

**The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 Scoping Opinion
of Stirling Council for the proposed development at
Craigforth Campus, Stirling.**

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1. Introduction

Stirling Council received a request under Regulation 17 of The Town and Country Planning (Environmental Impacts Assessment) (Scotland) Regulations 2017 ('The Regulations') for a scoping opinion in respect of a proposed development at Craigforth Campus, Stirling. The purpose of this scoping opinion is to provide the applicant with details of what the Council considers to be the main issues and therefore the issues upon which the EIA Report should focus.

As part of the process of preparing this scoping opinion the Council has consulted with a wide range of agencies (both statutory and non-statutory). Each of the consultees has provided a response relating to their own particular remit and they are attached to the scoping opinion for your information. Please note that the responses submitted by the consultation authorities form part of the scoping opinion and should therefore be read in full.

As is evidenced by the wide range of consultees, there are a number of issues associated with this proposal which require to be addressed within the EIA Report. This cover note summarises what the Council considers to be the issues upon which there will be likely significant effects, and therefore those upon which the EIA Report should focus.

2. Description of the development

The proposal is for a mixed use development which is expected to include the following elements:

Residential with associated infrastructure and engineering works;
Retail: comprising food and non-food retail;
Class 3 restaurant;
Pub/Restaurant;
Leisure;
Business Class 4;
Care Home;
Distillery;
Hotel;
Visitor Centre;
Nursery;
Car Parking;

In terms of access, the proposals have scope to incorporate a new vehicle access from the north off the A84 with a potential enhancement of the existing access from the south off Dumbarton Road.

3. Planning policy context

In developing the proposal and preparing the EIA Report, particular regard should be afforded to the relevant provisions of Scottish Planning Policy (SPP), The Town and Country Planning (Environmental Impact Assessment)(Scotland) Regulations 2017, Circular 1/2017: The Town and Country Planning (Environmental Impact Assessment)(Scotland) Regulations 2017 as well as other relevant national policy guidance; the provisions of the Stirling Council Local Development Plan and other material planning policy considerations.

The proposed development site is partly located within LDP site allocations B14 Craigforth and H119 Craigforth. The Plan identifies a range of Key Site Requirements (KSR's) for each site. B14 specifically states the allocation, extending to 8 ha and excluding the main headquarters building, is predominantly business, leisure and hotel uses. Other KSR's require due consideration to be given to heritage, landscape, flood risk, surface water drainage and water quality impacts. Similar KSR's apply to the 8 unit H119 housing allocation.

Within and immediately surrounding the proposed development site there are a number of environmental constraints. Also, given the scale of the proposed development, effects are likely to extend over a large area and the construction process will last for a considerable period of time, further emphasising the extent of any effects.

4. Consideration of alternatives

Schedule 4, paragraph 2 of the Town and Country Planning Environmental Impact Assessment (Scotland) Regulations 2017 requires that all EIA Reports should include information on the main alternatives studied and an indication of the main reasons for choosing the selected option, with reference to the environmental effects. The applicant should therefore include details of the alternative approaches to development which have been considered.

5. Landscape Implications

The EIA Report should assess the landscape implications of the proposed development using the most up-to-date methods and best practice. This process should be used in order to, in part, dictate the layout of the development, employing any mitigation measures which minimise adverse impacts upon the landscape character of the area.

The site is located adjacent to National and local designated areas of scenic and heritage importance. Within and around this designation proposals are to be carefully assessed in terms of their landscape and visual implications, due to the sensitive nature of the scenic area.

The scoping request discusses viewpoints, which are to be included as part of the landscape and visual impact assessment for the proposed development. Consultation with SNH, HES and this Council will be necessary as part of the EIA Report and planning application process. The applicant should agree viewpoints the required distances with both Stirling Council, SNH and HES prior to preparing the environmental statement.

6. Cumulative Effects

The EIA Report should include an assessment of the cumulative effects of the proposed development. Of particular concern are the potential cumulative effects which could arise in conjunction with how these proposals would combine and interact with the effects of other developments (including projects for which consent has been sought or granted, as well as those already in existence), in terms of landscape, infrastructure, traffic and transportation and noise.

7. Aviation

There are no aviation concerns with the proposed development that cannot be addressed through the planning application.

8. Design Principles

The layout of the site should be designed so as to minimise the impact of the development upon key environmental features, significant views and sites designated for their ecological, historical, cultural or scenic qualities. The principles to be adopted in the design process should be made explicit within the EIA Report.

The applicant will also have to give consideration to producing a design and access statement as part of the EIA process in order to demonstrate how ecology, heritage, landscape, drainage and access has informed the development layout.

In addition it should be noted that further investigation will be required to ensure any proposed development takes account of pipelines that may run through the site and any required safety requirements.

9. Nature Conservation Designations

There are nature conservation designations within the boundaries of the proposed development site. There are designated wildlife sites close to the site which could potentially be affected by the proposed development. The EIA Report should therefore assess any implications for these sites (identified by the agent and the consultees in the responses) and the mitigation measures that can be employed in order to avoid or reduce any potentially adverse effects.

It is welcomed that the submitted Scoping Report states that a number of nature studies will be undertaken and these surveys should be submitted along with the EIA report and include the further studies required and set out in the consultee responses. SNH and Stirling Council will need to agree the proposed surveys and methodologies.

10. Soils

A small area at the south western part of the site is identified as prime quality agricultural land. The proposed development will result in the loss of this land for agricultural purposes.

11. Short-term Impacts

The environmental report should assess impacts upon the surrounding area during the construction phase in terms of any potential for, inter alia, flooding, road congestion, noise, vibration and pollution.

The consequence of construction works should be assessed and addressed by means of a method statement, environmental management plan, mitigation programme, reinstatement measures and monitoring regime.

The effects of construction activities on water quality should be assessed, to avoid in particular, sedimentation and accidental spillages. Any private water supplies should be protected during and after construction. The development should maximise the use of secondary aggregates or recycled materials and the production of waste materials should be minimised.

12. Forestry

There will be no likely significant effects upon commercial forestry. The trees within the site form part of a designated Ancient Woodland.

