

## Structure Plan Topic Papers:

## Appendix 1(d):

- 1 Environment
  - 2 Economic Development
  - 3 Shopping
  - 4 Rural Development
  - 5 Minerals
  - 6 Waste Management
- .....

### 1 Environment

*A number of minor changes are proposed to sections of the Structure Plan 'Caring for the Environment' Chapter. None of these changes are considered to be substantive and it has been concluded that they will not require to be the subject of Strategic Environmental Assessment (although it will be applied to the assessment of the environmental implications of strategic development options).*

*The proposed changes are related to Nature Conservation, Green Belts, Environmental Enhancement, Countryside Management and Water Resources Management.*

#### A Nature Conservation

##### A.1 Introduction:

A.1.1 The Plan area contains a significant number of sites designated and protected for their wildlife and habitat value. There have been some changes to the number, extent and status of sites since the *Background Report* was compiled. Because, for instance, river systems are included, the designations are not only important *per se* but may also be a factor in the consideration of development options.

A.1.2 Wildlife conservation is beginning to assume a higher profile in tourism and recreational developments in the area, with both conservation charities and landowners establishing specifically wildlife-oriented visitor attractions.

##### A.2 Current position:

A.2.1 The progress of the UK Government's submission of 'Natura 2000' sites to the European Commission has resulted in the formal recognition of the candidate and proposed SACs and SPAs as SCIs (Sites of Community Importance). In March 2005 it was announced that the European Commission had confirmed all the proposed and candidate Natura 2000 (SAC and SPA) sites in Scotland. They are now designated SCIs (Sites of Community Importance). The planning policy requirements are unchanged at a strategic level but insofar as there are text references these will have to be updated. Several river systems, parts of the Forth estuary, and the Flanders Moss raised bog complex now enjoy this status. Paragraph 3.2.2 and fig 3.1 in the Plan require updating.

A.2.2 The Councils have now completed publication of *Local Biodiversity Action Plans* for the whole Plan area, incorporating Species and Habitat Action Plans for species and habitats of local conservation concern.

##### A.3 Changes to legislation and policy guidance:

A.3.1 The existing Structure Plan was produced in the context of NPPG14 - *Natural Heritage* (1999) (*Background Report pp13 - 15*). A Table on p.6 of the NPPG sets out the then nature conservation legislative background, with the primary species and habitat protection measures being in the Wildlife and Countryside Act 1981. NPPG 14 has

not been revised. Species protection largely remains the same, but the Nature Conservation (Scotland) Act 2004 has updated habitat conservation through a revised framework for SSSIs and more focussed roles for SNH and other agencies, landowners and managers. The Act also has significant implications for Local Authorities because it translates into a public duty the UK Government's commitment to support the UN 'Convention on Biological Diversity'.

Part 1 – Biodiversity; Section 1 - Duty to further the conservation of biodiversity;  
para. (1) states ... "It is the duty of every public body and office-holder, in exercising any functions, to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions".

A.3.2 For the purposes of the Act, "biodiversity" has the same meaning as has "biological diversity" in the United Nations Environmental Programme Convention on Biological Diversity of 5 June 1992. That definition is as follows: "Biological diversity means the variability among living organisms from all sources including, *inter alia*, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems".

A.3.3 The Structure Plan already recognises the significance of biodiversity but will have to be amended to incorporate this commitment into strategic planning policy for the area. Policy ENV1 and its supporting text therefore require minor revisions. (See also 'Environmental Enhancement' below).

#### A.4 Other issues/Local circumstances:

A.4.1 The Councils have now completed publication of Local Biodiversity Action Plans, incorporating Species and Habitat Action Plans. When the Structure Plan was prepared it was assumed that the LBAPs would provide something akin to a local 'layer' of constraint-mapping whereby development proposals could be referred to appropriate referees for advice as to whether species or habitats of local conservation concern might be adversely affected were they to be implemented. In fact, much survey and data management work remains to be done before habitat and species distributions could be added to a GIS and used in this way. It is not at all clear whether this survey work can or will be done systematically within a reasonable time period.

A.4.2 Consideration therefore has been given to whether the commitment in Policy ENV1(3) to test "all development proposals" against LBAP "recommendations and findings" is realistic.

#### A.5 Significance of change and potential options:

A.5.1 As indicated, the changes are in emphasis and in some cases terminology. The Councils' response in terms of amending the Plan is largely predetermined and not a matter for options. It is not considered that the confirmed status of the SCIs will alter the way in which the conservation interest will be taken into account in planning decision-making.

A.5.2 There are no issues that require to be tested through the SEA process.

## **B Green Belts**

### B.1 Introduction:

B.1.2 The Plan area contains three areas of Green Belts. At Strathblane a small area is included to complement the Glasgow/Strathclyde strategic Green Belt. There is no change that would lead to a reconsideration of this designation.

- B.1.3 The principal areas of Green Belt, in both Council areas, are in the Core Area:
- In Stirling – Stirling/Bannockburn, Bridge of Allan and Dunblane
  - In Clackmannanshire – Alloa, Tullibody and the Hillfoots towns
- They were designated in order to indicate long-term presumptions against extension to the built-up areas affected. While there is no intention to carry out a fundamental review of these designations, the most recent draft Scottish Executive planning guidance varies some of the principal functions of Green Belts. It is not considered that there are any implications likely to arise from this that would warrant a major review of the purposes and location of Green Belts in this Alteration.

B.2 Current position:

B.2.1 Some minor incursions of development into existing Green Belts have been approved in the Stirling Council area (eg new secondary school at Causewayhead, Stirling).

B.2.2 An Alteration to the Stirling Local Plan (see para B.4.1 below) proposes additions to the Stirling Green Belt.

B.3 Changes to legislation and policy guidance:

B.3.1 A consultation draft SPP21 – *Green Belts* was issued by the Executive in August 2005. The Councils consider that the Draft guidance does not warrant a response in this Structure Plan Alteration. However, the draft guidance places greater emphasis on viewing Green Belt designation as a tool to steer new development to sustainable locations at the edge of settlements, rather than as a simple stop to growth. Draft SPP21 suggests that development plans should preview positive management arrangements for land included within Green Belts.

B.4 Other issues/Local circumstances:

B.4.1 Alteration 2 (November 2004) to the Stirling Council Local Plan includes proposals for a relatively extensive addition to the Stirling Green Belt, following on Structure Plan Policy ENV4 and Proposal HP3. The related Stirling Local Plan proposals are the subject of Objections that were heard at the Alteration 2 LPI during October – December 2005. The Reporter's recommendations are expected in April/May 2006. In this context Draft SPP21 does not expect many new Green Belts to be designated.

B.5 Significance of change and potential options:

B.5.1 Whilst there is no intention to review the purpose and location of Green Belts across the whole Structure Plan area, there is a recognition by the Councils that if further large scale land releases are indicated by, for instance, response to strategic housing requirements, options involving localised Green Belt releases may have to be considered.

B.5.2 Any such options would also be tested through the SEA process.

B.5.3 The major eastwards extension to the Stirling Green Belt referred to above (para. B.4.1) would, potentially, have implications for any change in rural development policies arising from consideration of SPP15. (See Rural Development Topic Paper for further detail).

**C Environmental Enhancement**

C.1 Introduction:

C.1.2 The Plan, through Policies SD1, ENV1 and ENV5, supports wildlife conservation, but perhaps implies that this is only required to mitigate any adverse effects arising from development. Given the duty to promote biodiversity, a more positive approach is appropriate.

C.2 Current position:

C.2.1 Policy ENV5 supports environmental enhancement in association with development in a range of circumstances. It does not explicitly promote habitat creation.

C.3 Changes to legislation and policy guidance:

C.3.1 As already indicated the Nature Conservation (Scotland) Act 2004 introduces, for public bodies, a 'Duty to further the conservation of biodiversity'.

C.4 Other issues/Local circumstances:

C.4.1 Completion of the Local Biodiversity Action Plans provides justification for enhancing and extending particular habitats important in the local area.

C.5 Significance of change and potential options:

C.5.1 These would be minor changes in terms and emphasis and would not require to be tested through the SEA process.

**D Countryside Management**

D.1 Introduction:

D.1.1 When the Structure Plan was prepared the National Parks (Scotland) Act (2000) was in place, but the Loch Lomond & The Trossachs Interim Committee was still operating. The Act provides the basis for National Parks in Scotland. The current Structure Plan, 2002, relates to part of Scotland's first national park, The Loch Lomond and Trossachs National Park that was established in July 2002 and under the Park Authority's functions a *State of the Park Report* and related *Park Plan* were published in 2005. While the Park Authority has local planning functions, Structure Planning functions currently rest with each of the local authorities that cover the Park area: Stirling, Argyll and Bute, West Dunbartonshire, and Perth and Kinross Councils. The review of Scotland's planning system will change this and the National Park Authority's Park Plan and Local Plan can take a more strategic role in future. The Clackmannanshire and Stirling Structure Plan team liaises with the Park planning service in progressing this Alteration.

D.1.2 The Land Reform (Scotland) Act 2003 introduces a duty for Councils to prepare 'Core Path' plans in order to improve public access, notably for countryside routes.

D.2 Current position:

*Loch Lomond & The Trossachs National Park*

D.2.1 The National Park Designation Order came in March 2002 and the Park was fully established in July 2002. The Park Authority is a Planning Authority with Local Planning and Development Control functions, but is not a Structure Plan Authority.

D.2.2 The Aims of the Park, established by the Act, are fourfold:-

- To preserve and enhance the natural and cultural heritage
- To promote the sustainable use of natural resources
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the Park's special qualities
- To promote the sustainable social and economic development of the Park's communities.

