



DUMFRIES AND
GALLOWAY COUNCIL

Local Development Plan

Adopted
September 2014



*Strategic
Environmental
Assessment
Post-adoption
Statement*

Dumfries & Galloway Local Development Plan: Adopted September 2014
Strategic Environmental Assessment
Post-adoption Statement

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Acronyms and Abbreviations

- 2005 Act: The Environmental Assessment (Scotland) Act 2005
2006 Act: The Planning etc. (Scotland) 2006
DGC: Dumfries & Galloway Council
ER: Environmental Report. Assessment Report under the 2005 Act. Published with FCSP
FCSP: Further Consultation on Sites and Policies. More detailed and specific than MIR
LDP: Local Development Plan
LDP1: The first Local Development Plan, adopted in 2014
LDP2: The second Local Development Plan, to be prepared for adoption in 2019
IER: Interim Environmental Report. SEA assessment associated with the MIR
MIR: Main Issues Report - first main step in preparation of a LDP under the 2006 Planning Act
PAS: Post-adoption Statement. Required for plans subject to an Environmental Report
PP: Proposed Plan. The LDP agreed by the Council, but subject to public representations
SEA: Strategic Environmental Assessment. The name for the process required by the 2005 Act
SR: Scoping Report. Document required for plans subject to assessment under the 2005 Act

1. Introduction

This Post Adoption Statement (PAS) has been prepared as the final step in the strategic environmental assessment (SEA) process for Dumfries & Galloway Local Development Plan (LDP) which was adopted in September 2014. It shows that the SEA process under the Environmental Assessment (Scotland) Act 2005, including the Environmental Report (ER) and responses to the associated public consultation, have been taken into account in the adopted plan (LDP1). It describes the consideration of alternatives as part of the preparation of the Plan. It sets out the requirements for monitoring of LDP1. In doing these things it satisfies the requirements of the 2005 Act for this final part of the SEA process for LDP1.

Section 2 provides an overview of the Dumfries & Galloway LDP and its SEA process.

Section 3 provides tables and text to show:

- how environmental considerations have been integrated into the Local Development Plan (as required by Section 18(3)(a) of the 2005 Act);
- how the Environmental Report has been taken into account in the preparation of the Local Development Plan (as required by Section 18(3)(b) of the 2005 Act); and
- how opinions expressed in response to the consultations on the Environmental Report have been taken into account in the preparation of the Local Development Plan (as required by Section 18(3)(c) of the 2005 Act);

Section 4 describes the reasons for choosing the Local Development Plan, as approved, in the light of other reasonable alternatives outlined in the Main Issue Report (as required by Section 18(3)(e) of the 2005 Act).

Section 5 sets out the measures that are to be taken to monitor the significant environmental effects of implementation of the Local Development Plan (as required by Section 18(3)(f) of the 2005 Act).

2. Overview of the Plan and its SEA Process

SEA formed a necessary adjunct to the process of preparing the Dumfries & Galloway Local Development Plan. This Plan is understood as being provided at 3 planning levels:

- The Spatial Strategy
- The Proposals Maps for individual settlements. These are supported by general and area specific policies
- The Policies, that form the framework to be used to assess development proposals for which specific allocations have not been made.

The SEA assessment of the Dumfries & Galloway LDP recognised that in development plans environmental considerations are a central and fundamental concern. The SEA process involving assessment and preparation of an Environmental Report has worked with the LDP to support the integration of environmental considerations in its preparation.

Dumfries & Galloway Environmental Baseline

The most basic summary of the Dumfries & Galloway environmental position is that there is a high quality natural and cultural heritage environment. This makes it a desirable place to live and is the basis for the main long term elements of the economy. The headline environmental issues are how to nurture the asset as a continuing resource whilst at the same time responding to the anticipated issues of climate change and 'peak oil'.

At an area-wide level environmental issues for the Plan were identified in the Interim Environmental Report (IER). The adopted Plan seeks to secure most of its effects through:

- the allocation of sites for housing and industry; and
- the application of a framework of policies in the determination of planning applications.

There are 3 Overarching policies, of which 2 are of particular relevance to environmental effects: Policy OP1 deals with Development Considerations and covers: General Amenity; Historic Environment; Landscape; Biodiversity and Geodiversity; Transport and Travel; Sustainability; and Water Environment. Policy OP2 deals with Design Quality of New Development.

Table 1 below sets out the baseline environmental problems in Dumfries & Galloway as identified in the Interim Environmental Report (IER). This Table also sets out a summary of the response to these problems in the Proposed Plan (PP).

Table 1: Baseline Environmental Problems in Dumfries & Galloway

Current D&G baseline environmental problems	Summary of Response in the Proposed Plan
Biodiversity, flora and fauna: Decline in biodiversity in region; lack of information on European protected species and on biodiversity in general; impacts of climate change on biodiversity	Overarching Policy OP1 provides the overview policy position in respect of Biodiversity and Geodiversity. The issues of biodiversity flora and fauna are covered through 11 policies for the natural environment. These intend to protect and enhance the natural environment and the sustainable use and enjoyment of it.
Population and human health: Predicted population decline, ageing population, health inequalities	The spatial strategy says that it aims to get the right type of development in the right place which meets the need of the community whilst promoting a more sustainable pattern of development, creating opportunities for sustainable economic growth, reducing carbon emissions and minimising the need to travel.
Water and soil: Protection of prime	There is a set of policies (including Water Environment in

Current D&G baseline environmental problems	Summary of Response in the Proposed Plan
agricultural land and careful management of changes in land use. Scotland wide issues of erosion, climate change affecting organic content	OP1) to cover the issue of water quantity (flooding) and support for water quality. In respect of water quantity, the plan intends to avoid adding to flood risk. There is a policy that intends to protect better quality soils and in general conserve soil resources.
Material assets: The general trend of increasing waste generation is not consistent with sustainability. Scotland wide issues of poor building maintenance	The spatial strategy says that it aims to maximise the use of existing infrastructure and minimise the need for travel. There are 3 policies dealing with aspects of waste.
Air: No significant problems. Air quality in the region is generally of a high quality in terms of national air quality objectives	The spatial strategy which aims to minimise the need to travel is expected to support the maintenance of generally good air quality across the region.
Climatic factors: Flood risk in many areas. SEPA's State of Scotland's Environment 2006 identifies climate change as Scotland's most significant environmental problem	The spatial strategy which aims to get the right type of development in the right place is intended to minimise the need to travel and assist in the reduction of CO2 emissions. Overarching Policy OP2: Design Quality of New Development requires that it integrate sustainable energy measures. Overarching Policy OP1 part f) sustainability seeks to limit the impacts of climate change by, inter alia, setting targets for carbon emission reductions from new buildings.
Cultural heritage: Scotland wide issues of neglect of buildings, impacts on historic site settings and landscape character disruption due to major developments and infrastructure	Overarching Policy OP1 provides the overview policy position in respect of the Historic Environment. The issues of cultural heritage are covered through Historic Environment in OP1 and six subject specific policies (HE1-6). These intend to respect, protect and enhance the environment. This approach guided the identification of specific sites in settlements in the Plan.
Landscape: There is concern about broad changes in the balance of landuses, due to developments in farming, forestry and energy generation.	Overarching Policy OP1 provides the overview policy position in respect of Landscape. The issues of landscape in designated areas are covered by two subject specific policies (NE1 and NE2): These intend to protect and enhance the quality of National and Regional Scenic Areas. This policy approach guided the identification of specific sites in settlements in the Plan.

The above issues are relevant for the LDP in so far as it sets the default and framework for decisions on development proposals. In this context account must also be taken of the possible impacts of climate change and the need to provide mitigation or adaptation. More specific environmental issues are noted in Column 5 of Appendix 3 to the IER.

The SEA framework, against which the LDP was appraised, comprised environmental objectives for each of the planning levels. These were originally set out in the Scoping Report (see Table 3 below). Objectives were developed for each SEA topic. The environmental objectives were devised to cover the scope of the plan relative to each environmental topic. They took account of the baseline data and environmental issues. The appraisal framework against which the LDP was assessed therefore reflected environmental considerations and provided a means of appraising the performance of the

LDP using a consistent approach, enabling its potential effects to be identified and mitigated where possible, and enhancements recommended. The appraisal was an iterative process and its findings have been integral to refining the terms of the Plan. It is important to note that the most effective SEA practice can be during the phase leading up to an assessment in an ER. As a consequence of such early positive engagement, problematic matters can be mitigated or avoided or reduced so that they do not appear in the finally published ER. Whilst this is a good outcome, the positive SEA impact is in the process leading to the ER rather than the Report itself.

The SEA process for the Dumfries & Galloway LDP started with the Scoping Report (December 2010). This set up the broad terms of the process based on the then current Development Plan Scheme. As matters turned out there was assessment of the Main Issues Report in the IER and assessment of the Further Consultation on Sites and Policies in the ER. The Plan seeks to secure its effects through the allocation of sites for housing and industry and the application of a framework of policies in the determination of planning applications. As a support for good practice, though not part of the formal SEA process, there was also a Supplementary Report assessment of the detailed policies in the Proposed Plan. In addition, the changes in the Proposed Plan from the Main Issues Report and Further Consultation on Sites and Policies, and the changes in the Adopted Plan from the Proposed Plan were subject to a Screening under Section 8 of the 2005 Act. In each case a Determination was made that no further SEA process would be required.

Public consultation is an important part of the SEA process. The 2005 Act requires that the public be given an ‘early and effective’ opportunity to participate in the process. Public consultation was carried out on the IER associated with the Main Issues Report (MIR) published in March 2011 and ER associated with the Further Consultation on Sites and Policies (FCSP) published in December 2011. It is also a requirement of the 2005 Act that the SEA Consultation Authorities be consulted on the ER. The SEA process for the Dumfries & Galloway LDP included consultation with the Consultation Authorities on both the IER and ER.

In total, 81 individual comments were made to the IER and ER. Almost all were from the 3 SEA Consultation Authorities and these to some extent duplicated responses made to the Plan itself. In addition, 50 assessment comments were identified in the IER and ER.

3. How did SEA make a difference to this Plan?

Section 2, above, has outlined that the Dumfries & Galloway LDP is an important Plan and also that the SEA process for it has been complex. The steps are set out in Table 2 below. The sub-sections in the text below show how each step helped this first Dumfries & Galloway LDP (LDP1) to be more sensitive to environmental concerns than might otherwise have been the case.

Table 2: Log of SEA Engagement with Dumfries & Galloway Local Development Plan (LDP1)

(See sub-sections below for commentary on each of the stages in this Table)

SEA Stage	SEA activity	PP response	PAS content	What PAS does
1	Scoping Report Development of SEA objectives	Response in respect of identified environmental issues in PP	Text about PLDP for main environmental issues Table for objectives	Shows that notice was taken of the environmental issues in PLDP Shows that objectives were comprehensive for subsequent

SEA Stage	SEA activity	PP response	PAS content	What PAS does	
				assessments	
2	Engagement during preparation of MIR	Development of alternatives with MIR Limited other engagement	Response in MIR and PLDP	Text	Shows engagement around alternatives, but otherwise limited in extent
3	Comments in the IER. Advertised Mar 11	Main Issues and alternatives assessment All potential sites assessments Limited policy assessment	Response in the PLDP	Table with comments	Shows a robust assessment of Main Issues with PLDP response in policies
4	Comments to the IER	Logged respondents' representations in database and reported to Council along with recommendations at time of PLDP (Nov 12)	Response in the PLDP	Table with comments	Shows a PLDP response in policies
5	Engagement during preparation of FCSP	Focus on sites: Settlement sites assessments Broad focus on policies	Response in FCSP and PLDP	Text	Shows engagement about sites and in principle with policies
6	Comments in the ER. Advertised Dec 11	Focus on sites: settlement sites assessments Broad focus on policies	Response in the PLDP	Table with comments	Shows PLDP response in respect of sites and with policies
7	Comments to the ER	Logged respondents' representations in the database and reported to Council along with recommendations at time of PLDP (Nov 12)	Response in the PLDP	Table with comments	Shows a PLDP response mainly in policies
8	Engagement during preparation of PLDP. Screening of changes from MIR and FCSP	Focus on all policies: Draft policy assessments	Response in PLDP	Text	Shows an engagement with details of draft policies for PLDP
9	Comments in	Focus on all policies:	Response in the	Text	Shows

SEA Stage	SEA activity	PP response	PAS content	What PAS does	
	the SR. advertised Jan 13	Policy assessments	PLDP		assessment of PLDP policies
10	Comments to the SR	Logged respondents' representations in PLDP reps database and reported to Council Sep 13	Considered for the Examination LDP	Text	PP SEA representations considered for Examination
11	Screening of changes between PLDP and Adopted LDP	Assessment and determination	Considered for the Adopted LDP	Text	SEA considered for changes between Examination and Adopted LDP

3.1 The Scoping Report

The Scoping Report set up the SEA objectives to be used in the assessment of the Plan. There were objectives for each of the SEA issue areas at each of the 3 levels of the Plan. Given the broad scope of the LDP in terms of subject matter and spatial application the objectives could not be precisely defined. However, the use of these objectives (see Table 3 below) supported a thorough and comprehensive assessment.

The Scoping Report also contained a broad list of environmental issues in Dumfries and Galloway (see Table 1 above) and a Table of Baseline Information. This Table was then developed in the IER to provide a more comprehensive account of the position (IER Appendix 3) (see Table 9 below). It should be noted that baseline information relevant to the Plan was in any case set out in the LDP Monitoring Report which was published alongside the Main Issues Report. As a response to a number of factors, including the baseline information, policies for the appropriate protection and conservation of the environment were set out in the Proposed Plan.