13. Built and cultural heritage resources

Retention of historic buildings within the development site is essential. In terms of the wider impact on the built and cultural heritage, it is considered that the proposed development has the potential to have significant impacts. The response from Stirling Council Conservation Officer and Historic Environment Scotland further demonstrates this stance.

14. Tourism/ Recreation and Public Access Resources

The EIA Report should address the consequences of the development for users of the countryside and its direct and indirect impacts on tourism and recreational interests and resources in the vicinity. The application site contains local paths which the layout of the site will need to encompass.

15. Access issues

The environmental report should contain details of the access arrangements for the site, both during construction and following completion of the proposed development. This process should be used in order to identify any adverse impacts upon the surrounding environment, including the potential for congestion on the surrounding road network, and any subsequent mitigation measures which could be employed in order to avoid or reduce any potentially adverse effects. It is recognised that there will be overlaps with the Transport Assessment to be submitted as part of the planning application.

16. Traffic and transportation

The EIA Report should assess the impact of the construction and operational phases of the proposed development on the public road network in terms of the effects of the additional vehicular traffic generated, on traffic management, road safety, road layout and road condition.

The EIA Report should contain details of the routes considered for the delivery of materials and impacts upon the road network. The EIA Report should address access issues, particularly those impacting

upon the trunk road network, potential stress points at junctions, approach roads, bridges and site compound areas etc. It is noted that a Transport Assessment will be submitted as part of the planning application.

17. Noise, Vibration and Lighting

The environmental report should explore potential impacts upon sensitive receptors in terms of noise and vibration during both the construction and operational phases of the proposed development. Operational and construction traffic noise should be assessed by considering the increase in traffic flows. The applicant will need to undertake a noise impact assessment as part of the report.

It is noted that a the EIA Report will include a chapter which will consider Construction Impacts including noise, vibration, lighting, dust and impact on the water environment. Please see Environmental Health advice set out at the end of this opinion.

18. Flooding and Drainage

The Council's screening opinion identifies that there is a flood risk area within the proposed development site. It is noted that it is intended that Flooding and Drainage Issues will be considered within a submitted Flood Risk Assessment and within a specified chapter of the EIA Report, This approach is considered acceptable and details shall be included within the EIA Report which details how the development has been designed to address any identified flood risk constraint. Also take note of the SEPA and Council comment on this aspect.

19. Consultation responses

A consultation exercise has been conducted with all of the relevant consultees. All of the responses received are included as an appendix to this document. The issues raised within each of these responses should be carefully considered and addressed within the Environmental Report. Responses from the following organisations and services were received, as set out at Annex 1.

20. Conclusions

It is apparent that there are a number of constraints associated with the proposed development. The potential for likely significant effects clearly stems from the size of the proposed development and its location. The main issues of concern relate to amenity, noise, pollution, the surrounding road network (including during what would be a long construction phase), landscape, historic environment, natural environment and flooding. These issues are all covered in detail by the relevant consultation bodies. The responses set out below and the key points made should all be addressed in the EIA Report, but please be aware that upon the submission of the report the Council can request additional information to further assist determination of the impacts.

Annex 1 – Comments received by consultation authorities

Main Points from Consultees

Dorothy/Urban Design Comments:

Landscape & Visual Impact Assessment: Agree that a Landscape & Visual Assessment (LVIA) would be required as part of the EIA process, and that it be prepared and undertaken in accordance with the 3rd Edition of the Guidelines for Landscape and Visual Impact Assessment (2013).

The report (para 18.16 & 18.19) suggests that in terms of a study area for the assessment, a distance of 2km from the site is proposed. Within preceding paragraphs the Report acknowledges the low lying and visible nature of the site, relatively open nature of its immediate Carse context, and the potential for views from 'the fringes of Stirling and Bridge of Allan to the east/north east and from Cambusbarron to the south. Given this, it is queried why, at this early stage, such a tight study area has been stipulated, and would question whether this was appropriate, as consideration of many of these locations, in terms of potential important national/local viewpoints would be out with this – as would the Wallace Monument, and elevated views from the north.

In terms of methodology for the viewpoint study forming part of the assessment, it is recommended that at this stage the Report be explicit in stating that the range and location of viewpoints would be agreed in consultation with Stirling Council and SNH – the content of the aforementioned guidance document allows for this.

Health Impacts: It is noted that the Report considers that a separate chapter on Health Impacts should be scoped out – stating that the inclusion of air quality, noise impact, and transport assessments will assess likely effects, including those on human health. Given the new Planning Act requires consideration be given, before permission is granted for either national or major developments, to the likely health effects of the proposed development, consider there is merit for any Environmental Report to have a separate chapter addressing the issue. This may draw upon the findings of technical assessments informing separate chapters such as transport, but should also seek to include assessment of impact relative to location, quality of place, buildings, and open spaces relative to health and wellbeing.

Sustainability: In response to their question within paragraph 15.6, they should continue to consider BREEAM, accepting that at some point this may be scoped out in the future.

Richard Callendar: Principle Planning Policy Officer.

Scoping Opinion

General

From an EIA perspective, this proposal will also be the subject to a 'multi-staged consent.' Advice in this regard is set out in Planning Circular - Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, see para.'s 138 - 150. Given extent of site that will be covered by the PPP application consideration does need to be given as to whether the parameters of the assessment undertaken in support of the 'principal' decision will take account of all potential environmental effects likely to follow as consideration of an application proceeds through the multi-stage process.

Specific Topics

Flood Risk

The SSR confirms flood risk impacts will be subject to detailed evaluation. SEPA and Claire Elliot of Stirling's Flood Team have provided detailed comments.

SEPA's indicative flood maps show a significant proportion of the site to be at medium to high risk to flooding. Proposed development types include care home, identified in SEPA Flood Risk and Land Use Vulnerability Guidance as a 'most vulnerable use' and residential, deemed a 'highly vulnerable use.'

SEPA Planning Background Paper: Flood Risk states the following:-

'The main principles of flood management are identified as avoid, protect, prepare and accept. It identifies the land use planning system as one of the most powerful tools available to manage flood risk sustainability (pg 21).'