- D.2.3 The Park's statutory purpose is to pursue all four aims in a co-ordinated way, but where there is some conflict between aims, heritage conservation and enhancement should, according to the Act, be given the greater weight.

*Access to the Countryside*

- D.2.4 In terms of footpath networks and other access measures, the Structure Plan already indicates the Councils intentions to enhance accessibility. Additional reference to the Land Reform Act will update and confirm these commitments.

D.3 Changes to legislation and policy guidance:

*Loch Lomond & The Trossachs National Park*

- D.3.1 The Park Authority has decided not to progress the Finalised Draft Stirling Council Local Plan Alteration 1B. However, its policies are being quoted in planning decisions.

D.4 Other issues/Local circumstances:

*Loch Lomond & The Trossachs National Park*

- D.4.1 In May 2005 the Park Authority published a 'State of the Park' report and a Consultative Draft 'National Park Plan'. No Local Plan has yet been prepared by the Park Authority. It is expected that it will appear in draft form during 2006. Park officers have indicated that they wish to carry out a local housing needs survey before considering the capacity of the Park to accept new housing developments. The Park area contains about 10% of the Stirling Council area population and there is an expectation that some of the projected housing needs of the Structure Plan area will be met there.

- D.4.2 It is understood that the Park Authority is pursuing a major review of landscape designations within its area before considering policy for rural developments of significant scale. This review may also have implications for designations outwith the Park.

- D.4.3 Park officers have indicated dissatisfaction with the impact of some of the current Structure Plan policies within their area (e.g. the 'Dispersed Rural Communities' element of Policy H5).

D.5. Significance of change and potential options:

*Loch Lomond & The Trossachs National Park*

- D.5.1 Assessment of policy and development options against the Park's Aims as well as normal planning considerations and SEA could be rather complex. Given that local planning policies within the Park are unlikely to be clarified before a draft Structure Plan review is published, consideration is being given to regarding the Park as a separate entity in the Structure Plan Locational Strategy, rather than as an overlay to the rural policy areas ('Rural Villages' and 'Upland Areas') as at present.

- D.5.2 References in the Structure Plan text to functions of the Councils as Planning Authorities for the Park area, and in particular Proposal ENVP2, require to be updated.

- D.5.3 These would be minor changes in terms and emphasis and would not require to be tested through the SEA process. Option – testing will be limited to 'assigning' differing proportions of overall housing need to the Park area.

*Access to the Countryside*

- D.5.4 The Land Reform Act builds upon existing and ongoing countryside management and does not represent material changes in policy requiring SEA in the context of the Alteration.

## **E Historic and Built Environment**

- E.1 It is not considered that national guidance or local circumstances have changed sufficiently to warrant any Structure Plan review.

## **F Water Resources Management**

### **F.1 Introduction:**

- F.1.1 The Structure Plan refers to the flood risk, land drainage and ecological aspects of water management. Flood risk is a significant consideration for the Planning Authorities and for this Alteration.

- F.1.2 On the wider infrastructure front, severe problems have emerged in some places with regard to the ability of Scottish Water to provide water and drainage infrastructure to support existing development plan commitments and future aspirations. Available investment is being reserved largely for upgrading existing waste water treatment works in order to conform to discharge standards and so guarantee environmental protection, rather than creating additional treatment capacity. The scope for the Councils to direct new development to appropriate locations is significantly constrained. Developers may have to provide or contribute to water and drainage infrastructure.

### **F.2 Current position:**

- F.2.1 Structure Plan Policy ENV9 - *Water Resources Management* aims to ensure that all development avoids unacceptable harmful effect on the water environment, particularly for the Forth Estuary and its tributaries. Related aims and objectives of existing policy shall, therefore, be examined in the light of most recent planning guidance to determine whether ENV 9 and other related policies go far enough in planning effectively for all areas, including those areas of land affected by flooding.

- F.2.2 Existing waste water treatment works capacities and priorities for future investment programming by Scottish Water are given in their newly published statement '*Strategic Asset Capacity and Development Plan*', April 2006.

### **F.3 Changes to legislation and policy guidance:**

- F.3.1 The EU Water Framework Directive has been transposed into Scots law by the Water Environment and Water Services (Scotland) Act 2003. The Directive has as its principal aim the maintenance, and where possible the improvement, of water quality in inland waters, coastal waters and groundwater. The Act embodies the principle that all rivers and coastal waters with entirely Scottish catchments form one River Basin District for catchment management purposes. Sub-basin management planning for smaller areas will commence in 2006 and the Structure Plan period will encompass several River Basin Management Plan (River Basin Management Plan) cycles. Much of the Structure Plan area (and all the areas likely to be affected by significant developments) are in the Forth sub-basin). SEPA will be the lead Authority and Councils will be required to be involved in and support the process. Councils will require to assess changes for the planning system and consider adjusting policy and practice accordingly. The River Basin Management Plan processes acknowledge the significance of the plan-led Development Planning system and the main requirement is for improved joint working with the Scottish Environment Protection Agency.

- F.3.2 Councils will also (subject to the outcome of Scottish Executive consultation) be amongst the Responsible Authorities for various functions under the Act. Responsible

Authorities will be expected to adhere to the principles of 'sustainable flood management' – for which objectives and indicators are being worked up by an Executive advisory body.

F.3.3 The relationship between increased understanding of flood risk and planning for development has assumed an even greater profile since the Structure Plan was approved. The Scottish Executive has replaced NPPG7 with SPP7 - *Planning and Flooding* and PAN69 - *Planning and Building Standards Advice on Flooding* updating national planning policy and best practice guidance with respect to flood risk and sustainable drainage (both published 2004). The SPP reiterates the Executive's support for Flood Liaison and Advice Groups (formerly Flood Appraisal Groups) operating at Council area level.

F.3.4 The planning definition of a flood plain is now the area at risk from the calculated 1 in 200 year flood event. It is anticipated that in autumn 2006, the Executive will publish improved mapping of areas at risk from flooding, including coastal flooding, using this standard and incorporating more accurate topographical information derived from digital terrain modelling.

F.3.5 The importance of pre-planning for surface water drainage (SuDS) on development sites is further emphasised by the publication in 2005, by SEPA, of *Drainage Assessment – A Guide for Scotland*.

F.4 Other issues/Local circumstances:

F.4.1 The Scottish Executive has reviewed the effectiveness of existing (Flood Prevention Act 1961) flood alleviation schemes, including the one in Bridge of Allan. Stirling Council has commissioned flood risk studies of the River Teith at Callander and the River Forth through Stirling. Additional flood risk areas may be identified and this may affect options for new strategic land releases for development. The Planning Authorities now seek flood risk assessments in relation to most significant developments adjacent to rivers. SuDS drainage schemes are sought for development sites in all appropriate cases.

F.5 Significance of change and potential options:

F.5.1 Rewording of Policy ENV9 may be appropriate to establish clear and firm justification from the most recent planning guidance and to reflect firmer prohibitions on flood plain developments. Formal expression of support for land use aspects of the river basin planning process is also required. These would be minor changes in terms and emphasis and would not require to be tested through the SEA process.

## 2 Economic Development

### 2.1 Introduction

2.1.1 The principal reasons for updating the Economic Development aspects of the Plan relate to the issuing of revised policy guidance (SPP2) by the Scottish Executive and survey work in Stirling suggesting a need to assess and improve the availability of an effective supply of employment land. The strategic employment land position in Clackmannanshire is currently considered to be sound and only minor changes may be required. However, a study of the supply of and demand for business space in Clackmannanshire is proposed.

### 2.2 Current Position

2.2.1 The Housing Context Paper outlines the economic characteristics of the Clackmannanshire and Stirling areas. This indicates that whilst the economy is relatively strong in some areas, there are significant pockets of unemployment and lower income.

2.2.2 The current supply of business land allocated or 'identified' for employment uses in Stirling is around 203 ha. On initial inspection however it is clear that very little of this is effective and available in the short term due to various constraints including ownership, location, size, infrastructure, topography and ground conditions – Bandeath North which makes up a significant proportion of the supply (43 ha) is particularly constrained. Some sites are also under significant pressure for alternative uses - 4.71 ha has been lost to a new high school and trade retail uses have encroached within Springkerse. It is also evident from recent planning consents that the 'quality' and 'environmental amenity' of certain identified employment sites varies, making them attractive for certain uses and not for others. Also, certain sites are being viewed as appropriate for certain types of business ie. offices, industrial or warehousing, excluding consideration of a mix of these types of businesses.

2.2.3 The current supply includes sites identified in the Local Plan Alterations such as Castle 2 (24.4 ha) and MGA (10 ha). When these sites are included, and providing they can be protected and become effective for employment use, the supply of employment land is somewhat healthier. Other sites such as Bandeath and some rural sites have a key role to play in delivering suitable industrial land for the future but require a more proactive role for the Council to attract investment and ensure their effectiveness and delivery.

2.2.4 An Employment Land Supply Audit in Clackmannanshire has recently been completed and a full review of strategic and local employment land allocations will follow in Summer 2006. Considerable land remains available for employment at the strategic sites at New Alloa (3.4 ha), and Dumyat (16.9 ha). The Structure Plan identifies the Castlebridge site as having potential as a strategic business site, and Kilbagie/Gartarry area as having "longer term potential" for business development.

### 2.3 Changes to legislation and policy guidance

2.3.1 The existing background report refers to NPPG2 'Business and Industry'. This policy guidance was replaced by SPP2 'Economic Development' in November 2002. Its title was changed to reflect the significant contribution made to the economy by non-manufacturing sectors such as construction, retailing and tourism.