Table 3: SEA Objectives for Dumfries & Galloway Local Development Plan (IER Appendix 2)

SEA Issue	Strategy level SEA Objectives for D&G LDP	Development management policy level SEA Objectives for D&G LDP	Land allocations level SEA Objectives for D&G LDP
Biodiversity, Flora and Fauna	* Through strategy recognise, and integrate, the beneficial role of biodiversity and natural systems and processes	* Through development management policy, protect and, where possible, support the enhancement of species and habitats and the links between them. * Through development management policy, protect and, where possible, support the enhancement or creation of spaces important for biodiversity. * Through development management policy provide	* Through land allocations avoid damage to, and where possible provide protection or enhancement for, species and habitats and the links between them. * Through land allocations avoid damage to spaces which are important for biodiversity: Where possible, provide protection or enhancement for such spaces: Where possible support the creation of new

SEA Issue	Strategy level SEA Objectives for D&G LDP	Development management policy level SEA Objectives for D&G LDP	Land allocations level SEA Objectives for D&G LDP
		respect for natural processes and systems.	ones. * Through land allocations provide respect for natural processes and systems.
Population and Human Health	<p>* Through strategy recognise, and integrate, the value of the quality of Dumfries and Galloway as a safe and healthy place to live, work and visit.</p> <p>* Through strategy provide support for the development of a more balanced population structure.</p> <p>* Through strategy support development locations which help improve accessibility to jobs/employment, education, public services and recreation opportunities.</p>	<p>* Through development management policy support development that facilitates healthy lifestyles.</p> <p>* Through development management policy support development that addresses safety concerns.</p> <p>* Through development management policy support development that minimises conflict with environmental health concerns.</p> <p>* Through development management policy support the creation and / or retention of quality open space for community use.</p> <p>* Through development management policy, protect and enhance public accessibility to open space and the wider landscape.</p> <p>* Through development management policy provide support for the provision of recreation space.</p> <p>* Through development management policy support the development of sites for development which respect community identity.</p> <p>* Through development management policies support sites which help improve accessibility to jobs/employment, education, public services and recreation opportunities.</p>	<p>* Through land allocations facilitate healthy lifestyles.</p> <p>* Through land allocations support the addressing of safety concerns.</p> <p>* In land allocations support the minimisation of conflict with environmental health concerns.</p> <p>* Through land allocations support the creation and / or retention of quality open space for community use.</p> <p>* Through the allocation of sites protect and, where possible, enhance public accessibility to open space and the wider landscape.</p> <p>* Through land allocations support the provision of recreation space.</p> <p>* Through land allocations respect community identity.</p> <p>* Through land allocations help improve accessibility to jobs/employment, education, public services and recreation opportunities.</p> <p>* Through land allocations identify sites for a mix of housing types and tenures, including homes for families and affordable housing.</p> <p>* Through land allocations identify sites to accommodate the anticipated ageing of the population, in-migration, and increase in households.</p>
Soil	* Through strategy recognise, and integrate, the	* Through development management policy support the avoidance or minimisation of the adverse	* In land allocations avoid or minimise the adverse impacts of development on soil quality.

SEA Issue	Strategy level SEA Objectives for D&G LDP	Development management policy level SEA Objectives for D&G LDP	Land allocations level SEA Objectives for D&G LDP
	value of soil quality for the overall well-being of the area.	impacts of development on soil quality. * Through development management policy support the avoidance or minimisation of soil loss or destabilisation resulting from development.	* In land allocations avoid or minimise soil loss or destabilisation resulting from development.
Water	* Through strategy recognise, and integrate, the value of a high quality water environment.	* Through development management policy support the objectives of the Solway Tweed River Basin Management Plan for the Dumfries & Galloway area. * Through development management policy avoid adding to flood risk and support opportunities to reduce flood risk.	* Through land allocations support the objectives of the Solway Tweed River Basin Management Plan for the Dumfries & Galloway area. * Through land allocations avoid adding to flood risk and support opportunities to reduce flood risk.
Air	* Through strategy recognise, and integrate, support for the maintenance of a high level of air quality	* Through development management policy, protect or, if practical and appropriate, support the improvement of local air quality.	* Through land allocations avoid detriment to or, if practical and appropriate, improve, local air quality.
Climatic Factors	* Through strategy secure a reduction in greenhouse gas emissions * Through strategy secure a reduction in vulnerability to the effects of climate change	* Through development management policy, support reduction in the need to travel. * Through development management policy support an increase in the opportunities for more sustainable travel. * Through development management policy support locations and detailed designs which enable reduced greenhouse gas emissions. * Through development management policy support sustainable production of energy. * Through development management policy support	* Through land allocations seek to minimise the need to travel. * Through land allocations seek to optimise the opportunities for more sustainable travel. * Through land allocations identify locations which enable reduced greenhouse gas emissions. * Through land allocations provide support for the ability of households and communities to utilise and generate renewable energy. * Through land allocations avoid flood areas for flood sensitive development. * Through land allocations

SEA Issue	Strategy level SEA Objectives for D&G LDP	Development management policy level SEA Objectives for D&G LDP	Land allocations level SEA Objectives for D&G LDP
		<p>the efficient use of energy.</p> <ul style="list-style-type: none"> * Through development management policy, support the ability of households and communities to utilise and generate renewable energy. * Through development management policy support avoidance of flood sensitive development in flood risk areas. * Through development management policies and land allocations support development design which intends to be resilient to the effects of climate change. 	<p>support development design which intends to be resilient to the effects of climate change.</p>
Material Assets	<p>* Through strategy recognise the value of material assets (including natural resources and infrastructure) and integrate their efficient use for future years.</p>	<ul style="list-style-type: none"> * Through development management policy support the regeneration of derelict, vacant or contaminated land. * Through development management policy support the avoidance of blighting mineral assets. * Through development management policy support the sustainable management of waste according to the waste hierarchy. * Through development management policy support the optimum use of development infrastructure, viz. transport, utilities and services. * Through development management policy support the efficient use of land and buildings. * Through development management policy support development which in relation to its purpose has high design quality, and is robust and resilient. 	<ul style="list-style-type: none"> * Through land allocations support the regeneration of derelict, vacant or contaminated land. * Through land allocations avoid blighting mineral assets. * Through land allocations seek to support the optimum use of development infrastructure, viz. transport, utilities and services. * Through land allocations support the efficient use of land and buildings.
Cultural Heritage	<p>Through strategy recognise the</p>	<ul style="list-style-type: none"> * Through management of development policy, protect, 	<ul style="list-style-type: none"> * Through the allocation of sites respect the pattern and

SEA Issue	Strategy level SEA Objectives for D&G LDP	Development management policy level SEA Objectives for D&G LDP	Land allocations level SEA Objectives for D&G LDP
	value of, and integrate, the rich and diverse cultural and historic built environment and archaeological assets in D&G.	conserve and, where appropriate, provide for the enhancement of the historic environment and other elements of built cultural heritage. * Through development management policy, provide respect for the pattern and form of development, and the landscape and historic setting of settlements. * Through management of development policy protect archaeological sites and the historic environment.	form of development, and the landscape and historic setting of settlements. * Through the identification of sites avoid damage to archaeological sites and the historic environment.
Landscape	Through strategy recognise the importance of the natural landscape, and integrate its protection or, as appropriate, enhancement.	* Through of development management policy, protect and, where appropriate, provide for the enhancement or restoration of good quality landscape character, local distinctiveness and scenic value. * Through development management policy protect and, where appropriate, provide for the enhancement of the landscape settings of settlements	* Through the allocation of sites provide for protection and, where appropriate, enhancement of the landscape settings of settlements

3.2 Engagement during preparation of the MIR

At the outset of the LDP process it was understood that the MIR would, in the main, focus on high level concerns. It would set out the preferred spatial strategy and the alternatives that have been considered. It was expected to indicate any new policy and any headline changes in existing policy in the then current Development Plan. It was expected to indicate all the candidate sites considered for those settlements for which there were to be Inset Maps.

An assessment was made of the preferred spatial strategy and main alternatives. The pre-MIR engagement helped to sharpen and focus the terms of the spatial strategy, but given the high level nature of this MIR, it was accepted that mitigation work remained to be done in developing the detail of the policies for the Proposed Plan. With the benefit of hindsight, it is considered that the potential for reasonable alternatives to the preferred spatial strategy could have been explored more thoroughly.

3.3 Assessment in the Interim Environmental Report

Table 4: Assessment in the Interim Environmental Report

Ref	Matters from MIR IER to be addressed in PP	Question	LDP Response
2	Para 2.3.3 as the MIR is not able to provide detail, there should be clarity in policies in the PP.	Does the policy text in the PP provide clarity in respect of environmental concerns?	The policies for the Proposed Plan have been positively assessed in the Supplementary Report.
3	Para 2.3.3 policies should provide for mitigation or avoidance of adverse effects.	Is avoidance or mitigation of negative environmental effects identified in policy?	The policies for the Proposed Plan have been positively assessed in the Supplementary Report.
4	Para 2.3.3 cumulative and synergistic (environmental) effects should be supported or deterred, as appropriate, through policies.	Do policies respond to this comment?	The policies for the Proposed Plan have been positively assessed in the Supplementary Report.
5	Para 2.3.5 the spatial strategy supports the prospect that people will seek to live in relative proximity to their work. The success of this approach will depend on it not being undermined by disproportionate development in smaller settlements and rural areas that do not have matching employment.	Do policies respond to this concern?	The spatial strategy seeks to make good use of existing infrastructure and contain carbon emissions due to travel whilst also allowing for rural development. The success of the strategy will be assessed through monitoring, though a complicating factor may be the sluggish nature of the current housing market.
6	Para 5.1.2.1 the policies for the LDP must be assessed at a later stage in the preparation process.	Has there been opportunity for assessment of policies?	The policies for the Proposed Plan have been positively assessed in the Supplementary Report.
7	Para 5.2.3.1 there should be avoidance and mitigation in respect of landscape impacts of industrial development in the M74 corridor.	Does policy respond to this concern?	Site guidance in the Proposed Plan responds to this concern.
8	Para 5.2.3.1 the potential tension of retail development between main settlements is not addressed (in the spatial strategy).	Does policy respond to this concern?	This concern is not identified as an issue and not addressed in the Proposed Plan
9	Para 5.2.4.1 the LHS (from which housing figures for the LDP are derived) is subject to SEA.	Have the required SEA processes been carried out for the LHS?	All sites in the Proposed Plan, including sites in the Local Housing Strategy, were subject to environmental assessment in the LDP.

Ref	Matters from MIR IER to be addressed in PP	Question	LDP Response
10	Para 5.2.4.1 the details of how water and drainage facilities have influenced the outcome of the Settlement Hierarchy setting process are not clear.	Has any commentary been provided to demonstrate how water and drainage facilities have influenced the outcome of the Settlement hierarchy setting process?	Various factors were taken into account in the Settlement Hierarchy. These include drainage facilities as part of infrastructure, but an exact weighting for drainage in the overall formula was not developed.
11	Para 5.2.4.1 the need to carefully monitor and perhaps control the numbers of new houses outwith the main settlements is not addressed.	Has this concern been addressed in policy?	The success of the spatial strategy will be assessed through monitoring, though a complicating factor may be the sluggish nature of the current housing market.
12	Para 5.2.4.1 the typology for rural housing is not specified. Where there is not a local rural employment justification there are possible adverse environmental impacts.	Has the rural typology adopted for policy been identified?	The opportunities and constraints are made clearer in the Supplementary Guidance for 'Housing Development in Villages', 'Housing in the Countryside'. And 'Housing Development Immediately Outside Settlement Boundaries'.
13	Para 5.2.5 there is no reference to the likely tensions between various pressures influencing design.	Has this concern been addressed in policy?	This point is not addressed in the policy but there is detailed guidance in the supplementary guidance 'Design quality of New Development'.
14	Para 5.2.5 there is no indication as to how guidance is to avoid inhibiting innovation and becoming formulaic.	Has this concern been addressed in policy?	There is detailed guidance in the supplementary guidance 'Design quality of New Development'.
15	Para 5.2.5 suggestion that a carrot and stick approach be considered to complement supplementary guidance.	Has this suggestion been adopted or considered? Is there a policy?	This suggestion has not been incorporated as part of the LDP.
16	5.2.6 no indication about the possible scale of charges for infrastructure.	Does the policy identify the likely areas and amounts of charge?	This is not addressed in the LDP but there is more detailed guidance in the 'Developer Contributions' supplementary guidance.
17	5.2.6 the tension between the effective collection of infrastructure money and developer assessment of viability is not addressed.	Does the policy deal with this concern?	This is not addressed in the LDP but there is more detailed guidance in the 'Developer Contributions' supplementary guidance.