This approach is fully supported by relevant policy guidance in SPP, the Stirling LDP and the Forth Local Flood Risk Management Plan.

The SSR states:-

Alternatives

4.4. Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 states that the following must be incorporated:

'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.'

4.5. In response the EIA will explain the site selection process and include consideration of alternative layouts, as appropriate.

Given indisputable significance of the flood risk impacts and inherent practical difficulties in long term mitigation, the environmental report should consider as a reasonable alternative, a site layout where vulnerable development avoids areas of medium to high flood risk, as defined by detailed hydrological studies.

Biodiversity

Agree with SNH's opinion that: - 'Stirling Council, as competent authority, must establish that the proposal will not adversely affect the integrity of the site. Consequently, an appropriate assessment must be carried out.' They also highlight however that strict application of environmental criteria should ensure proposal will not adversely affect the integrity of the River Teith SAC.

Guy Harewood (Biodiversity Officer) has also highlighted proposed designation of Craigforth as a local nature conservation site. The LDP's Policy 8.2: Proposals affecting Local Nature Conservation Sites (LNCS) states development proposals should not adversely affect sites of value to local nature conservation (LNCS). Applicant should carry out an assessment of the site in line with the LNCS process.

Climate Change

Climate change should be scoped in as a specific topic, especially relevant given the Council's formal recognition of the Climate & Ecological Emergency. Attach advice and guidance from the Institute of

Environmental Management and Assessment which provides a useful overview on benefits to the assessment process.

Landscape

Limited scope of landscape assessment, and that viewpoints be agreed in consultation with Stirling Council and SNH/HES.

Conservation Officer

Para 3.8 - States that "the extensive redevelopment will involve the demolition of the existing buildings" Is it intended to apply also to Craigforth House on the site (category B listed)?

An application for Listed building consent will be required.

Para 5.4 and 5.5 - It is important to note that all built structures that pre-date 1948, within the curtilage of Craigforth House are effectively listed category B. Paragraph 5.4 makes reference to "other buildings formerly associated with Craigforth House" and paragraph 5.5 makes reference to "a number of features that can be directly linked to the former country house" on the site. The report should acknowledge that these buildings and features may be covered by statutory listing and where appropriate require to be identified and assessed as such. Any impacts on these buildings and features may require listed building consent.

Para 5.5 - Remnant landscape features within the designed landscape of Craigforth House should be identified and mapped as non-designated heritage assets and impacts assessed relating to these.

Para 5.6 - The character of the setting of the Drip Bridge conservation area also requires to be considered.

Paras 5.7-5.9 - The assessment should include non-designated heritage assets including remnant landscape features and associated trees and planting. An assessment of the trees and planting within the landscape and how this relates to the designed landscape is important in understanding and informing decision affecting potential loss or change.

5.18 - Strongly recommend inclusion of the Stirling Town and Royal Park conservation area in the list of heritage assets most likely to have their settings affected (currently omitted from the proposed list), and to be considered in the EIAR.

5.20 Onwards - Stirling Council supplementary guidance in the form of the conservation area character appraisals for the Drip Bridge conservation area and for the Stirling Town & Royal Park conservation area should be included in the list of documents used for the purposes of the desk based assessment, and as guidance in the assessment of effects and their significance.

SNH

Designated sites: The proposed development is located on land immediately adjacent to the River Forth, which joins to the River Teith approximately 1km to the north. From the confluence of these rivers, both up and downstream, the Rivers Teith and Forth are part of the River Teith Special Area of Conservation (SAC) designated for Atlantic salmon and brook, river and sea lamprey. The qualifying species require good water quality - the location of the proposed development upstream from the SAC means that there is connectivity to the site through potential impact on water quality both during construction and once completed.

Biodiversity – protected species: standard species surveys have been undertaken, with further assessment highlighted where necessary, however SNH have changed service statement and no longer offer bespoke advice to routine species issues. Rather SNH fulfil an advisory role on protected species through the provision of standing advice and do not expect to be consulted except in exceptional circumstances not covered by our standing advice at

Scoping If it is determined that an EIA will be carried out, then comments on the Scoping are as follows:

Designated sites Paragraph 10.6 of the screening and scoping report identifies that there are potential sources of pollution during both construction and operational phases, and that the temporary and permanent drainage and waste water treatment may both effect the surrounding hydrological environment. The key issues identified in paragraph 10.7 – ‘Effects on water quality’ associated with sediment-laden runoff or chemical pollution and ‘Effects on associated protected areas, freshwater ecology or water uses’ due to pollution, obstruction of watercourses, or changes in the hydrological regime – both identify issues which may detrimentally impact the River Teith SAC. The mitigation measures outlined in paragraphs 10.16 – 18 are agreed. These should ensure that construction will not lead to a deterioration in water quality that would affect the qualifying features. The Environment Management Plan produced must be in accordance with SEPA guidance (available on the SEPA website) and include site specific measures to avoid the risk of impacts on the species for which the site is designated. These measures should ensure there is minimal direct disturbance of the qualifying features, and protect against adverse indirect impacts on important ecological requirements such as on water quality, water flow and/or river channel substrate.

The River Teith SAC is discussed within the Biodiversity chapter as well as chapter 10 ‘drainage and hydrology’. As stated above, the mitigation set out is agreed, however, paragraph 12.21 states that based on this mitigation the proposed development could be screened out of a Habitats Regulations Appraisal (HRA). This is not correct, as stated, this proposal could be progressed without any modification, however, due to the connectivity between the proposed development and the SAC, this proposal is likely to have a significant effect on the qualifying interests of site. Because it could affect internationally important natural heritage interests, Stirling Council, as competent authority, must establish that the proposal will not adversely affect the integrity of the site. Consequently, an appropriate assessment must be carried out.

It is advised that if the mitigation set out in chapters 10 and 12 are incorporated in the EMP, and the proposal is carried out in strict accordance with this, then the proposal will not adversely affect the integrity of the site.

Biodiversity: The River Teith SAC is the only designated site which may be impacted by this proposed development.

Landscape and visual impact including Placemaking. A masterplan shall be prepared to address how landscape, place making, connectivity and biodiversity (particularly woodland) will be sympathetically incorporated into the development to make a distinctive place that is attractive and useable for both people and nature. For example: - Existing water courses present opportunities for attractive place making features for people and nature that could contribute to green networks. These should be incorporated into the development proposals.

