas of ecological value around the boundary of the site. The creating of a robust green belt to the east would also add to the ecological value of the site.</p> <p>The Council states that development would have a significantly negative impact due to a ...potential adverse impact on legally protected Species. Development would be supported by an Ecological Survey, including a review of the sites habitat. Mitigation measures will be incorporated into the development and quality habitat will be protected and enhanced. The majority of the site is in agricultural use and there is limited habitat to suggest that protected species inhabit or use the site. The Council also states that there would be a negative impact ...due to loss of trees and hedges. Development of the site will be supported by an Arboricultural Assessment and will protect and enhance quality trees/planting on site.</p> <p>It is therefore considered that the Council’s scoring should be revised from a significant negative effect to neutral/negligible effect.</p>	<p>Environmental Assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p> <p>Details of proposed mitigation are also set out within the detailed assessment matrices. We agree the effect of mitigation in this instance would be likely to result</p>

Consultation Authority	Comment	Response
		in changing the potential significant negative effects on biodiversity to neutral/ negligible.
WLI	<p>Environmental assessment of site 131 Bensfield Farm – Population and Human Health - The development would have a positive effect on population and human health ...through improving the quality and connectivity of the green network... and ...through creation of new open space which addresses existing deficiencies in access to open space in the local area... Open space provision would be provided on site, in accordance with the Council’s requirements, including play equipment. Development of the site would also provide affordable homes for the local community, and direct and indirect job creation.</p> <p>The Council states that ...due to a marginal increase in road noise from traffic... there will be a negative effect on population and human health. The site is situated adjacent to an existing busy road network. Increases in vehicle movements would be marginal in the Council’s view. It is therefore considered that the Council’s scoring should be revised from a negative effect to neutral/negligible effect.</p>	<p>Provision of affordable homes and direct and indirect job creation are not considered to be environmental effects.</p> <p>It is a matter of professional judgement as to which negative effects are negligible and which are negative. We have consistently recorded a marginal increase in road traffic noise as a negative environmental effect on population and human health and are satisfied that this is an appropriate approach. Recording these effects as negligible would in our view run the risk of masking potential</p>

Consultation Authority	Comment	Response
		cumulative negative effects.
WLI	<p>Environmental assessment of site 131 Bensfield Farm – Soil - Development would have a positive impact on soil ...through making safe unstable ground.</p> <p>The Council states that there will be a significant negative effect on soil ...through loss of prime quality agricultural land. The benefits of the development would outweigh that of the loss of prime agricultural land on this occasion. While some negative impact is inevitable, development of the site to meet the housing land requirement and spatial strategy of the emerging LDP2 would accord with SPP paragraph 80. It is considered that the Council's scoring should be revised from a significant negative effect to negative effect.</p>	<p>It is not the purpose of the Environmental Report to recommend whether the benefits of development would outweigh the negative effects of developing on prime quality agricultural land. The purpose of the Environmental Report is to report on the environmental effects of development to inform decision making within LDP2.</p> <p>We have consistently highlighted the loss of prime quality agricultural land as a significant negative environmental effect on soil and are satisfied that this is an appropriate approach.</p>
WLI	Environmental assessment of site 131 Bensfield Farm – Water - The Council states that there	Environmental

Consultation Authority	Comment	Response
	<p>would be a negative impact on water ...due to potential surface water flood risk. Development will incorporate Sustainable urban Drainage System (SuDS) located in the south west which will restrict water discharge to greenfield run-off rates. SuDS will be provided in accord with Scottish Water and Council requirements. It is therefore considered that the Council's scoring should be revised from a negative effect to a positive effect.</p>	<p>Assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p> <p>Details of proposed mitigation are also set out within the detailed assessment matrices. With an appropriately scoped drainage strategy and an appropriately designed surface water management system, the environmental effect on water is likely to be neutral.</p>
WLI	<p>Environmental assessment of site 131 Bensfield Farm – Air - The Council states that there would be a negative impact on air ...due to an increase in traffic related air pollution. Some increase in traffic as a result of the development is inevitable and would be no greater than similar sized sites in the area. The Council's scoring is agreed with.</p>	<p>Comment noted.</p>

