

Post Adoption Statement – Cover Note

SEA Post Adoption Statement: PART 1

To: SEA.gateway@gov.scot

Or

SEA Gateway
Scottish Government
Area 2-J (South)
Victoria Quay
Edinburgh
EH6 6QQ

SEA Post Adoption Statement: PART 2

An SEA Post –Adoption Statement is attached for:	Local Development Plan Adopted Dec 2016
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The Responsible Authority is:	Loch Lomond & the Trossachs National Park Authority
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SEA Post Adoption Statement: PART 3

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Date:	May 2017
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Abbreviations

ER - Environment Report

FRA - Flood Risk Assessment

HES – Historic Environment Scotland

LDP - Local Development Plan

NPA – National Park Authority

PP - Proposed Plan

SEA - Strategic Environmental Assessment

SEPA - Scottish Environment Protection Agency

SNH – Scottish Natural Heritage

SEA Post Adoption Statement: PART 4

1. Introduction

- 1.1. This document (referred to here as the Post Adoption SEA statement) has been prepared in accordance with sections 18 and 19 of the Environmental Assessment (Scotland) Act 2005.
- 1.2. The National Park Authority (NPA) adopted the Loch Lomond & Trossachs National Park Local Development Plan (LDP) on 22 December 2016.
- 1.3. This Post-Adoption SEA Statement demonstrates how the findings of the Strategic Environmental Assessment have been taken into account in the adopted Local Development Plan. In accordance with the Environmental Assessment (Scotland) Act 2005, this Post-Adoption Statement will demonstrate:
 - The integration of environmental considerations into the Local Development Plan,
 - How opinions expressed, from both the community and consultation authorities, during the consultation of the Environmental Report have been taken into account,
 - The reasons for preparing the Local Development Plan in light of other reasonable alternatives, and
 - The measures to be taken to monitor the significant effects of the implementation of the Local Development Plan.

Key Facts

Name of Responsible Authority	Loch Lomond & Trossachs National Park Authority
Title of Plan, Programme or Strategy:	Loch Lomond & Trossachs National Park Authority Local Development Plan
What prompted the Plan, Programme or Strategy:	As a legal requirement of the Planning etc. (Scotland) Act 2006, the National Park Authority (NPA) has prepared a Local Development Plan for the National Park. It replaces the Adopted Local Plan 2012-2016.
Period Covered by Plan, Programme or Strategy:	The plan covers a period of five years 2017-2021
Frequency of updates	Every five years
Purpose and/or objectives of the Plan, Programme or Strategy:	The Local Development Plan guides future use of land in the National Park Area and indicates where development should and should not happen. It contributes to sustainable development and tackles climate change. Helping the National Park realise its four statutory aims.

Date Plan Adopted	22 December 2016
Contact:	Add: Development Planning & Communities Team, Loch Lomond and The Trossachs National Park Authority, National Park Headquarters, Carrochan Road, Balloch, Alexandria, G83 8EG Tel: 01389 722600 Email: hello@ourlivepark.com

2. Strategic Environmental Assessment Process

2.1. A Strategic Environmental Assessment (SEA) has been completed for the Loch Lomond and the Trossachs National Local Development Plan (Plan), as required under the Environmental Assessment (Scotland) Act 2005. This has involved preparing an Environmental Report which summarises potential significant environmental effects likely to impact the Park as a result of implementing the Plan. The assessment process identified appropriate mitigation measures to incorporate into the Plan to safeguard against any significant damage to the Park's natural or built heritage.

2.2. A draft Environmental Report (ER) was published for consultation with the Main Issues Report stage from 28 April – 7 July 2014. A draft Environmental Report Addendum was produced at the Proposed Plan (PP) stage which was consulted upon from 22 May 2015 to 29 June 2015 (An extra week was added for late reps - to early July 2015). The table below provides a full list of stages and associated dates work was carried out.

LDP Strategic Environment Assessment Stages	Date carried out
Pre Main Issues Report (MIR) Engagement	December 2012 – April 2014
Preparation of MIR	June 2013 – April 2014
Submit Strategic Environmental Assessment (SEA) Scoping Report to SEA Gateway; SEA Gateway Consultation Response	October 2013 – December 2013
SEA Draft Environmental Report Preparation	January 2014 – April 2014
Consult on MIR/ SEA and Consider Representations	April 2014 – July 2014
Prepare the Proposed Plan and Action Programme	July 2014 – April 2015
Update the Environmental Report	July 2014 – April 2015
Prepare Habitats Regulations Assessment (HRA)	July 2014 – April 2015
Publish and Consult on the Proposed Plan, the Environmental Report and HRA and submit the Environmental Report to the SEA Gateway.	May 2015 – July 2015

Prepare Response and Report of Conformity with Participation Statement and further Modifications if required.	July 2015 – November 2015
Submit HRA record to Scottish Ministers	November 2015
Submit the Proposed Plan to Scottish Ministers	December 2015
Examination of the Proposed Plan and Reporter’s Report Issued	December 2015 – October 2016
Consider the Reporter’s Recommendations; prepare Modifications to the Proposed Plan and Statement of Explanation if required	October 2016
Revise the Environmental Report and HRA in accordance with the modifications to the Proposed Plan and send to the Scottish Ministers	October - November 2016
Advertise Intention to adopt the Plan	November 2016
Adopt Plan	December 2016
Publish Plan Action Programme	March 2017
Publish Post Adoption SEA Statement and submit to the SEA Gateway	May 2017

3. Integration of environmental considerations and Environment Report on Local Development Plan

The LDP has been influenced by environmental considerations and the Environment Report. This section clarifies how significant positive and negative effects, environmental problems and any necessary mitigation have been addressed.