2.3.2 SPP2 identifies four themes where planning can contribute to economic development:-

- i) Provide a range of development opportunities
- ii) Securing new development in sustainable locations
- iii) Safeguarding and enhancing the environment

iv) Promoting dialogue between councils and business

2.3.3 The SPP requires development plans to maintain a supply of sites offering a choice of size, location and environmental amenity, and which allow flexibility to provide for market uncertainty. It also stipulates that these allocated sites be regularly reviewed taking account of their marketability.

2.3.4 The SPP requires replacement sites to be brought forward where existing allocations do not meet current and anticipated market expectations. Where existing long standing allocations have not been developed or where business uses such as manufacturing fall out of use and are in locations considered to be no longer appropriate or marketable for their original purpose, the sites should be reallocated and redeveloped for other uses.

2.4 Other Issues/Local circumstances

#### ***Stirling Business Space Strategy***

2.4.1 In late 2004 Stirling Council with Scottish Enterprise Forth Valley commissioned a review of the business property market across the Stirling area and to prepare a Stirling Area Business Space Strategy report. The Strategy builds on the content of *Making Stirling Work*, a partnership Action Plan to guide the development of the Stirling economy over a 10 year period. The purpose of the study was to provide recommendations to develop a Business Space Strategy for Stirling. This included analysing the existing business property market, existing business property stock, estimating the likely scale and type of future demand for business property, and considering appropriate delivery mechanisms.

2.4.2 The report highlights that there is less than one year's supply of vacant industrial units and industrial land is at only 0.9% of total stock, one of the lowest industrial vacancy rates in Scotland. It also recommends the need to protect the current supply of industrial accommodation or significantly increase the supply of general industrial accommodation in order to meet current demand and accommodate future growth. In terms of office, based on past take-up and current availability, the report estimates only 3 year's supply of office accommodation. There is a need therefore to tap into demand for owner occupied offices otherwise Stirling may lose out to other areas.

2.4.3 The supply of immediately available (effective) employment land has dropped from 60 ha in 1998, to only 28 ha in 2005, with some of this supply already under offer or proposed for alternative uses. In total, only 12 ha of available land supply remain within the Strategic Employment Sites (Castle, Broadleys & Springkerse). A large proportion of the supply is also constrained by location, poor ground conditions and lack of infrastructure/services. The conclusions from the study clearly highlight that the lack of effective land supply will curtail indigenous growth and the attraction of new businesses to the area which could have significant constraints on future economic growth.

2.4.4 The report highlights the limited land and property currently available at existing business & industrial estates and recommends an urgent need to identify new future high quality employment land and locations, which may have to include greenfield sites in order to meet anticipated future demand and current demonstrable land for owner occupied business space. The study identifies a net requirement of 70 ha in total of business land over the next 20 years (to 2025) which takes into account the forecast population growth for Stirling. In terms of the breakdown between offices and industrial/workspace, this is estimated as a 75%/25% split with the emphasis on office accommodation.

#### ***Clackmannanshire***

- 2.4.5 The opening of the Upper Forth Crossing in 2009 and reopening of the Stirling-Alloa-Kincardine railway line in 2007 offer considerable opportunity for attracting new businesses to Clackmannanshire. In East Clackmannanshire, the Castlebridge and Kilbagie/Gartarry strategic employment locations are well located to benefit from both new rail and road access and it is proposed that these should be brought forward for development within the period of the altered Structure Plan. Together with the existing sites at Dumyat and New Alloa, this will provide c.70 ha. of land. Both Castlebridge and Kilbagie/Gartarry have been previously identified as preferred strategic sites with development potential in the existing Structure Plan and the Alteration will provide for programming their development. As the principle of development has been previously established for both sites through the development planning process, it is not considered that SEA will be required. The sites are well located for public transport services and to take advantage of the potential for rail linkage and, as such, are considered to offer considerable scope for development in accordance with the principles of sustainable development.
- 2.4.6 Any significant new allocations of housing in West Clackmannanshire may require additional or revised strategic employment land allocations. It is expected that these allocations could take place as additional phases at Dumyat or New Alloa. However, the current Review of Business Land will consider further options which could allow improved co-location of business land with new housing and business areas. Consideration will also be given to the supply of office accommodation within Clackmannanshire as part of the Review. Site options for new strategic business development in East Clackmannanshire will be subject to the SEA process as explained below.

## 2.5 Significance of Change and Potential Options

- 2.5.1 The Structure Plan Alteration involves substantive alteration to the policies, proposals and supporting text relating to economic/employment developments, in order to take into account revised need assessments and recent national planning policy changes.
- 2.5.2 Following SPP15 on Rural Development, the potential employment related development in the accessible rural areas (including parts of the National Park) has been examined, but this is dealt with in a separate consideration of rural development issues.
- 2.5.3 Within Clackmannanshire minor alteration is proposed, to enable development of previously identified strategic development sites at Castlebridge and Kilbagie/Gartarry. No SEA is considered necessary for these alterations.
- 2.5.4 However, the scale, nature and location of any further new employment land supply will, potentially, represent a significant source of environmental impacts arising from the Alteration to the Structure Plan. For the purposes of SEA, policy options for assessment have been devised for a range of responses to the apparent employment land requirements. There are options in terms of whether the Councils either seek to maintain or to increase land availability and whether any new sites should reflect existing patterns or co-locate with new housing or take advantage of improved transport links.
- 2.5.5 Depending upon the Option chosen to be incorporated into the Structure Plan Alteration, the extent of text amendment will vary. Minor changes are most likely required to Paras.4.2.6 (reference needed to role of LEC's); 4.2.8 (allow for growth to 2025); and 4.2.11 (removal of 10-30 ha site reference) and Policies ED2, EDP1 and EDP2.

<p><b>Option 1 – No change.</b></p>	<p>Provide, maintain and review supply of strategic and local business and industry sites giving priority to re-use of brownfield, vacant and derelict land or buildings and completion of existing sites.</p> <p>Maintain existing allocations as key strategic locations for economic development. Only allow for development within locations outwith Strategic Employment Sites where locational need is demonstrated, they are in the Core Area or have linkage to Strategic Public Transport network, and where urban regeneration and/or local employment benefit.</p> <p>No change to policies and text so expectations that environmental impact will be limited.</p>
<p><b>Option 2 – Maintain supply through de-allocation and reallocation.</b></p>	<p>Commitment to identify the progress towards meeting the range of needs ie. 75% offices / 25% industrial (for Stirling) and keep this under review. The related assessment of needs for business land and locations within Clackmannanshire must be based on the full range of strategic options being considered in Alteration 3. e.g co-location of housing and employment opportunities. Some allowance for the reallocation of sites for alternative uses where no longer considered suitable for industrial or business use and the potential to allocate replacement sites in accordance with SPP2 ought to be included in any assessment.</p> <p>All sites identified to be justified in terms of their 'effectiveness'. Commitment in Policy ED2 to look at the marketability of sites and keep the supply under review. Commitment also to bring forward difficult sites and make effective, in partnership with other bodies ie. SEFV.</p> <p>All Strategic Employment Sites in EDP1 need to be protected for the uses specified to prevent encroachment of non-employment uses. <i>Note: May need to transfer certain sites from EDP2 to EDP1 to accord with current Local Plan allocations.</i></p> <p>This approach is less likely to raise significant environmental issues.</p>
<p><b>Option 3 – Increase supply to meet forecast demand ensuring its effectiveness (including through de-allocation and reallocation if necessary).</b></p>	<p>As option 2 but also provide more flexibility in the supply of employment land. Commitment to maintaining a range and choice of employment sites in terms of location, tenure and size that will meet the needs of different economic sectors and are co-located with new housing allocations. Move away from priority for brownfield, vacant and derelict land approach and allow for land allocations to closer match needs of different economic sectors. Increase supply and allow for development of specific greenfield sites for employment ie. identify the MGA as a Strategic Employment Site in EDP2.</p> <p>Some environmental impacts may arise as a result of releasing greenfield land required to ensure an effective employment land supply.</p>

<b>Option 4 – Go for Growth.</b>	<p>Increase supply beyond that forecast and allocate additional sites for employment purposes, increasing the range and choice of supply in terms of location, tenure and size that will meet the needs of different economic sectors. Adopt a more flexible approach to allow for major employment sites to come forward where and when demand arises ie. more developer led. No de-allocation or reallocation of existing sites.</p> <p>Significant environmental impacts may arise from attempting to allocate for such provision including pressures on the Green Belt and on greenfield sites.</p>
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### 3 Shopping

#### 3.1 Introduction

3.1.1 The principal reasons for reviewing the Structure Plan relative to shopping provision are the issuing by the Executive of a consultative draft revision/replacement of NPPG8 (i.e. SPP8), and the outcome of a review of retail performance and floorspace in the Stirling and Clackmannanshire areas.

#### 3.2 Current Position

3.2.1 The role of the Strategic Shopping Centres in providing for a range of household, essential and personal shopping continues to reflect the current Structure Plan. Some of these areas have experienced significant development since 2002, consistent with their role and function and helping to reinforce their status as Strategic Shopping Centres.

3.2.2 Since 2002, the household shopping floorspace at Springkerse, Stirling has increased by almost 8000 sq.m and there are current proposals to increase this further – this will see the completion of Springkerse Retail Park. Consents have also been given (although not yet implemented) to extend and increase the capacity of the existing superstores within Stirling, further enhancing the provision of essential or convenience floorspace. The major new visitor related shopping provision outlined for Forthside (12,000 sq.m) in Proposal SP2 is no longer being pursued due to a failure in the market. This site is now likely to include only 200 sq.m of retail floorspace.