Ref	Matters from MIR IER to be addressed in PP	Question	LDP Response
18	Para 5.2.7 it is not clear how the stated position on woodlands is consistent with the vision that there will be more woodlands.	Does the policy clarify the position?	The Plan contains Policy NE6 - Forestry and Woodland. This is supported by the 'Forestry and Woodland Strategy' Supplementary Guidance.
19	Para 5.2.7 some clarification of the text on renewables could potentially have resulted in a positive assessment.	Would the policy available with the PP allow for a more positive assessment?	The Council has developed a spatial framework for wind energy development, taking into account the SPP and online guidance. The policy as set out in Policy IN2 Wind Energy is supported by supplementary guidance.
20	Para 5.2.7 there is an absence of commitment about the Council's high level position in respect of other forms of fuel. This should be clarified in the PP.	Is the position clarified through policy in the PP?	The broad principles applying to renewable energy proposals in general are set out in Renewable Energy Policy IN1.
21	Para 5.2.7 further clarification in the PP on the commitment to securing local or Scottish targets for CO2 reduction would be desirable.	Do the policies respond to the concern of this comment?	This is covered in bullet point 9 in Development Considerations Policy OP1 part f) Sustainability in the Adopted LDP. Supplementary guidance remains to be produced in support of this policy.
22	Para 5.2.7 clarify whether it is the case that visual sensitivities have priority over the objective of securing reduced greenhouse gas emissions and response to climate change.	Is the position clarified in policy in the PP?	Overarching Policy OP2 Design Quality in New Development says that where relevant proposals should integrate sustainable energy measures.
23	Para 5.2.8.1 it is not clear that the preferred approach takes fully into account that there are centres in the region with strong links outwith the region (rather than to Dumfries).	Does the preferred approach in the PP recognise that as well as links to Dumfries there are important cross boundary links?	The LDP does not address this specific point.
24	Para 5.2.8.1 there is no consideration of the potential environmental impacts of the alternative housing options for Dumfries.	Have alternative housing (and development) options been considered as part of the process of preparing the PP?	The consideration of alternatives for Dumfries was carried out through the assessment of all the possible potential development sites in and around the town.
25	Para 5.2.8.2 the issue that support for Dumfries town centre infers that there will be restrictions elsewhere is not addressed.	Has this issue been addressed in policy in the PP?	The LDP does not address this specific point.

Ref	Matters from MIR IER to be addressed in PP	Question	LDP Response
26	Para 5.2.8.2 in the PP there should be a response to the issue of the frequent flooding of the Whitesands. This should be part of the overall approach for the town centre.	Has the response to this issue been set out along with wider approach for the town centre been set out in policies in the PP?	This is being developed through the 'Whitesands Masterplan' supplementary guidance. This takes a comprehensive approach toward conservation and regeneration of the town centre area. Flood protection is a main element and this is being progressed as a development project.
27	Para 5.2.8.2 the issue of the potential conflicts between different types of use in the town centre area is not addressed.	Do policies in the PP address this concern?	The LDP does not address this specific point.
28	Para 5.2.8.3 the extent and type of new development at the Crichton should be carefully considered for the PP (so as to protect its environmental quality).	Do policies in the PP address this concern?	The LDP contains Policy ED3: The Crichton Quarter. This is to be supported by supplementary guidance. The Crichton Trust is producing a masterplan taking account of the issues raised. The LDP includes an area of Protected Open Space in the Crichton site.
29	Para 5.2.8.4 the positive identification of a new site for industry might help reduce the pressure of access to the Crichton and hospital area.	Has this issue been addressed through site allocation in the PP?	The issue covered by this point is reduced because there is now approval for the relocation of DGRI to a new site at the west end of the existing Dumfries bypass.
30	Para 5.2.8.4 the inclusion of the Ladyfield area for housing in the PP could help reduce the pressure of access to the Crichton and hospital area.	Has this suggestion been followed through with site allocations in the PP?	Ladyfield is identified for 557 houses as a long term site in the adopted LDP though its potential environmental benefit in terms of reduced need to travel may not now be so great given the relocation of DGRI.
31	Para 5.2.9 development at Stranraer waterfront should be dependant on assurance that as designed there is not a significant flood risk now or in the future.	Is this issue covered by policy (possibly linked to SG) in the PP?	This issue was investigated as part of the SEA for the Stranraer Waterfront Masterplan. Any development proposed will in any case be subject to Policy IN7 - Flooding and Development.

Ref	Matters from MIR IER to be addressed in PP	Question	LDP Response
32	Para 5.2.10 the value of Lockerbie railway station is set out but a position (from the Local Transport Strategy) on the public transport connection to Dumfries is not set out.	Is the Council position on Lockerbie/Dumfries public transport link been set out in the PP? (This relates to spatial strategy.)	This issue is not specifically identified in the LDP.
33	Para 5.2.11.1 the selection of a different standard for consideration of distance from towns from that used at national level is not justified in the MIR text (rural typology?).	Is the rural typology used for the PP specified? Is this consistent with Scottish Government typology?	This issue is not addressed in the LDP.
34	Para 5.2.11.1 there is an absence of targets for CO2 reductions. This should be addressed in the PP.	Are targets for CO2 reduction set out in the vision or spatial strategy or policies of the PP?	This is covered in bullet point 9 in Development Considerations Policy OP1 part f) Sustainability in the Adopted LDP. Supplementary guidance remains to be produced in support of this policy.
35	Para 5.2.11.1 the means to ensure that development in smaller settlements does not undermine the Spatial Strategy are not identified.	Is this concern addressed in policy in the PP?	This issue is addressed in Policy H2 - Housing Development in Villages. It is expected to be considered as part of monitoring. This should look at the relative rates of implementation of the different elements of the strategy as a check on whether its overall integrity is being maintained and its objective is being secured.
36	Para 5.2.11.1 the means to ensure that development in rural areas does not undermine the Spatial Strategy are not identified.	Is this concern addressed in policy in the PP?	See comment immediately above. The issue is not specifically addressed in Policy H3 - Housing in the Countryside.
37	Para 5.2.11.2 many the potential adverse effects of the Spatial Strategy should expect to be avoided or mitigated through the policies of the PP.	Do policies in the PP address this concern? (Is there support for Spatial Strategy and are there protective overarching polices.)	There is a framework of general policies in the Plan that should secure the avoidance of adverse impacts at a local level.

Ref	Matters from MIR IER to be addressed in PP	Question	LDP Response
38	Para 6.1.1 SEA Process: Lesson to be learnt: There is a need for there to be sufficient time for the SEA process to effectively contribute to the alternatives?	Has this concern been accepted so that it can be accommodated in the timetable in future iterations of the LDP?	Time for detailed consideration of policies has been included as part of the programme leading to the Proposed Plan, although this assessment did not form part of the formal SEA process.
39	Para 6.1.1 SEA Process: there is (available) information about the D&G environment but the work of analysis to justify and test policy has not been strongly developed. Further work on this is required for the PP and beyond.	Has this concern been accepted so that there can be more effective monitoring of the environment for future iterations of the LDP?	This is a continuing concern. In addition to monitoring specified as part of the SEA process for LDP1 there will be a Monitoring Report published along with the MIR for LDP2.
40	Assessment of Main Issues matrix: Housing and Spatial Strategy: Consider whether if it is not controlled by policy, housing in villages (not mapped), SBGs and rural areas may promote development patterns which: put disproportionate pressure on biodiversity, produce disproportionate CO2 emissions, have disproportionate adverse effects on soil, disproportionate adverse effects on landscape, fail to make use of existing material assets, and undermine the main Spatial Strategy of the PP.	Has this concern been addressed in the policy of the PP?	Any potential adverse impacts on biodiversity, soil, and landscape should be avoided or mitigated through application of the framework of general policies provided in the Plan. Any potential impact on the spatial strategy is not addressed in the Plan but is expected to be considered as part of monitoring. This should look at the relative rates of implementation of the different elements of the strategy as a check on whether its overall integrity is being maintained and its objective is being secured.
41	Assessment of Main Issues various elements: Need to have a policy for the protection of soil (and possibly also avoidance of risk of soil erosion).	Does the PP contain a policy for the protection of soil (especially better quality soil) against loss or erosion due to development?	There is a policy on soil, NE13 - Agricultural Soil in the LDP and also Policy ED16 - Protection and Restoration of Peat Deposits as Carbon Sinks.

3.4 Comments to the Interim Environmental Report

Table 5: Comments to the Interim Environmental Report

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
43	0086.003.001: The discharge from	Has this concern about	Site not allocated in the Plan

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	the septic tank of our property is to Castle Loch. This is unsatisfactory. It would be preferable if a development connected to the mains system on site ref 0086.001 could come forward and the property could be connected to that.	effluent draining to Castle Loch been taken into account in the identification in the PP of appropriate sites for development in Lochmaben?	
44	0179.014.001: Current planning policies make no provision for improving the building stock through very low energy design and policy should be developed to encourage the advanced design standards such as the Code for Sustainable Homes or PassivHaus.	Do policies for design in the PP respond to this concern?	This concern is addressed in part f, 'Sustainability', especially bullet point 9, of Overarching Policy OP1. It is also in the final bullet point of overarching Policy OP2- Design Quality of New Development.
45	0195.019.001: Land west of Kirkbrae, Creetown: Respondent says this site would have ... Little or no effect on biodiversity. No potential flood risk identified. Little or no effect on conservation area, only landscape improvement to badly neglected area. Would make massive improvement to general environment. Existing housing identified on site. 0195.007.	Has this representation been considered in the process leading to the identification of appropriate sites for development in Creetown?	Yes. However the SEA assessment with the MIR is unchanged.
46	0195.017.001: Land north of Garage Crescent, Creetown. Respondent says ... Comment - Please note there are no flood risk issues. 0195.001.?	Has this representation been considered in the process leading to the identification of appropriate sites for development in Creetown?	Yes. However the SEA assessment with the MIR is unchanged.
47	0195.018.001: Land off Park Crescent, Creetown. Respondent says ... No potential flood risk - SEPA and DGC (as flood prevention authority) have information which adequately addresses the risk of flooding at this site and all other sites mentioned here. Area already identified in existing local plan for housing. Ideal location within short walking distance to village facilities. A good contribution to reduction in carbon emissions from transport. Would be making best use of site with little (or) no impact on landscape. 0037.030.	Has this representation been considered in the process leading to the identification of appropriate sites for development in Creetown?	Yes. Further flood data has been made available that indicates that the level of risk would be acceptable. This modifies the SEA site assessment with the MIR. The site is in the 2006 LP and to be included in the PP.

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
48	0195.020.001: Land east of Kirkmabreck Church, Creetown. Respondent says this site ... May improve natural biodiversity. No possible flood risks identified in this area. A natural improvement to what is existing. 0195.006.	Has this representation been considered in the process leading to the identification of appropriate sites for development in Creetown?	Yes. However the SEA site assessment with the MIR is unchanged.
49	0195.021.001: Land off Grimshawe, Creetown. Respondent says ... Please note there are no identified flood risk issues relating to this site. All adjoining properties are either on the same level or lower! It is a detached site with adequate natural landscape. 0195.004.	Has this representation been considered in the process leading to the identification of appropriate sites for development in Creetown?	Yes. However the SEA site assessment with the MIR is unchanged.
50	0195.022.001: Existing housing allocation NC18, Creetown. Respondent says ... Ideal location within short walking distance of local bus stop and all village facilities. A good contribution to reduction in carbon emissions from transport. Would be making best use of site with little or no landscape impact. 0195.003.	Has this representation been considered in the process leading to the identification of appropriate sites for development in Creetown?	Yes. The SEA site assessment with the MIR is unchanged. The site is in the 2006 LP and to be included in the PP.
51	0195.023.001: Existing housing allocation NC11, Creetown. Respondent says ... Ideal location within short walking distance of all village facilities - a great contribution to reduction in carbon emissions from transport (and) would be making best use of small site with little or no landscape impact. 0195.002.	Has this representation been considered in the process leading to the identification of appropriate sites for development in Creetown?	Yes. The SEA site assessment with the MIR is unchanged. The site is in the 2006 LP and to be included in the PP.
52	0263.002.001: SEA Overall Assessment SEA: Respondents ... Are unsure of what the minor issues relating to landscape could be, given that both Scrabo and Amboseli were part of the original greenfield site which is no longer detached as it is contiguous with Amboseli? 0037.001	Has this representation been considered in the process leading to the identification of appropriate sites for development in New Galloway?	Yes. The SEA site assessment with the MIR is unchanged.
53	0302.002.001: Respondent (HS) understands that it is intended to undertake a further stage of consultation prior to bringing forward a proposed plan and that	Has this comment been taken into account in the LDP preparation process?	Yes in the Further Consultation on Sites and Policies (December 2011)

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	the Environmental Report will be revised and form part of that additional stage of engagement. Given the Council has not expressed a preferred view in relation to specific site proposals respondent agrees that this further engagement will be helpful and advises that this should take place before DGC have reached a settled view.		
54	0302.002.004: Respondent says ... it would also be helpful to provide a short summary within the main report on the key findings that have emerged from the detailed assessment contained within these appendices – the significant effects that will affect decisions taken in reaching a settled view on the spatial strategy.	This should be dealt with in the SEA Post-adoption statement.	The Council carried out a 'Further Consultation on Sites and Policies'. This was published December 2011 and was accompanied by an assessment of sites for settlements in an Environmental Report.
55	0302.002.005: Respondent notes that the Council chose not to take a view on whether or not any of the proposals are preferred or not preferred in the MIR, so there is perhaps an opportunity for the revised Environmental Report to make clear recommendations about which sites would have significant negative effects.	Noted.	This has been covered in the assessment of sites in the Environmental Report that accompanied the Further Consultation on Sites and Policies.
56	0302.002.006: Annan 0081.024: Respondent agrees that development within this allocation could have a significant impact upon the Mote of Annan scheduled monument (index no. 702) and that this should be considered further in determining whether or not to bring this allocation forward.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	The site is not identified for development in the Plan.
57	0302.002.007: Annan 0048.10: Respondent considers this allocation is likely to have a direct impact on the scheduled monument of Annan Hill Roman Camp (index no. 4273). Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. However,	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	The site is not identified for development in the Plan.