Consultation Authority	Comment	Response
WLI	<p>Environmental assessment of site 131 Bensfield Farm – Climatic Factors - The Council states that there will be a negative effect on climatic factors ...due to increased release of greenhouse gases. Any increase would however be marginal and development would incorporate off-setting low and zero carbon generating technologies. The site would be well integrated into and serviced by the existing settlement. The sustainable location of the site would promote walking, cycling and public transport. It is therefore considered that the Council's scoring should be revised from a negative effect to neutral/negligible effect.</p>	<p>Environmental Assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p> <p>It is a matter of professional judgement as to which negative effects are negligible and which are negative. We have consistently recorded an increase in greenhouse gases caused by development as a negative environmental effect on climatic factors and are satisfied that this is an appropriate approach. Recording these effects as negligible would in our view run the risk of masking potential</p>

Consultation Authority	Comment	Response
		cumulative negative effects.
WLI	<p>Environmental assessment of site 131 Bensfield Farm – Material Assets - Development would have a positive impact on material assets ...through increasing the amount of LZCGT... and ...improving the quality of the active travel network... Development would provide a high quality built environment, which would utilise existing sustainable transport services. The development would provide on-site open space, including play provision. Development would also deliver affordable homes for the local community.</p> <p>The Council states that development would have a negative effect on material assets ...due to increased use of primary resources in the construction process...and ...increased vehicular traffic on the local road network. Sustainable building materials would be utilised in the building process and LZCGT integrated into the development. Any increase in vehicle movements would be marginal. It is therefore appropriate to revised the Council’s scoring from a negative to a neutral/negligible effect.</p>	<p>An increase of provision in open space, for the purposes of this environmental assessment, has been assessed as a positive effect on population and human health rather than material assets.</p> <p>Delivery of affordable homes is not considered to be an environmental effect.</p> <p>It is not possible to assess at MIR stage whether the proposed development at Bensfield would provide a high quality built environment or not, although we agree that any improvement of overall townscape quality</p>

Consultation Authority	Comment	Response
		<p>would be a positive effect on material assets.</p> <p>It is a matter of professional judgement as to which negative effects are negligible and which are negative. We have consistently recorded an increase in vehicular traffic on the road network as a negative environmental effect on material assets and are satisfied that this is an appropriate approach. Recording these effects as negligible would in our view run the risk of masking potential cumulative negative effects.</p> <p>We agree that use of sustainable building materials would reduce the use of primary materials in the</p>

Consultation Authority	Comment	Response
		<p>construction process and help to mitigate negative effects on material assets, however, environmental assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p>
WLI	<p>Environmental assessment of site 131 Bensfield Farm – Cultural Heritage - The Council states that there would be a negative effect on cultural heritage ...due to potential negative impact on features of archaeological interest. There is no scheduled or known deposits on the site. The potential for unknown deposits will be addressed through an appropriate scheme of archaeological investigation, in agreement with the Council. Given the distance and scheme of proposed landscaping works, there would be no impact on the setting of any listed buildings. The Council's scoring should therefore be revised from a negative to a neutral/negligible score.</p>	<p>The Council's archaeologist has noted that a Roman Coin has been found on the site, it was therefore considered that without further investigation negative effects on cultural heritage were possible. We accept that with appropriate mitigation effects are likely to be</p>