3.2.3 Within Clackmannanshire, there has been considerable expansion in essential (convenience) shopping in Alloa Town Centre with the opening and subsequent expansion of Tesco and this growth is expected to continue with the opening of Asda and Aldi during 2006. Some increase in personal shopping provision will also be delivered through Tesco and Asda and the opening of the new shopping centre at the Thistle Brewery site in 2006. Once these developments are open, essential shopping floorspace in Alloa Town Centre will have increased by 8,500 sq m and personal shopping by 5,500 sq m. It is expected that the increased development interest in Alloa Town Centre will be maintained.

#### 3.3 Changes to legislation and policy guidance

3.3.1 NPPG8 -*Town Centres and Retailing* is the national Planning Policy relating to shopping. A revision to NPPG8 (SPP8) is envisaged for Spring 2006. Although the underlying policy in NPPG8, emphasising support for town centres, is unaltered, the SPP does suggest certain changes to the policy approach: -

- To acknowledge the importance of a broader range of land uses rather than specific focus on retailing.
- To establish methods for treating out of centre retailing so that it will be complementary to proposals in town centres.
- To recognise a role for additional centres, focussed particularly on shopping and leisure, which may, where impact is acceptable, complement town centres.
- To clarify and widen the definition of Town Centres to cover city, town and district centres, irrespective of size, that provide a diverse and sustainable mix of activities and land uses which create an identity that signals their function and wider role.

3.3.2 If the published SPP8 mirrors this draft version, then the above issues will require to be considered in the review of the Structure Plan.

#### 3.4 Other Issues/Local circumstances

##### ***Stirling Retail Forecast & Capacity Study***

3.4.1 Stirling Council commissioned a study in July 2005 to assess the projected convenience and comparison retail expenditure capacity for the Stirling area up to 2025. The main purpose of the study was to provide an information base to underpin future retail planning policies in this review of the Structure Plan. Focusing on the 3 main types of retailing - convenience, comparison and tourist-related retailing, it highlights where there may be spare capacity to support each type of retail development in the periods 2005-2010, 2010-2015 and 2015 onwards.

3.4.2 The Study Findings suggest a need to identify further retail opportunities within the Stirling area in order to reduce leakage to other areas. In summary:-

*Convenience Shopping:*

3.4.3 Up to 2010, the spare capacity over and above the existing planning consents is limited and only relates to potential clawback of leakage. As the existing unimplemented consents to extend existing superstores will create significant improvements to the convenience retail provision in Stirling, there will be no great capacity to support further convenience shopping up to 2010. With limited spare expenditure capacity in the immediate future, the most supportable opportunities appear in the form of additional food discount supermarkets, or the replacement or relocation of one of the existing superstores. Creating a wider distribution of supermarkets around Stirling will be the main issue. In terms of discount foodstore provision, the report recommends that this be considered for the NW part of Stirling, to enhance choice in this area.

3.4.4 Between 2010 and 2015, the additional projected spare convenience capacity ranges between £17m to £25m which could support a new mainstream supermarket (circa 4,000 sq.m gross) and food discounter/smaller supermarkets (7,500 sq.m gross in total). As the whole southern part of Stirling is least well served by major foodstores, the report recommends provision of a new supermarket (c 4,000 sq.m gross) in the Bannockburn area in a readily accessible location to serve SE Stirling, Eastern Villages and the Major Growth Area. As there is also support, in both demand and expenditure terms, for additional food discount operators, these opportunities would appear best located in the south central part of Stirling (near St. Ninians) or to the NW. There may also be some capacity to support an additional small supermarket in either Dunblane or Bridge of Allan.

3.4.5 After 2015 the projected increase in capacity continues but this projection carries a high level of uncertainty. Should the closure of any existing foodstores or the non-implementation of existing consents arise then additional expenditure capacity would be available to service other convenience development opportunities.

*Comparison Shopping:*

3.4.6 The projected future expenditure capacity for comparison shopping within the Stirling area is significant. The main issues arising from the study in relation to comparison shopping are:-

- How to accommodate major provision of personal goods retail floorspace in Stirling to maintain/support the longer term competitiveness of the City Centre.
- Lack of space in the city centre requires exploration of Edge of Centre locations.
- Providing site opportunities for additional household goods retailing.

*Personal Shopping:*

3.4.7 Up to 2010, there is spare capacity to support up to 19,000 sq.m gross of personal shopping floorspace. Projected spare capacity beyond 2010 is considerable and rises to an additional 25,000 sq.m gross capacity. These figures reflect the removal of Forthside.

3.4.8 Realisation of this potential growth in personal shopping expenditure will require additional development, otherwise inflows will diminish and leakage increase. Stirling City Centre needs to remain competitive and given that there is little available space within the centre itself, the study recommends an Edge of Centre site as the next appropriate option to support the city centre. An out of centre, personal goods retail park is not promoted as it would divert trade from the City Centre, without the benefit of drawing shoppers towards the Centre.

*Household Shopping:*

3.4.9 The study identifies potentially high levels of spare capacity in household goods expenditure up to 2010 (13,000 sq.m gross) largely fuelled by the estimated overtrading at Springkerse, even with significant leakage from the Stirling area. Beyond 2010, another 13,000 sq.m gross could be supported. While Springkerse is a good location for household goods shopping, it is nearing completion. The study recommends that new site opportunities are investigated elsewhere in Stirling, notably on the west side of the City. It is doubtful as to whether the 6,000 sq.m household retailing allocated for Raploch can be accommodated on the existing site. A search for alternative sites either elsewhere in the Raploch area or further to the south west closer to the substantial population there, taking into account the environmental and access issues, is therefore recommended.

**Clackmannanshire Retail Capacity Study and Alloa Town Centre Healthcheck**

3.4.10 Clackmannanshire Council commissioned a study in February 2005 to produce a Town Centre Healthcheck for Alloa Town Centre and Retail Capacity Study for Clackmannanshire. The main objectives of the study were to:

- Evaluate the capacity for future convenience and comparison retail development in Clackmannanshire over the period to 2014;
- Assess the potential role of future retail demand in promoting the vitality and viability of Alloa Town Centre and how the town centre can most effectively meet the needs of the population up to the year 2014, including the scope to improve facilities, the environment and accessibility of the town centre.

3.4.11 The study findings suggest that existing and potential capacity would not support major new shopping development. Rather, the focus of attention should be on small-scale quantitative and qualitative improvements, particularly aimed at the non-food and leisure markets. In summary:

*Convenience Shopping:*

3.4.12 On a purely quantitative basis, there is no capacity for additional new convenience floorspace within the short-term forecast period (up to 2009) despite a growing population. In the longer-term a small element of floorspace capacity will emerge, although this would not be significant enough to accommodate a new convenience store.

3.4.13 It is suggested that a period of consolidation should be adopted in respect of convenience floorspace, and that the Council should focus on persuading shoppers to make more visits to the traditional retail core (i.e. in addition to visiting the superstores) by developing a strategy aimed at attracting specialist food retailers, and services such as high quality cafes and restaurants.

### *Comparison Shopping:*

- 3.4.14 Clackmannanshire enjoys only a small market share of comparison expenditure, with Alloa offering only very small-scale provision in this sector. There is likely to be modest levels of floorspace capacity within the household goods sub-category up to 2009. This is predicted to reach significant levels in the longer term, enough to accommodate a large new development or a number of small-scale schemes. An over-supply of personal goods floorspace is anticipated in the short-term, with a modest level of floorspace capacity predicted to emerge beyond 2009 in the region of 2,000 – 3,000 sq. m gross.
- 3.4.15 There is, therefore, quantitative capacity to enhance Alloa's status within the comparison goods sector and the Council is advised to actively promote sequentially preferable sites for new comparison floorspace development. This need will become more acute if the anticipated closure of the Co-op department store (2,200 sq. m gross) goes ahead. It is noted that there is currently a lack of demand in this sector in Alloa, indicating that the town needs to promote itself to generate stronger demand and to provide modern, new, retail floorspace; also, that market demand will always be constrained in a town of Alloa's size, due to its relatively small catchment population and competition from Stirling, Falkirk, Perth, Dunfermline and other out-of-centre developments (Sterling Mills).
- 3.4.16 It is considered that the existing Structure Plan policy support for household shopping at Clackmannan Road and Sterling Warehouse and personal shopping at Sterling Mills is entirely consistent with Draft SPP 8 and no change is proposed to this.

### 3.5 Significance of Change and Potential Options

- 3.5.1 The Structure Plan Alteration potentially involves substantive alteration to the policies, proposals and supporting text relating to shopping in order to take into account revised need assessments for Stirling and recent national planning policy changes (proposed).
- 3.5.2 For Alloa, it is considered that the identified needs do not require any major change to the existing strategy of enhancing its role via town centre improvement schemes, redevelopment and other initiatives within the town centre. Specifically, it is intended that the identified comparison shopping needs will be so accommodated, although the position will be reviewed if anticipated sites and redevelopment opportunities do not emerge by 2009. This approach is consistent with sustainability objectives. Para. 4.2.27 requires to be updated to reflect the current position and progress with the Town Centre Management Initiative.
- 3.5.3 The scale, nature and location of any new retail floorspace development in Stirling will, potentially, represent a significant source of environmental impacts arising from the Alteration to the Structure Plan. For the purposes of SEA, policy options for assessment have been devised for a range of responses to the apparent retail floorspace requirements in the Stirling area. There are options in terms of whether the Councils seek to enable the full requirement to be met, options in terms of strategic locations for development, and options in terms of phasing of development. There are potentially a number of combinations of these options, so it is proposed to take four broadly practicable scenarios through the SEA process, rather than test the variations of each Policy that may be required in association with any one scenario.
- 3.5.4 Depending upon the Option chosen to be incorporated into the Structure Plan Alteration, the extent of text amendment would vary greatly. Changes are most likely to be required to Paras. 4.2.21 – 4.2.37, leading to revision of Policies S1 – S3 and Proposals SP1 – SP2.