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	respondent considers that some housing could be accommodated in the western section of the allocation.		
58	0302.002.008: Castle Douglas 0041.001: Respondent notes that remains of a scheduled stone circle (index no. 1011) are present in close proximity to this land allocation and the SEA process may wish to consider any impacts upon the setting of this monument if intending to allocate this area for development.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	The site is not identified for development in the Plan.
59	0302.002.009: Dalbeattie 100/DBT/B&I11: Respondent says ... There are several scheduled monuments in the vicinity of this proposal and we agree that a small extension to the existing industrial estate would not result in significant impacts. As noted in your site assessment, further recording/evaluation would be useful should development proceed in this area.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	In its guidance for this site the Plan says "There are archaeological issues that require some evaluation/mitigation to be carried out based on the site being on or adjacent to former WWII Munitions works".
60	0302.002.010: Dumfries 162.01: Land South of Park Road: Respondent says ... This allocation is likely to have a direct impact on the scheduled monument Curriestanes Cursus (index no. 5738), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. As the monument survives as a buried feature which is only visible from aerial photographs as a cropmark, development outwith the scheduled area, but within the remainder of the land allocation, is unlikely to raise significant issues.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	Noted. This site is not allocated for development in the Plan.
61	0302.002.011: Dumfries 145.012: Ladyfield West: Respondent says ... We agree with your site assessment. There is a presumption in favour of retaining this building	Has this comment been taken into account in the process leading to the identification of appropriate sites for the	Noted. This site is not allocated in the Plan. Any proposal for it would be subject to the framework of general policies in the Plan.

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	and we would very much welcome its renovation and reuse. The A-listed house is currently a shell, but a condition of the listed building consent for this work was that the house should be marketed to a restoring purchaser as soon as possible. Mitigation could involve the provision for a small amount of sensitively placed development to the side of the house to support the restoration of the house.	PP?	
62	0302.002.012: Dumfries 167.001: Crichton Glasshouses: Respondent says ... These are listed at category B and as such, listed building consent will be required for alterations to them. There is a presumption in favour of their retention and we would welcome work that provided them with a viable use. If this allocation requires the demolition of the glasshouses then this should be considered a significant negative effect.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	Noted. This site is not allocated for development in the Plan. Any proposal for it would be subject to the framework of general policies in the Plan.
63	0302.002.013: Dunragit 0018.09: Respondent says ... This allocation is located immediately to the east of Round Dounan Fort (Index No. 1995). The fort is located on the summit of a natural hillock and has open views of in all directions. The policies of Dunragit House form open ground immediately to the east of the fort. Development within this land allocation has the potential to have a significant impact on the immediate open setting of the fort. Some development could be accommodated on the eastern side of the land parcel, therefore retaining the open aspect from the fort to the east.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	The Plan does not include an Inset Map for this settlement.
64	0302.002.014: Dunscore 0121.001 & 0121.002: Respondent says ... We support your site assessment and agree that while some limited frontage development could be	Has this comment been taken into account in the process leading to the identification of appropriate sites for the	The Plan does not include an Inset Map for Dunscore.

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	accommodated, extensive development in this area would have a significant impact upon the A listed Dunscore Parish Church.	PP?	
65	0302.002.015: Holywood 100/HLW/1: Respondents says ... This allocation is likely to have a direct impact on the scheduled monument Cursus (index no. 4217), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. While some development could be supported within the western portion, mitigation could involve amendments to the boundary to exclude the eastern portion to reflect what can be realistically delivered.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	This site is allocated for development in the Plan. The site guidance includes for consideration of archaeological remains and further investigation will be required.
66	0302.002.016: Langholm LHM7: Respondent says ... This allocation is likely to have a direct impact on the scheduled monument Langholm Castle (index no. 7774), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. While some development could be supported within the western portion, we consider that the boundary should be amended to exclude the eastern portion to reflect what can be realistically delivered.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	This site is not included within the Langholm settlement boundary in the Plan
67	0302.002.017: Leswalt 0199.002 & LSW/4: Respondent says ... Development in this area is likely to impact upon the immediate setting of Leswalt Old Parish Church (index no. 7875). We request that this is taken into consideration in reaching a view on the location and scale of development in this area.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	Neither site is allocated for development in the Plan. Both are outwith the Leswalt settlement boundary.
68	0302.002.018: Lochmaben 0086.01: Respondent says ... This allocation is	Has this comment been taken into account in the	This site is not allocated for development in the Plan. Part

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	to the east of Castle Hill, Motte and Bailey Castle (index no. 2637). As this land parcel is an extension to the south of the existing settlement we consider that this is unlikely to have a significant impact on the setting of the monument.	process leading to the identification of appropriate sites for the PP?	of the area is outwith the settlement boundary.
69	0302.002.019: Lockerbie 0182.01: Respondent says ... This allocation could have a direct impact on the scheduled monument Fairholm Fort (index no. 2385), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. As the monument survives as a buried feature which is only visible from aerial photographs as a cropmark, development outwith the scheduled area, but within the remainder of the land allocation, is unlikely to raise significant issues.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	This area is not allocated for development in the Plan and is outwith the Lockerbie settlement boundary.
70	0302.002.020: Moffat MOF/3 & 179.08: Respondent says ... These allocations could have a direct impact on the scheduled section of the Roman Road, Coats Hill to Holehouse Linn (index no. 3347), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. Due to the size of the land allocation development could be accommodated which does not affect the monument. Mitigation could involve a sufficient development buffer zone around the boundary of the scheduled monument to allow for the continued understanding of the linear nature of the road.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	Neither site is allocated for development in the Plan and both are outwith the Moffat settlement boundary.
71	0302.002.021: Moffat 0122.007: Respondent says ... This allocation could have a direct impact on the scheduled monument Auldon	Has this comment been taken into account in the process leading to the identification of	This site is allocated for development in the Plan. The site guidance requires the preparation of a Masterplan

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	<p>Motte (Index no. 684), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. Also ... Due to the proximity of the development and lack of development currently surrounding the monument it is likely that a proposal in this location would have a significant impact on the immediate setting of Auldton Motte. However, we consider that some development could be accommodated within this allocation which would have a minimal effect on the setting of Auldton Motte (land to the south and east of the monument, leaving the immediate hinterland to the south of the motte open ground).</p>	<p>appropriate sites for the PP?</p>	<p>which includes “safeguards for Auldton Motte Scheduled Ancient Monument”.</p>
72	<p>0302.002.022: New Abbey 0105.006: Sweetheart Abbey and its precinct is a scheduled monument and also a Property in the Care of Scottish Ministers. To the N, W and E of the main complex of buildings are substantial fragments of the precinct wall, with the likely positions of two of the gateways indicated by the line of the road which enters and leaves the precinct to W and E. The abbey was to the S of the Pow Burn, from which its main water supply was presumably drawn. The precinct was large, and the size of the scheduled area reflects this. Sensitive and highly significant buried archaeology relating to the use and development of the abbey is likely to survive within the scheduled area.</p>	<p>Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?</p>	<p>Noted. Not allocated for development in the Plan and is outside the New Abbey settlement boundary.</p>
73	<p>0302.002.023: New Abbey 0105.04 & others: Respondent says ... The 0105.04 housing allocation is likely to have a direct impact on the scheduled monument New Abbey</p>	<p>Has this comment been taken into account in the process leading to the identification of appropriate sites for the</p>	<p>Noted. Only site 0105.05 is allocated for development in the Plan. The site guidance includes that “Careful consideration of the design</p>

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	Corn Mill (index no. 90232), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. Allocations 0105.02, 0105.08, 0105.06, 0105.05 and 0105.09 are likely to have a significant cumulative impact on the conservation area and the Sweetheart Abbey PiC and will need to be carefully considered.	PP?	will be required in order to ensure that any development will be appropriate to the form and character of the village and its setting.”
74	0302.002.024: Portpatrick 100/PPK1, 4 & 2: Respondent says ... Dunskeath Castle (index no. 2017) occupies the promontory site known as Castle Point which is located c. 700m S of Portpatrick. In order to preserve the sense of remoteness of the castle, it would be desirable to leave the southern edge of land parcel 100/PPK/2 undeveloped.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	The Plan does not allocate any of these areas for development. They are outwith the Portpatrick settlement boundary.
75	0302.002.025: Sandhead 0201.02: Respondent says ... This allocation is located immediately to the east of Balgreggan motte (index no. 2305). The motte sits within open ground with views out to the bay/foreshore. Development within this land allocation has potential to partially/fully interrupt and obscure the currently open views to and from the motte and thus impacting upon an important element of its setting. While some development could be accommodated here we would request that careful consideration is given to the setting of Balgreggan motte (i.e. small-scale development, retaining key views).	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	This site is not allocated for development in the Plan and is outwith the Sandhead settlement boundary.
76	0302.002.026: Sanquhar 100/SNQ/06: Respondent says ... This allocation is likely to have a direct impact on the scheduled monument Sanquhar Castle (index no. 687), which is located within the allocated land parcel. Direct impacts	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	This area is not allocated in the Plan and is outwith the Sanquhar settlement boundary.

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	upon this monument would have a significant effect and so any works within the scheduled area should be avoided. We agree that due to significant archaeological interests this site is not suitable for development.		
77	0302.002.027: Stranraer 0089.01: Respondent says ... This allocation is likely to have a direct impact on the scheduled monument Mid Ochtrelure (index no. 7368), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. As the monument survives as a cropmark of an oval enclosure, development outwith the scheduled area, but within the remainder of the land, is unlikely to raise significant issues.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	This area is not allocated for development in the Plan and is outwith the Stranraer settlement boundary.
78	0302.002.028: Thornhill 0046.30: Respondent says ... This allocation is likely to have a direct impact on the scheduled monument Templand Mains, Roman Signal Station (index no. 2838), which is located within the allocated land parcel. Direct impacts upon this monument would have a significant effect and so any works within the scheduled area should be avoided. We consider that development outwith the scheduled area, but within the remainder of the land, with sufficient buffer zone should be acceptable in principle.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	Site allocated for development in the Plan but the site guidance reflects comments.
79	0302.002.029: Wigtown 100/WGT/03: Respondent says ...We agree with your assessment and consider that due to the significant impacts upon Wigtown Castle (index no. 11055) that this site is not suitable for development.	Has this comment been taken into account in the process leading to the identification of appropriate sites for the PP?	This area is not allocated for development in the Plan and is outwith the Wigtown settlement boundary.
80	0324.001.001: Respondent notes the work to date (in the IER) has highlighted the issues and questions	These are identified in the section above on Matters from the IER to be	Noted. The extent to which these are addressed in the Plan is set out in Table 4

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	relevant to the scope and influence of the Dumfries and Galloway Local Development Plan which need to be addressed as the plan preparation progresses.	addressed in the PP.	above.
81	0324.001.002: Respondent notes the IER identifies where it may be necessary to provide further clarification in the Proposed Plan.	These are identified in the section above on Matters from the IER to be addressed in the PP.	Noted. The extent to which these are addressed in the Plan is set out in Table 4 above.
82	0324.001.003: Respondent notes from Para 5.2.4.1 that the IER identifies that it is not clear how water and drainage have been taken into account for Main Issues 2 – Housing.	This is identified in the section above on Matters from the IER to be addressed in the PP.	The methodology is set out in the Settlement Hierarchy Technical Paper. This does not include water supply and drainage as a separate element within infrastructure. It is understood that this is in part because the Scottish Water position is that if there is a demonstrated housing need and demand then water supply and drainage services can be supplied.
83	0324.001.004: Respondent considers that the provision of adequate drainage infrastructure to support new development is a key consideration for the assessment of potential adverse effects of development on the water environment. Respondent considers any allocations which do not connect to the public sewage system as having a significant negative effect against the water environmental receptor and would ask that this is taken into account as Plan preparation progresses.	Has this response been taken into account in the drafting of PP policy for Waste Water?	The Plan does not include development allocations that would not be expected to be provided with public water supply and drainage services. Bullet point 5 in part f of Overarching Policy OP1 - Development Considerations requires that development should integrate with existing infrastructure where possible.
84	0324.001.005: Respondent notes from Para 5.3.4 of the IER that potential land allocations for consideration have been identified at this stage and further work on cumulative and synergistic effects will be carried out as this list is refined.	Has this concern been addressed in subsequent LDP SEA stages?	This response has been covered through the assessment and identification of sites for the FCSP.
85	0324.001.006: Respondent notes from Para 5.1.2.1 that due to the developing nature of the	Has this concern been addressed in subsequent LDP SEA stages?	Policies were assessed as far as was practically possible for the FCSP. An assessment of

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	preparation of the MIR, policies have not currently been assessed. It is therefore recommended that as the policies are considered, potential cumulative and synergistic effects are included in the assessment.	Cumulative and synergistic effects of policies need to be considered.	details of policies in the PP was the focus of the SEA Supplementary Report published along with the PP. This Supplementary Report was not a formal part of the statutory SEA process.
86	0324.001.007: Respondent requests that it be noted that following a recent update, Appendix 1 should now include reference to the Water Environment (Controlled Activities) (Scotland) Regulations 2011 which replaced the 2005 Regulations.	Noted.	These Regulations are referenced in relevant policy section of the Plan.
87	0383.002.001: Respondent asks ... What is your definition of inappropriate rural housing? Respondent comments.... So far most of the housing that has sprung up in rural areas is highly inappropriate and totally out of keeping with the surroundings, being more at home in highly urban areas.	Development in rural areas could be inappropriate on account of its design or its individual or cumulative scale. Is this addressed in policy in the PP for such development?	This issue is addressed in Policy H2 - Housing Development in Villages, Policy H3 - Housing in the Countryside, and H4 - Housing Development Immediately Outside Settlement Boundaries. Each of these is supported by Supplementary Guidance.
88	0321.001.001: Respondent says ... We have noted that some Main Issues Report (MIR) points are not addressed within the IER.	Has this concern been addressed in subsequent LDP SEA stages? (Assessment of policy in ER and SR.)	Further and more detailed matters were assessed in the Environmental Report associated with the Further Consultation on Sites and Policies. There was a detailed assessment of policies in the Supplementary Report that accompanied the Proposed Plan.
89	0321.001.002: Respondent notes that ... At this stage not all the points referred to in our scoping response to you of the 18th January 2010 have necessarily been covered (our reference CNS SEA LDP D&G 59207). We anticipate that these will be addressed within the full Environmental Report and look forward to commenting on them, and any recommendations made in this response, at that time.	Has this concern been addressed in subsequent LDP SEA stages?	Further and more detailed matters were assessed in the Environmental Report associated with the Further Consultation on Sites and Policies. There was a detailed assessment of policies in the Supplementary Report that accompanied the Proposed Plan.
90	0321.001.007: Respondent believes ... that a SEA for Stranraer Waterfront Masterplan is required.	Has SEA for Stranraer Waterfront SG been incorporated into the LDP	As there was a wish to ensure there could be early progress with development at

