

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

Scoping Opinion of South Ayrshire Council for the proposed development at Monkton

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1. Introduction

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

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

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

2. Description of the development

The proposed development relates to the erection of 277 new residential dwellinghouses and associated infrastructure, including access roads, landscaping, open space and drainage on an area of land located between the A77 and Kilmarnock Road, Monkton, approximately 0.5km north east of Monkton village centre.

3. Planning policy context

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

The proposed development site is located within a larger area of land which is known as Monkton Masterplan Area and is identified under LDP Policy: Maintenance and Protection of an Effective Housing Land Supply of the South Ayrshire Local Development Plan (SALDP) as a housing release site. The SALDP notes that release of the wider Monkton site for residential purposes is dependent on the outcome of assessment of impact on the truck road network and the preparation of a masterplan which demonstrates that the development will not adversely affect the built and environment heritage resources within the site or the landscape quality and value of the locality.

4. Consideration of alternatives

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

5. Landscape Implications

The EIA Report should assess the landscape implications of the proposed development using the most up-to-date methods and best practice. This process should be used in order to, in part, dictate the layout of the development, employing any mitigation measures which minimise adverse impacts upon the landscape character of the area. If developed, the site would be crucial both in terms of providing a landscape setting for Monkton and in terms of how the town would be perceived by those travelling along the A77. It is therefore important that the site is welcoming

and of high environmental quality. Landscaping will be one of the key components of the site in this regard.

The scoping request identifies a number of visual receptors and it is noted that an assessment of each of the visual receptors would be included within the environmental statement. Consultation with SNH will be necessary as part of the EIA Report and planning application process.

The EIA Report should include a description of the existing landscape character types that will be affected by the proposed development and should take account of the findings of the relevant Landscape Character Assessment. A Landscape and Visual Impact Assessment (LVIA) should be undertaken and SNH advise that any assessment should include the following:

- Justification for the siting and design of the development as well as the individual elements with the development footprint, and;
- An assessment of the capacity or sensitivity of the landscape for this type of development, i.e. the degree of fit between the proposed development and the baseline landscape character (with reference to the relevant LCA).

Furthermore SNH advise that viewpoints are selected to provide the following:

- Different directions/compass points (for different blackcloth or skyline issues, different lighting);
- A range of distances from the site;
- Different landscape character types;
- Different types of views, e.g. residential areas in close proximity, footpaths, minor roads and other key routes where the development may be the focus of the view;
- Sequential views along key routes, and;
- Static viewpoints on OS maps, particularly valued viewpoints (e.g. those cited in tourist literature) or any areas of cultural significance.

In addition to the above it is submitted that the EIA Report should consider the impact the proposed development will have upon the listed buildings and scheduled monument and their associated setting.

The applicant should agree viewpoints with both South Ayrshire Council and SNH prior to preparing the environmental statement.

6. Cumulative Effects

The EIA Report should include an assessment of the cumulative effects of the proposed development.

The Council has recently permitted a Proposal of Application Notice (17/01017/PAN) on the site known as HMS Gannet, which neighbours the site subject to this scoping report. The EIA Report should explore any potential cumulative effects with this proposal.

7. Aviation

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

A consultation response from Glasgow Prestwick Airport details mitigation which should be included in the design of any development that comes forward.

8. Design Principles

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

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

9. Nature Conservation Designations

There are no nature conservation designations within the boundary of the proposed development site. The closest designated site to the proposed development is the Site of Special Scientific Interest (SSSI) which is located 1.6km to the west of the site boundary.

It is noted that a Preliminary Ecological Appraisal, which includes an extended Phase 1 Habitat Survey and a Preliminary Roost Assessment have been undertaken. In terms of individual species surveys SNH have advised the following:

Badgers

Should the site be developed, a pre-construction survey should be completed prior to site clearance/construction to confirm that no badgers have utilised the area during the time elapsed between the survey and constructions.

Otter

A dedicated otter survey should be undertaken which should include a 250m study area extending upstream and downstream of Pow Burn.

Bats

There are trees and structures within the site have roosting potential. In light of the potential which exists it is important to note that a 30m buffer around each of the potential roosting features is suggested. Should such a buffer not be possible SNH request that further dedicated bat surveys are undertaken. In addition a 30m buffer should also include structures within the residential area along the southern section of the development site.

SNH note their agreement with regard the retention of habitats of high ecological value, while the mitigation proposed in the Preliminary Ecological Appraisal in relation to ornithology is accepted.

10. Soils

The proposed development site is located on the edge of a built up area. The majority of the site is identified as land capable of producing a moderate range of crops, while smaller areas of the site are identified as land capable of producing a wide range of crops and land capable of producing a narrow range of crops.

The proposed development will result in the loss of this land for agricultural purposes.

11. Short-term Impacts

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

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

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

12. Forestry

The site does not contain any areas of forestry therefore there will be no significant effects upon forestry.

13. Built and cultural heritage resources

The proposed development site includes a number of buildings of historic significance. The Scheduled Monument, Whiteside enclosure, is located within the proposed development site, to the north of B739, while two category A listed buildings, Monkton Windmill and Macrae's Monument, are also located within the proposed development site. The EIA Report will require to take account of the above buildings of historical significance to ensure they or their setting are not significantly affected by the proposed development.