Retention/safeguarding of existing trees will contribute to local distinctiveness as well as having biodiversity value. It will be beneficial to retain the ancient woodland on Craigforth Crag, as stated in

the screening scoping report. - To benefit place making within the residential section, it would be beneficial to mix the housing types instead of strictly zoning them according to style – this is consistent with the tenure-blind approach encouraged by Scottish Government (Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits <https://www.gov.scot/publications/planning-advice-note-2-2010-affordable-housinghousing-land-audits/>). - To create a well-connected place, it will be important to retain and enhance where possible connectivity to existing path networks adjoining the development site and in the wider area. It is beneficial to highlight active travel connections and to take opportunities for the paths routes to be multifunctional – i.e. by incorporating adjacent SUDS and green networks. - It would be useful for a development proposal to explain what landscaping, planting and uses the proposed amenity and green spaces will have. SNH Encourage multi-functionality and incorporation of places for nature as well as people (e.g. incorporation of SUDS into greenspaces, and areas such as wildflower strips or meadows where wildlife can feed and shelter, which also provide visual interest for people).

Sepa

The following key issues must be addressed in the Environmental Impact Assessment process. To avoid delay and potential objection the following information must be submitted in support of the application.

Flood risk

Waste water drainage

Surface water drainage

Ecology

Pollution prevention and environmental management

Engineering activities in the water environment

Existing groundwater abstractions

Groundwater abstractions

Space for waste management provision within site layout

Air Quality

Energy Statement

While all of the issues below should be addressed in the EIA Report, there may be opportunities for several of these to be scoped out of detailed consideration. The justification for this approach in relation to specific issues should be set out within the EIA Report. SEPA would welcome the opportunity to comment on the draft EA Report.

- It is noted that the application site (or parts thereof) lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding.
- SEPA hold multiple records of flooding in the area in 1877, 1894, 2005, 2006,

2012, 2016, and 2018. These records include fluvial and surface water flooding mechanisms. SEPA also hold aerial photographs of flooding near to Dobbies Garden Centre in 2005 and 2006.

- Multiple flood studies have been undertaken by Stirling Council along the River Forth and River Teith. SEPA are currently aware that a Flood Study is underway for the River Forth and Allan Water. SEPA strongly suggest that the Flood Risk Management Authority is contacted to glean any information/local knowledge that they may possess.
- A SEPA Gauging station is located just downstream of the M9 motorway on the River Forth crossing at Craigforth. Station number 18011. For AMAX, water level and general information please contact the local hydrometry team which will be able to provide this information.

Waste water drainage

Details of the waste water provision for your development should be provided in the EIA Report or planning submission, including consideration of options for waste water treatment facilities. Drainage is a material planning consideration and will be assessed as part of your planning application in line with PAN 79 Water and Drainage and the relevant policy of the Local Development Plan. Where there is a public sewerage system, waste water drainage from development within and close to the settlement envelope should be directed to that system. If the system has insufficient capacity, then early dialogue with Scottish Water will be required to determine if works are planned to overcome this problem, or what developer pro-rata contributions will be necessary to remove the constraint.

If there is no or limited public sewerage infrastructure, given the scale of development we would still expect the development of strategic infrastructure to adoptable standards. Contact should be made with Scottish Water to determine the standards required to ensure adoption of new infrastructure. Please note that SEPA is not likely to support proposals for private foul drainage systems for significant development (e.g. more than 25 houses) where development of public infrastructure is the sustainable long-term solution. An interim solution may be acceptable provided an appropriate upgrade has been agreed with Scottish Water and there will be no unacceptable impact on the water environment. For further guidance please refer to our Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements

Surface water drainage

The treatment of surface water runoff by sustainable drainage systems (SUDS) is a legal requirement for most forms of development, however the location, design and type of SUDS are largely controlled through planning. SEPA encourage surface water runoff from all developments to be treated by SUDS in line with Scottish Planning Policy (Paragraphs 255 and 268), PAN 61 Planning and Sustainable Urban Drainage Systems, PAN 79 Water and Drainage and the relevant policy of the Local Development Plan. SUDS help to protect water quality, reduce potential for flood risk and release capacity in the public sewerage network where the alternative is use of combined systems. Discharges to combined sewers should be avoided to free up capacity for waste water discharges.

SEPA expect surface water from all developments to be treated by SUDS in line with Scottish Planning Policy (Paragraph 268) and, in developments of this scale, the requirements of the Water Environment Controlled Activities Regulations (CAR). SUDS help to protect water quality and reduce potential for flood risk. Guidance on the design and procedures for an effective drainage system can be found in Scotland's Water Assessment and Drainage Assessment Guide.

The proposed SUDS should accord with the SUDS Manual (C753) and the importance of preventing runoff from the site for the majority of small rainfall events (interception) is promoted. The applicant should use the Simple Index Approach (SIA) Tool to ensure the types of SUDS proposed are adequate.

Construction phase SUDS should be used on site to help minimise the risk of pollution to the water environment. Further detail with regards construction phase SUDS is contained in Chapter 31 of SUDS Manual (C753).

Comments should be requested from Scottish Water where the SUDS proposals would be adopted by them and, where appropriate, the views of your authority's roads department and flood prevention unit should be sought on the SUDS strategy in terms of water quantity and flooding issues.

If >1000 car park spaces, SUDS will require a Simple CAR licence authorisation. If <1000 spaces, discharge will be covered under CAR GBR10.

Are the ponds surface or groundwater fed? A habitat assessment should be undertaken to establish the pond's status and whether any habitat improvements can be made as part of the development. Existing ponds cannot be used as SUDS. Care should be taken not to contaminate the ponds during demolition and construction phases.

The applicant alluded to a CHP/district heating project – depending on the size, this may require authorisation under PPC. If abstracting water from the river or a borehole for the system, a CAR authorisation may be required.

Pollution prevention and environmental management

One of our key interests in relation to major developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. The construction phase includes construction of access roads, borrow pits and any other site infrastructure.