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	We suggest that the LDP undertake this as although we believe there will be impacts they will be localised in nature and can be dealt with perhaps as part of suite of masterplan assessments.	process? Is there a policy?	Stranraer Waterfront, SEA was separately carried out for the Masterplan rather than as part of the LDP process.
91	0321.001.009: Respondent says ... 5.2.4.1 Main Issue 2 – Housing: We note that the Local Housing Strategy draft consultation is currently in circulation and will be subject to the SEA process. We will therefore reserve our comments for that process.	How has SEA for the Local Housing Strategy (LHS) been progressed?	The Local Housing Strategy was subject to a Screening submitted to the SEA Gateway in October 2012.
92	0321.001.010: Respondent says ... 5.2.4.1 Main Issue 2 – Housing ... We agree the comments contained in this paragraph regarding limitations within the MIR and look forward to seeing these addressed at the SEA stage.	How has this concern been addressed in the SEA processes for the LDP?	This issue is addressed in Policy H2 - Housing Development in Villages, Policy H3 - Housing in the Countryside, and H4 - Housing Development Immediately Outside Settlement Boundaries. Each of these is supported by Supplementary Guidance.
93	0321.001.011: Respondent says ... The lack of reference to landscape capacity and settings within the MIR has not been referred to in the IER. SNH strongly advises that this be addressed particularly in view of the number of national and locally recognised important sites (NSAs and RSAs) found within Dumfries and Galloway.	Is this concern addressed in policy in the PP?	This is addressed in Overarching Policy OP1 - Development Considerations, in particular - parts 'b' Historic Environment and 'c' Landscape
94	0321.001.012: Respondent says ... 5.2.5 Main Issue 3 Quality – Place Making: We agree the comments contained in this paragraph regarding limitations within the MIR and look forward to seeing these addressed at the SEA stage.	This is identified in the section above on Matters from the IER to be addressed in the PP. Policy.	The Plan contains Overarching Policy OP1 - Development Considerations. This contains elements addressing General Amenity, Historic environment, Landscape, biodiversity and Geodiversity, Transport and Travel, and Sustainability. The Plan also contains Overarching Policy OP2 - Design Quality of New Development. This latter policy is supported by Supplementary Guidance.

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
95	0321.001.013: Respondent says ... 5.2.6 Main issue 4 – Infrastructure: We agree the comments contained in this paragraph regarding limitations within the MIR and look forward to seeing these addressed at the SEA stage.	This is identified in the section above on Matters from the IER to be addressed in the PP.	The Plan contains Overarching Policy OP3 - Developer Contributions. This is supported by Supplementary Guidance.
96	0321.001.015: Respondent says ... It would be useful for the LDP to identify current CO2 emissions within D&G so that a baseline figure, against which to measure reductions, can be established.	Is this addressed in Vision, Spatial Strategy and Policy in the PP?	The Plan does not provide the requested level of detail. The general issue of CO2 emissions from new development is covered in Overarching Policy OP1 - Development Considerations, part 'f' Sustainability, bullet point 9. This is to be supported by Supplementary Guidance.
97	0321.001.016: Respondent says ...5.2.8.1 Main issue 6 – Dumfries: We believe that there is insufficient information regarding the 5 housing options so that it is impossible to give a view on them. Therefore we think that the IER does not go far enough in its assessment referring as it does only to '5 very broad housing options'.	Was this issue responded to as part of the processes leading to the FCSP and PP? (Recommended sites for Dumfries?)	An assessment of the development sites for Dumfries was carried out as part of the assessment of sites for the Environmental Report associated with the Further Consultation on Sites and Policies. A separate assessment of alternative development options for Dumfries was not carried out.
98	0321.001.018: Respondent says ... 5.2.9 Main Issue 9 - Stranraer: We agree the comments contained in this paragraph. Regarding the reference to an Environmental Assessment of SPG for the Waterfront development, SNH have at the time of writing a screening opinion from DGC in which they say that a SEA of the Waterfront masterplan is not required. We will respond to this suggesting that an assessment is most appropriately undertaken within the SEA for the LDP.	Has SEA for Stranraer Waterfront SG been incorporated into the LDP process? (Is there a policy?)	See 0321.001.007 above. As there was a wish to ensure there could be early progress with development at Stranraer Waterfront, SEA was separately carried out for the Masterplan rather than as part of the LDP process.
99	0321.001.020: Respondent says ... 5.2.11.1 Spatial Strategy: We agree the comments contained in this paragraph and note again that it would be useful for the LDP to	Is this addressed in Vision, Spatial Strategy or policy of the PP?	The Plan does not provide the requested level of detail. The general issue of CO2 emissions from new development is covered in

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	identify current CO2 emissions within D&G so that a baseline figure, against which to measure reductions, can be established.		Overarching Policy OP1 - Development Considerations, part 'f' Sustainability, bullet point 9. This is to be supported by Supplementary Guidance.
100	0321.001.022: Respondent says ... Appendix 1: Table of Relevant Plans, Programmes and Strategies: We agree with the list but suggest the addition of: • the Wildlife & Natural Environment Act (Scotland) Act 2011, which was passed by the Scottish Parliament on 2 March 2011, and received Royal Assent on 7 April. (WANE). • the Environmental Liability (Scotland) Regulations 2009.	Has this been considered?	Subject to update, these documents should be referenced in SEA for LDP2.
101	0321.001.023: Respondent says ... Appendix 2: SEA Objectives for Dumfries and Galloway Local Development Plan Within the row SEA Issue "Population and Human Health" and column headed "Development management policy level SEA Objectives for D&G LDP": We suggest the inclusion of a sentence which recognises the important role which core paths will play in helping to deliver the health issue and objectives.	Has this been considered?	It is considered that this issue is covered in a broad sense within the objectives originally set out in the Scoping Report. Core paths are protected in Policy CF4 - Access Routes.
102	0321.001.024: Respondent says ... Within the row SEA issue "Soil" and column "Strategy level SEA objectives for D&G LDP" there should be a sentence recognising the role which well designed and managed forests have in retaining and maintaining soils. There could also be a reference to the importance of flood control and prevention in retaining soils.	Has this been considered?	It is considered that these issues are covered in a broad sense within the objectives originally set out in the Scoping Report. Policy NE6 covers Forestry and Woodland, Policy IN7 covers Flooding and Development, and Policy NE13 covers protection of agricultural Soil. The connections between these planning considerations are not identified.
103	0321.001.025: Respondent says ... Within the row SEA issue "Climatic factors" and column "Strategy level SEA objectives for D&G LDP" there should be recognition of the	Has this been considered?	It is considered that these issues are covered in a broad sense within the objectives originally set out in the Scoping Report. Policy NE6

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	important role which well designed and managed woodlands can play in managing CO2 capture.		covers Forestry and Woodland. This is supported by Supplementary Guidance - the Dumfries & Galloway Forestry and Woodland Strategy. This document was separately subject to SEA.
104	0321.001.026: Respondent says ... Within the row SEA issue "Material assets" and column "Strategy level SEA objectives for D&G LDP" acknowledge core paths and other routes as a material asset. This would help clarify what is meant by the word "infrastructure".	Has this been considered?	It is considered that these issues are covered in a broad sense within the objectives originally set out in the Scoping Report. Core paths are protected by Plan Policy CF4 Access Routes.
105	0321.001.027: Respondent says ... Appendix 3: Baseline Environmental Data and Environmental Issues. SEA Issue Sites of Special Scientific Interest. The IER comment notes that "Number/area not particularly important – condition much more so." SNH thinks this wording is clumsy. Condition is of course fundamentally important but so to is the fact that these sites exist..	What is the response to this concern?	Agreed. Subject to updating this should be incorporated into the baseline position for LDP2.
106	0321.001.033: Respondent says ... SEA Issue "Coastal erosion" ... There has been no attempt to identify issues in D&G and we wish to see this addressed in the full Environmental Report. We do see however that there is a description of this issue as it relates to D&G under SEA Issue "Climate change".	Is there a response in terms of policy in the PP to this concern?	The Plan contains Policy NE10 - erosion and Coastal Protection.
107	0321.001.034: Respondent says about Appendix 3 ... SEA Issue "Renewable Energy planning consents" There has been no attempt to identify issues in D&G and we wish to see this addressed in the full Environmental Report.	Local issues are recognised in the SEA for the Wind Energy Development Interim Planning Policy (IPP). This was subject to SEA and was approved by the Planning, Housing and Environment Services Committee in February 2012. It will be supported by policy in the PP.	The Plan contains Policy IN1 - Renewable Energy and Policy IN2 - Wind Energy. Policy IN2 is supported by: Supplementary Guidance - Part 1 Wind energy Development: Development Management Considerations; and Technical Paper - Interim Spatial Frameworks Maps. This is to be reviewed as part of the MIR for LDP2.
108	0321.001.035: Respondent says	Is there a response in terms	The Plan contains Policy ED14

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	about Appendix 3 ... SEA Issue "Minerals" There has been no attempt to identify issues in D&G and we wish to see this addressed in the full Environmental Report.	of policy in the PP to this concern? SG is expected. This may be subject to separate SEA processes.	- Minerals Safeguarding, Policy ED15 - Minerals. This is supported by Supplementary Guidance. The Plan contains Policy ED15 - Minerals about new working or extension to existing workings. The Plan contains Policy ED16 - Protection and Restoration of Peat Deposits as Carbon Sinks.
109	0321.001.036: Respondent says about Appendix 3 ... SEA Issue "Coal Authority Consultation zones. There has been no attempt to identify issues in D&G and we wish to see this addressed in the full Environmental Report.	Is there a response in terms of policy in the PP to this concern? SG is expected. This may be subject to separate SEA processes.	Policy for coal is contained in the 3 minerals policies noted immediately above. Areas of coal reserves are identified in the text of the Supplementary Guidance, but are not mapped.
110	0321.001.037: Respondent says about Appendix 3 ... SEA Issue "Waste disposed in landfill" There has been no attempt to identify issues in D&G and we wish to see this addressed in the full Environmental Report.	Is there a response in terms of policy in the PP to this concern? SG is expected. This may be subject to separate SEA processes.	The Plan contains Policy IN3 - New Waste Management Infrastructure, Policy IN4 Protection of Existing Waste Management Infrastructure, Policy IN5 - Energy Recovery from Waste, and Policy IN6 - Waste Management Requirements for New Development.
111	0321.001.045: Respondent says ... Rows 10 to 13 (in Appendix 4 b) rarely contain any text and where they do it is not clear whose comments appear in them. There is no reason given for this but we presume the full ER will contain relevant information.	What is the response to this concern?	This is to do with consideration of cumulative and synergistic effects at the level of Spatial Strategy. The rows have not been filled out because cumulative and synergistic effects that are separate from those already identified relative to the SEA issues have not been identified.
112	0321.001.046: Respondent sets out 75 detailed comments (Page 8 - Page 33 of response) on the assessments in appendix 4b. These cover a variety of issues: presentation; minor inconsistencies between the MIR and IER; requests for clarifications about the assessments; minor disagreements about individual assessments; the	What is the response to these concerns?	These are detailed rather than major comments about the SEA process and assessment. These were discussed and clarified at a meeting (c June 2011) with the respondent. Specific responses in the PP are not required.

Ref	Matters from responses to IER to be addressed in PP	Question	LDP Response
	meaning of accessibility; assessments to be included in later work.		
112 a	0506.002.001: Site 0159.002. Regarding the December 2011 Site Assessments (SEA Issues Summary Ranks table), for site 0159.001 we present the developer's case that a "positive" score can be justified for most criteria under Population and Health, and "no impact" for the remainder. We therefore contend that the SEA rankings should be amended to reflect this. Site 0159.002 was accidentally omitted from the SEA assessment published with the MIR and FCSP. It is understood that the published assessment for 0159.001 is similar to that for site 0159.002.	Has this assessment been reviewed in the light of this comment?	This is about the assessment scores for site 0159.002. The IER and ER both note that SEA conclusions are subject to a degree of uncertainty. This assessment has been reviewed in the light of this representation and confirmed as consistent with the assessment of other sites in Dumfries.

3.5 SEA Engagement during Preparation of the Further Consultation on Sites and Policies

This stage in the preparation of the LDP intended to bring forward additional detail about the policies to be set out in the Plan and conclusions about sites that should be allocated in the Plan. The policies for the Plan were broadly intended to carry forward those of the existing Development Plan, simplifying where appropriate, and with adjustments and new policy as indicated in the MIR. However, the then current 169 policies were contained in the 1999 Development Plan and the 4 Local Plans of 2006. It would be necessary to bring these together as a single unified set the policies and this would involve a significant reduction in the overall number of policies. The FCSP did not set out specific text for policies, except for Housing in Villages, Housing in small building Groups, Housing in the Countryside, Housing Outwith Settlement Boundaries and Affordable Housing. These policies, the objectives for other policies and the SEA objectives for policies formed the basis for the engagement and assessment in the ER.