In light of the above, the response from Historic Environment Scotland (HES) should be considered with some significance. HES state:

Any EIA should include a full appreciation of the setting of each of these heritage assets, and we would request that photomontage visualisations of the development are provided where impacts are potentially highest. This is likely to occur in relation to the Category A listed Monkton Windmill (LB14252) and the Category A listed Macrae's Monument (LB14253). In line with this, we would recommend the following visualisation viewpoints:

- *Long distance views of the proposed development from the north along the A78*
- *Views along Kilmarnock Road towards Macrae's Monument and Monkton Windmill*
- *View along landscape ridge from pathway adjacent to Macrae's Monument past Monkton Windmill towards the coastline*
- *View of Monkton Windmill from Tarbolton Road adjacent to Whiteside Farm*
- *Views from Macrae's Monument and Monkton Windmill across the development site.*

In addition, HES go on to note that:

We have reviewed the EIA Scoping Report (October 2017) provided as part of this consultation and are content with the methodology proposed at Chapter 8 (Archaeology and Cultural Heritage). In particular, we note that the report sets out that Management Plans would be required for significant heritage assets located within the development site boundary. We welcome this approach and would support proposals that avoid adverse impacts on these heritage assets while retaining them under sustainable and sensitive management regimes. We would also be happy to engage in discussions about any proposals for compensatory measures.

West of Scotland Archaeology Service has also considered the proposed development and is generally in agreement with the proposals outlined in the scoping report subject to a number of clarifications which are detailed in the attached annex.

The proposed development has the potential to significantly impact the existing built heritage and as such detailed consideration is required.

14. Tourism/Recreation and Public Access Resources

In line with Scottish Planning Policy any development should include strong and safe links to, from and through the development. In addition high quality and accessible greenspace provides opportunities for informal and formal recreational space and help to contribute to creating a sense of place and quality of life.

SNH have advised that *the LVIA should include consideration of impacts on the landscape setting of the site and the surrounding area and how this may affect the enjoyment of existing outdoor recreational users. Consideration must also be given to the existing and potential use of the area for recreation by the general public, with reference to Scottish access rights under the Land Reform (Scotland) Act 2003 and rights of way.*

15. Traffic and Transportation

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

It is noted that a stand-alone Transport Assessment will be submitted as part of the planning application. In this regard Ayrshire Roads Alliance have advised that they are satisfied with the scope of the Transport and Accessibility chapter and expect that the content of the stand-alone Transport Assessment informs the environmental chapter on transportation.

16. Noise, Vibration and Lighting

The EIA Report should explore potential impacts upon sensitive receptors in terms of noise and vibration during both the construction and operational phases of the proposed development. Operational and construction traffic noise should be assessed by considering the increase in traffic flows. The applicant may wish to give consideration to undertaking a noise impact assessment as part of the environmental statement.

Environmental Health have confirmed that the methodologies proposed in respect of Air Quality, Noise and Light Pollution are acceptable and are in line with the expectations of the service.

17. Flooding and Drainage

The south eastern area of the development site is identified as being at risk of fluvial flooding from the Pow Burn which runs through the site. It is noted that no development should take place in the functional floodplain. In addition SEPA also note the presence of surface water flood risk within the site boundary.

It is noted that a Flood Risk Assessment will be undertaken and will accompany the submission of any planning application. SEPA have provided a response which states:

We would require in a formal consultation that the applicant provides a detailed site layout with finished floor levels relative to the Pow Burn bed/bank levels. With this information, we will be able to determine if further information such as a Flood Risk Assessment will be required.

18. Consultation responses

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

- Scottish Environmental Protection Agency
- South Ayrshire Council Environmental Health
- Ayrshire Roads Alliance
- Scottish Natural Heritage
- Scottish Water
- Historic Environment Scotland
- West of Scotland Archaeology Service
- Prestwick Airport

19. Conclusions

It is apparent that there are a number of definitive constraints associated with the proposed development. The presence of two category A listed buildings and a scheduled monument within the development site will require important consideration to ensure any development does not adversely affect them or their associated setting. The likely significant effects in terms of landscape and visual impact also require detailed consideration. The main issues of concern relate to amenity, noise, the surrounding road network (including during the construction phase), landscape, built heritage and flooding. These issues are all covered in detail by the relevant consultation bodies. The potential cumulative effects from any development at the adjacent site (HMS Gannett) also require to be considered with some significance.

Annex 1 – Comments received by consultation authorities

Statutory consultee comments

Scottish Environmental Protection Agency

Town and Country Planning (Scotland) Acts Proposed Residential Development Monkton

Thank you for consulting SEPA on the scoping opinion for the above development proposal by way of your letter which SEPA received on 09 October 2017. We would welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter.

While all of the issues below should be addressed in the EIA Report (ES), there may be opportunities for several of these to be scoped out of detailed consideration. The justification for this approach in relation to specific issues should be set out within the ES. We would welcome the opportunity to comment on the draft ES. Please note that we can process files only of a maximum size of 25MB and therefore, when the ES is submitted, it should be divided into appropriately sized and named sections.