SEA Issue	Environmental Considerations	How this matter has been taken into account in the Local Development Plan
Biodiversity	Development adversely impacting protected sites and species, especially Natura sites.	<p>Environmental policies ensure potential adverse impacts to be satisfactorily mitigated. A Habitats Regulations Appraisal was carried out for the Natura Sites and additional measure included in Plan to distinguish between Natura sites and other environmental designations.</p> <p>No significant adverse impact on sites. Potential minor impacts on habitats on Claish Farm in Callander, Acharn in Killin, and both Succoth sites. Environmental policies in the Plan ensure that biodiversity, flora and fauna will be protected. The policy framework will encourage the creation of new habitats and connectivity for species resulting in positive environmental outcomes. In addition, both Claish Farm and Acharn sites have ‘natural environment designation icon on the site</p>

		maps' which require developers to assess impact on habitats nearby. Land at Claish Farm forms the majority part of the Callander South Masterplan Framework which incorporates adoption of the ecosystems services approach. No significant adverse impact identified on biodiversity, flora and fauna, particularly on designated sites.
Population & Human Health	<p>Majority of development taking place in remote locations reducing active travel.</p> <p>Ageing population not sustaining services and facilities e.g. schools.</p> <p>Lack of provision of affordable housing.</p> <p>Access to open space and creation of more welcoming environments for pedestrians and cyclists.</p>	<p>No significant adverse impact identified on population and human health. Land has been identified within towns and villages throughout the park with a mix of land uses, with the aim of sustaining existing services and facilities. Policies will support business, tourism and residential opportunities within or near towns and villages with access to public transport. The majority of sites are for housing with others for visitor experience and business uses. More rural development will be less beneficial to human health due to separation to services and facilities and having to travel further.</p> <p>Housing policies are less restrictive than the previous Local Plan and should result in delivery of more affordable housing as previous Plan policies were not delivering many affordable houses in the Park.</p> <p>Areas of public open space have been safeguarded within towns and villages. This supports human health through active travel, sport and recreation.</p> <p>Plan policies and allocations support Active Travel which in turn support health benefits. 9 Place-making opportunities are identified which will have a positive impact on human health as these improve connectivity for active travel and improve the overall appearance of public spaces. Key areas of open space within towns and villages have been safeguarded for such use. Policies support active travel and creation of new open space.</p>
Geology, Minerals and Soil	<p>Impact from development on landform.</p> <p>Avoid land contamination and remediate existing land contamination.</p>	<p>No significant adverse impact from general policies.</p> <p>Potential negative impact on landform on following sites: Claish Farm mixed use and long term site in Callander, and</p> <ul style="list-style-type: none"> • Acharn rural activity site in Killin. • Claish Farm sites have icons safeguarding geology and archaeology. <p>The Cononish gold mine development was assessed under the Environmental</p>

		<p>Impact Regulations and conditions are attached to the planning permission covering mitigation and restoration works.</p> <p>There is no prime agricultural land in the Park. Development on sites which have existing contamination will be addressed through the planning application stage.</p> <p>No significant adverse impacts on geology, minerals and soil.</p>
Water Environment	<p>Development polluting water environments – burns, rivers, lake and lochs. Important environment for wide range of species and habitats.</p> <p>Flood risk in numerous towns and villages.</p> <p>Source of water supply for most of west of Scotland.</p> <p>Source of sustainable energy from river hydroelectricity.</p> <p>Potential water based transport connecting villages.</p> <p>Better access to water for sport and recreation.</p>	<p>No significant adverse impacts on water environment. The water environment protects a wide range of species and habitats in the Park.</p> <p>The policies and proposals are not anticipated to have a negative environmental impact with areas of sensitivity either avoided or capable of being mitigated. Plan will have an overall positive environmental impact when any necessary mitigation is implemented.</p> <p>Allocated sites clearly highlight sites where there is potential flood risk and an appropriate assessment and mitigation would be required at planning application stage.</p> <p>Maps for allocated sites within the Plan show the proximity of Special Areas of Conservation. Environment Policies provide suitable safeguards for Special Areas of Conservation.</p> <p>Policies are supplemented by Guidance documents including for Renewable Energy. Advice is given to developers on how to intergrate river hydro schemes sympathetically to the natural environment.</p> <p>Sites have been allocated within the Plan for Transport purposes including the installation or upgrade of piers on both inland and sea lochs. This will help create better connections to villages and visitor hubs.</p>
Air Climate	<p>With growth proposed for housing, business and tourism (visitor experience) there is likely to be an increase in air pollution</p>	<p>The Plan Strategy is to focus development within towns and villages, especially Callander, Balloch and Arrochar. This will reduce the need to travel to access services and facilities. Active Travel plans are asked for the larger sites to ensure pedestrian and cycle access is addressed at the planning application stage.</p>