Consultation Authority	Comment	Response
		<p>neutral, however, environmental assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p>
WLI	<p>Environmental assessment of site 131 Bensfield Farm – Landscape - The Council states that there will be a significant negative effect on landscape ...through loss of greenbelt land which adversely affects the landscape setting of Stenhousemuir and Carronshore... and ...due to adverse landscape and visual impact on an area of low sensitivity to landscape change. The existing green belt boundary to the east of the settlement is relatively weak. Development of the site would include landscaping along the eastern boundary which would establish a ...clearly identifiable visual boundary markers based on landscape features in accordance with SPP paragraph 51. The site would be well integrated into the existing settlement and would include appropriate screening so that it has no impact on the existing landscape character.</p> <p>It is therefore appropriate to revise the Council’s scoring from a negative to a positive impact.</p>	<p>We have consistently reported the loss of greenbelt land as a significant negative environmental effect and are satisfied that this is an appropriate approach.</p> <p>We accept that the negative effects on landscape caused by adverse landscape and visual impact in an area of low sensitivity to landscape change can be</p>

Consultation Authority	Comment	Response
		<p>fully mitigated, however, environmental assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p>
WLI	<p>Environmental assessment of site 131 Bensfield Farm - The review demonstrates that the Site scores more positively against all but one of the environmental topic areas. The Site also scores more positively than the Council's preferred option and other alternatives in the MIR. The Site represents a sustainable development and would have an overall positive impact on the environment.</p>	<p>This statement appears to be made under the incorrect assumption that the Bensfield Farm site is an alternative to developing the currently allocated sites (026-028, 062 & 094). This is not the case, the development of the Bensfield Farm site is an alternative to promoting no further growth over and above the currently allocated sites as clearly explained</p>

Consultation Authority	Comment	Response
		<p>in paragraph 4.48 of the MIR.</p> <p>The environmental effects of developing the Bensfield Farm site would accumulate with those caused by the currently allocated sites, so whilst it is correct to say that the development would be likely to result in additional positive effects, it would could also result in additional negative effects.</p>
Miller Homes	<p>Environmental Assessment of site 103 North Bank Farm – Biodiversity - The development will have a positive impact on biodiversity ...due to opportunity to improve the function and connectivity of the habitat network. The existing hedgerow boundary, minor watercourse and pond feature will be retained and enhanced as part of the developments green network.</p> <p>The Council states that there would be a significant negative effect on biodiversity ...due to potential for adverse impact on legally protected species and potential loss of Firth of Forth SPA supporting habitat. The site is in agricultural use and has limited existing habitat potential for accommodating protected species. Habitat worthy of retention, which is largely the sites boundary, would be retained and enhanced as part of the development. Development would in</p>	<p>Environmental Assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p>

Consultation Authority	Comment	Response
	<p>any case be supported by an Ecological Survey, which would outline a scheme of mitigation measures (if required). Given the existing ecological potential of the site, development will result in an overall positive impact as the result of connecting and enhancing habitat and wildlife corridors on the site. It is therefore considered that the scoring for Option B should be revised from a significant negative effect to a positive effect.</p>	<p>Details of proposed mitigation are also set out within the detailed assessment matrices.</p> <p>It remains to be seen whether the site acts as supporting habitat to the Firth of Forth SPA. Is this would only be clarified through the production of an ecological survey, it would be premature to speculate whether this significant negative environmental effect could be fully mitigated</p>
Miller Homes	<p>Environmental Assessment of site 103 North Bank Farm – Population and human health - The development would have a positive effect on population and human health ... due to improvement and expansion of the green network. Open space provision would be provided on site, in accordance with the Council's requirements, including play equipment. The development would connect into existing path networks to the north and west, promoting access to the outdoors. Development of the site would also provide affordable homes for the local community, and direct and indirect job creation.</p>	<p>Provision of affordable homes and direct and indirect job creation are not considered to be environmental effects.</p>