1 Flood risk

The site should be assessed for flood risk from all sources in line with Scottish Planning Policy (Paragraphs 254-268). The [Flood Maps for Scotland](#) are available to view online and further information and advice can be sought from your local authority technical or engineering services department and from our [website](#).

If a flood risk is identified then a Flood Risk Assessment should be carried out following the guidance set out in the document [Technical flood risk guidance for stakeholders](#).

We would expect South Ayrshire Council to undertake their responsibilities as the Flood Risk Management Authority.

Our pre-application advice relies on the accuracy and completeness of the information supplied with this consultation. Should finalised development proposals differ in any future planning application we reserve the right to alter our position if we are of the opinion that such proposals would not meet with the principles of Scottish Planning Policy

2 Technical Report

We previously provided flood risk advice for this planning application in May 2017 and stated that if formally consulted through the planning process on the proposed development we would be unlikely to object on flood risk grounds based on the information supplied with that consultation.

We highlighted in our previous response that the vast majority of the site appears to be developable however the southeast area (which includes the Pow Burn between the A77 and the B739) lies within the 1 in 200 year fluvial flood extent of the SEPA Flood Map and no development should take place in the functional floodplain. We also noted the presence of surface water flood risk within the site boundary.

We have reviewed the Scoping Reports Part 1 and 2 and we note that no detailed site plans (layout, finished floor levels) have been provided as per our recommendation in the previous response. Once plans reach a more detailed stage, for the site as a whole, further information and/or a Flood Risk Assessment will need to be submitted to ensure that any proposed development in proximity to the Pow Burn is consistent with the requirements of Scottish Planning Policy.

We note from the Scoping Report that the applicant intends to undertake a Flood Risk Assessment.

We would require in a formal consultation that the applicant provides a detailed site layout with finished floor levels relative to the Pow Burn bed/bank levels. With this information, we will be able to determine if further information such as a Flood Risk Assessment will be required.

3 Caveats & Additional Information for Applicant

The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river cross-sections and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland.. For further information please visit <http://www.sepa.org.uk/environment/water/flooding/flood-maps/>.

We refer the applicant to the document entitled: “*Technical Flood Risk Guidance for Stakeholders*”. This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from <http://www.sepa.org.uk/media/162602/ss-nfr-p-002-technical-flood-risk-guidance-for-stakeholders.pdf>. Please note that this document should be read in conjunction Policy 41 (Part2).

Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from <http://www.sepa.org.uk/media/159170/flood-risk-assessment-checklist.xls>.

Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

4 Waste water drainage

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

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

5 Surface water drainage

The treatment of surface water runoff by sustainable drainage systems (SUDS) is a [legal requirement](#) for most forms of development, however the location, design and type of SUDS are largely controlled through planning. We encourage surface water runoff from all

developments to be treated by SUDS in line with Scottish Planning Policy (Paragraphs 255 and 268), [PAN 61 Planning and Sustainable Urban Drainage Systems](#), [PAN 79 Water and Drainage](#) and local plan policy. SUDS help to protect water quality, reduce potential for flood risk and release capacity in the public sewerage network where the alternative is use of combined systems. Discharges to combined sewers should be avoided to free up capacity for waste water discharges.

It is important to ensure that adequate space to accommodate SUDS is incorporated within the site layout. Consideration should be given to this matter early in the planning process when proposals are at their most fluid and modifications to layout can be easily made with less expense to the developer. Each individual type of SUDS facility, such as a filter drain, detention basin, permeable paving or swale, provides one level of surface water treatment. The level of SUDS required is dependant on the nature of the proposed development, for example residential or non residential, the size of development, and the environmental risk posed by the development which is principally determined by the available dilution of the receiving waterbody. Best practice requires the following levels of treatment:

Residential developments of more than 50 houses and retail/ commercial/ business parks with car parks of more than 50 spaces require two levels of treatment for all hardstanding areas including roads. An exception is run-off from roofs which requires only one level of treatment. We recommend, as best practice, the second level of treatment to be a basin or pond designed in accordance with Sewers for Scotland Second Edition. Please also refer to section 3.3 below;

All roads schemes typically require two levels of treatment, except for residential developments of 50 houses or less and retail/commercial/business parks with car parks of 50 spaces or less. For technical guidance on SUDS techniques and treatment for roads please refer to the [SUDS for Roads](#) manual.

For all developments, run-off from areas subject to particularly high pollution risk (eg yard areas, service bays, fuelling areas, pressure washing areas, oil or chemical storage, handling and delivery areas) should be minimised and directed to the foul sewer. Where run-off from high risk areas cannot be directed to the foul sewer we can, on request, provide further site specific advice on what would be the best environmental solution.

The SUDS treatment train should be followed which uses a logical sequence of SUDS facilities in series allowing run-off to pass through several different SUDS before reaching the receiving waterbody. Further guidance on the design of SUDS systems and appropriate levels of treatment can be found in the CIRIA C697 manual entitled [The SUDS Manual](#). Advice can also be found in the SEPA Guidance Note [Planning advice on sustainable drainage systems \(SUDS\)](#). Please refer to the [Regulations section](#) of our website for details of regulatory requirements for surface water and SUDS. Comments should be sought from the local authority roads department and the local authority flood prevention unit on the acceptability of post-development runoff rates for flood control.