This stage in the process of bringing forward sites for the Plan was started from the assessment of individual sites in the IER. The FCSP sought to identify the best package of sites to be allocated for each of the settlements for which there was to be an Inset Map in the Plan. The SEA assessment, which developed from the data about sites held in a database, was integral to this process. The conclusions were set out in the ER. It was possible to consider alternative packages of sites for each settlement, though this was not developed as a formal stage of the SEA (or LDP) process. The environmental assessment of individual sites and packages of sites considered potential environmental effects on the basis of a full range of environmental factors. It should be noted that these factors were also relevant to the planning assessment, although the weight attached to individual items was not necessarily the same.

The considerable quantity of information collected was stored in a database which was also used for the planning assessment. The assessments for individual sites and packages of recommended sites for settlements were carried out by the planning officers working on these areas and thus took advantage of their local knowledge. For the ER assessment the SEA ranks were presented in a matrix with the analysis of the overall / cumulative effects, under each SEA topic only presented for the recommended package of sites.

3.6 Assessment comments in the Environmental Report

Table 6: Assessment comments in the Environmental Report

Ref	Matters from FCSP ER to be addressed in PP	Question	Comment
114	Page 15, SEA recommendations for policies: For new and updated policies the emphasis should be on seeking enhancement and / or specifically trying to achieve positive environmental effects, especially where these are within the control of the planning system ... At the moment many policies simply list considerations ... to be taken into account ... without highlighting the positive outcomes that should be expected.	Has this comment been adopted in the framing of policy in the PP?	In principle this is accepted and it has influenced the terms in which policies have been set out. However, in the development of detailed policy it has been considered that planning policy is constrained in that it should not seek to apply conditions that are not directly related to the development in question. The scope for enhancement could be further considered in the review of the detail of policy for LDP2.
115	Page 20, SEA recommendations for sites: Potential negative environmental effects of sites should be acknowledged within site guidance that outlines potential measures for mitigation.	Has <i>site guidance</i> been provided for sites identified in the PP?	Site guidance is provided for each of the sites allocated in the Plan. This guidance draws attention to environmental and other matters that should be addressed in development proposals.
116	Page13, para 4.2: New policies with draft wording: Is there other policy to protect soils or limit or mitigate soil impacts.	Is there policy in the PP to protect soils?	The Plan includes Policy NE13 Agricultural Soil.
117	Page13, para 4.2: New policies with draft wording: Is there policy to require consideration of climatic impacts in terms of CO2 emissions from transport?	Is there policy in the PP to require consideration of climatic impacts in terms of CO2 emissions from transport?	No. The spatial strategy set out in the Plan promotes a pattern of development that seeks to minimise the need to travel and where sustainable transport is integral to development. The Plan contains Policy T2 Location of Development / Accessibility.
118	Page 20: Is there policy to limit flood impacts.	Is there policy in the PP to limit and manage flood impacts?	The Plan contains Policy IN7 Flooding and Development. This is supported by Supplementary Guidance. The Plan contains Policy IN8 Surface Water Drainage and Sustainable Drainage Systems (SuDS). This is supported by

Ref	Matters from FCSP ER to be addressed in PP	Question	Comment
			Supplementary Guidance.
119	Assessment of policies: Are the environmentally positive policy objectives identified in the FCSP all supported in policy wording in the PP?	Have all the positive environmental policy objectives set out in the FCSP been secured in policy in the PP?	The Plan contains a comprehensive set of 67 policies that were, overall, positively assessed in the Supplementary Report published with the Proposed Plan.
120	Assessment of policies: Is there policy to protect biodiversity when other policies are specifically encouraging development?	Does the wording of policy support for biodiversity in the PP cover situations when other policies are encouraging development?	The Plan text notes that “The statutory duty placed on the Council by the Nature Conservation (Scotland) Act 2004 to further the conservation of biodiversity is not restricted to sites, habitats or species that are subject to statutory protection. However, there is no specific policy to support that duty.
121	Assessment of policies: Do the policies for development in rural areas include control on numbers so that cumulative impacts are avoided and the overall strategy is supported?	Do the policies in the PP for development in rural areas include control on numbers so that cumulative impacts are avoided and the overall strategy is supported?	The Plan contains Policy H2 Housing Development in Villages. This includes the limitation that such development should not on its own or in combination with other developments in the housing market area undermines the overall objective of the spatial strategy. Policy H3 Housing in the Countryside does not contain this limitation.
122	Assessment of policies: Is there policy to secure appropriate design of development in rural areas?	Is there policy in the PP to secure appropriate design of development in rural areas?	The Plan contains Policy OP2 Design Quality of New Development which seeks to achieve high quality design. Policy H3 Housing in the Countryside sets out requirements in respect of landscape setting, design and scale relative to location, and CO2 emissions.
123	Assessment of New policies: Look for policy for sustainable development cast in wide terms.	Is the policy for sustainable development in the PP cast in wide terms (not just CO2 emissions)?	The Plan contains Overarching Policy OP1 Development Considerations. Part ‘f’ of this addresses Sustainability. It sets out 9 distinct matters that should

Ref	Matters from FCSP ER to be addressed in PP	Question	Comment
			be taken into account. Also OP2 Design Quality of New Development supports the integration of sustainable development measures.
124	Assessment of New policies: Look for reference to the objective of wider benefits in Trees and Development policy.	Does the policy for Trees and Development in the PP seek to secure a range of benefits from tree planting?	The Plan text notes that trees and woodland “play a key part in maintaining and improving the quality of life for residents.” The Plan contains Policy NE6 Forestry and Woodland. This says that account should be taken of the Forestry and Woodland Strategy. The Plan also contains Policy NE7 Trees and Development. This is supported by Supplementary Guidance.

3.7 Comments Made in Response to the Environmental Report

Table 7: Comments Made in Response to the Environmental Report

Ref	Matters from responses to FCSP ER to be addressed in PP	Question	Comment
126	03002.002.001: (HS) Respondent supports the recommendation that when developing new and updated policies, the emphasis should be on seeking enhancement and / or specifically trying to achieve positive environmental effects, especially where these are within the control of the planning system (for example, through better design and layout). At the moment, many policies simply list the considerations which need to be taken into account, such as avoiding negative impact on landscape, without highlighting the positive outcomes that should be expected.	This comment is covered in the section above.	In principle this is accepted and it has influenced the terms in which policies have been set out. However, in the development of detailed policy it has been considered that planning policy is constrained in that it should not seek to apply conditions that are not directly related to the development in question. The scope for enhancement could be further considered in the review of the detail of policy for LDP2.
127	03002.002.002: (HS) Respondent says ...As you have noted, the majority of effects [of policies] upon the historic environment will be neutral although it might be useful to clarify any assumed mitigation applied in relation to forestry, transport and renewable energy policies within the commentary.	It is presumed that this means to refer to the commentary in the form of site guidance in the Proposed Plan.	In its introduction the Plan says that it should be read in its entirety as individual policies and land allocations do not set out the whole picture for the various types of development. The Plan contains two overarching

Ref	Matters from responses to FCSP ER to be addressed in PP	Question	Comment
			policies that should always be considered and are important relative to environmental impacts and concerns, viz. OP1 - Development Considerations and OP2 Design Quality of New Development. A number of policies, including NE6 - Forestry and Woodland, IN2 - Wind Energy and T2 - Location of Development / Accessibility are supported by Supplementary Guidance.
128	0321.004.002: (SNH) Respondent says ... We do have concerns about the Woodland and Commercial Forestry Policy Objective, which are noted here and also in our response to the FCPS. The policy objective seems very conservative/unadventurous. The woodland/forestry assets of the region are a major asset. DGC's policy should actively seek to ensure positive effects on virtually all the SEA objectives. As written the objective merits at best only 0s. Simply securing the assets does not bring about the landscape improvements for example that could improve the setting for many settlements (particularly to small plantations).	Is this concern addressed in policy in the PP?	The Plan contains Policy NE6 - Forestry and Woodland which says that in determining its response to forestry proposals the Council will take into account environmental and other interests identified in the Forestry and Woodland Strategy. The relevance to trees as part of landscape setting is referenced but not developed in the Forestry and Woodland Strategy.
129	0321.004.003: (SNH) Respondent says ... We do not agree with your assessment regarding Transport Infrastructure development. The Policy objective as noted in the FCSP (page 40) has at best unknown SEA effects and worse serious negative impacts.	Is this concern addressed in policy in the PP?	The Plan contains Policy T1 - Transport Infrastructure which deals with both strategic and local transport networks. It does not itself contain network proposals for new elements or enhancements or changes. Thus, there are no current proposals and in consequence no environmental impacts. It should be expected that any proposal of substance should be subject to environmental assessment through the Regional or Local Transport Strategy. Any such proposal should be considered against

Ref	Matters from responses to FCSP ER to be addressed in PP	Question	Comment
			the framework of policies set out in the Plan.
130	0321.004.004: (SNH) Respondent suggests ... Score for assessment of soil for Housing in the Countryside policy should be 0.	Is this concern addressed in policy in the PP? (See other comments in sections above concerned with policy in the PP for soil.)	The Plan contains Policy NE13 - Agricultural Soil and Policy ED16 - Protection and Restoration of Peat Deposits as Carbon Sinks.
131	0321.004.006: (SNH) Respondent suggests ... That the score for biodiversity flora & fauna in respect of the new policy for Development Outwith Villages should be - 1, as despite other policies there is the potential for a small negative impact.	Does the wording of policy support for biodiversity in the PP cover situations when other policies are encouraging development?? (See similar comment in section above.)	Noted. The comment refers to the 'potential' for a small negative impact. This potential should be avoided or mitigated or reversed through the application of the framework of general policies. The Plan text notes that "The statutory duty placed on the Council by the Nature Conservation (Scotland) Act 2004 to further the conservation of biodiversity is not restricted to sites, habitats or species that are subject to statutory protection. However, there is no specific policy to support that duty.
132	0321.004.010: (SNH) Respondent says ... Policy objective for Aquaculture refers to fish farming. To date no fin fish farms have been proposed but several shellfish proposal have come forward. See SNH aquaculture advice for further information.	Is this concern addressed in policy in the PP?	The Plan contains Policy ED13 - fish Farming. The Plan text notes that to date there have not been proposals for fish farming below the low water mark and says that if pressure for such development emerges it will consider producing Supplementary Guidance.
133	0321.004.011: (SNH) Respondent says ... In relation to biosphere policy objective ... as written the objective is neutral but as it is 'To provide support for the Biosphere reserve.' We think that a more positive assessment is appropriate given the potential benefits of an enlarged Biosphere reserve in D&G.	Is this concern addressed in policy in the PP?	The Plan contains Policy ED11 - Galloway and Southern Ayrshire Biosphere. This seeks to protect and support the Biosphere.
134	0321.004.014: (SNH) Respondent says they (SNH) are not the lead consultee on this	Is this observation covered in policy in	The Plan contains Policy NE7 - Trees and Development and

Ref	Matters from responses to FCSP ER to be addressed in PP	Question	Comment
	but effective TPOs should benefit Biodiversity.	the PP?	also Policy NE8 - Tree Preservation Orders. NE8 reflects the terms of Circular 1/2011 - Tree preservation Orders and does not include biodiversity as possible reason for the making of a Tree Preservation Order.
135	0321.004.014: (SNH) In relation to the assessment of the policy objective for Transport Infrastructure development respondent ... disagrees with the assessment comment that the policy objective 'seeks to ensure that development can be coordinated, making best use of resources', and considers that the policy Objective as written can at best be assessed as unknown but potentially all SEA topics could score as negative.	Is this concern addressed in policy in the PP?	The Plan contains Policy T1 - Transport Infrastructure which deals with both strategic and local transport networks. It does not itself contain network proposals for new elements or enhancements or changes. Thus, there are no current proposals and in consequence no environmental impacts. It should be expected that any proposal of substance should be subject to environmental assessment through the Regional or Local Transport Strategy. Any such proposal should be considered against the framework of policies set out in the Plan.
136	0324.002.002: (SEPA) Respondent ... welcomes the aim of seeking enhancement or positive environmental effects when developing new and updated policies.	Is this concern addressed in policy in the PP? (See 03002.002.001.)	In principle this is accepted and it has influenced the terms in which policies have been set out. However, in the development of detailed policy it has been considered that planning policy is constrained in that it should not seek to apply conditions that are not directly related to the development in question. The scope for enhancement could be further considered in the review of the detail of policy for LDP2.
137	0324.002.003: (SEPA) Respondent notes ... that the SEA assessment of sites has helped to select sites which are less likely to have negative environmental effects.	Is this concern addressed in site guidance for development sites	Site guidance is provided for each of the sites allocated in the Plan. This guidance draws attention to environmental

Ref	Matters from responses to FCSP ER to be addressed in PP	Question	Comment
	Where potential negative environmental effects have been identified we are content that specific site guidance will outline potential measures to militate against these.	identified in the PP? (See sections above for similar comments.)	and other matters that should be addressed in development proposals.

3.8; 3.9; and 3.10 Engagement during preparation of the Proposed Plan; Assessment Comments in the Supplementary Report; and Comments to the Supplementary Report

The Main Issues Report and Further Consultation on Sites and Policies had set out the spatial strategy and the preferred sites. They had also set out new policy and any headline policy changes from existing policies in the then current Development Plan. However, the process of bringing forward the LDP required the consolidation of the 169 policies in the then current Development Plan. As a result of this process, there are 67 policies (covering the same overall subject and geographic area) in the LDP. This meant that although the substance of policies should be as indicated in the MIR and FCSP, new text was needed for all. Draft text was produced in the preparation of the Proposed Plan. Each policy was subject to broad review, including environmental assessment. The outcome following the assessment was the final text as set out in the Proposed Plan. It is this text that was subject to the assessment contained in the non-statutory Supplementary Report which was published for consultation alongside the Proposed Plan. A summary of the assessment of the draft policies is set out in the Supplementary Report.