Consultation Authority	Comment	Response
	<p>The Council states that ...due to a marginally increased traffic noise and possible odours from agricultural buildings there will be a negative effect on population and human health. The site is situated adjacent to an existing busy road network. Increases in vehicle movements would be marginal in the Council's view. The layout of the development would retain an appropriate level of separation to the existing farm steading to the south east of the site. Although it is anticipated that effects would be marginal, the Councils scoring is agreed with for Option B.</p>	
Miller Homes	<p>Environmental Assessment of site 103 North Bank Farm – Soil - Development would have a positive impact on soil ...through making safe unstable ground.</p> <p>The Council states that there will be a significant negative effect on soil ...due loss of prime quality agricultural land. The benefits of the development would outweigh that of the loss of prime agricultural land on this occasion. While some negative impact is inevitable, development of the site to meet the housing land requirement and spatial strategy of the emerging LDP2 would accord with SPP paragraph 80. It is considered that the scoring for Option B should be revised from a significant negative effect to negative effect.</p>	<p>It is not the purpose of the Environmental Report to recommend whether the benefits of development would outweigh the negative effects of developing on prime quality agricultural land. The purpose of the Environmental Report is to report on the environmental effects of development to inform decision making within LDP2.</p> <p>We have consistently highlighted the loss of prime quality agricultural land as a significant negative environmental</p>

Consultation Authority	Comment	Response
		effect on soil and are satisfied that this is an appropriate approach.
Miller Homes	<p>Environmental assessment of site 103 North Bank Farm – Water - Development would have a positive impact on water ...due to potential to promote watercourse restoration and to reduce surface water flooding. The only water features on Option B are a small ponding area in the north east and watercourse in the west. These features would be incorporated and enhanced as part of the development. SuDS would be integrated into these areas. Development would result in wider biodiversity improvements and a positive impact on the water environment.</p> <p>The Council states that there would be a negative impact on water ...due to potential flood risk... and ...potential to adversely impact on the water environment. Only a small part of Option B is identified as at risk to surface water flooding. Development will incorporate Sustainable urban Drainage System (SuDS) located in the north east and west which will restrict water discharge to greenfield run-off rates. SuDS will be provided in accord with Scottish Water and Council requirements. Drainage will be designed to prevent a oring for Option B should be revised from a negative effect to a neutral/negligible effect.ny adverse impact on the water environment. It is therefore considered that the sc</p>	<p>SEPA have highlighted that these is a ditch running along the western boundary of the site and that there are opportunities for watercourse restoration.</p> <p>Environmental Assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p> <p>Details of proposed mitigation are also set out within the detailed assessment matrices.</p>

Consultation Authority	Comment	Response
		<p>We have consistently highlighted the potential for fluvial flood risk as a significant negative environmental effect. A culverted tributary of the Carriden Burn which bounds the south western corner of the site is a potential source of fluvial flood risk.</p> <p>With an appropriately scoped drainage strategy and an appropriately designed surface water management system, the negative environmental effects caused by surface water flooding are likely to be recorded as neutral.</p>
Miller Homes	Environmental assessment of site 103 North Bank Farm – Air - The Council states that there would be a negative impact on air ...due to an increase emissions from transport. Some increase in traffic as a result of the development is inevitable and would be no greater than similar sized sites in the area. The Council's scoring is agreed with.	Comment noted.
Miller Homes	Environmental assessment of site 103 North Bank Farm – Climatic Factors - The Council states that there will be a negative effect on climatic factors ...due to increased release of greenhouse	Environmental Assessment at MIR stage

Consultation Authority	Comment	Response
	<p>gases. Any increase would however be proportionate to the scale of development. The development would incorporate off-setting low and zero carbon generating technologies. The site would be well integrated into and serviced by the existing settlement and sites to the north and west. Walking/Cycling routes would be enhanced and promoted as part of the development. Bus services and local amenities are within walking distance of the site. It is therefore considered that the scoring for Option B should be revised from a negative effect to neutral/negligible effect.</p>	<p>is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p> <p>It is a matter of professional judgement as to which negative effects are negligible and which are negative. We have consistently recorded an increase in greenhouse gases caused by development as a negative environmental effect on climatic factors and are satisfied that this is an appropriate approach. Recording these effects as negligible would in our view run the risk of masking potential cumulative negative effects.</p>