Comments from Scottish Water should be sought where the SUDS proposals would be adopted by them. We encourage the design of SUDS to Sewers for Scotland Second Edition standards and the adoption of SUDS features by Scottish Water as we are of the view that this leads to best standards and maintenance.

SUDS must be used on all sites, including those with elevated levels of contaminants. SUDS which use infiltration will not be suitable where infiltration is through land containing contaminants which are likely to be mobilised into surface water or groundwater. This can be overcome by restricting infiltration to areas which are not affected by contamination, or constructing SUDS with an impermeable base layer to separate the surface water drainage system from the contaminated area. SUDS which do not use infiltration are still effective at treating and attenuating surface water. Please refer to the advice note on [SUDS and brownfield sites](#) for further information.

6 District Heating, Low or Zero Carbon Heat Networks

In order for the government's renewable energy and heat demand targets to be met, it is important that all types of new development consider the role they play in using heat from renewable sources. Paragraph 154 of SPP states that the planning system should support the transformational change to a low carbon economy including deriving "11% of heat demand from renewable sources by 2020" and supporting "the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity – and the development of heat networks".

SEPA have recently published new development management guidance on Heat Networks and District Heating, supported by a background paper, setting out our expectations to support the achievement of these targets in line with our duties under the Climate Change (Scotland) Act 2009. We require that new substantial development ensure that their heat demand is met through district heating networks subject to the outcomes of a feasibility statement prepared in line with the Scottish Government's Planning Advice on Heat. Any future planning application for the site should be supported by sufficient information to demonstrate how it is proposed to address this issue at the development site.

7 Pollution prevention and environmental management

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

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

A Construction Environmental Management Document is a key management tool to implement the Schedule of Mitigation. We recommend that the principles of this document are set out in the ES outlining how the draft Schedule of Mitigation will be implemented. This document should form the basis of more detailed site specific Construction Environmental Management Plans which, along with detailed method statements, may be required by planning condition or, in certain cases, through environmental regulation. This approach provides a useful link between the principles of development which need to be outlined at the early stages of the project and the method statements which are usually produced following award of contract (just before development commences).

Best practice advice developed by The Highland Council (in conjunction with industry and other key agencies) on the Construction Environmental Management Process is available in the guidance note Construction Environmental Management Process for Large Scale Projects

8 Engineering activities in the water environment

In order to meet the objectives of the Water Framework Directive of preventing any deterioration and improving the water environment, developments should be designed to avoid engineering activities in the water environment wherever possible. The water environment includes burns, rivers, lochs, wetlands, groundwater and reservoirs. We require it to be demonstrated that every effort has been made to leave the water environment in its natural state. Engineering activities such as culverts, bridges, watercourse diversions, bank modifications or dams should be avoided unless there is no practicable alternative. Paragraph 255 of SPP deters unnecessary culverting. Where a watercourse crossing cannot be avoided,

bridging solutions or bottomless or arched culverts which do not affect the bed and banks of the watercourse should be used. Further guidance on the design and implementation of crossings can be found in our [Construction of River Crossings Good Practice Guide](#). Other best practice guidance is also available within the water [engineering](#) section of our website.

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

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

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

9 Disruption to wetlands including peatlands

If there are wetlands or peatland systems present, the ES or planning submission should demonstrate how the layout and design of the proposal, including any associated borrow pits, hard standing and roads, avoid impact on such areas

A Phase 1 habitat survey should be carried out for the whole site and the guidance [A Functional Wetland Typology for Scotland](#), should be used to help identify all wetland areas. National Vegetation Classification should be completed for any wetlands identified. Results of these findings should be submitted, including a map with all the proposed infrastructure overlain on the vegetation maps to clearly show which areas will be impacted and avoided.

Groundwater dependent terrestrial ecosystems, which are types of wetland, are specifically protected under the Water Framework Directive. The results of the National Vegetation Classification survey and Appendix 2 (which is also applicable to other types of developments) of our [Planning guidance on windfarm developments](#) should be used to identify if wetlands are groundwater dependent terrestrial ecosystems.

The route of roads, tracks or trenches within 100 m of groundwater dependent terrestrial ecosystems (identified in Appendix 2) should be reconsidered. Similarly, the locations of borrow pits or foundations within 250 m of such ecosystems should be reconsidered. If infrastructure cannot be relocated outwith the buffer zones of these ecosystems then the likely impact on them will require further assessment. This assessment should be carried out if these ecosystems occur within or outwith the site boundary so that the full impacts on the proposals are assessed. The results of this assessment and necessary mitigation measures should be included in the ES.

For areas where avoidance is impossible, details of how impacts upon wetlands including peatlands are minimised and mitigated should be provided within the ES or planning submission. In particular impacts that should be considered include those from drainage, pollution and waste management. This should include preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, dewatering, excavations, drainage channels, cable trenches, or the storage and re-use of excavated peat. Detailed information on waste management is required as detailed below.