	from associated traffic.	Public transport opportunities are supported and where possible for the forestry industry, timber transportation is being encouraged by water and rail.
Forest and Woodlands	Loss of forest and woodlands as a result of development.	<p>Overarching policies protect important ancient trees and woodland within the Park. Natural Environment policy 8 strengthens the protection for trees and woodland and the requirement for compensatory planting where development is accommodated.</p> <p>Development of Rural Activity site Acharn in Killin has a potential negative impact on forests and woodlands as is located within plantation forestry. Site map includes icon for woodland/ancient woodland and developer would have to provide satisfactory mitigation to accommodate development on site. No significant adverse impact identified on forest and woodlands.</p>
Historic Built Environment	<p>Potential adverse direct or indirect impacts of development on listed buildings, conservation areas and scheduled ancient monuments.</p> <p>Significant effects on Scheduled Ancient Monuments at Claish Farm in Callander and on listed building and Conservation Area at Laurelfields in Drymen</p>	<p>Local Development Plan and National Park Partnership Plan policies support high quality development and protection of the historic built environment.</p> <p>For allocated sites, site icons have been added to protect and safeguard the historic environment. Through the planning application stage there should not be any significant adverse impacts on the built environments. In addition, the Claish Farm site is further protected by Callander South Masterplan Framework Planning Guidance requiring adoption of ecosystems services approach.</p>
Landscape	<p>Impact on Parks special landscapes character, National Scenic Areas, Trossachs, River Earn, core area of Wild Land, and Historic Garden and Designed Landscapes.</p> <p>Impact from economic development sites including two rural development framework areas. Potential adverse impact</p>	<p>Environmental policies require proposed development to fit into the Parks special landscape. Where necessary a Landscape Character Assessment would be required along with suitable mitigation. There would be no adverse impact on Landscape as a result of the overarching policy relating to Landscape.</p> <p>Site icons have been added to sites where there are landscape impact concerns. Site icons include landscape assessment and design statements to ensure proposed developments complement the site and surrounding landscape.</p>

	on sites at High Road in Strone, Laurelfields in Drymen, and a number of sites in Gartocharn.	
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4. Representative opinions and consultation comments on Local Development Plan

Organisation	Issue	Comment	How addressed through SEA process
Scottish Environment Protection Agency (SEPA)			
Scottish Environment Protection Agency	Flood risk	Forestry Commission site in Aberfoyle liable to flooding.	Flood Risk Assessment icon added to site map.
Scottish Environment Protection Agency	Flood risk at Balloch VE2 East Riverside	The River Leven is located on the eastern boundary of the site with large parts of the site at risk of fluvial flooding. We would therefore require a Flood Risk Assessment which assesses the risk of flooding to the site from the Leven to ensure that built development is located outwith the functional floodplain and or adoption of appropriate flood management measures.	Site was reduced in size to exclude area subject to flooding between Proposed LDP and LDP stages. No flood icon required.
Scottish Environment Protection Agency	Flood risk at Callander ED1 Lagrannoch Industrial Estate	SEPA require a Flood Risk Assessment which assesses the risk from the Teith and small watercourses which affect the site. Consideration should be given to any nearby culverted watercourses which cause flooding in this area.	Drainage Assessment and Flood Risk Assessment icons have been added to site map.
Scottish Environment Protection Agency	Flood risk at Callander MU1 Station Road	Require a Flood Risk Assessment which assesses the risk from the small watercourses which flow through the site.	Flood Risk Assessment icon added to site map.
Scottish Environment Protection Agency	Flood risk at Callander H1 Pearl Street	Council may have more info on flood risk to site. SEPA support the provision of a Flood Risk Assessment. SEPA do not hold any additional information on flood risk.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Callander H2 Old Telephone Exchange	SEPA did comment on this site during the planning process (2010/0021/DET) and offered no objection as mitigation measures incorporated within design to prevent risk of flooding from surcharging of	Flood Risk Assessment and Drainage Impact Assessment icons within site map.

Organisation	Issue	Comment	How addressed through SEA process
		upstream culvert. Should the site design/ layout change compared to what was previously agreed we would require an Flood Risk Assessment that takes into account the risk from the small watercourse which is culverted adjacent/ within boundary of site. Flood Risk Assessment should be requested.	
Scottish Environment Protection Agency	Flood risk at Callander H3 Churchfields	A Flood Risk Assessment has been undertaken for this site and developable areas have been agreed with SEPA. We would highlight that the site will be constrained due to flood risk. Should site have changed we would require an updated Flood Risk Assessment. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Flood Risk Assessment (but not DIA) requested in Proposed LDP.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Callander LT1 Cambusmore	As this site is for tourism we require a Flood Risk Assessment which assesses the risk from the River Teith and adjacent loch/ workings. Site will likely be constrained and we would stress that this site allocation may be unsuitable for more sensitive uses as defined in our vulnerability guidance due to a significant portion being at risk of flooding. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Flood Risk Assessment (no Drainage Impact Assessment) requested in Proposed LDP.	Majority of site is a manmade loch as a result of quarry works. The site is identified as a long term tourism option and would be linked to loch uses such as fishing, canoeing or swimming. Flood Risk Assessment icon within site map.
Scottish Environment Protection Agency	Flood risk at Callander LT2 Claish Farm	SEPA require a Flood Risk Assessment which assesses the risk from the River Teith and small watercourses which flow through the site. Site will	Flood Risk Assessment and Drainage Impact Assessment icons within site map.

Organisation	Issue	Comment	How addressed through SEA process
		likely be constrained due to flood risk. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Flood Risk Assessment (no DIA) requested in Proposed Plan.	
Scottish Environment Protection Agency	Flood risk at Callander MU2 Claish Farm	SEPA require a Flood Risk Assessment which assesses the risk from the Teith and the small watercourses which flow through the site. Site will likely be constrained due to flood risk (including part of the site is within marshy ground). Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.	Flood Risk Assessment and Drainage Impact Assessment icons within site map. This matter is also raised within Callander South Masterplan Framework Planning Guidance.
Scottish Environment Protection Agency	Flood risk at Callander LT3 Balgibbon Drive	SEPA require a Flood Risk Assessment which assess the small watercourse which flows through the site. Consideration should be given to any culverts/ bridges which may exacerbate flooding. PAN 69 states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Callander RA1 Callander East	SEPA require a Flood Risk Assessment which assesses the risk from the Keltie Burn which flows along the southern perimeter of the site and the small watercourse (and pond) which flows through the site. We commented on part of this site as a mushroom farm was proposed (PCS111543, 2010/0324/DET) and due to low sensitivity of proposal we did not object.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Callander RET1 Stirling Road	SEPA require a Flood Risk Assessment which assesses the risk from the small watercourse which flows on the boundary of the site. Consideration should be given to any culverts/ bridges which may	Flood Risk Assessment and Drainage Impact Assessment icons within site map.