Consultation Authority	Comment	Response
Miller Homes	<p>Environmental assessment of site 103 North Bank Farm – Material Assets - Development would have a positive impact on material assets ...through increasing the amount of LZCGT. Development would provide a high quality built environment, which would utilise existing sustainable transport services. The development would provide on-site open space, including play provision. Development would also deliver affordable homes for the local community. The Council states that development would have a negative effect on material assets ...due to increased use of primary resources in the construction process...and ...increased vehicular traffic on the local road network. Sustainable building materials would be utilised in the building process and LZCGT integrated into the development. Any increase in vehicle movements would be marginal in the context of the developments scale. It is therefore appropriate to revise the scoring for Option B from a negative to a neutral/negligible effect.</p>	<p>An increase of provision in open space, for the purposes of this environmental assessment, has been assessed as a positive effect on population and human health rather than material assets.</p> <p>Delivery of affordable homes is not considered to be an environmental effect.</p> <p>It is not possible to assess at MIR stage whether the proposed development at North Bank Farm would provide a high quality built environment or not, although we agree that any improvement of overall townscape quality would be a positive effect on material assets.</p>

Consultation Authority	Comment	Response
		<p>It is a matter of professional judgement as to which negative effects are negligible and which are negative. We have consistently recorded an increase in vehicular traffic on the road network as a negative environmental effect on material assets and are satisfied that this is an appropriate approach. Recording these effects as negligible would in our view run the risk of masking potential cumulative negative effects.</p>
		<p>We agree that use of sustainable building materials would reduce the use of primary materials in the construction process and help to mitigate negative</p>

Consultation Authority	Comment	Response
		effects on material assets, however, environmental assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.
Miller Homes	Environmental assessment of site 103 North Bank Farm – Cultural Heritage - There are no known cultural heritage interests on or within close proximity of the site. The Council's scoring is agreed with.	Comment noted.
Miller Homes	Environmental assessment of site 103 North Bank Farm – Landscape - The Council states that there will be a significant negative effect on landscape ... due to adverse landscape/ visual impact in an area of high landscape sensitivity and significant impact on the landscape setting of Bo'ness. A section of high and prominent land to the south of the site has been omitted from this revised proposal. The development layout would avoid development beyond the extent of adjacent development to the west. The southern and eastern boundaries would be enhanced by a scheme of planting, which would establish a ... clearly identifiable visual boundary markers based on landscape features... in accordance with SPP paragraph 51. The visual and landscape impact on the development will be mitigated by a number of measures. A large proportion of development would be situated to the north of Borrowstoun Road, which is less prominent in the landscape. It is therefore appropriate to revise the Council's scoring from a significant negative impact to a negative impact.	<p>We have consistently reported the loss of greenbelt land as a significant negative environmental effect and are satisfied that this is an appropriate approach.</p> <p>We accept that the significant negative effects on landscape caused by adverse</p>

Consultation Authority	Comment	Response
		<p>landscape/ visual impact in an area of high landscape sensitivity can be partially mitigated as suggested, however, environmental assessment at MIR stage is based on an unmitigated scheme as it is not the function of the MIR to set out the mitigation necessary at sites which are preferred options for development nor their alternatives.</p>
Miller Homes	<p>Environmental assessment of site 103 North Bank Farm - The review demonstrates that the Site scores more positively than the Council's preferred option and other alternatives contained in the MIR. The Site would represent a sustainable larger option for development, with an overall positive impact on the environment.</p>	<p>As highlighted above, we do not accept the findings of the review.</p> <p>Whilst it is correct to say that the development would be likely to result in additional positive effects, it would could also result in additional negative effects.</p>