SEPA advise that the applicant should, through the EIA process or planning submission, systematically identify all aspects of site work that might impact upon the environment, potential pollution risks associated with the proposals and identify the principles of preventative measures and mitigation. This will establish a robust environmental management process for the development. A draft Schedule of Mitigation should be produced as part of this process. This should cover all the environmental sensitivities; pollution prevention and mitigation measures identified to avoid or minimise environmental effects. Please refer to the Pollution prevention guidelines.

The development however requires a Construction Site Licence as the site is >4ha. See SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

The applicant shall prepare a Pollution Prevention Plan, made available to all site contractors during demolition and construction phases. See Supporting Guidance WAT-SG-05

Engineering activities in the water environment

In order to meet the objectives of the Water Framework Directive of preventing any deterioration and improving the water environment, developments should be designed to avoid engineering activities in the water environment wherever possible. The water environment includes burns, rivers, lochs, wetlands, groundwater and reservoirs.

SEPA require it to be demonstrated that every effort has been made to leave the water environment in its natural state. Engineering activities such as culverts, bridges, watercourse diversions, bank modifications or dams should be avoided unless there is no practicable alternative. Paragraph 255 of SPP deters unnecessary culverting. Where a watercourse crossing cannot be avoided, bridging solutions or bottomless or arched culverts which do not affect the bed and banks of the watercourse should be used. Further guidance on the design and implementation of crossings can be found in our Construction of River Crossings Good Practice Guide. Other best practice guidance is also available within the water engineering section of our website.

If the engineering works proposed are likely to result in increased flood risk to people or property then a flood risk assessment should be submitted in support of the planning application and SEPA should be consulted as detailed below.

A site survey of existing water features and a map of the location of all proposed engineering activities in the water environment shall be included in the EIA Report or planning submission. A systematic table detailing the justification for the activity and how any adverse impact will be mitigated should also be included. The table should be accompanied by a photograph of each affected water body along with its dimensions. Justification for the location of any proposed activity is a key issue for us to assess at the planning stage.

Where developments cover a large area, there will usually be opportunities to incorporate improvements in the water environment required by the Water Framework Directive within and/or immediately adjacent to the site either as part of mitigation measures for proposed works or as compensation for environmental impact. SEPA encourage applicants to seek such opportunities to avoid or offset environmental impacts. Improvements which might be considered could include the removal of redundant weirs, the creation of buffer strips and provision of fencing along watercourses. Fencing off watercourses and creating buffer strips both helps reduce the risk of diffuse water pollution and affords protection to the riparian habitat.

Ecology/Pollution

The site is located in the catchment of the River Forth, approximately 0.5 km upstream of the River Teith confluence. The River Teith SAC lies approximately 200 m to the north of the development site at its closest point. It is designated for its Atlantic salmon and lamprey populations.

The Raploch Burn (a tributary of the Forth) runs through the site adjacent to the southern boundary and receives the majority of the site runoff before it discharges to the Forth downstream.

The River Forth is located to the immediate west of the site. The information provided states that it receives runoff directly from the site via overland flow, via a single land drain to the west of the Crag and via the Raploch Burn tributary.

The information provided states that the burn on site should not be impacted directly by the development (as no crossings or in-stream works are required), but acknowledges that watercourses are at risk during the construction phase.

The information provided acknowledges the potential for significant environmental impacts. It recommends that the EIA should assess the potential significant effects to hydrology and drainage. A Construction Site Licence will also be required, which will contain a section setting out environmental commitments required when working near a watercourse. This will set out measures for effective mitigation of silt and safe storage of potential pollutants.

To avoid contamination of aquatic habitats it is imperative that during the construction phase silt and any other pollutants such as oils and concrete are not allowed to enter watercourses, as they can cause significant ecological damage. Run-off of any contaminated water to drains or burns should be avoided by following carefully laid-out work procedures and following guidance provided in SEPA's Pollution Prevention Guidance. Timing of the construction phase should avoid periods of high rainfall to prevent siltation within the watercourses.

Run-off of silt can be contained by the use of settlement lagoons, silt-traps and bunding. They should be situated away from watercourses. Soils and material dug for any ground works should not be stored on wetland areas and disturbed ground on or near sensitive habitats should be re-instated in the shortest possible time to avoid runoff issues. The dispersal of contaminated water should not be into any current areas of wetland.

Groundwater Dependent Terrestrial Ecosystems (GWDTEs)

The proposed development comprises predominantly brownfield areas and arable farmland, located on low permeability soils.

A preliminary ecology survey has been undertaken, which followed the extended Phase 1 Habitat Survey Methodology. Outline NVC communities were assigned to the main Phase I Habitat types on site based on the key species present in the habitats.

The preliminary survey identified an area of rank marshy grassland to the north west of the car park in the northern site. The application also states that no GWDTEs were identified as part of this survey and, given existing ground conditions, are not anticipated to be identified within, or in hydrogeological connection with, the proposed development.

SEPA request further explanation regarding why the area of marshy grassland is not considered to be a potential GWDTE. We also request a copy of the Phase 1 Habitat Survey map, overlain by the proposed infrastructure.

If at any stage any GWDTE is identified within 100m of the development area, mitigation measures should be put in place to maintain the functionality of the wetland.

Biodiversity and habitats

The information provided states that retaining and enhancing a significant portion of the open space across the site is a key component to the emerging masterplan. SEPA welcome this as the site and proposals offer potential to create and maintain a mosaic of beneficial wildlife habitats.

A single area of woodland listed on the Ancient Woodland Inventory (AWI) lies within the site. Crag woodland is a long-established woodland of plantation origin (LEPO). Other trees are also present on site. The information provided states that it is unclear at this stage if any of this habitat will be lost to the proposals, but it is recommended that it is retained where at all possible.

If any tree felling is required, it would be good practice to replant with native species of local provenance to replace lost habitat and enhance the local biodiversity, working towards Local Biodiversity Action Plan targets where possible.