<p><b>Option 1 – Do nothing</b></p>	<p>Do not plan for growth in expenditure capacity. No change except to remove anomalies in SP2 ie. remove Forthside retail expansion.</p> <p>Limited environmental impact. Will require to accept potential leakage to other centres.</p>
<p><b>Option 2 – Constrained Approach</b></p>	<p>Do not plan for growth in expenditure capacity, but recognise need to relocate some floorspace provision already planned. Remove shopping allocation at Forthside and allocate for reduced household shopping at Raploch or reallocate elsewhere.</p> <p>Limited environmental impact, however accommodating household shopping elsewhere, given likely need for an out of centre location, could present environmental pressures. Will also require to accept potential leakage to other centres.</p>
<p><b>Option 3 – Meet all Projected Needs</b></p>	<p>Identify strategic locations to meet expenditure capacity to 2025 identified from the Stirling and Clackmannanshire studies, with contingency built in to provide for any loss in capacity. Provide a strategic framework to enable this to happen by identifying a role for Edge of Centres and some out of centre locations in Policy S1 and Proposal SP2 in meeting convenience, personal and household shopping needs.</p> <p>This approach is likely to reflect the emerging SPP8 in proactively planning for Edge and out of centre retailing ensuring it is complementary to existing centres. It may also help to stem the loss of leakage to other areas.</p> <p>Some environmental impacts may result from the release of land required to meet the floorspace requirements. By spreading shopping provision around Stirling, this may have implications for sites allocated for other uses and for other sensitive locations around Stirling. Impacts on existing centres will also need to be considered.</p>
<p><b>Option 4 – Go for Growth</b></p>	<p>Allocate floorspace beyond the identified retail expenditure forecasts. This will require substantial alterations to existing shopping policies including lifting the restrictions on further out of centre shopping ie. not restricted to that identified within Proposal SP2.</p> <p>Significant environmental impacts may result from attempting to provide for such provision including pressures on the Green Belt and on greenfield sites in out of town, possibly unsustainable locations. Impacts on existing centres will also need to be considered but it may help stem the loss of leakage to other areas.</p>

## 4 Rural Development

### 4.1 Introduction:

4.1.2 The Structure Plan area may be broadly characterised as rural in terms of landscape and settlement pattern, but with the bulk of the population, employment and development activity concentrated in a small number of the larger urban communities in the Core Area. By any geographical definition the greater proportion of the area is rural and most of that is 'countryside'.

4.1.3 Much of the Structure Plan area is also identified as having high landscape value. Approximately 10% of Stirling's population (and 48% of its area) are in the National Park, which is by definition an area of high environmental quality.

4.1.4 The Executive has issued revised national planning guidance for the rural areas of Scotland and a number of the policy ideas promoted run contrary to the Development Plans locally. The Councils have to consider whether, and to what extent, current planning policies and practice may require to be altered. The National Park Authority has, mainly informally, indicated dissatisfaction with some policies affecting its area within Stirling Council's area.

### 4.2 Current position:

4.2.1 The Structure Plan locational framework (pages 5, 6 and 7 and the Key Diagram) divides the area into three basic types i.e. the 'Core Area', the 'Rural Villages Area' and the 'Upland Area':

- The Core Area includes the major towns of Stirling and Alloa and has the greatest concentration of population, employment, shopping, leisure facilities and public transport services. The Plan seeks to concentrate the majority of new development within this area. Outwith and separating the settlements is attractive countryside, parts of which are designated as Green Belt.
- The Rural Villages Area is an intermediate area with a number of towns and villages within attractive countryside settings. Development pressure is high due to relative proximity to the main population centres. Parts of the countryside are covered by AGLV designations.
- The Upland Area is more remote from the main centres and less affected by pressure for new development. Here there is a need to promote appropriate rural development to sustain local communities and services. There is a strong presumption against development in the Ochil Hills and in parts of Stirling (such as the National Scenic Areas).

4.2.2 Within the Stirling Council area, the Upland Area and that part of the Rural Villages Area located within the Trossachs now falls largely within the boundaries of the National Park. Designation of the National Park raises a new set of development management issues and consideration will be given to identifying the National Park as a separate policy area. No other changes are proposed to be made to the locational framework as it is considered that the broad strategy remains valid in support of the Plan's sustainability objectives.

4.2.3 At national level, the Scottish Executive has developed a 6-fold Urban Rural Classification (referred to in PAN 73). In this, most of Scotland is classified as *Remote Rural* area. Outwith towns and cities, most of the Central Belt is classified as *Accessible Rural*. (*Accessible* is defined as those areas that are within a 30-minute drive time from the centre of a town with a population of 10,000 or more). Within the Structure Plan area, most of the countryside would be classified as *Accessible Rural* – only the remoter parts of the Ochils, Trossachs and Campsies would be classified as *Remote Rural*. These latter areas are extremely sensitive and visually prominent landscapes.

4.2.4 In general, the location and character of the rural area within the Structure Plan area is such that it is relatively accessible and prosperous, with large swathes covered by landscape designations. Pressure for unsustainable development is considerable, particularly for housing that would encourage commuting by private car. While acknowledging the need for a review of current Structure Plan policies in response to the new national policy framework, it is contended that a relatively restrained and cautious approach is appropriate in this part of rural Scotland.

#### 4.3 Changes to national planning policy framework:

4.3.1 Scottish Planning Policy SPP 15: *Planning for Rural Development* was published in February 2005 and replaces National Planning Policy Guideline (NPPG) 15: *Rural Development* issued in 1999. The SPP encourages a more supportive, pro-active, attitude towards 'appropriate' development in rural areas. It is accompanied by two Planning Advice Notes (i.e. PAN 72 *Housing in the Countryside*; PAN 73 *Rural Development*). The approved Structure Plan was prepared during the currency of NPPG 15. Rural policies now need to be critically re-examined within the context of this new national policy framework (and other related new Scottish Executive policy, particularly SPP2: *Economic Development*, SPP 3: *Planning for Housing*, SSP 17: *Planning for Transport* and SPP 21 (Draft): *Green Belts*), and consideration given to the need for review.

4.3.2 The new national guidance sets out a clear vision for rural areas and a direction to local authorities to facilitate and promote rural development in appropriate circumstances. In particular, there is an imperative to deal positively with the need for rural diversification in general and farm diversification specifically. Less clear is what the appropriate response should be within this Structure Plan area and the degree to which existing policies need to be amended and/or new policies developed. The key lies with the character and classification of the local rural area. The new national policy framework emphasises the need to recognise different types of rural area and the consequent need for policies to be adapted accordingly.

#### 4.4 Other issues/local circumstances:

4.4.1 Prior to more detailed consideration of a response to the new agenda, it is useful to summarise the existing relevant policies of the Structure Plan, briefly review their operation and consider issues arising. This is an integral part of the ongoing Structure Plan monitoring process to assess the effectiveness of the Plan's strategy and may point to the need to consider other amendments to rural development policies over and above any regarded as appropriate in response to SPP 15 and other related national guidance.

##### *Summary of existing Rural Development policies*

4.4.2 In the current Structure Plan, most of the new housing land requirement is to be met from the Core Area. In the Clackmannanshire Rural Villages Area, some potential is recognised for expansion of established settlements, including Forestmill (Proposal HP1). In the Stirling Rural Villages Area, the strategy is to focus most new housing development in the three 'Rural Centres' i.e. Callander, Balfron and Doune, with other contributions to be monitored from the Other Rural Villages (affordable housing only) and from the Upland Villages (affordable/general needs housing). More detailed policies for new housing development in rural areas are set out in Policies H4, H5 and H6. To support rural development and sustain rural communities, housing development will be acceptable in the Upland Area within settlement boundaries. Exceptionally, within identified 'Dispersed Rural Communities', development of single houses may be permitted, subject to strict criteria being met (Policy H5). Elsewhere in the countryside, new housing development will be restricted unless it meets a proven requirement in association with an enterprise or activity requiring a countryside location or where the proposal involves conversion of a traditional redundant building which is structurally sound and substantially intact (Policy H6)

4.4.3 With regard to economic activity, the strategy of the Plan concentrates development to the Core Area. However, the needs of the rural areas are acknowledged. The need for Rural Diversification is seen as a particular priority in order to sustain rural communities and reduce commuting. Consequently the 2002 Plan adopts a more flexible approach to rural development than earlier Structure Plans, which contained policies designed to restrict development solely to that requiring a rural location or ancillary to a farm business. Diversification into tourism, recreation and other resource based activities, technology based employment and workshop provision is encouraged by the current Plan, subject to the relevant local criteria being satisfied. Particular emphasis is placed on employment generating activities in the Rural Centres (Callander, Balfron, Doune) and provision is made for the Stirling Local Plan to consider identification of 'Rural Activity Areas'. These Rural Activity Areas promote a concentrated approach to the location of rural businesses in accessible locations, catering for instance to new businesses which cannot be accommodated within the existing settlement pattern, or existing businesses whose success has outgrown their start-up premises. A more constrained approach is applied to Green Belt areas and to the Rural Villages area in Clackmannanshire, where there is less justification in terms of wider rural sustainability objectives. The approach is summarised in Policy ED4 as follows:

- focusing development within existing towns and villages, with emphasis being placed on the identification of opportunities in the Rural Centres;
- restricting development within the Green Belt and Clackmannanshire's Countryside Area to that requiring a rural location, including appropriate farm diversification;
- support for appropriate rural development in the Stirling Countryside to include the identification of rural activity areas and to support economic activity including farm diversification, in particular where this can re-use rural buildings.