It should be emphasised here that as a result of a thorough internal assessment during preparation of the Proposed Plan it is no surprise that the published assessment of the final text for Proposed Plan policies is overall positive. By comparison with the first draft for the policies, the set of policies in the Proposed Plan are more clear and coherent so that they should better secure the objectives of the LDP and SEA.

At the same time as assessment was being made of the details of policies, an assessment was made of the changes made between the MIR and FCSP documents and the Proposed Plan. In this it was concluded that there were not likely significant environmental impacts from the changes. As a result, a Screening Determination that further SEA assessment was not required was made.

Notwithstanding the terms of the assessment in the Supplementary Report the consultation on it drew attention to the arrangement that responses to it would be treated as responses to the Proposed Plan unless respondents stipulated otherwise. This arrangement meant that the Council could potentially amend the Proposed Plan to accommodate SEA responses - if that were considered appropriate. As it turned out, the consultation responses to the Supplementary Report were positive (See Table 8 below) and so modifications to the Proposed Plan were not required.

Table 8: Consultation Responses to the Supplementary Report

Rep	Rep RID No	Representation Summary	LDP response
SNH	0321.0 06.002	We are pleased to note that the majority of comments raised in our earlier response dated 28 February 2012 to the Interim Environmental Report have been incorporated in the Proposed Plan.	No modification proposed to the plan.

Rep	Rep RID No	Representation Summary	LDP response
SNH	0321.0 06.001	We are satisfied that the SEA Supplementary Report is well presented and has addressed the key requirements of the 2005 Act. We are in broad agreement with its findings. (These findings are about its assessment of policy in the proposed Plan and the changes in the Proposed Plan from the MIR and FCSP.)	No modification proposed to the plan.
SEPA	0324.0 06.001	We welcome the production of a Supplementary Environmental Report to provide a more detailed assessment of policies than was possible at the earlier stages of preparation of the LDP. We are satisfied that a thorough assessment of the plan has been carried out.	No modification proposed to the plan.
SEPA	0324.0 06.002	We ... would agree with the assessment findings that any changes in the plan are unlikely to lead to significant environmental effects.	No modification proposed to the plan.
HS	0302.0 04.001	Overall the SEA Supplementary Report provides a clear assessment of the likely effects of the emerging plan on the historic environment and I am pleased that the comments we have returned in previous correspondence have been taken into account.	No modification proposed to the plan.
HS	0302.0 04.002	I welcome the approach taken in assessing the policy updates and agree with the findings set out in the SEA Supplementary Report. The non-technical summary and the key recommendations provide a very helpful overview of how your assessment has influenced policy development in the Plan.	No modification proposed to the plan.
HS	0302.0 04.003	I also agree that the minor amendments to the spatial strategy at this stage are unlikely to result in significant effects for the historic environment.	No modification proposed to the plan.

3.11 Changes between the Proposed Plan and the Adopted Plan

The Examination on the Proposed Plan took place between December 2013 and June 2014. The Reporters made 224 recommendations, all of which were accepted by the Council. In summary, it was considered that in almost all cases the recommendations were relatively minor modifications to the Proposed Plan. There were a limited number of more substantial revisions, including new policy and new sites: There were 10 policy changes, 15 site deletions and 6 new sites. All of the Reporters' recommendations, which arose from the consideration of the unresolved LDP Issues in the Examination, were screened for their environmental impacts. In most cases the impacts are considered to be nil or minimal. Where environmental effects specific to the recommendations could be anticipated these were all considered to be small, and almost all positive. In all cases it was concluded that there were not likely significant new environmental effects arising from the Reporters' recommendations. This assessment was developed from the earlier work of the IER, the ER, and Supplementary Report.

4. Consideration of alternatives for the Plan

In accordance with the requirements of the 2005 Act (Section 18(3)(e)) the likely significant effects of reasonable alternatives for the LDP need to be considered. The Scoping Report established the starting position: "It is considered that the assessment of alternatives at the level of broad spatial strategy establishes the approach which the LDP should develop in its allocation of sites. The general policies will intend to support the recommended strategy. Given that these policies will also

carry forward the wider context it is the case that much of what they say could also be contained in alternative approaches. Nonetheless, it follows that the scope for reasonable alternatives is constrained in the consideration of sites.”

The Main Issues Report identified 8 main issues that together made up the spatial strategy:

1. How can we grow our economy in a sustainable manner?
2. How much housing is needed and where?
3. Place making - how can we create places where people want to live?
4. How best to provide infrastructure for new development?
5. How best to deal with climate change and make the best use of natural and renewable resources?
6. Dumfries – Regional Capital
7. Stranraer and Loch Ryan
8. Gretna Lockerbie Annan (GLA) Corridor Regeneration Strategy (CoReS)

Section 17 of the Planning etc. (Scotland) Act 2006 requires that in addition to its general proposals for the plan area the Main Issues Report should include and general proposals which constitute a reasonable alternative (or reasonable alternatives).

Alternatives were identified only for main issues 1, 2, and 7. Appendix 4a of the IER presented the assessment of the preferred responses for the main issues and the identified alternatives. In broad terms, important differences in terms of environmental impact between the alternatives and the preferred strategy were not identified and the preferred responses were selected on other grounds, that they better supported the vision for Dumfries & Galloway: This vision is of “thriving region with a sustainable economy built on sustainable principles that safeguard the landscape, natural and historic environment, promote growth, maximise the use of existing infrastructure and enhance connectivity”. With the benefit of hindsight, it is considered that the potential for reasonable but substantive alternatives to the preferred spatial strategy could have been more thoroughly explored.

5. SEA Monitoring for the Local Development Plan

Monitoring of significant environmental effects is the second of the two big centres of attention for this Post-adoption Statement. These effects include the intended environmental benefits of the Plan. Monitoring should also relate to the environmental issues which are: (1) commented on in the baseline; (2) noted in the assessment; and (3) referred to in consultation responses from the consultation authorities.

Monitoring of the environmental effects of the LDP is required under Section 18(3)(f) of the 2005 Act. The Post-adoption Statement must include:

- the measures that are to be taken to monitor the significant environmental effects of the plan”.

The 2005 Act also says that monitoring must be:

- such as to enable the authority to identify any unforeseen adverse effects at an early stage and then allow the undertaking of appropriate remedial action.

In the case of this LDP the most likely mechanism for bringing forward such action is the next version of the Plan which is required within 5 years of the adoption of the current Plan.

As the plan which is the subject to this Post-adoption Statement is a Development Plan the terms for its preparation are set out in law and regulation. Monitoring of the environment is required. An early task in Plan preparation is to monitor:

- changes in the principal physical, economic, social and environmental characteristics of the area, and also the

- impact of the policies and proposals of the existing plan.

SEA monitoring of the adopted Plan would not expect to add to or be separate from what is committed to for the purposes of preparation of the next version of the Plan, and thus could be a subset of what in any event requires to be done.

The Development Plan Scheme for LDP2 says “Now that LDP1 has been adopted, the Council will start to carefully monitor the effect of the policies and proposals in this new Plan before looking to begin a review during 2015.” The Scheme also says “Monitoring will be ongoing from October 2014 and continue throughout the lifetime of the Plan but the first official Monitoring Statement will be published alongside the MIR. ... All this will ensure that meaningful assessment can be undertaken with the results of the monitoring etc. being used to inform the approach taken in LDP2.”

In the Scoping Report for LDP1 Table 1 set data elements and sources relevant to Dumfries & Galloway under SEA issue headings. This table was further developed for the IER and carried forward into the ER. The Council will refer to all of the data sources listed in the table below (Appendix 3 in the IER) to monitor all the policies in the current LDP. The data sources in the Table will be updated so that they continue to be relevant for monitoring purposes. In doing so it is expected that this would cover changes in the principal physical, economic, social and environmental characteristics of the area and also enable the authority to identify any unforeseen adverse effects at an early stage.

Table 9: Monitoring

Data	Description	Source	Baseline in D&G	Issue in D&G?
SEA Issue: Biodiversity, flora and fauna				
Sites of Special Scientific Interest (SSSI).	Number and size of SSSI's. Compare with Scotland	SNH DGC Geographic Information System (GIS)	96 SSSIs covering 70,264ha (2009) (out of 1452 in Scotland covering 1,030,729ha). 6.8% of Scottish area in D&G.	Number/area not particularly important – condition much more so (See Baseline and Issues for Notified habitats and species below.)
Local Nature Reserves.	Number and size of Local Nature Reserves. Compare with Scotland	SNH DGC GIS	2 LNRs covering 2982ha. (2009)(out of 56 in Scotland covering 10,001ha). Includes largest LNR in Britain. 29.8% of Scottish area in D&G.	As above for biodiversity, but LNRs have more of a role with people.
National Nature Reserves	Number and size of National Nature Reserves. Compare with Scotland	SNH DGC GIS	4 NNRs covering 10,440ha (2009)(out of 64 in Scotland covering 138,041ha). 7.6% of Scottish area in D&G.	As above.
RAMSAR sites.	Number and size of RAMSAR sites. Compare with	SNH DGC GIS	4 sites covering 33,076ha (2009)(out of 313,181ha in Scotland). 10.6% of Scottish area in D&G.	Number/area not particularly important – condition much more so (See baseline and issues for notified habitats and species below.)

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Data	Description	Source	Baseline in D&G	Issue in D&G?
	Scotland			
Special Protection Areas.	Number and size of SPAs. Compare with Scotland	SNH DGC GIS	6 SPAs covering 48,713ha (2009)(out of total of 147 in Scotland covering 880,096ha). 5.5% of Scottish area in D&G.	As above.
Special Areas of Conservation.	Number and size of SACs. Compare with Scotland	SNH DGC GIS	17 SACs covering 91,963ha (2009)(out of 239 in Scotland covering 962,690ha). 9.5% of Scottish area in D&G.	As above.
Marine Consultation Areas.	Number and size of MCAs. Compare with Scotland	SNH	1 MCA covering 3,777ha (2009)(out of 29 in Scotland covering 111,895ha). 3.4% of Scottish area in D&G.	Number/area not particularly important. (See baseline and issues for notified habitats and species below.)
Tree Preservation Orders	Number and location of TPOs	DGC – Environmental Planning	Approximately 60 TPO's in a region of 2,500 square miles. Hard copy records held in area offices.	Large number of trees; rather taken for granted. Opportunity within consultation process for community groups to bring forward trees considered worth protecting. No central/digital database.
Conifer Forests	Woodland and forestry maps and data. Compare with Scotland	Forestry Commission DGC – Biodiversity Officer DGC GIS	137,427ha (1995, woodlands of 2ha+ only)(out of 915,940ha in Scotland). 15% of Scottish total and c. 21% of D&G land area. (Note: D&G has c. 8% of the Scottish land area.)	Higher than average level of conifers.
Broadleaved & mixed woodland	Woodland and forestry maps and data. Compare with Scotland	Forestry Commission DGC – Biodiversity Officer DGC GIS	18,610ha (1995, woodlands of 2ha+ only)(out of 231,399ha in Scotland). 8% of Scottish area in D&G and c. 3% of D&G land area.	Lower than average level of broadleaves.
All forest & woodland.	Woodland and forestry maps and data. Compare with Scotland	Forestry Commission DGC – Biodiversity Officer DGC GIS	170,848ha of forest and woodland, including open spaces within them (1995, woodlands of 2ha+ only)(out of 1,300,000ha in Scotland). 13.1% of Scottish area in D&G.	26.2% of Dumfries & Galloway was forest & woodland (1995). More than any other local authority area in Britain.
Non-statutory reserves.	Number and size of reserves. Compare with	RSPB, SWT, NTS, WWT, BFT (and any other organisations)	6 (47) RSPB, 9 SWT (120), 4 NTS, 1 WWT (1), 2 BFT (Approx Scottish totals in brackets, where known). Area not known.	