Organisation	Issue	Comment	How addressed through SEA process
		exacerbate flooding. PAN 69 states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active".	
Scottish Environment Protection Agency	Flood risk at Callander VE1 Auchenlaich	SEPA require a Flood Risk Assessment which assesses the risk from the small watercourse which flows through the site. From historic flooding photos this site will likely be constrained due to flood risk. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Carrick Castle H1 Former Hotel	Adjacent to coastal flood extent and for information Coastal Flood Boundary level is approximately 4.28mOD Coastal Flood Boundary. This should be used to help define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Croftamie H1 Willowbrae	SEPA would require a Flood Risk Assessment for the site in order to assess the risk of flooding from the Catter Burn and potential developable area.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Drymen H1 Stirling Road	A minor culverted watercourse potentially flows through the site. This should be investigated as part of the Flood Risk Assessment. Consideration should be given to Planning Advice Note 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic Flood Risk Assessment will be required either prior to, or in conjunction with any planning application. This will need to define the	Drainage Impact Assessment and SUDs icons are within site map but no flood risk icon. SEPA comments were missed in relation to this site at Examination stage. However, Natural Environment Policy 13 on Flood Risk ensures any development within medium to high risk of flooding must demonstrate the flood risk can be mitigated. In addition, the current planning application for the site includes a Flood Risk Assessment.

Organisation	Issue	Comment	How addressed through SEA process
		areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.	
Scottish Environment Protection Agency	Flood risk at Gartocharn H1 Burnbrae Farm	A minor watercourse runs through this site, this poses a potential risk of flooding. A basic Flood Risk Assessment will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirms design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.	Drainage Impact Assessment and SUDS icons are within site map but no flood risk icon. SEPA comments were missed in relation to this site post Examination stage. However, the Natural Environment Policy 13 on Flood Risk ensures any development within medium to high risk of flooding must demonstrate the flood risk can be mitigated.
Scottish Environment Protection Agency	Flood risk at Killin ED1 Road Depot	SEPA require a Flood Risk Assessment which assesses the risk from the River Lochay and small watercourse which flows along the boundary of the site. Consideration should also be given to any interaction between the Lochay and the Dochart. As a road depot is proposed we do not object in principal. As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The Flood Risk Assessment is required to inform the area of redevelopment, type of development, and ensure that the development has a neutral impact on flood risk. Development will likely be constrained due to flood risk.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Killin RA1 Acharn	There are uncertainties with the flood map in this area. The proposal is for a rural activity and no further information is provided. As such we require a Flood Risk Assessment which assesses the risk	Flood Risk Assessment and Drainage Impact Assessment icons within site map.

Organisation	Issue	Comment	How addressed through SEA process
		from the small watercourses which flow to the east and west of the allocation. Consideration should also be given to the River Dochart depending on how far the site extends as there is uncertainty over the site allocation size. We commented on a wood fired Combined Heat and Power plant within this allocation (PCS112713, 2011/0011/DET) and did not object.	
Scottish Environment Protection Agency	Flood risk at Kilmun H1 Former Nursing Home	Approximate 1/200 Coastal Flood Boundary level is 3.9mOD. Minor watercourse also flows through site and should be assessed.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Blairmore VE1 Blairmore Green	Approximate 1/200 Coastal Flood Boundary level is 3.84mOD.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Lochearnhead H1 Former Holiday Centre	SEPA require a Flood Risk Assessment which assesses the risk from Loch Earn and the small watercourses which flow through/ adjacent to the site. Site will likely be constrained due to flood risk. There is a Controlled Activities Regulations licence for this site which would require consideration.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Lochearnhead MU1 Former Garage	SEPA require a Flood Risk Assessment which assesses the risk from the Ogle Burn and small watercourse which is shown adjacent to the site and may be culverted through the site. Consideration should be given to any culverts/ bridges which may exacerbate flooding. PAN 69 states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active".	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at Luss H1 Land North of Hawthorn Cottage	SEPA would be supportive of the Flood Risk Assessment requirement.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Flood risk at St Fillans H1 Station	Commented on part of site (PCS136170, 2014/0237/DET) and did not object. From previous	Flood Risk Assessment and Drainage Impact Assessment icons within site

Organisation	Issue	Comment	How addressed through SEA process
	Road	consultation, site visits indicate the site is a sufficient distance from the Struie Burn and the Flood Map is erroneous in this areas. However, we have not commented on the entire site allocation. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. We support the provision of a Flood Risk Assessment in the LDP.	map.
Scottish Environment Protection Agency	Flood risk at Tyndrum MU1 Clifton	Flood Risk Assessment was submitted as part of the development of this site (PCS104531, 2009/0311/PP). Should the proposal change from what was previously agreed we would require a Flood Risk Assessment which assesses the risk from the Crom Allt burn. There is a culvert adjacent to the site.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Scottish Environment Protection Agency	Waste hierarchy	Overarching Policy 1 encourages waste reduction, reuse and recycling. We support the promotion of waste reduction within the Plan area however we recommend that this policy is updated to encourage waste hierarchy principles in line with the Zero Waste Plan objectives and Scottish Planning Policy (SPP), paragraph 176. We would suggest the following modification to the policy wording: - Supporting the provision of waste reduction and waste hierarchy principles including prevention, reuse (e.g. composting) or recycling.	Overarching Policy 1 amended accordingly.
Scottish Environment Protection Agency	Low and zero carbon	Overarching Policy 2: Development Requirements - The requirement that buildings incorporate low and zero carbon generating technologies should help to ensure that new buildings contribute to the reduction of carbon emissions. This is in line with	Acknowledge support for policy.