*Operation of existing policies: Stirling*

4.4.4 For rural housing, apart from delays due to lack of drainage infrastructure, the larger sites in the Rural Centres and Rural Villages are being progressed; half of the land supply identified at the commencement of the Plan period has been built out. Although there is no specific allocation of a housing target for the countryside and small villages, pressure to develop housing in the countryside remains considerable. Most demand is not related to the operational needs of rural businesses. In the knowledge of the generally restrictive Development Plan policies, most formal applications have been for the conversion or redevelopment of existing rural buildings. Relatively large numbers of new dwellings have been and are being created through this process. There is an increasing tendency for developers/owners to seek to replace rather than renovate and extend individual dwellings.

4.4.5 Experience with the 4 'Dispersed Rural Communities' (all now located within the National Park area) has been mixed. Ardeonaig has seen little activity. By contrast, development pressure in Balquhidder glen has been severe. The Park Authority has not welcomed this policy. Another problem has arisen with regard to delivery of affordable housing by housing associations in the Stirling Rural Villages Area – the current wording of Policy H4 has had the effect of preventing the development of otherwise acceptable sites adjacent to (as opposed to within) settlement boundaries.

4.4.6 Progress with the 4 'Rural Activity Areas' has also been mixed, with few new developments attracted. There are other examples of redundant brownfield sites in the countryside that have failed to attract proposals for re-use and redevelopment that are acceptable under current policies. There is a small but steady demand for holiday accommodation and some recent interest in countryside locations for more leisure-orientated visitor facilities and (often in association) rural retailing. The fact that a large portion of rural Stirling is now in the National Park is likely to be a

constraint upon development, and may be encouraging some displacement proposals (e.g. holiday homes) to areas outside the Park.

- 4.4.7 Employment and the economy in the Structure Plan area rely considerably on the tourism and leisure sectors. However, there have been very few larger scale developments, and there is some concern that policies may be too restrictive, particularly in their current application to countryside areas.

*Operation of existing policies: Clackmannanshire*

- 4.4.8 Clackmannanshire is “Accessible Rural” in the Scottish Executive’s terminology. Proposals for development have to date been considered fairly strictly under the auspices of Structure Plan Policy ENV 3 – *Development in the Countryside*.

- 4.4.9 Farm diversification is supported in principle and many farmsteadings have been refurbished and developed according to the criteria given in local *Supplementary Planning Advice* for Clackmannanshire.

- 4.4.10 Due to the proximity of many of the small towns in Clackmannanshire a significant amount of countryside around towns is designated Green Belt. This is referred to above. The Rural Villages area of Clackmannanshire is under considerable pressure for development and the current Structure Plan acknowledges that there might be scope for development in that area.

4.5 Significance of change and potential options:

- 4.5.1 Issues arising from the above analysis include:

- Should the National Park be identified as a separate policy area within the Structure Plan’s locational framework?
- What scope is there for relaxing existing constraints on development in response to SPP 15 without having any significant adverse impacts?
- Options and any related strategy implications of Alteration 3 must consider how to address housing land supply, the economy of the Structure Plan area, and the other issues mentioned earlier but also it ought to enable development of the countryside in a sustainable way.
- Are further greenfield releases adjacent to existing settlements in the rural area required to meet local and strategic housing needs? If so, which would be the most sustainable locations? In the Stirling Rural Villages Area, is it necessary to retain the distinction between the Rural Centres and other settlements i.e. should new housing development be supported on appropriate sites within all settlement boundaries?
- Need to review designation of ‘Dispersed Rural Communities’ and approach to housing development in such areas
- Need to review designation of ‘Rural Activity Areas’ and approach to development within such areas
- Consider need for policy amendments to encourage acceptable re-use and redevelopment of redundant brownfield sites in the countryside
- Need to amend detailed wording of Policy H4 to allow expansion of housing association programme for affordable housing
- To what extent should the demand for holiday homes outwith the National Park be accommodated?
- To what extent should the demand for rural retailing be accommodated?
- Are the existing tourism-related policies too restrictive? What more can be done to promote sustainable tourism?
- Some aspects of the rural development policies do not apply across the whole Plan area (e.g. there is no “Rural Centre” in Clackmannanshire). Harmonisation and simplification may be desirable.

- Should the existing 3 separate rural/countryside housing policies (i.e. H4, H5 and H6) be rationalised and recast as one new policy?

*A range of policy responses is available:*

4.5.2 For Strategic Environmental Assessment (SEA) and discussion purposes and in order to assist in identifying the most appropriate future Rural Development strategy, five potential scenarios are set out below. In effect, these represent different levels of response to take account of both local monitoring considerations and the new national guidance.

<p><b>Option 1</b> 'Do nothing' (i.e. continue with existing policies)</p>	<p>It is arguable that the Structure Plan already conforms to the new national policy framework to a significant extent, bearing in mind local circumstances i.e. the relative economic health of the rural area, its proximity to major population centres and landscape sensitivities. This strategy of restraint outwith the existing larger settlements reduces landscape impacts, and enables most residents to be close to local facilities, services and infrastructure.</p>
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<p><b>Option 2</b> Fine tuning to improve effectiveness of existing policies</p>	<p>The same position in relation to the new national policy guidance as Option 1. However this option would address some of the other monitoring issues raised earlier. At minimum perhaps:</p> <ul style="list-style-type: none"> <li>• Introducing a 'National Park' rural policy area into the locational framework, enabling the Park Authority, should they wish, to opt out of the 'Dispersed Rural Communities' and 'Rural Activity Areas' policies, and the Councils to harmonise policy, as far as possible, across the remaining Rural Villages areas.</li> <li>• Amendment to detailed wording of Policy H4 to support provision of additional rural affordable housing where appropriate and there is a need.</li> <li>• Policy revisions to promote sustainable tourism.</li> </ul>
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These elements would also be incorporated into Options 3 - 5.

<p><b>Option 3</b> Selective policy relaxations (varying degrees of relaxation possible) to take account of new national guidance, subject to sustainability criteria (varying degrees of strictness possible)</p>	<p>Would comprise a package of detailed policy amendments, based on a relaxation of the previous constraints that sought to divert non-essential development away from rural areas or into the main centres. For each policy, a range of detailed options would be possible reflecting degrees of relaxation. However, strict criteria would be applied to ensure that significant potential adverse environmental impacts were avoided or managed to an acceptable level. The key issue here is to identify the types and locations of developments that could be supported without undesirable consequences and precedents, subject to application of relevant criteria in a manner that leads to consistency of decision making.</p> <p>A critical test for all significant new development will be the sustainability of the location, in particular its accessibility by public transport. Other criteria would include:</p> <ul style="list-style-type: none"> <li>• Drainage capacity and other infrastructure constraints</li> <li>• Availability of suitable road and pedestrian and cycle access</li> </ul>
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	<ul style="list-style-type: none"> <li>• Scope for associated environmental improvements and other related benefits</li> </ul> <p>For farm diversification proposals, a business plan demonstrating long term viability.</p>
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<p><b>Option 4</b> Substantial policy relaxations, but still subject to appropriate sustainability criteria</p>	<p>Seek to maximise appropriate and sustainable development through further relaxation of controls and criteria. Under this scenario, more weight would be given to the achievement of economic and social objectives for the rural area and rural communities, but on the basis that such additional development could be absorbed without significant adverse impact on environmental quality. Examples of the types of development that could be considered for support here could include:</p> <ul style="list-style-type: none"> <li>• Re-use and redevelopment of redundant brownfield sites in the countryside</li> <li>• Ancillary residential development to provide funding support for a primarily employment-generating development</li> <li>• Limited new-build in association with converted or rehabilitated buildings where this results in a cohesive group well related to its landscape setting</li> <li>• Small-scale infill within an existing cluster of dwellings.</li> </ul> <p>Criteria relaxations could include the requirement for the development to be accessible by public transport. Under this scenario it would be accepted that some potential development locations in remoter areas can only be served realistically by private car. For small-scale development, particularly farm diversifications, this may be a relatively minor concern. However, for larger developments in more accessible areas, more weight would be attached to the requirement for public transport access.</p>
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<p><b>Option 5</b> As above (i.e. Option 2, 3 or 4), plus new greenfield sites adjacent to existing settlements (i.e. planned settlement expansions) to meet a portion of strategic and/or local housing needs and/or business and industrial land requirements.</p>	<p>Seeks to maximise the potential of the rural area to accommodate growth where this can be justified in terms of protecting and enhancing the sustainability of rural communities. For both residential and economic development, consideration would be given to identifying appropriate new sites (i.e. through Local Plan reviews). This could involve the planned release of land adjacent to existing settlement boundaries (and consequent amendment of settlement boundaries) to meet, for example, a portion of the Structure Plan area's mobile housing demand, expansion sites for existing local businesses and sites and premises for local start-ups and footloose companies looking for a rural location. In the local context and given landscape sensitivities, it is considered that such planned release is a more appropriate response to the new national guidance than a further relaxation of constraints that would allow sporadic new housing clusters and groups in close proximity to settlements and more single houses scattered throughout the countryside.</p> <p>In sustainability terms the emphasis would be on the social and economic sustainability of rural communities by promoting additional population and employment. At the same time, for larger scale development including proposals</p>
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	for settlement expansion, it will be important to ensure that potential adverse environmental impacts are minimised through careful siting and design, use of spare capacity in existing infrastructure where available and ensuring accessibility to reasonable public transport services. Location options would need to be assessed to determine the most sustainable locations.
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Each of the above scenarios (except Option 1) would comprise a package of detailed amendments to some or all of the existing Structure Plan policies. Such a package will be presented for consideration in the Consultative Draft Alteration, following selection of a preferred scenario.