Two ponds are present on site. Pond 1 (221 m²) is located within the North Site, between the River Forth and existing parking. Pond 2 (414 m²) is located within the Central Site, on the eastern edge of the crag adjacent to the access road bordering the Crag. No reference is made to these being impacted

by the development proposals. The small pond which lies in the west of the northern section of the site (Target Note 7) was choked with great reedmace and held little to no standing water at the time of survey. Wetland and pond habitats can bring many benefits and we would encourage these to be protected wherever possible.

The green spaces and in the design should be planted to create as many interconnected wildlife friendly habitats as possible. Meadows, native hedging, wetland areas and native tree cover may all be possibilities. Wildlife habitats should also ideally be protected from too much disturbance from the public once the site is open. Native species should be used wherever possible for any planting.

Non-native invasive species

There was no mention of non-native invasive species in the information provided at this stage. They are not always readily apparent, even if present on site. Details of legal responsibilities can be found in the Code of Practice on Non-Native Species produced by the Scottish Government. SEPA regulates the disposal of non-native plant material.

Conclusions

SEPA seek clarification on the marshy grassland area and why it is not considered to be possible GWDTE. As stated above, we also request a copy of the ecological survey maps overlain with the proposed infrastructure.

Existing groundwater abstractions

Roads, foundations and other construction works associated with large scale developments can disrupt groundwater flow and impact on groundwater abstractions. To address this risk a list of groundwater abstractions both within and out with the site boundary, within a radius of i) 100 m from roads, tracks and trenches and ii) 250 m from borrow pits and foundations) should be provided.

If groundwater abstractions are identified within the 100 m radius of roads, tracks and trenches or 250 m radius from borrow pits and foundations, then either the applicant should ensure that the route or location of engineering operations avoid this buffer area or further information and investigations will be required to show that impacts on abstractions are acceptable. Further details can be found in Appendix 2 (which is also applicable to other types of developments) of our Planning guidance on windfarm developments.

Water abstraction

Where water abstraction is proposed SEPA request that the EIA Report, or planning submission, details if a public or private source will be used. If a private source is to be used the information below should be included. Whilst we regulate water abstractions under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended), SEPA require the following information to determine if the abstraction is feasible in this location;

Source e.g. ground water or surface water;

Location e.g. grid ref and description of site;

Volume e.g. quantity of water to be extracted;

Timing of abstraction e.g. will there be a continuous abstraction;

Nature of abstraction e.g. sump or impoundment;

Proposed operating regime e.g. details of abstraction limits and hands off flow;

Survey of existing water environment including any existing water features;

Impacts of the proposed abstraction upon the surrounding water environment.

If other development projects are present or proposed within the same water catchment then SEPA advise that the applicant considers whether the cumulative impact upon the water environment needs to be assessed. The EIA Report or planning submission should also contain a justification for the approach taken.

Space for waste management provision within site layout

In accordance with Scottish Planning Policy (Paragraph 190) and the relevant policy of the Local Development Plan, space for collection, segregation, storage and possibly treatment of waste (e.g. individual and/or communal bin stores, composting facilities, and waste treatment facilities) should be allocated within the planning application site layout. Please consult with your local council's waste management team to determine what space requirements are required within the application site layout. Some local authorities have an information sheet setting out space requirements.

Air quality

The local authority is the responsible authority for local air quality management under the Environment Act 1995, and therefore SEPA recommend that Environmental Health within the local authority be consulted.

They can advise on the need for this development proposal to be assessed alongside other developments that could contribute to an increase in road traffic. They can also advise on potential impacts such as exacerbation of local air pollution, noise and nuisance issues and cumulative impacts of all development in the local area. Further guidance regarding these issues is provided in Scottish Planning Specific Advice (2004) available on the Scottish Government's Planning website entitled Air Quality and Land Use Planning.

Energy Statement

SEPA recommend that substantial developments ensure their heat demand is met from district heating, subject to the outcome of a feasibility statement. This can be achieved through onsite heat generation, co-location with an existing or proposed heat source (including Energy from Waste facility or other facility which produces heat/power including excess or waste heat), or an existing or proposed heat network off site.

The development must enable connection to a heat network or heat producer, unless it can be demonstrated to your authority that this would not be feasible. An Energy Statement informed by a Feasibility Study should be provided for assessment by your authority demonstrating how the proposal will meet the requirements for providing district heating onsite. This should be prepared in line with the Scottish Government's online planning advice Planning and Heat and assess the technical feasibility and financial viability of heat network/district heating for this site, identifying any available existing or proposed sources of heat (within or out with the site) and other factors such as where land will be safeguarded for future district heating infrastructure.

Please note that we will not audit Energy Statements or Feasibility Studies as the responsibility for this lies with your authority. However we expect them to be undertaken to demonstrate full consideration of how the proposed development can contribute towards Scotland's climate change targets in line

with our Public Body Duties under the Climate Change (Scotland) Act 2009 to act “in the way best calculated to help deliver the emissions reduction targets and the statutory Adaptation Programme” and” in a way we consider is most sustainable.”

Applicants should provide evidence of how the national heat map and/or relevant local authority heat maps (where available) have been used to maximise potential connections / co-location between heat providers and high heat demand users when considering site selection for developments involving heat/power. Consideration of heat mapping should maximise opportunities for the co-location of ‘high heat demand’ developments with heat supply sources, like energy from waste facilities, to maximise the provision of energy efficient and low carbon heat networks and district heating installations.

Heat Maps clearly show where there are areas of heat use and heat generation, and can therefore be used as locational criteria for new heat providers, or for new development sites which could utilise the heat being generated. Heat maps are intended for a number of uses, including in planning new developments, and identifying heat network feasibility. They also identify existing heat providers, particularly those that produce heat as “excess” or “waste” who can connect to heat networks, utilising heat that was previously “wasted”.

A Design and Access statement which demonstrates how the findings of the Energy Statement have been incorporated into the design and layout of the proposed development should be provided. Where new developments are located adjacent to existing heat networks or district heating, the connection should be an integral part of the design to enable connection to take place at time of construction, unless it would not be viable or feasible to do so (the burden of proof is placed on the developer). Ensuring users can be connected to district heating networks is an essential part of delivering the Government’s targets towards renewable and low-carbon heat. There are also significant opportunities within Scotland to make use of heat that is currently waste or excess, in particular from industrial facilities.