Any mitigation proposals should also be detailed within the Construction Environmental Management Document as detailed below.

10 Carbon balance

Scottish Planning Policy (SPP) states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments should aim to minimise this release." The ES or planning submission should include a) a summary demonstrating how the development has been designed with regards to layout and mitigation to minimise release of CO₂ and b) preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat.

11 Disturbance and re-use of excavated peat

Where the proposed infrastructure will impact upon peatlands, a detailed map of peat depths (this must be to full depth) should be submitted. The peat depth survey should include details of the basic peatland characteristics.

By adopting an approach of minimising disruption to peatland, the volume of excavated peat can be minimised, reducing CO₂ emissions and the commonly experienced difficulties in dealing with surplus peat. The generation of surplus peat is a difficult area which needs to be addressed from the outset given the limited scope for re-use.

The ES or planning submission should detail the likely volumes of surplus peat that will be generated, including quantification of catotelmic and acrotelmic peat, and the principles of how the surplus peat will be reused or disposed of.

There are important waste management implications of measures to deal with surplus peat as set out within our [Regulatory Position Statement - Developments on Peat](#). Landscaping with surplus peat (or soil) may not be of ecological benefit and consequently a waste management exemption may not apply. In addition we consider disposal of significant depth of peat as being landfilled waste, and this again may not be consentable under our regulatory regimes. Experience has shown that peat used as cover can suffer from significant drying and oxidation, and that peat redeposited at depth can lose structure and create a hazard when the stability of the material deteriorates. This creates a risk to people who may enter such areas or through the possibility of peat slide and we are aware that barbed-wire fencing has been erected around some sites in response to such risks.

It is therefore essential that the scope for minimising the extraction of peat is explored and alternative options identified that minimise risk in terms of carbon release, human health and environmental impact. Early discussion of proposals with us is essential, and an overall approach of minimisation of peatland disruption should be adopted. If it is proposed to use some excavated peat within borrow pits or bunding then details of the proposals, including depth of peat and how the hydrology of the peat will be maintained, should be outlined in the ES or planning submission.

Our [Energy/Renewable webpage](#) provides links to current best practice guidance on peat survey, excavation and management.

12 Existing groundwater abstractions

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

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

13 Water abstraction

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

- Source e.g. ground water or surface water;
- Location e.g. grid ref and description of site;
- Volume e.g. quantity of water to be extracted;
- Timing of abstraction e.g. will there be a continuous abstraction;
- Nature of abstraction e.g. sump or impoundment;
- Proposed operating regime e.g. details of abstraction limits and hands off flow;
- Survey of existing water environment including any existing water features;
- Impacts of the proposed abstraction upon the surrounding water environment.

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

14 Space for waste management provision within site layout

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

15 Air quality

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

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

16 Regulatory advice for the applicant

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

31 Miller Road
Ayr

KA7 2AX

If you have any queries relating to this letter, please contact me by telephone on 01698 839337 or e-mail at planning.sw@sepa.org.uk

South Ayrshire Council Environmental Health

In this respect the Environmental Impact Assessment has been perused and the methodologies proposed in respect of Air Quality, Noise and Light Pollution would be those expected by this service and as such at this stage of the development we would have no adverse comments.

Ayrshire Roads Alliance

Having reviewed the EIA I would confirm that I am generally satisfied with the scope in terms of Transport and Accessibility. As mentioned in the scoping report, we would expect the separate Transport Assessment to cover these matters in greater detail, with the contents of the TA informing the EIA chapter on Transportation.

Scottish Natural Heritage

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011

EIA Scoping request: Residential development for 277 new homes and associated infrastructure, access roads, landscaping, open space, and drainage, in Monkton, South Ayrshire

Thank you for consulting SNH on the scoping opinion for the above development proposal by way of your email dated 30 October 2017 and thank you for the extension to the response deadline.

Background

Persimmon Homes Limited intends to apply to South Ayrshire Council (SAC) for Planning Permission in Principle under the Town and Country Planning (Scotland) Act 1997, for the construction and development of 277 units, covering an area of 21.1 hectares. The screening opinion provided by SAC confirmed that the proposal requires the undertaking of an Environmental Impact Assessment, and we are therefore being consulted for a scoping opinion.

Key issues to be addressed in the EIA Report

The EIA Report (ES) must contain the information specified in Schedule 4 Part II of the Environmental Impact Assessment (Scotland) Regulations as a minimum.

We consider that the key issues to be addressed in detail as part of the EIA process are:

- a) Ecological impacts, including direct and indirect impacts upon habitats and protected species;
- b) Landscape and visual impacts;
- c) Recreational impacts, including positive and negative impacts associated with the development, and;
- d) The cumulative impacts of all of the above in combination with other development proposals in the area.

Our detailed response can be found in Annex 1 below. Further guidance on the Environmental Impact Assessment process can be found in SNH's publication; A Handbook for Environmental Impact Assessment (2013). This publication can be downloaded from the SNH website at: <https://www.snh.scot/sites/default/files/2017-06/A1198363.pdf>. Further information at this link provides pre-application and scoping advice to developers, specifically for onshore wind farm developers, however it also provides useful information for other developments.