Organisation	Issue	Comment	How addressed through SEA process
		Scottish Government targets within SPP (paragraph 154) which seeks to reduce emissions and energy use in new buildings. We therefore support this approach.	
Scottish Environment Protection Agency	Natural Environment Policy 10: Protecting Peatlands, and Natural Environment Policy 11: Protecting the Water Environment	We support this policy.	Acknowledge support for policy.
Scottish Environment Protection Agency	Natural Environment Policy 12: Surface Water and Waste Water Management	<p>We object unless a modification is made to part (a) of this policy. The use of the phrases ‘small settlement’ and ‘limited number of dwellings’ does not adequately explain the situation. The issues are not the size of a proposed settlement or the number of dwellings but the impact of additional flow and load on the water environment (and from Scottish Water’s perspective, on network and works capacity). It is our opinion that if the development is in a sewered area (or area served by Scottish Water’s sewer) then any new development must be connected. While there may be constraints, this would be for Scottish Water to comment on. Sites where connection to the public sewer is constrained or there is a detrimental impact on the environment should be avoided. Further, it is unclear what is meant by the phrase ‘to a suitable capacity’.</p> <p>We suggest a modification to the policy: - If the public sewerage system cannot be developed due to technical constraints or the connection is unacceptable to Scottish Water, then</p>	Policy change amended.

Organisation	Issue	Comment	How addressed through SEA process
		<p>a private system may be permitted. This would be subject to the system not creating or exacerbating an environmental risk, including cumulative impacts with other developments. Any private wastewater treatment system must be designed to meet SEPA's requirements for authorisation and receiving water quality.</p> <p>In part (b) of the policy, there is no reference to SEPA's role. We suggest it would be useful to modify the policy to include wording such as a reference to the need to meet our requirements. With regard to the paragraph 'Private water supplies will only be supported where a public water supply system and/or capacity are unavailable and where there is no adverse effect on the water environment or the lawful interests of other land and water users.', there are implications regarding authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (or CAR regs) and therefore we suggest a modification to include reference to meeting our requirements.</p> <p>We suggest a modification removing the word new in the paragraph 'Development should minimise the areas of impermeable surface and consider the impact of managing additional surface water arising from developments. Sustainable Drainage Systems (SuDs) will be required for all new development except single dwellings where the surface water discharge is made directly to coastal waters and will be incorporated into the overall design of the development. There may be cases in which</p>	

Organisation	Issue	Comment	How addressed through SEA process
		changes to existing developments may require construction phase or completion phase SuDs. We also suggest a modification to include a reference to construction phase or completion phase SuDs.	
Scottish Environment Protection Agency	Natural Environment Policy 13: Flood Risk	<p>We support this policy. We are concerned however that for some of the allocated sites, no reference has been made to the detailed information we previously provided during the consultation process. Further detailed comment on this matter is included in the attached spreadsheet which contains the site allocations. At this stage of the plan process, we would have expected our comments to have been fully incorporated and we therefore object unless a modification is made which takes account our previous comments.</p> <p>The Site Map Icon explanation for the 'raindrop' in Appendix 4 states in the odd occasion a flood assessment may result in the FRA being required. We suggest clarification is required regarding this wording.</p>	<p>There is a requirement from Scottish Planning Policy for Local Development Plans to be concise map based documents. It is impossible to meet this requirement and have significant detail assigned to every site from various key agencies. The site icons and policies are sufficient to address these matters at the planning application stage and Development Management will have access to key agency responses.</p> <p>Explanation for flood risk icon within Appendix 4 has been updated accordingly.</p>
Scottish Environment Protection Agency	Natural Environment Policy (NEP) 14	<p>Natural Environment Policy (NEP) 14 is not clearly linked to others. For example, perhaps there could be a link to NEP 11. However, as NEP 11 relates only to new development it may be simpler to make a modification by adding new text under NEP 14 such as;</p> <ul style="list-style-type: none"> - (d) on the water environment 	<p>Many of the planning policies within the Plan relate to one another. It is impossible to produce a concise map based policy with inclusion of every eventuality which may cross relate. The layout of the Plan has introduced overarching policies to avoid repetitive criterion which was in many policies within the previous Local Plan.</p> <p>The water environment is safeguarded effectively within Natural Environment Policy 11 Protecting the Water</p>

Organisation	Issue	Comment	How addressed through SEA process
			Environment and Overarching Policies 1 & 2 'minimising adverse impacts on water...' and 'protect and/or enhance... the water environment...'. Specific change not required.
Scottish Environment Protection Agency	Natural Environment Policy 16: Contaminated Land	<p>Our remit is concerned with radioactive contaminated land and contaminated land Special Sites. There are currently no statutory identifications of Radioactive Contaminated Land or Special Sites currently within the National Park boundary.</p> <p>We note and support the Overarching Policy 1 for reusing brownfield land or vacant property where possible. We also note and support the content of Natural Environment Policy 16: Contaminated Land.</p> <p>We note that some allocations in Section 3 indicate 'Contaminated Land' is present. We would caution the use of the term 'Contaminated Land' in the Local Plan both in the maps in Section 3 and Environmental Policy 16 as this term has specific implications under Part IIA of the Environment Protection Act 1990.</p> <p>To avoid confusion and distinguish from statutorily identified 'Contaminated Land', we would suggest a modification to the policy to utilise the term 'Land Contamination' instead. We would also recommend consultation with the appropriate Local Authorities whose area these sites are in for suggested alternative descriptions.</p>	Amended 'Contaminated Land' to read 'Land contamination in both Natural Environment Policy 16 and Site Map Icons keys and associated explanation.
Scottish Environment Protection Agency	Renewable Energy Policy 1: Renewable	We support production of the Renewable Energy Planning Guidance to provide greater clarity for key	No amendment requested. Acknowledge support for policy and guidance.