Where connections are intended to be made to proposed heat sources in the future, the design of new developments should incorporate space to ‘safeguard’ the future provision of pipework, energy hubs or other associated heat infrastructure to ensure that the subsequent connection to a proposed district heating network can be undertaken (if not already proposed within the original design) without causing disturbance to buildings or infrastructure. This applies to all new significant/anchor development (i.e. developments with a significant heat load or demand). Consideration should be given to potential barriers or restrictions on making district heating connections, for example when planning new key infrastructure such as bypass roads which may interrupt the route of district heating pipeworks.

Creating links between heat producers and heat users is essential to create heat networks and accords with guidance in SPP. In order to deliver the Scottish Government’s targets for 40,000 homes to be heated through heat networks, new developments need to be designed to incorporate district heating. Where substantial new developments are planned, the opportunity arises for providing a heat network within the site and for this to be required and designed in at the earliest stages.

New developments have a role to play in not only establishing and creating these networks, but also in connecting to networks to make use of heat that is being captured.

SEPA therefore recommend that an Energy Statement in prepared for this development.

Regulatory advice for the applicant

Please consider if any of the installations or processes proposed within this mixed use development are likely to require authorisation under the Pollution Prevention and Control Regulations 2000 or other environmental regulations. Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office.

Transport Scotland

From 1st October 2015, planning authorities are no longer required to consult with Scottish Ministers on EIA development.

Historic Scotland has merged with Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS) to form Historic Environment Scotland (HES). HES is named as both a statutory consultee in the planning system and as a consultation body for Environmental Impact Assessment (EIA) purposes. Planning authorities are required to make their own arrangements for consulting HES directly on EIA development. Further information on these wider changes can be found in Historic Environment Circular 1.

In light of the above changes, the Scottish Government has taken the opportunity to streamline EIA consultation arrangements such that Transport Scotland will no longer respond to EIA consultations in a statutory capacity. Planning Authorities must, however, continue to consult Transport Scotland on applications where required by Regulation 25 and Schedule 5 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. These consultations should be sent to Transport Scotland's Development Management Team.

It should be stressed that this response relates only to the EIA consultation. Transport Scotland will require to be formally consulted on the planning application for this development, and will respond separately by means of a TR/NPA/2.

Sustainability Officer

6. Roads & Transport:

This section makes no mention of climate change, especially emissions from transport, which is a major over-sight. Not just emissions during development but, more critically, the increase in emissions generated by the development once fully operational. While these issues could be included here, on balance, they'd be better in a Climate Change Chapter (see below).

12. Biodiversity:

* Para 12.6, p 51: Protected Mammal species - Common Seal, *Phoca vitulina* (they have been seen within 5km of the site this winter) Protected in Britain under Conservation of Seals Act, 1970, and a Priority Species under the UK Post-2010 Biodiversity Framework.

* Table 12.6 says no evidence of otters was recorded but point No 14 of the July 2008 Grant of Outline Planning Permission refers to the requirement for a 30m disturbance-free buffer zone to an otter resting place.

* Para 12.21, p 58 states that "any adverse effect on the River Teith SAC resulting from the proposal is predicted to be extremely unlikely" so it is considered possible to screen the SAC out of the need for a Habitats Regulation Assessment. Given that the development will take place downstream from

the SAC and 2 of the 3 lamprey species for which the River is designated migrate upriver from the sea then the need for an HRA needs further consideration - not just to consider impacts during development but for longer-term impacts of the site during operation.

* Need to include an assessment of insect species.

15. Sustainability, 16. Waste Management & Minimisation, and 17. Climate Change:

Agreed that these 3 chapters could be combined under separate sub-headings in one chapter, provided it doesn't become unwieldy. A single chapter should be titled 'Climate Change and Sustainability' to reflect renewed priorities. Stirling Council recognised the Climate & Ecological Emergency at its 3rd October meeting and is in the process of developing a Climate Emergency Plan to detail the Council's response to this existential threat. Much of what is outlined in the Screening and Scoping report follows a fairly traditional methodology. We are however facing an unprecedented threat from our changing climate which requires a realignment of priorities and it is entirely proper therefore that a Climate Change and Sustainability chapter should come first in the ER.

The response to the climate challenge is two-fold, requiring significant action to reduce greenhouse gas emissions (Carbon Reduction) while also building resilience to the changes already in the system from historical emissions (Climate Adaptation). Any chapter in the ER dealing with climate change will need to include sections under those 2 sub-headings.

Carbon reduction

Research by the Tyndall Centre on carbon budgets aligned with the UK's Paris Agreement commitments shows that emissions from energy (fossil fuel combustion and electricity) from the Stirling area need to reduce by 62% between 2015 and 2025. Any new development therefore needs to demonstrate how it will be as near carbon zero as possible so it does not add to those emissions. That will largely be emissions from buildings but also includes emissions from transport.

* For buildings, options include passivhaus standards, high-density settlements, smaller floor areas to reduce heating needs and amount of materials needed, adaptable properties for changing needs through different life stages, retirement villages, more flatted properties with significantly better insulation to tackle noise and heating issues.

* Re-prioritised transport options include limited car parking, fewer private vehicles and more public transport options, pedestrianised residential streets with play areas, active travel routes and lots of greenery, more working from home and in local office hubs.

Climate Adaptation

* Whilst separate chapters on 9. Flood Risk, 10. Drainage & Hydrology, and 11. Ground Conditions will be included in the ER, it is also important to include relevant issues in the Climate Change chapter, especially action to cope with localised surface water. All properties should be designed to deal with rain falling onto them through inclusion of rain gardens, swales, green roofs, depression soak-aways, residential drainage channels, detention ponds and eco-corridors, as appropriate.

Green and blue infrastructure has a major role to play in building climate resilience, with trees being the ultimate climate change tool by slowing down run-off, increasing infiltration rates, providing

shade, improving biodiversity, providing timber, biofuel and food production (fruit & nuts), absorbing (sequestering) carbon, ameliorating air pollutants, dampening down noise, providing shelter.