The information provided in this response is given without prejudice to any views that we may wish to express at a later date and is based upon our understanding of the project at this time.

Annex 1

Designated sites

There are no internationally or nationally designated sites within the proposed site boundary. We agree that the closest statutory designated site is the Troon Links and Foreshore Site of Special Scientific Interest (SSSI) and this is roughly 1.5km west of the site boundary, however we do not consider this site to be ecologically connected to the proposed development site. There may be locally designated sites within or close to the site, and we recommend that the applicant checks with South Ayrshire Council whether there are any local sites within or close to the site.

Protected species

A Preliminary Ecological Appraisal and Preliminary Roost Assessment were both undertaken on 29 August 2017. Our advice with regards to protected species is as follows.

Badger

No evidence of badger activity or badger setts was recorded within the site or 50m study area, however the woodland habitat within the site was assessed as suitable to support badgers. We agree with paragraph 6.4.1 of the Preliminary Ecological Appraisal (September 2017), which recommends “in the event of the site being developed in future, pre-construction survey is completed prior to site clearance/construction to confirm that no badgers have utilised the area during the time elapsed between the survey and constructions”.

Otter

Pow Burn has been identified as providing potential for otter. We agree with paragraph 6.4.3 which states that “a dedicated otter survey is recommended and should include a 250m study area extending upstream and downstream of Pow Burn.”

Bats

Seven trees and three structures were identified as having potential roosting features for bats. We agree with the recommendations in paragraphs 6.4.7 to 6.4.11. We would recommend that all bat surveys are undertaken in line with the Bat Conservation Trust guidance.

All survey work for protected species should be undertaken in line with the best practice guidance outlined on our website. Where survey methods or other work deviates from the published guidance, this should be agreed with us in advance to ensure that any deviations still meet our needs. A full explanation of why any deviations are considered appropriate should also be provided in the ES for the benefit of others. The results of the surveys should be used to avoid or minimise impacts, thereby informing the iterative layout and design of the development.

You should note that protected species surveys should be completed no more than 18 months prior to submission of the application to ensure that the survey results are a contemporary reflection of species activity at and around the site. If significant land use, habitat or population changes have occurred during this time, advice should be sought from us prior to application submission to ensure the surveys will be adequate.

Ornithology

The Preliminary Ecological Appraisal found that the woodland, hedgerow, and grassland habitats within and immediately adjacent to the site boundary are suitable for a range of lowland and woodland bird species, including five Red Listed birds. We agree with the proposed mitigation in paragraph 6.5.1 of the Preliminary Ecological Appraisal.

Habitats

The Phase 1 Habitat Survey undertaken on 29 August 2017 found 13 dominant habitat types. These included broadleaved semi-natural woodland and hedgerow. Section 6.3 of the Preliminary Ecological Appraisal proposes that the section of mature woodland along Pow Burn offers the highest ecological value and should therefore be retained as part of the masterplan design. The same recommendation was made for the retention of hedgerows in paragraph 6.3.3. We support the recommendation that habitats of high ecological value should be retained.

Landscape and Visual

We recommend that a full assessment of the effects of the development on landscape and visual amenity is undertaken. This assessment should be undertaken in line with the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute, 2013).

We advise that the ES should contain a description of the existing landscape character types that will be affected by the proposed development. This should take account of the findings of the relevant Landscape Character Assessment. The Landscape and Visual Impact Assessment (LVIA) should make use of all other relevant landscape and planning documents, including Planning Advice Notes (PANs) and the Scottish Planning Policy (SPP).

The LVIA should include the following:

- Justification for the siting and design of the development as well as the individual elements with the development footprint, and;
- An assessment of the capacity or sensitivity of the landscape for this type of development, i.e. the degree of fit between the proposed development and the baseline landscape character (with reference to the relevant LCA).

We recommend that the detailed survey/plan is produced showing the location of existing trees, shelter belts, field boundaries and any other landscape features. This plan should then be used to inform the masterplan and ensure that these features are retained and incorporated into the development layout. We also suggest that the applicant produces a landscape masterplan to show how the development will sit within the landscape and how it will work within this framework.

Respect for, and where possible re-enforcement of, the existing landscape character of the area should be used to inform the siting and design of all aspects of the development. Where negative impacts are identified by the LVIA, mitigation proposals should be considered and put forward and the final effects determined. Any significant post-assessment changes should be re-assessed, re-visualised and re-evaluated.

We advise that viewpoints are selected to provide the following:

- Different directions/compass points (for different blackcloth or skyline issues, different lighting);
- A range of distances from the site;
- Different landscape character types;
- Different types of views, e.g. residential areas in close proximity, footpaths, minor roads and other key routes where the development may be the focus of the view;
- Sequential views along key routes, and;
- Static viewpoints on OS maps, particularly valued viewpoints (e.g. those cited in tourist literature) or any areas of cultural significance.

For each viewpoint, we recommend a minimum of:

- A photo
- A photo marked up with the site location in the view
- The approximate height and extent of the development visible from each viewpoint

Mitigation proposals to reduce the impact of the development proposal on the landscape and reduce its visual impacts should be clearly defined in the ES and should be both specific and achievable.