## **5 Minerals**

### **5.1 Introduction**

- 5.1.1 The Structure Plan minerals policies, specifically those relating to opencast coal, require to be reviewed to take account of Scottish Policy Planning (SPP) 16 “Opencast Coal” (published in July 2005), and the outcome of a review of the basis of opencast coal policy in Clackmannanshire, completed by David Tyldesley and Associates in 2005. It should be noted that national planning policy guidance on other minerals (contained in NPPG 4 – “Land for Mineral Working”) is currently under review by Scottish Executive.

### **5.2 Current position**

- 5.2.1 Shallow coal reserves that may be suitable for opencast working are found across much of Clackmannanshire and the Eastern Villages part of the Stirling Council area, extending from the carseland to the south east of Stirling along the Forth and Devon valleys to the eastern extremity of Clackmannanshire. Currently there is no active working, although there has been considerable recent exploitation of the reserves in East Clackmannanshire and it is expected that pressure for working will continue for the foreseeable future. The main market for locally sourced coal is Longannet Power Station.

- 5.2.2 In the existing Structure Plan, the Eastern Villages area is identified as a priority area for urban regeneration as well as being in the area of search for a Major Growth Area (Proposal HP2). Opencast coal mining was not viewed as being compatible with these other strategic development objectives and accordingly this area was considered to be an area of high constraint within which opencast mining would not be permitted. Although the preferred location for the Major Growth Area has now been identified, it is considered that the broad objectives of urban regeneration remain applicable. The increased importance of environmental acceptability and the enhanced separation distances set out in SPP 16 also support the continued application of a high constraint approach in this area, where the coalfield is interspersed with established communities and the proposed new Major Growth Area.

- 5.2.3 Within Clackmannanshire, the Structure Plan raises the possibility of extracting coal in advance of the construction of the new Upper Forth Crossing. However, recent studies have revealed various issues affecting the viability of extraction here and it seems unlikely that this idea will now be pursued.

- 5.2.4 Generally, the Structure Plan sets out a strategy for the sustainable exploitation of the coal resource, directing opencast coal mining away from sensitive locations to ensure that any environmental or community impacts can be successfully mitigated. The strategy is based upon the identification of three types of area: high, medium and low constraint.

### **5.3 Changes in legislation and policy guidance**

- 5.3.1 SPP 16 is more clearly founded on the need to achieve environmental justice than its predecessor, NPPG 16 and emphasises the need to move towards a low carbon economy. It introduces a more precautionary approach to opencasting and contains what amounts to a presumption against new opencast coal operations, bringing Scottish policy more closely into line with existing policy in England and Wales. Applicants will now need to clearly demonstrate that opencast coal proposals can comply with a test on environmental acceptability, governed by tightly defined criteria set out in the SPP. Alternatively, if applicants can demonstrate that a proposal provides local or community benefits which clearly outweigh the likely impacts this may be sufficient to justify a grant of planning permission. However, eligible “local or community benefits” are limited to significant improvements arising from activities

such as land rehabilitation or stabilisation, or the generation of employment that is genuinely beneficial to impacted communities and would safeguard their interests.

5.3.2 SPP 16 tightens the rules on cumulative impact significantly, requiring an assessment of cumulative impacts if there are already two or more operational or consented sites that could raise similar impacts within 5km of a nearby community. This provision will make it more difficult for applicants to succeed in gaining permission for new opencast sites in areas that already have existing mines, quarries or landfill sites.

5.3.3 The guidance on separation distances between communities and opencast sites has been amended. As a general rule, any part of an opencast site within 500m of any community or sensitive building will be unacceptable (though off-site works such as tree planting will be acceptable within this distance). This amends the former guidance that stated that working faces should not be located within 500m of a community. The general protection for individual dwelling houses or sensitive establishments is also improved. Although the Guideline continues to emphasise the ability of the planning authority to time limit operations through conditions, it states that proposals are now likely to be unacceptable where they are likely to result in a period of disturbance to communities that, including extensions, involves extraction for a period of more than 10 years.

5.3.4 Opencast working will not be acceptable on sites that rely solely on road haulage that passes directly through communities or which affect adversely any natural or built heritage designation or site.

#### 5.4 Other issues / local circumstances

5.4.1 The existing Structure Plan (see Figure 3.2) defines a range of “Opencast Strategy Areas”, i.e. High, Medium and Low Constraint. These are based largely on work undertaken by David Tyldesley and Associates that has recently been reviewed. Although little change was proposed by the consultants with regard to the definitions, the opportunity has been taken to revise the definitions in accordance with the review and also taking account of SPP 16. *[Note: Within Clackmannanshire, it is proposed to further identify detailed areas of High, Medium and Low Constraint through a forthcoming Local Plan Alteration that will replace the current non-statutory Supplementary Advice Note.]*

5.4.2 The main proposed changes to Figure 3.2 are related to stronger restrictions on working in proximity of communities (the definition of which will be changed from settlements of greater than 20 dwellings to those of greater than 10 dwellings) and the introduction of new protection for individual houses and sensitive establishments. This reflects the greater emphasis given to the protection of community interests in the new guideline. The protection of Green Belt land will also be accorded enhanced status in accordance with the statement in SPP 16 that “opencast coal working is generally incompatible with green belt objectives” (para. 17), and the guidance set out in SPP 21 “Green Belts” (Consultation Draft). Stronger protection will be accorded to Gartmorn Dam Local Nature Reserve by specifically giving “Medium Constraint” status to local nature reserves in Figure 3.2 (the LNR was previously protected by virtue of its designation as a Country Park). Gartmorn Dam is surrounded by areas of potential opencast interest. Conservation Areas will also be given enhanced protection. The review found that the only Low Constraint area continues to be Broadcarse (no change from the existing Structure Plan).

#### 5.5 Significance of change and potential options

5.5.1 National planning policy on opencast coal has now diverged further from that for other types of mineral operation than was the case previously and the two are now quite distinct in policy terms. Consequently, it has been decided to revise the entire structure of the minerals section of the Plan. It is no longer considered appropriate to apply one “generic” set of general principles (Policy ENV 10) to both opencast and

other minerals development. It is intended that the general principles should therefore be divided into two separate policies, and amalgamated with the detailed assessment principles currently set out in Policies ENV 11 (Opencast Coal) and ENV 12 (Other Minerals). This will have the benefit of providing a more robust policy framework that is more relevant to each type of mineral working and can comply more closely with revised national planning policy guidance.

- 5.5.2 The required alteration would affect the Structure Plan section on “Minerals – General Principles” (paras. 3.10.1-3.10.3 and Policy ENV 10) in so far as it relates to opencast coal. The Structure Plan section on “Opencast Coal” (paras. 3.11.1-3.11.4, Figure 3.2 (Definition of Opencast Strategy Areas in Clackmannanshire) and Policy ENV 11 (Opencast Coal) would also be affected.
- 5.5.3 For the purposes of Strategic Environmental Assessment (SEA), options for assessment have been devised for proposed new policy approaches to opencast coal working, incorporating some elements of the existing General Principles applied to minerals developments in the Plan area. Similar consideration has been given to the planning approach to other minerals. However, in this case the proposed policy changes envisaged are consequential in nature and it is considered that they are not likely to give rise to any new significant environmental effects. Accordingly, no SEA is proposed in the case of the “Other Minerals” section. Changes to Figure 3.2 are considered minor in nature and also would not be subject to SEA.
- 5.5.4 For SEA purposes, three broad policy options have been set out for opencast coal working. A short statement of the objectives of each option and its level of compliance with national planning policy is set out below. Following selection of the preferred option, a detailed revised version of Policy ENV 11 will be presented for consideration in the Consultative Draft Alteration, together with the new revised Policy ENV 10, revised Figure 3.2 and supporting text changes (existing paras. 3.10.1 – 3.10.3; 3.11.1 – 3.11.4).

<b>Option 1 – Positive Policy</b>	This approach seeks to encourage opencast coal working, recognising its economic benefit and its role in providing employment in the local community. However, the option is considered to be weak in terms of controlling unacceptable environmental effects that may arise as a result of working. Furthermore, the bias towards recognition of economic benefits without fully considering possible environmental implications would mean that it would not comply fully with national policy guidance.
<b>Option 2 – Neutral Policy</b>	This option attempts to achieve a balance between the need to allow opencast coal working where suitable coal reserves occur and the need to protect important environmental and community interests. A hierarchy of constraint areas and other restrictions, such as time limits for working, control of cumulative effects, and discouragement of road haulage of coal through communities, is used to minimise harmful effects. The provisions of this policy are considered to fully comply with new national planning policy guidance.
<b>Option 3 – Negative Policy</b>	This approach seeks to discourage opencast coal working, recognising the potential harm it may cause to both the environment and local communities. However, the option is considered to be weak in terms of recognition of the benefits which opencasting offers to both the national and local economy. Furthermore, the precautions taken to prevent working preclude consideration of the potential for environmental benefits that can accrue from opencast coal working (e.g. removal of contamination or stabilisation of land), community benefits (e.g. the construction

	of a new bypass or provision of a community facility), or economic benefits (e.g. local employment). Discounting these issues would mean that the option would not fully comply with national policy guidance.
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## 6 Waste Management

### 6.1 Introduction

6.1.1 The Structure Plan waste management policy and supporting text requires to be reviewed and updated to take account of changes to the regulatory and policy context and practices since 2002. The existing policy (ENV13) was an interim policy, pending completion of an Area Waste Plan (AWP). The latter was produced in 2003 and, together with the EU Landfill Directive, has had a major affect on waste management practices within the Structure Plan area.