* While increased rainfall is a significant issue, so are drought and over-heating. Detention ponds and other storage facilities (individual property rain butts) will be important for retaining water. Solar gain is important in winter, but shading will be just as important in spring through autumn, with properties needing a balance between the two. Properties need to incorporate passive cooling options, brise soleil / sun screening, water features and standard trees.

* Should also include local food growing options in community spaces - not so much to reduce food miles, but to ensure supply chains as climate impacts hit other places harder.

Flood Officer Claire Elliot

In terms of flooding the scoping outlines all of the detail and data sources expected from a flood risk assessment.

Biodiversity Officer

The applicant has recommended that an EIA is carried out. In terms of scoping, most of the key issues have been covered in the applicants screening and scoping report. The one thing to add is that the wooded crag, identified in the report as an area within the ancient woodland inventory, is also a potential Local Nature Conservation Site. Although the site has not been surveyed or assessed it has been identified as an area that has potential local significance and biodiversity value. I would ask that the applicant carry out an assessment of the site in line with the LNCS process. TWIC can help.

Tree Officer Ingrid Withington

There are no TPO's in this area and the area is not Conservation Area. The site is not listed in the HES 'Inventory of Gardens and Designed Landscape', although it is listed on the draft list of sites produced by the GHSS.

The site includes a central wooded crag area, with many mature/specimen/veteran trees. In addition this area is designated both SNH Ancient Woodland and SNH Semi-natural Woodland. This feature within the flat carse area, is of high visual prominence, as well as being of high amenity and biodiversity value. It currently screens much of the development to the north.

The trees on this site need to be surveyed by a qualified Arboriculturalist to BS 5837:2012 and in accordance with SG 31 Trees on Development Sites, including a Tree Survey Plan, including tree positions, canopies and Root Protection Areas (RPA's). In addition an Arboricultural Constraints report and Arboricultural Method Statement, which would assess the feasibility of the construction within and close to Root Protection Areas (RPA) and make recommendations for construction details for hard surfacing/ construction in the vicinity of tree roots with guidance on material/ methods of work and Tree protection will be required.

Proposed Planting and Maintenance Details should be supplied in accordance with Supplementary Guidance SG 29 Landscape and Planting Requirements in New Developments, which provides guidance on the requirements and would include a Planting Plan, planting details (including plant numbers), Schedules and Specification.

Archaeology Murray Cook

Looked at the proposed approach outlined in Chapter 5 (Cultural Heritage and Archaeology) and it is all extremely thorough and competent re the archaeology and with nothing to add.

Roads Officer Neil Pirie

An application of this scale and nature shall be supported by a Transport Assessment, which should be fully scoped with the Transport Development Team prior to submission. These discussions should include Transport Scotland given the A84 forms part of the trunk road network.

HES

HES consider that the proposed development has the potential to affect heritage assets in our remit located within and outside of the development site boundary. HES therefore recommend, whether an EIA is undertaken or not, that any planning application for the development should be accompanied by an assessment of impacts on the historic environment. HES recommend that this assessment is undertaken by a suitably qualified professional and meets the requirements of Scottish Planning Policy (SPP, 2014), the Historic Environment Policy for Scotland (HEPS, 2019) and associated Managing Change Guidance Notes.

HES recommend that particular attention is paid to the potential for impacts on the following heritage assets within our remit and their settings. We have provided further comments regarding these heritage assets in the attached Annex.

- Drip Old Bridge over River Forth (Category A listed building, LB6725)
- Stirling Castle (Property in Care and Scheduled Monument, Index no. 90921)
- Stirling, Royal Garden including King's Knot (Scheduled Monument, Index no. 90288)

This list is not exhaustive, and HES recommend that ZTV analysis is used to identify any additional heritage assets for assessment. Where the potential for adverse impacts is identified, visualisations should be produced to allow for robust assessment and help refine any mitigation. HES have provided further information on viewpoint locations and potential mitigation in the attached Annex. EIA Screening and Scoping Report (February 2020)

HES have reviewed the EIA Screening and Scoping Report (February 2020) submitted as part of this consultation and can confirm that HES are broadly content with the approach to assessment set out within this document. It remains unclear, however, why the study area for setting effects has been limited to 1km in this instance. HES recommend therefore that any assessment should be informed by ZTV analysis demonstrating that significant impacts are unlikely beyond this distance.

Environmental Health

The environmental issues of relevance to this Department (ie noise, air quality and ground quality) have been identified within the report, however EH make the following specific comments:

General

Prior to completion of the noise and air quality work assessment, agreement must be reached with Stirling Council on the projected transport figures associated with the proposed development.

The report refers to preliminary discussions with Environmental Health prior to undertaking, for example, the noise assessment. This would be welcomed.

Noise

Whilst reference is made to retaining the existing access to the site, the covering letter refers to a possible new vehicular access to the site. The impact of this proposed new route on existing properties likely to be affected should be assessed as part of the EIA.

It is noted that the noise readings are intended to enable assessment of impact on proposed residential receptors. Other proposed noise sensitive receptors including the care home, offices and hotel should also be considered in the readings. It would be preferable if night-time readings could also be carried out.

As well as traffic noise, a large number of potential noise sources could be associated with the proposed development including deliveries, air conditioning units, plant, commercial ventilation systems, operational noise, music noise, entertainment noise, renewable energy source noise etc. Whilst the impact of these will require to be taken into account in the design and layout of the wider site, the potential impact of these sources on existing residential receptors (on and in the vicinity of the site) should be included in the assessment.

The impact of transport noise on existing residential receptors may require to be assessed once the transport figures and internal road layouts for the site have been agreed.

Air quality

Model verification should be included in the assessment.

Impact on existing residential receptors surrounding the site should also be included.

Ground quality and investigation

It is noted that some of the site was used for agricultural purposes. For information, I attach a checklist of potential contamination sources from this former land use which should be addressed as part of the ground investigation.

The potential for gassing soils is mentioned within the report. Based on local knowledge, EH would advise that the geology of the area means high levels of natural gas are present in the area generally. The gasses are generally confined beneath a depth of superficial clay which is of variable thickness. This issue should be addressed in the ground investigation.

Given the proximity of watercourses to the proposed development site, risks to the water environment will require to be assessed.