Table 2 – Revised Environmental Report comments

Consultation Authority	Comment	Response
HES	<p>We note that spatial allocations included within the Proposed Plan are assessed by group in both the Revised Environmental Report and the detailed matrix at Appendix 2. While we understand that this allows for cumulative assessments to occur, this can make it difficult to distinguish where individual sites may give rise to environmental effects. It also makes it difficult to distinguish whether effects have been subject to appropriate mitigation</p>	<p>The feedback is noted and we will be reviewing the methodology/presentation adopted to identify improvements for the SEA of the third local development plan. We will engage the consultation authorities as part of this review.</p>
SEPA	<p>We are content that the Revised Environmental Report (ER) provides a satisfactory assessment of the likely significant environmental effects of the Falkirk LDP Proposed Plan (PP</p>	<p>Comments noted.</p>
SEPA	<p>The section on Existing Environmental Characteristics the infrastructure numbers were incorrect when compared with the 2015 data for Falkirk in the revised waste sites and capacity Spotfire tool. There have been some changes due to clean up of the data. According to the revised figures the sentence should say:</p> <p>“There were 28 operational waste management sites with the Council area in 2015 with an annual capacity of 2,886,576 tonnes.”</p> <p>Source: SEPA’s revised Waste Sites and Capacity Tool - Waste Sites and Capacity Summary: filtered for 2015, Falkirk and then ‘operational’ status only.</p> <p>We also suggest that the next text on the page is changed to:</p> <p>“The requirement for the Forth Valley area in Table 1 of the Regional Capacity Table (SPP 2015 data), is currently for an additional 215,000 tonnes of waste management infrastructure capacity in the Forth Valley area. The SPP data show that the 10 year required landfill capacity for</p>	<p>The text has been changed as per SEPA’s suggested revision.</p>

	<p>the Forth Valley area at December 2015 was 1.34 million tonnes. The total remaining landfill capacity for the Forth Valley area as at 31 December 2015 was 1.90 million tonnes.</p> <p>Sources: SPP 2015 data and SEPA’s revised Waste Sites and Capacity Tool - Landfill Sites and Capacity Summary)</p> <p>In the section on Existing Environmental Issues, the text should be corrected to say:</p> <p>“Although there is no need to identify additional landfill sites in the Forth Valley area, there is a need to enable the provision of more waste management infrastructure capacity. SEPA still requires an additional 215,000 tonnes capacity to be accommodated within Forth Valley, some of which is likely to fall into the Falkirk area. This additional capacity comprises 70,000 tonnes to manage source segregated recyclables and 145,000 tonnes to manage unsorted waste.”</p>	
SEPA	<p>In particular, page 38 of the ER states that FRAs should be undertaken for all sites with significant flood risk. We recommend removing the word ‘significant’ as this can lead to confusion</p>	<p>We disagree. All sites are to some degree at risk of flooding, and it is a matter of professional judgement as to whether a particular site has a significant flood risk.</p>
SEPA	<p>There are a number of sites within Air Quality Management Areas (AQMAs) and the ER recognise this as a significant environmental effect, however the mitigation measures for these are not clearly identified in the ER. Forms of mitigations for the purpose of SEA could be the submission of an Air Quality Report as part of the planning application and/or compliance with the air policy and the transport-related policies.</p>	<p>Mitigation of air quality issues can be secured through application of LDP2 Policy PE26 – Air Quality. It was an oversight that this policy was not expressly stated as mitigation for sites whose development could pose air quality issues.</p>