### 6.2 Current position

6.2.1 Increased disposal site management standards from SEPA, prompted by the EU Landfill Directive, and lack of tipping capacity, led to the closure, in 2004, of the Stirling and Clackmannanshire municipal landfill facilities (at Lower Polmaise, Fallin and Black Devon, Alloa, respectively). All municipal waste from within the Structure Plan area is now transferred to a commercially operated site at Avondale in the Falkirk Council area. The Councils recognise that there will continue to be a role for further capacity in landfilling within the waste hierarchy and, as such, landfill sites and practices must be as sustainable as can practically be achieved. A working group (The Forth Valley Strategic Options Case Group), established through the Area Waste Planning process and comprising both Council and SEPA staff, has determined that the best practical environmental option (BPEO) for satisfying the continuing requirement for landfill capacity is to expand the facility at Avondale. Falkirk Council have included a policy commitment in the Finalised Draft Falkirk Structure Plan (March 2005) safeguarding the land for this site expansion. Investigation of other waste management options is ongoing, with the need to identify a location for transfer and treatment facilities within the Structure Plan area of particular importance.

6.2.2 Inert waste generally has a less stringent management and disposal regime, due to having less potential to cause harm to people and the environment. A new facility for inert waste has been approved at Muirpark, Tullibody. Small sites for disposal of inert waste may be considered within the Stirling Council area. However, within the Structure Plan area there will be an emphasis on re-use of inert materials, such as for use as fill on development sites.

### 6.3 Changes in legislation and policy guidance

6.3.1 The Scottish Environment Protection Agency produced a National Waste Plan for Scotland in 2003. This is delivered locally by the Forth Valley Area Waste Plan (2003), which was developed jointly covering the Clackmannanshire, Falkirk and Stirling Council areas. The planning system needs to make provision for efficient and appropriate waste management facilities and services that are consistent with the Forth Valley AWP, and with the local Integrated Waste Management Plans (IWMPs) when implemented. In doing so, the 'proximity principle', or the need to treat waste near to where it arises must be considered. Waste management must be structured around the 'waste hierarchy' (set out below), whereby landfill and disposal of waste is a last resort, as applied in both the National and Area Waste Plans.

*Waste Hierarchy:*

Waste prevention/reduction  
Reuse and refurbishment  
Recycling and composting  
Energy recovery  
Disposal / landfill

6.3.2 National Planning Policy Guideline 10 (NPPG10) (March 1996) and Planning Advice Note 63 (PAN63) (February 2002) should be applied through the planning system.

- 6.3.3 The National and Area Waste Plans both provide strategies for improving the sustainability of municipal waste management and set targets until the year 2020. The AWP sets targets for the Forth Valley of 19% recycling and 19% composting of municipal solid waste (MSW) by 2010, with the remainder going to landfill. By 2020, it rises to 28% recycling, 25% composting, 17% energy recovery and 30% landfilling. Local authorities are required to conform with the relevant AWP.
- 6.3.4 The *Landfill Directive (99/31/EC)* is a key driver behind waste management reform across Europe, and behind Scotland's new waste regime. The directive bans landfilling of hazardous (special) waste with non-hazardous waste, from 15<sup>th</sup> July 2004. Following the Directive the *Landfill Allowance Scheme (Scotland) 2005 Regulations* came into force on 1<sup>st</sup> April 2005, whereby the Scottish Executive wrote to all councils allocating them various allowances for landfilling biodegradable municipal waste (BMW). This is the only mandatory target for waste management. BMW is assumed to be 63% of MSW.

Mandatory Landfill Targets for the Structure Plan area:					
Year	2005/06	2006/07	2007/08	2008/09	2009/10
Clackmannanshire	18,842*	15,604	14,925	14,249	13,574
Stirling	41,305	34,383	33,058	31,725	30,384
<b>Total</b>	<b>60,147</b>	<b>49,987</b>	<b>47,983</b>	<b>45,974</b>	<b>43,958</b>

\* BMW (tonnes)

Source: *Guidance on Landfill Allowance Regulations (Scotland) 2005* Scottish Executive

- 6.3.5 Integrated Waste Management Plans (IWMPs) will be a statutory requirement, with the *Environmental Protection Act (EPA) 1990* being changed to replace recycling plans with IWMPs. IWMPs will effectively be local waste management strategies, and are expected to be ratified by both Councils in late 2006.
- 6.3.6 The *Animal By-Products Regulations (ABPR)* introduced in late 2003, amongst other things prohibit the landfill of raw meat and fish waste, and require a separate permit for composting and biogas in addition to the waste management permit. Local authorities enforce the associated regulations, and there is now a Composting Industry Code of Practice. Through the *Special Waste Amendment (Scotland) Regulations 2004* there has been a tighter focus on ensuring that new special (hazardous) wastes are identified, separated and treated in accordance with the Regulations.
- 6.4 Other issues / local circumstances
- 6.4.1 The Area Waste Plan sets out the best practicable environmental option (BPEO) for management of the area's municipal solid waste. The primary elements of the BPEO include; a public awareness campaign; recycling; composting; review of AWP implementation; and reduce the quantity of landfill disposal. Other elements include; waste prevention; community waste planning; re-use and refurbishment; advanced waste treatments to enhance recovery; and disposal to landfill. Of vital importance is the public awareness and participation, without which achieving the targets will be impossible.
- 6.4.2 Though total municipal waste and the proportion going to landfill have begun to decrease there will remain a demand for landfill capacity for the foreseeable future. At present the optimum balance between operational efficiency and minimising environmental impacts will be achieved through the further expansion of the Avondale facility. It is recognized however that this creates conflict with the 'proximity principle', which requires waste to be disposed of as close to its source as possible to improve sustainability. This raises issues of additional cost, energy consumption and pollution due to the requirement to transport the waste further. However, this provides greater impetus for Stirling and Clackmannanshire to minimise the volumes of waste going to landfill and for developing the many economic and business opportunities for the

processing of waste, including a modern transfer station. A good strategic site for the development of a transfer station has been identified at Manor Powis. However, there are significant access problems to be overcome, and a temporary alternative at Lower Polmaise, Stirling, is being pursued. The changing approach to waste management creates many business and activity niches, examples of which include furniture salvage and restoration, computer and printer cartridge recycling, and paper and glass recycling.

6.4.3 It should be noted that the Forth Valley Councils and 'Waste Aware Forth Valley' have published a 'Supplementary Development Advice Note' (DAN) *Managing Waste in Housing and Commercial Developments*, providing guidance on the incorporation of appropriate waste facilities within new developments and redevelopments.

6.5 Significance of changes and potential options

6.5.1 The planning system needs to make provision for an appropriate network of waste management facilities taking account of the Plan's strategy and the need to treat waste close to where it arises (the 'proximity principle'). Structure plans should provide a strategic view of waste management, paying attention to the level of waste arisings and implementing the AWP, thus providing a framework for more detailed policies and proposals in local plans. Where possible, the strategic areas suitable for waste treatment and disposal facilities should be identified. The land use planning system will play an important role in the delivery of the infrastructure required for waste management reform, guiding sustainable development whilst safeguarding the natural and built environment.

6.5.2 For Strategic Environmental Assessment (SEA) purposes, and for identification of the most appropriate waste management policy, three broad policy options have been identified. A short statement of the objectives of each option and its level of compliance with the national regulatory and policy context is set out below. Following selection of the preferred option, a detailed revised version of Policy ENV13 will be presented for consideration in the Consultative Draft Alteration, together with supporting text changes (existing paras. 3.13.1 – 3.13.3)

<p><b>Option 1 – Inactive Policy</b></p>	<p>This option is essentially to leave things as they are. This option would mean continuing landfill at its current level whilst searching for additional sites to cope with future demand as present sites near the end of their life, and a maintenance of the current ratio between landfill, recycling and composting. This Option requires minimal change to Section 3.13 of the Structure Plan, effectively to update references within paras. 3.13.2 and 3.13.3 with regard to the Black Devon and Lower Polmaise landfill sites, which have now closed, and to review wording with regard to the NWP and AWP to reflect that they are now operational, and thus, that Policy ENV13 is no longer an interim policy.</p> <p>However, Policy Option 1 could not be considered progress toward sustainability, nor is it appropriate in terms of the broader regulatory and policy context. In particular, Councils are required to conform with the principles of the NWP and AWP, and the current Policy ENV13: Waste Management Interim Policy falls short of this requirement.</p>
<p><b>Option 2 – Compliant Policy</b></p>	<p>Proposes relatively significant changes to Policy ENV13 for the Structure Plan Alteration. However, it remains a moderate and realistic policy that is very closely aligned to the aims and principles of the Forth Valley Area Waste Plan 2003 and takes into consideration the work carried out by the Forth Valley Strategic Options Case Group.</p>

<b>Option 3 – Proactive Policy</b>	Proposes a more proactive approach through the redevelopment of Policy ENV13 on waste management. This Policy Option aims to use the Forth Valley AWP as a basis to further the principles of sustainable waste management, but to provide a progressive land use planning approach to waste management that goes further than merely complying with statutory and regulatory requirements. It draws on the findings of the Forth Valley Strategic Options Case more directly than Options 1 and 2.
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