Organisation	Issue	Comment	How addressed through SEA process
	Energy within the National Park	stakeholders in relation to for new renewable energy developments. We welcome a policy approach that encourages the principle of renewable energy development, notwithstanding the consideration of various impacts relating to preserving and enhancing amenity, landscape, visual impact, and the water environment.	
Scottish Environment Protection Agency	Renewable Energy Policy 1: Renewable Energy within the National Park - Renewable Heat and Power (Heat Networks and District Heating)	It is recommended that the policies section of the LDP is updated to confirm the production of a localised Loch Lomond Heat Map and include policy wording to require subsequent consideration of this heat map when determining the location for new heat networks and/or opportunities for significant anchor development (with the potential to establish and/or connect to heat networks) within the Plan area. We acknowledge the lack of this documentation is likely to be related to the relatively short timescale between the adoption of the SPP and formulation of the Proposed Plan. Nevertheless, we recommend that a new approach is undertaken to allow for adequate cognisance of this issue at the earliest opportunity and ensure that Scottish-wide low carbon and heat energy objectives can be met. In order to implement this approach, we also recommend that the production of this Heat Map is identified as a specific outcome within the LDP Action programme.	Renewable Energy Policy 1 was not amended to refer to the Loch Lomond Heat Map. However, this issue was considered at the Examination stage and additional text was added to the overview page about Callander which now refers to co-locating development with heat demand to sources of heat supply. And further text on community heating scheme potential at Claish Farm site has been recognised in the Callander South Planning Guidance. Also, on page 71 of the LDP the opportunity to utilise surplus heat from the proposed Acharn Biomass Plant near Killin has been added.
Scottish Environment Protection Agency	Renewable Energy Policy 1: Hydro energy	We support this policy however as there are implications regarding authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (or CAR regs) in terms of construction, abstraction and impoundment. We would therefore suggest a modification to the policy which makes reference to	In order to meet the requirement for the Plan to be concise, it is impossible to include caveats to meet every potential eventuality. It is the responsibility of the developer to meet relevant legislation. Amendment not included. Policies offer sufficient support to protect pollution to

Organisation	Issue	Comment	How addressed through SEA process
		meeting SEPA requirements.	land, water and air. This matter is effectively addressed in the Renewable Energy Planning Guidance on Table 1.
Scottish Environment Protection Agency	Mineral Extraction Policy 1	We support this policy however as there are implications regarding authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (or CAR regs) and the Waste Management Licensing (Scotland) Regulations 2011 (or WML regs.). We would therefore suggest a modification to the policy which makes reference to meeting SEPA requirements.	Plan to be concise, it is impossible to include caveats to meet every potential eventuality. It is the responsibility of the developer to meet relevant legislation. Amendment not included. Policies offer sufficient support to protect pollution to land, water and air.
Scottish Environment Protection Agency	Waste Management Policy 1: Waste Management Requirement for New Developments	We support the principle of this policy requiring the provision of proportionate on-site waste, recycling and composting facilities within new development sites. This should seek to encourage waste minimisation both during construction and operation. This is considered to be in line with SPP (paragraph 176-177) seeking to achieve Zero Waste Plan objectives and promoting waste minimisation.	Policy change amended – covered within Overarching Policy 1 under heading ‘A low carbon place’.
Scottish Environment Protection Agency	Waste Management Policy 2: Waste Management Facilities	We object to this policy unless modifications are made to part (b) of this policy, removing a requirement for new waste facilities to be supported solely on the basis of local operational need. SPP requires that LPAs consider the potential for new waste infrastructure based on a Scottish-wide capacity, whilst there is still significant operational shortfall in capacity. Therefore, we recommend that this policy is modified to remove any reference to local need, replacing this with a statement supporting the provision of waste management facilities to meet shortfalls in waste capacity. This	Policy change amended.

Organisation	Issue	Comment	How addressed through SEA process
		<p>position is in line with SPP paragraph 182 requiring Plans be ‘mindful of the need to achieve the all-Scotland operational capacity’ and complimented further by stating that ‘achievement of a sustainable strategy may involve waste crossing planning boundaries’. Our interpretation of this issue is that it is acceptable for waste arising from any location within Scotland to be treated in any waste management facility and we would not require information or comment on the origin of the waste to be treated in a particular facility.</p> <p>This policy does not specifically identify where new waste facilities would be supported. We would therefore object unless this policy was modified to make reference to employment, industrial or storage and distribution uses’ being acceptable for waste infrastructure. This is considered to be in line with SPP (paragraph 185) which requires that LDPs ‘make provision for new infrastructure, indicating clearly that it can generally be accommodated on land designated for employment, industrial or storage and distribution uses’.</p> <p>We suggest this policy could be modified to include wording stating that: - Waste management facilities would be supported on land allocated for employment, industrial or storage and distribution uses.</p> <p>Part (c) of this policy in relation to safeguarding existing waste management facilities is supported. We consider this to be in line with SPP (paragraph</p>	