Access and Recreation

Our advice regarding access and recreation is that the LVIA should include consideration of impacts on the landscape setting of the site and the surrounding area and how this may affect the enjoyment of existing outdoor recreational users. Consideration must also be given to the existing and potential use of the area for recreation by the general public, with reference to Scottish access rights under the Land Reform (Scotland) Act 2003 and rights of way.

In keeping with the policy principles in Scottish Planning Policy, we are keen to see strong, safe links to, from and through this development. High quality and accessible greenspace provides the setting for informal and formal recreation and contributes to a sense of place and quality of life. Joined-up greenspaces enhance connectivity across the site and link to wider green networks and active travel routes.

Scottish Water

Proposed Residential Development at Monkton – EIA Scoping

Thank you for consulting with Scottish Water regarding the above proposed development.

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed development.

Scottish Water Assets

A review of our records indicates that there are Scottish Water assets within the site including a 6" steel main and a 150mm combined sewer along the site boundary with Kilmarnock Road. The location of Scottish Water assets (including water supply and sewer pipes, water and waste treatment works etc.) should be confirmed through obtaining detailed plans from our Asset Plan Providers. Details of our Asset Plan Providers are included in Annex 1.

All Scottish Water assets potentially affected by the development should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with.

In the event that asset conflicts are identified then early contact should be made with the Scottish Water Asset Impact Team (AIT) at **service.relocation@scottishwater.co.uk**. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the AIT for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water.

Annex 1 includes a list of precautions to be taken when working within the vicinity of Scottish Water assets. This list of precautions is not exhaustive but should be taken into account as the development progresses through the planning and development process.

Sustainable Drainage Systems

The Sewerage (Scotland) Act 1968 as amended requires Scottish Water to actively progress requests to vest Sustainable Drainage Systems (SUDS) where those assets meet our specification. All new development proposals intended for vesting need to comply with our statutory requirements and associated technical specifications, as set out in Sewers for Scotland 3rd Edition. Guidance on SUDS is available in the Water Assessment and Drainage Guide prepared by the Sustainable Urban Drainage Scottish Working Party (SUDSWP).

Connection to Scottish Water's Network

A Water Impact Assessment (WIA) and Drainage Impact Assessment (DIA) will be required for the proposed development to understand the effect on the existing Scottish Network and what upgrades would be required to support the proposed development. It is therefore recommended that the developer contacts our Development Operations Team on **0800 389 0379** or via email at **development.operations@scottishwater.co.uk** as soon as possible to discuss their proposed development. It should be noted that granting of planning consent does not guarantee a connection to the Scottish Water network.

If you have any questions relating to the above, or in relation to the information presented in Annex 1, please do not hesitate to contact me.

Historic Environment Scotland

Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
Monkton Residential Development
Scoping Report

Thank you for your consultation which we received on 09 October 2017 about the above Scoping Report. We have reviewed the details in terms of our historic environment interests. This covers world

heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

South Ayrshire's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

I understand that the proposals are for a residential development of 277 units and associated infrastructure at Monkton, South Ayrshire.

Our views on the principle of the development

We note that an allocation for the development of 250 residential units in this area (MON1) is included within the adopted South Ayrshire Local Development Plan (2014). The Local Development Plan allocation (MON1), however, extends to include brownfield land associated with HMS Gannet not included with the site boundary identified for this development.

We therefore hold concerns that the proposals that are the subject of this Environmental Impact Assessment (EIA) Scoping Request may not be delivered without significant and detrimental impacts on the setting of the Category A listed *Monkton Windmill (LB14252)* and the Category A listed *Macrae's Monument (LB14253)*. In particular, we are concerned that concentrating a greater volume of development than is allocated within the Local Development Plan into a smaller site area, has the potential to create an unacceptable level of development pressure adjacent to these nationally important heritage assets.

We also hold concerns as to how the *Whiteside, enclosure (SM5261)* Scheduled Monument may be successfully managed and preserved within open space as part of these proposals. Further information relating to the background of this case and our pre-application design advice has been provided in the attached Annex.

Scope of assessment

As above, we consider that these proposals are likely to give rise to significant impacts on the below heritage assets located within the development site boundary. Particular attention should therefore be paid to these as part of any EIA undertaken for the development.

- *Windmill, Whiteside (Category A Listed Building, LB14252)*
Monkton Windmill is an 18th century vaulted windmill which was converted for use as a dovecot during the early 19th century and is a prominent conical feature in the landscape with an expansive setting. It was sited on the highest point of a low ridge running from southwest to northeast, so as to harness the prevailing coastal winds. Both as a windmill and in its later guise as a dovecot, the structure would have required open space around it in order to serve its function. This sense is preserved in the landscape today, and development should take this setting into account.
- *Macrae's Monument (Category A Listed Building, LB 14253)*
Macrae's Monument is a fine obelisk monument which was designed to be visible in the flat landscape and has to a large extent retained its original, designed function as a prominent feature. We consider that development in the vicinity of this Monument has the potential to compromise its setting, and recommend that any proposed development should be set back from this feature toward the southern part of the site.
- *Whiteside, enclosure (Scheduled Monument, Index No. 5261)*
The Whiteside enclosure is a set of subsurface remains of a ditched sub-rectangular enclosure of probable prehistoric date. It is now visible only as a cropmark in aerial photographs. Development in the vicinity of the monument should ensure that there is no intrusion into the scheduled area.