<p>SEPA</p>	<p>Opportunities for watercourses restoration have been identified in Appendix 2 but not reported in the ER spatial strategy section and in the PP. Is this because the effects are not considered significant according to the matrix? Someone could argue that after this type of enhancement there would be a significant positive environmental effect on the water environment. The best form of mitigation/enhancement is making changes to the plan and as the SEA has identified opportunities we are unclear why these have not been taken forward in the PP developer requirements. This is the case for H10, H32, H33, MU04, MU05, MU09, BUS10, BUS19, BUS22.</p>	<p>The Council did not consider the reported opportunities for watercourse restoration to have a significant positive effect on the environment. This judgement was made when assessing the opportunities against the SEA objectives and related questions. During the examination of the plan, the Reporter did not accept SEPA’s request to include the potential for watercourse restoration within the site comments for H10, H32, H33, MU04, MU05, BUS10, BUS19, BUS22 However, the Reporter recommended the following modification to the plan: On page 82, under “Key Principles” for MU09 Broad Street, add a seventh bullet point that read “Sclanders Burn is a straightened waterway within the site. Restoration of the natural course of the burn should be investigated along with opportunities to de-culvert.”</p> <p>This modification has been made to the plan.</p> <p>In addition, Policy PE22 of the plan seeks to protect the water environment and supports opportunities to improve and/or restore watercourses. Enhancements to water environment as part of development can be secured through application of this policy.</p>
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SEPA	We note that the environmental effect of pressure on the capacity of waste water treatment works has been recognised, however no clear mitigation measures have been identified. Consultation with Scottish Water and potential upgrading of the sewage network could be considered mitigation measures. Any private waste water discharge would require authorisation under Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR).	Noted. Mitigation is specified in the plan in the form of proposals IN19-IN21 which cover Dalderse, Torwood, Whitecross Waste Water Treatment Works Upgrades. The plan has policies (such as IR10) that would allow the environmental impacts of a private waste water discharge associated with a planning proposal to be considered and addressed.
SEPA	Page 52 - Development proposals at the Grangemouth Docks West, Bo'ness Road and Wholeflats Road (BUS15-BUS17) sites and page 56 Grandsable road. Mitigation may be provided in due course by the Grangemouth Flood Protection Scheme. The Standard of Protection (SOP) for the scheme has not yet been established. We refer the Council to the guidance SEPA Planning Information Note (PIN4)	Noted.
SEPA	Page 68 - the enhancement/mitigation section states: mitigation of air quality issues in Falkirk Town Centre and other centres would, in theory, be provided by the air quality policy, although in practice the introduction of cleaner vehicle technologies...' the sentence is not completed.	This is a drafting error and the sentence should read "Mitigation of air quality issues in Falkirk Town Centre and other centres would, in theory, be provided by the air quality policy."
SNH	Section 5.5.1 Place sets out a predicted environmental effect for the Spatial Strategy that there should be significant positive effects on landscape "through the resulting investment in and improvements to the built and natural environment". We generally agree with this assessment but consider that the Areas of Major Change could have significant negative effects due to landscape character change if Development Guidance for these is not adhered to. Similarly, we consider that the additional allocation at East Bonnybridge (site MU20) could have a significant negative landscape effect if Development Guidance is not prepared for that site. We have submitted a representation on that matter in response to the Proposed Plan.	Noted. We have incorporated SNH's suggested mitigation for MU20 within the site comments to lessen significant effects on the landscape.

SNH	Assessment of the predicted environmental effect at section 5.5.24 includes “Within the areas of search on the Slamannan Plateau, proposals could have a wide range of significant negative effects including on biodiversity...” Cross-referencing to the HRA Record, it appears that this effect includes the Slamannan Plateau Special Protection Area (SPA) and we advise that the SEA should have clearly set that out rather than referring to biodiversity as a catch-all term.	No specific environmental effects were identified for Slamannan Plateau Special Protection Area (SPA) in relation to the the spatial strategy for minerals. The HRA Record noted there is flexibility within the areas of search for coal mining operations to proceed without having an adverse effect on European Sites. No changes needed to the SEA.
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FALKIRK

Local Development Plan²

Proposed Plan

Strategic Environmental Assessment

Revised Environmental Report

Appendix 5: Record of Comments on the Environmental Report

September 2018



Falkirk Council