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		184) which seeks to facilitate the successful operation of such facilities. We also welcome the identification of local waste management infrastructure sites within the settlement strategies for Callander and Killin.	
Scottish Natural Heritage			
Scottish Natural Heritage	Landscape Assessment icon missing from Arrochar ED1 Church Road site map.	Arrochar and Succoth ED1: Environment Report states 'topography is an important consideration on this site. The higher part of the site is visually prominent and not suitable for development', however there is no landscape assessment symbol in the Plan.	The site was restricted to the break of slope and it is not therefore considered necessary to include a landscape assessment icon as the higher ground shown in the indicative line at Main Issues Report stage was subsequently removed from the site area.
Scottish Natural Heritage	Flood risk at Balloch VE2 East Riverside	Balloch VE2: Environment Report describes flooding as an issue but there is no flood icon in LDP.	Site was reduced in size to exclude area subject to flooding between Proposed LDP and LDP stages. No flood icon required.
Scottish Natural Heritage	Flood risk icon missing from site map.	Callander H2: ER says flooding is an issue but there is no flood icon in LDP.	A flood icon has been added to Callander H2 within the LDP.
Scottish Natural Heritage	Flood risk at Callander H2 Old Telephone Exchange.	We recommend that by including the following symbols on the proposal maps this would help ensure that the SEA mitigation is delivered: Callander H2: Environment Report highlights flooding an issue but there is no flood icon in LDP.	Flood Risk Assessment and Drainage Impact Assessment icons within site map.
Historic Environment Scotland			
Historic Environment Scotland	Direct impacts on scheduled monuments located within Claish Farm LT2 long term site.	With the exception of allocations at Claish Farm, Callander significant negative effects on the historic environment are not likely. This proposed long term development site contains	The two site maps for Claish Farm mixed use sites (MU2 and LT2) in Callander include icons for; historic environment, open space, landscape context and design document (masterplan). The

Organisation	Issue	Comment	How addressed through SEA process
		<p>four scheduled monuments within its boundaries: SM 6968 Claish Farm, palisaded enclosures and timber hall SM 6966 The Clash, palisaded enclosure SM 6967 The Clash, enclosure SM 6972 Lots of Callander, palisaded enclosures</p> <p>There have been no exceptional circumstances demonstrated in the Proposed Plan which would outweigh national planning policy for the historic environment, to justify development at a scale which is likely to have adverse impacts on the scheduled monuments within the site.</p> <p>We therefore request that an indicative capacity is not quantified in the LDP, to ensure that there is flexibility to achieve an appropriate, deliverable level of development without adverse impact on the historic environment. Secondly, as sensitive design will be required to ensure the protection of the scheduled monuments and their setting, we request that the Action Programme names Historic Environment Scotland as a stakeholder in relation to this site, to ensure early and effective consultation.</p>	<p>future applicant will have to demonstrate how these matters have been addressed in order to comply with site icons and associated planning policies. Site map icons are explained on pp 121-122 of the Plan whereas Historic Environment Policy 6 is on p107 of the Plan.</p> <p>Numerous planning measures can be used to address these concerns including; density, scale, massing and location of buildings, landscaping treatment, and provision of open space.</p> <p>In addition, Callander South Masterplan Framework Planning Guidance has been produced which further highlights these issues and refers to the adoption of the ecosystems services approach, supported by key agencies, fisheries trust and both land agents (Claish Farm and Churchfields). The site map (pg24) within the Guidance clearly shows the exact locations of the scheduled monuments within the long term site. The Planning Guidance (Pg. 15-16) describes the scheduled monuments and page 20 provides specific guidance on mitigation measures to be considered at the planning application and associated masterplan stage.</p> <p>It is necessary for long term sites to include a housing number as an indication of potential growth. The site</p>

Organisation	Issue	Comment	How addressed through SEA process
			area and housing numbers are solely indicative.
Historic Environment Scotland	Adverse impact on settling of Listed Building and Conservation Area for Laurelfields, Drymen housing site.	Additionally, it is unclear why effects relating to Laurelfields, Drymen have been reported here as significant negative, whereas in the assessment matrix they are scored as significant positive.	The summary statement incorrectly highlighted the potential impacts on the historic environment as significant instead of referring to the assessment in the Matrix. The matrix assessment gave a scoring of positive/negative impacts given the site is adjacent to a listed building and within the Drymen Conservation Area. A mitigation step was taken to reduce the scale of development from 16 homes to 10 homes from Main Issues Report stage to Proposed Plan stage. Therefore, the summary statement on under Historic Built Environment and Cultural Heritage has been amended to state there are only potential significant negative impacts in relation to the Claiash Farm sites, not Laurelfields. Site icons have been added to site map to protect the built heritage interests. These measures will be assessed at the planning application stage.
Historic Environment Scotland	Policy and site assessment summaries	<p>Site assessment summaries provided were not sufficiently detailed to support the assessment scorings for cultural heritage objectives.</p> <p>Policy assessment summaries - more detailed commentary to support the assessment scores, particularly to provide additional discussion in relation to the scoring of Policies 1,2 and 3 as significant positive for the cultural heritage</p>	<p>Where a site with a negative effect is identified on historic environment or cultural heritage in the site assessment further commentary has been added for clarification in an updated version of the SEA post adoption stage Report as follows:</p> <ul style="list-style-type: none"> Tyndrum MU1 references Clifton Conservation Area

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		objectives, whereas the remainder of historic environment policies are scored as minimal positive or neutral.	<ul style="list-style-type: none"> • Arrochar ED1, Tarbet VE1 references nearby listed buildings and archaeological area. • Arrochar VE1, H3 and MU1, MU2 references nearby archaeological area. • Arrochar H1 references nearby listed building. • Callander H2 references nearby listed building and conservation area. • Callander VE1, RA1, Gartocharn H2, Tarbet MU1 references nearby archaeological area. <p>For policies additional commentary has been added regarding scoring.</p>
Scottish Water			
Scottish Water	Water environment	<p>As mentioned, the park has internationally important lochs and water catchments and as such, it is key that due care and attention is given when There is any development in the vicinity of these areas.</p> <p>Please see attached Scottish Water's list of precautions to protect drinking water and assets.</p>	Appreciate importance of lochs and water catchment areas. Natural Environment policies duly protect the water environment.