Any EIA should include a full appreciation of the setting of each of these heritage assets, and we would request that photomontage visualisations of the development are provided where impacts are potentially highest. This is likely to occur in relation to the Category A listed *Monkton Windmill*

(LB14252) and the Category A listed *Macrae's Monument* (LB14253). In line with this, we would recommend the following visualisation viewpoints:

- Long distance views of the proposed development from the north along the A78
- Views along Kilmarnock Road towards Macrae's Monument and Monkton Windmill
- View along landscape ridge from pathway adjacent to Macrae's Monument past Monkton Windmill towards the coastline
- View of Monkton Windmill from Tarbolton Road adjacent to Whiteside Farm
- Views from Macrae's Monument and Monkton Windmill across the development site

EIA Scoping Report

We have reviewed the EIA Scoping Report (October 2017) provided as part of this consultation and are content with the methodology proposed at Chapter 8 (Archaeology and Cultural Heritage). In particular, we note that the report sets out that Management Plans would be required for significant heritage assets located within the development site boundary. We welcome this approach and would support proposals that avoid adverse impacts on these heritage assets while retaining them under sustainable and sensitive management regimes. We would also be happy to engage in discussions about any proposals for compensatory measures.

Further guidance can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at www.engineshed.org.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Alison Baisden and they can be contacted by phone on 0131 668 8575 or by email on Alison.Baisden@hes.scot.

West of Scotland Archaeology Service

I agree with the proposals outlined to deal with archaeology in the report with the following clarifications –

- the assessment of setting should also be extended to the fort site which is a "C" category site in the non-statutory register (ie it is of national significance but not currently scheduled)
- the assessment of setting for significant sites should assess the change in setting proposed to the current baseline setting and give a view on that as opposed to assessing the change to the significance of the site brought about by the proposals
- I would not be minded to accept an argument that states that cropmarks do not have a landscape setting because they have no visible trace above ground
- the issue of buried archaeology will probably also be a major issue in these fields based on the discoveries made in modern archaeological interventions in the surrounding landscape and extensive evaluation would be required for greenfield areas

Glasgow Prestwick Airport

To assist in the key items which Glasgow Prestwick Airport requires to make an assessment of this development the following information would be required and will be considered further in the event of a full planning application

1. **Co-Ordinates** - Exact co-ordinates of the site (Easting and Northings) so that the location can be plot for safeguarding purposes.
2. **Building Height** - Exact height of the buildings at the highest point so that the location can be plot for safeguarding purposes.
3. **Lighting** - Advise if there are to be lighting poles, if so please advise the following:
 - a. Exact location of each pole
 - b. The height of each pole at the highest point
 - c. Type of lighting to be installed

4. **Bird Mitigation Plan / Risk Assessment** - Any disturbance of the land (within 13km of an aerodrome) will have the potential to increase the attraction of birds to the area and wherever possible in close proximity to an aerodrome the developer should incorporate measures to minimise their attractiveness to birds. Where a significant risk is identified, the developer will be expected to modify their proposals to mitigate this risk. It is possible that as part of the mitigation, it will be necessary to produce and implement a Bird Mitigation Plan which should be submitted to the aerodrome, further details can be obtained by contacting the Compliance Department at Glasgow Prestwick Airport (Andrew Barclay (abarclay@glasgowprestwick.com)).
5. **Waste Bins** - To minimise the number of birds attracted to the area consideration of the type of waste bins used on site should be made to discourage the number of birds in the vicinity, fully enclosed or covered skips must be used.
6. **Birds / FOD** - Buildings do not provide a food source in themselves; however, buildings may be used by birds depending upon the design and use of the building and the availability of food in the nearby environment. Gulls may rest on flat roofs and Swifts and Swallow will nest inside roof space and inside buildings to which they can gain access, wherever possible measures to minimise their attractiveness should be taken.
7. **Landscaping** - Landscaping or planting of any new trees / shrubs may attract birds by providing feeding, nesting and roosting habitat, large quantities of berry-bearing species should be avoided.
8. **Noise** - As this development falls within the aerodrome safeguarding regime, we are concerned that you may be adversely affected by aircraft noise. We are keen to minimise any complaints that may arise from their proximity to the airfield.
9. **SUD Basins / Standing Water** - no planted species or vegetation other than grass is planted in the SUD basin and is fully established before the basins are used. Access is provided to the basin to ensure a maintenance programme is implemented to ensure regular cutting of grass, an annual clearance of aquatic vegetation and silt removal.
10. **Cranes** - If cranes are to be used during the development, authorisation will be required from the airport well in advance.

The area and size of the proposed development may have further reaching consequences out with the normal scope of this department and will need to be considered at length in relation to the Aerodrome operations and development