5. Reasons for adopting Local Development Plan in light of alternatives

The Local Development Plan must comply with the National Park Partnership Plan, the National Park (Scotland) Act 2000, the Planning (Scotland) Acts 2006 and 1997. Preferred and Alternative options had to be reasonable. The options have to be set within the parameters of the Acts.

From the National Park (Scotland) Act 2000 the aims of the Park are to:

“(a) to conserve and enhance the natural and cultural heritage of the area,

(b) to promote sustainable use of the natural resources of the area,

(c) to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public, and

(d) to promote sustainable economic and social development of the area’s communities.”

In terms of the Planning etc. (Scotland) Act 2006;

‘The planning authority must exercise the function with the objective of contributing to sustainable development.’

The option of doing nothing is not an option given the legislation above and the statutory requirement for the Local Development Plan to be replaced every 5 years. A reasonable alternative would be the ‘business as usual approach’. The majority of policies within the former Local Plan were transferred over to the Local Development Plan. Policies were updated to cover changes to national policies or legislation. Much of the repetition in Local Plan policy criterion has been amalgamated / consolidated into the overarching policies within the Local Development Plan. The option to continue with the policies within the former Local Plan was not feasible given the requirements of various legislation to keep the plan up to date and avoid significant adverse environmental impacts.

In terms of allocated development opportunity sites; alternative sites were identified as non-preferred sites at the Main Issues Report stage and Additional Sites stage. These alternative sites were ruled out for various environmental reasons including impact on landscape, flooding, road access and proximity to services and facilities. The alternative sites would have a greater negative impact (social, economic and environmental) than the preferred sites identified in the Local Development Plan.

6. Monitoring of significant environmental effects

Under to Section 18(3)(f) of the Environmental Assessment (Scotland) Act 2005 there is a requirement to monitor the significant environmental effects when the plan is implemented. This monitoring will include the provision of information on the measures that are to be taken to monitor for any unforeseen environmental effects so that appropriate remedial action may be taken. The table below sets out the proposed indicators that will be used to monitor the impact of the Plan on each SEA topic. An Action Programme has been also been prepared, listing actions required to deliver the specific proposals and policies within the LDP, and identifying the agencies, groups or individuals who will be required to implement these. Implementation of the actions will be monitored regularly by the Council through updates to the Action Programme.

Proposed monitoring of key significant effects identified in the assessment

<i>Biodiversity, flora & fauna</i>	<ul style="list-style-type: none"> • Extent and condition of UK BAP habitats and species (including key upland bog / peatland and woodland habitats). • Extent and condition of designated sites • Location and extent of natural / semi-natural habitats. • Biodiversity index: species indicators – e.g. farmland / woodland bird species.
<i>Geology & soils</i>	<ul style="list-style-type: none"> • Proxies for soil carbon content: extent of soils rich in organic matter; extent of peatlands; soil record books. • Water quality / sediment content (as a proxy for soil erosion). • Areas of highly erodible soils.
<i>Water</i>	<ul style="list-style-type: none"> • Overall quality (WFD status) of river and loch waterbodies in the Park. • Likely % compliance of waterbodies across the Park with WFD objectives. • Flooding related indicators as per <i>climatic factors</i>. • SUDS incorporated into development
<i>Air & noise</i>	<ul style="list-style-type: none"> • Modal choice / split for visits to the Park. • Percentage of Park residents with access to public transport. • Levels of car and van ownership amongst Park residents. • Local authority air quality reporting. • Visitor numbers to the Park or suitable proxies (e.g. number of overnight stays).

Climatic factors	<ul style="list-style-type: none"> • Transport related indicators as per <i>air & noise</i>. • Flood hazard extent / depth (especially fluvial flooding). • Flooding impacts. • New renewable energy development • Total greenhouse gas emissions (CO₂e) from the Park. • Socio-economic impacts of climate risks (e.g. levels of service disruption). • New development (e.g. number of houses delivered). • New development adopting sustainable design (e.g. timber construction, micro-renewables)
Landscape & cultural heritage	<ul style="list-style-type: none"> • Landscape Character Areas. • Extent and condition / integrity of areas of wild land in the Park. • Extent and condition of historic and designed landscapes in the Park.
Population & human health	<ul style="list-style-type: none"> • Delivery of new / upgraded access and outdoor recreation infrastructure (e.g. length of upgraded path). • Visitor numbers to the Park or suitable proxies (e.g. number of overnight stays). • Participation rates in different outdoor recreation activities in the Park or suitable proxies (e.g. usage of core path network). • Health outcomes in affected communities.

7. Conclusion

The SEA of the Local Development Plan has added value to the Local Development Plan process and compliments the National Park Partnership Plan to safeguard and enhance the special qualities of the National Park. The SEA has resulted in constructive changes to Plan policies and allocated sites which will have a positive effect on the environment. Monitoring of significant potential effects (positive and negative) will take place throughout the five year Plan period for sites and policies in conjunction with the review of the Local Development Plan Action Programme. Lessons have been learned throughout the SEA process which will improve how we carry out future Plan SEAs to provide greater clarity.