Data	Description	Source	Baseline in D&G	Issue in D&G?
	Scotland	identified)		
Local Wildlife Sites.	Number and size of sites. Compare with Scotland	DGERC DGC GIS	52 LWSs covering 2459ha (2010). Scottish total not known.	
Biosphere reserve	Information on D&G Biosphere Reserves	SNH	1 site covering 5010ha (out of 4 in Scotland covering 11,808ha). 42.5% of Scottish area in D&G.	Modification (including expansion) and re-notification under consideration.
Notified species in favourable conditions	Data on the condition of local species	SNH DGC – Biodiversity Officer	68% of features monitored on sites in favourable condition (2005)(72% of all species/habitats/geology features in favourable condition in Scotland in 2005)	95% target (combined species/habitats/geology features) http://www.snh.org.uk/snh/
Notified habitats in favourable conditions	Data on the condition of local habitats	SNH DGC – Biodiversity Officer	61% of all sites monitored in favourable condition (2005)(72% of combined species/habitats/geology features in favourable condition in Scotland in 2005)	95% target (combined species/habitats/geology features) http://www.snh.org.uk/snh/
Notified geological features in favourable condition.	Data on the condition of local geology.	SNH DGC – Biodiversity Officer	100% in favourable condition (2005)(72% of combined species/habitats/geology features in favourable condition in Scotland in 2005)	95% target (combined species/habitats/geology features) http://www.snh.org.uk/snh/
Cockle stock assessment	Survey of cockle grounds	Solway Shellfish Management Association Fisheries Research Services DGC – Countryside Officer	There is a bi-annual stock assessment taken for the cockles in the Solway. This is the responsibility of Marine Scotland. Therefore, in terms of a baseline, there is data in the hands of government via Marine Scotland. The most recent available data is from 2008. Data may have been gathered more recently but this is not yet available.	
Biodiversity			http://www.dumgal.gov.uk/index.aspx?articleid=1978 LBAPII was adopted April 2009. The consultation on the Environmental Report was carried out in January 2008. This set out an environmental baseline for the Region. This is relevant	As identified in the Environmental Report on LBAPII

Data	Description	Source	Baseline in D&G	Issue in D&G?
			as part of the environmental baseline for the LDP.	
SEA Issue:			Population and Human Health	
Population figures	D&G Small Area Population Estimates	DGC Briefing Notes – Statistician, Development Planning NOMIS (Official labour market statistics)	Figures from the General Register Office for Scotland (GROS) in 2010 estimate the population of Dumfries & Galloway to have been 148,510 in June 2009, an increase of 730 (0.49 %) since 2001. In mid-2009 it is estimated that 16.8% of the population were aged under 16, 57.5% were of working age and 25.7% were of pensionable age (65 for men, 60 for women). There were more females (51.6%) than males (48.4%) in Dumfries & Galloway.	Population projections: Dumfries & Galloway’s projected population Dumfries & Galloway’s population is set to drop to 147,138 by 2033 according to the latest population projections (2008 based) released by the General Register Office for Scotland (GROS). This represents a decrease of 1.0% (1,442 people) from the current population of 148,580. It is important to remember that these results are based on past trends and do not take account of any policy initiatives which may influence the demographic profile of Dumfries & Galloway in the future. They do however represent a useful baseline which to measure our demographic change.
Age structure	D&G Small Area Population Estimates	DGC Briefing Notes – Statistician, Development Planning NOMIS	Changing age structure of Dumfries & Galloway’s population 1999 - 2009: The age structure of Dumfries & Galloway’s population has changed considerably since 1999. This is important as changes in different age groups will have different social and economic impacts. Of particular concern is the decrease of 15.8% in the number of children under 10, whilst there has been an increase of a third (32.5%) in the number of people aged over 80. The continuing ageing of the population is evident in the rise of the 55-69 age group (19.6%) and the fall in the 25-39 age group (-28.7%)..	Projected population change 2008-2033: Despite the projected decrease in population over the next 25 years, the pattern of continued population ageing is a key point to note. The implication of this for service providers and policy makers in Dumfries & Galloway remains unchanged. The top heavy 2033 pyramid of age groups in Dumfries & Galloway shows the inevitable ageing of our current (already older) population. Projected population age structure 2008-2033: Dumfries & Galloway is projected to see significant population declines in the number of children, young

Data	Description	Source	Baseline in D&G	Issue in D&G?
				<p>people and those of working age in the area. The population of those of retirement age (65 for men, 60 for women) is projected to reach 54,925 by 2033 (37.3% of Dumfries & Galloway's projected population). This represents an increase of 46.6% (17,459 people) from the current population of 37,466. Overall, the age profile of the population is changing at an uneven rate. This presents challenges to public bodies that need to plan and budget for services to a changing society</p>
Household characteristics and composition	D&G Household Estimates	DGC Briefing Notes – Statistician, Development Planning NOMIS	<p>Dumfries and Galloway household estimates: There were 68,161 households in Dumfries & Galloway in 2009, an increase since 2001 of 6.7% (4,262 households). Over the last year the number of households has increased by 0.5% (310 households) which is lower than the 5 year average. Comparison with population change: The number of households has increased at a faster rate than the population over the same period. This is because the average household size is getting smaller, with fewer large households and more people living alone.</p>	<p>Dumfries & Galloway's projected households: The number of households in Dumfries & Galloway is projected to increase to 74,410 between 2008 and 2033. This is an increase of 9.7%, or 6,560 households. Over the same period, Dumfries & Galloway's population is projected to decrease by 1.0%. Therefore, most of the 9.7% increase in the number of households is due to more people living alone or in smaller households. The average household size is projected to decrease from 2.17 in 2008 to 1.94 in 2033. Type of household: There is expected to be a large increase in the number of adults living alone, from 22,260 (32.8% of all households) in 2008 to 30,930 (41.6%) by 2033. The number of households containing one adult with children is projected to rise from 3,490 to 5,020. In contrast, households containing two or more adults with children is</p>

Data	Description	Source	Baseline in D&G	Issue in D&G?
				<p>projected to decrease from 12,550 (18.5% of all households) in 2008 to 8,150 (11.0%) by 2033. There is also a projected increase in the number of households containing two or more adults, from 29,550 to 30,300</p> <p>Household projections are mainly used for informing decisions about future housing need and service provision. It is important to remember that the projections provide an indication of what would happen if past trends continue. They do not take account of policy initiatives, or other factors that may affect future populations.</p>
Changes / trends in demography	D&G Population Projections 2006-2031	DGC Briefing Notes – Statistician, Development Planning NOMIS	Population change 1999-2009: Three factors influence population change – births, deaths and migration. Over the past decade Dumfries & Galloway’s population has been in a state of “natural decline” with more deaths per year than births.	The population projections show that Dumfries & Galloway’s population is ageing, with a projected increase in the number of people in the older age groups, and fewer people in the younger age groups. This trend is reflected in the household projections, with the largest increases shown in households headed by people aged 60 and over (an increase of 39.5% between 2008 and 2033, from 28,780 to 40,140). In contrast, households headed by someone aged 45-59 are projected to decrease by 25.3%. The number of households headed by someone aged 75 or over is projected to almost double, from 10,670 to 20,540.
Migration:	Net migration to/from Scottish administrative areas	GROS DGC	The net-migration assumptions used in the 2008 based projection are: 500 for 2008/09, 2009/10, and 2010/11; 450 for 2011/12, 400 for 2012/13	

Data	Description	Source	Baseline in D&G	Issue in D&G?
			and 350 per annum for the remainder of the projection to 2033.	
Life expectancy	Health and Wellbeing Profiles. Compare with Scotland	Scottish Public Health Observatory (Scot PHO) GROS	Dumfries & Galloway 2006 – 08 Life expectancy at birth All 78.5, males 76.4 and females 80.5. These are all higher than the Scottish average by at least one year.	Issue is about reducing health inequalities in the area which will help to increase life expectancy. Males who live in the most deprived areas have a lower life expectancy by up to 5.4 years and females have a lower life expectancy by up to 3.2 years.
Mortality by cause	Health and Wellbeing Profiles. Compare with Scotland	Scottish Public Health Observatory (Scot PHO)		Births: Birth rates are expected to drop to 1,269 births in 2032/2033 compared to 1,524 births in 2008/2009, a decline of 16.7%. Mortality: Death rates are expected to reach 2,050 deaths by 2032/2033 compared to 1,825 deaths in 2008/2009, a rise of 12.3%.
Deprivation	Benefits Data. Compare with Scotland	DGC NOMIS	There are low levels of household income in D&G the proportion of employees earning less than £7 per hour is the third highest in Scotland (Office for National Statistics) the number of households in receipt of tax credits over and above the family element is the highest in Scotland (Scottish Neighbourhood Statistics) Official figures about the distribution of income and relative poverty across Scotland were issued in mid August 2010. In D&G between 2002 and 2008, the percentage of households in relative poverty in D&G increased from around 17% to 22%.	Between 2002 and 2008 D&G poverty rates rose from just below to just above the Scottish average. However the actual number of households living in relative poverty increased so although D&G is above the Scottish average, it has more people in poverty than before. (report available on http://www.scotland.gov.uk/Publications/2010/08/26_155956/0 Relative poverty across Scottish Local Authorities.) Relative poverty means that there is a relatively lesser capacity for social resilience in the face of environmental change.
Number of people affected by: Ambient noise levels;	Noise Complaints requiring further investigation	Audit Scotland DGC – Environmental Health	The number of people affected by ambient noise or domestic noise can not be identified. Only the number of noise complaints	There are no significant issues in D&G.

Data	Description	Source	Baseline in D&G	Issue in D&G?
Domestic Noise Levels			are recorded, not the number of people affected. However, the numbers of noise complaints for 08-09 and 09-10 (all types, including antisocial behaviour) were 650 and 414 respectively.	
Access to open space	DGC Open Space Audit. compare with standards	DGC	Need to await results of Open Space Audit – in progress February 2011.	Initial results suggest that although D&G is a rural area with ample countryside, being able to <i>access</i> such areas can be problematic. There is a perceived lack of open space for older children / young people.
Access to bathing beaches	SEPA Bathing waters quality	SEPA: http://www.sepa.org.uk/water/monitoring_and_classification.aspx	Of the 7 identified bathing waters in D&G 6 met the mandatory, though not guideline standard in 2009. One failed. The single failure would produce a failure rate less good than Scotland as a whole, but given the small number of beaches involved this should not be seen as significant. Overall, in the period 2000 - 2009 there may be a positive pattern of change but if so this is not strong.	The problematic issue for bathing waters in D&G appears to be diffuse pollution and as such is not the direct result of development.
Recreation in forests	Recreation opportunities in forests	Forestry Commission	http://www.forestry.gov.uk/pdf/map2.pdf/\$FILE/map2.pdf	
SEA Issue:			Soil	
Soil Types Soil Quality	Digital Soils Information; State and threats to Scotland's soil resource	James Hutton Institute Scottish Government data SEPA	Soil Survey for Scotland – Land Capability for Agriculture 1:50,000 scale Sheets; 71, 76, 78, 82, 83, 84 and 85. There is only a very small proportion of soil of classification 3.1 or better in Dumfries & Galloway.	Should consideration also be given to the value of protecting soils relatively better in localities even if they are not 3.1 or above? The annual costs of a licence for inclusion of this data for use by planning on the Council's GIS are not currently regarded as being justified.
Contaminated land	Information on D&G contaminated land	DGC – Contaminated Land Officer	The position in July 2010 was that ... from a review of historical maps, 16,125 sites within the region were identified where historical activities of a potential contaminative nature were	Overall, contaminated land is not a major environmental issue in Dumfries & Galloway, although it is also the case there are potential environmental issues at

Data	Description	Source	Baseline in D&G	Issue in D&G?
			<p>undertaken. Of these: 6,832 sites were screened out as posing a very low to low risk; 9,017 are categorised as low to medium risk; and 276 sites are categorised as medium to high risk.</p> <p>To date 268 desktop surveys have been completed and from this work, 63 potentially high risk sites have been investigated/assessed/remediated as appropriate. This includes 25 sites where no further action was required and 10 sites where remediation was undertaken. 41 of the 63 sites are former gasworks/gasometers, and 8 are former tanneries. New sites continue to be added as they are discovered.</p>	each of the potentially contaminated localities. Remediation of sites now mainly takes place through the planning process.
Soil erosion	State of Scotland's farmed environment ; Soil damage	http://www.sepa.org.uk/land/contaminated_land/extent_of_contaminated_land/scotland_soil_resource.aspx (Two reports: 1 Report on the current state and threats to Scotland's soil resources, and 2 The SEPA State of the Environment: Soil Quality Report.)	http://www.sepa.org.uk/land/contaminated_land/extent_of_contaminated_land/scotland_soil_resource.aspx (Two reports: 1 Report on the current state and threats to Scotland's soil resources, and 2 The SEPA State of the Environment: Soil Quality Report.)	General concern noted especially in relation to extensive development.
Coastal erosion	Areas of coastal erosion	DGC – DGC Shoreline Management Plan http://www.dumgal.gov.uk/index.aspx?articleid=4694	DGC – DGC Shoreline Management Plan http://www.dumgal.gov.uk/index.aspx?articleid=4694 Only a small proportion of the region's coastline has coastal protection or flood defences. The Shoreline Management Plan (SMP)	

Data	Description	Source	Baseline in D&G	Issue in D&G?
			<p>study is an initial step in developing a coastal defence strategy for the Dumfries and Galloway coastline.</p> <p>Such a plan allows future defence options to be considered in a consistent manner, helping with the long term development along the coasts of Scotland. At a local level, this plan helps to identify the investment needed to safeguard human lives, and a wide range of assets, from the threat posed by the sea. The document provides DGC with priorities for coastal defence management, taking into account public safety, preservation of property and infrastructure, and preservation of the environment. In addition it provides information on the assets at potential risk from erosion or flooding.</p>	
		SEA Issue	Water	
Water body classification	D&G water body Classification	SEPA – River Basin Management Plan for the Solway Tweed River Basin District	<p>The baseline for the quality of waterbodies in D&G is contained in the Solway Tweed River Basin Management Plan 2009. This can be viewed at http://www.sepa.org.uk/water/river_basin_planning.aspx</p>	<p>The main issues in Dumfries & Galloway are: Chemical condition - diffuse run-off; Structure of watercourse - morphology; Acidification (two thirds of all Scotland's occurs in Galloway); and Non-native invasive species. These main issues do not directly have to do with development in D&G which is the central focus of the LDP</p>
% Water bodies with good ecological status or above	D&G Water bodies with good ecological status or above. Compare with Scotland	SEPA – River Basin Management Plan for the Solway Tweed River Basin District	<p>The 2008 baseline position is of 49% of water bodies at good or higher status. The improvements which it is intended should be secured by 2015, 2021, and 2027 are 55%, 64%, and 92% respectively. This contrasts with 65%, 72%, 77% and 98% for the rest of Scotland.</p>	<p>The scale of improvement proposed in the RBMP is more ambitious for D&G than for the rest of Scotland. However, the main issues do not directly have to do with development in D&G which is the central focus of the LDP.</p>

Data	Description	Source	Baseline in D&G	Issue in D&G?
			The baseline position in Scotland is not as affected by diffuse pollution and morphology changes as in D&G	
SUDS	Extent of use of SUDS in new development		Local Plan General Policy GP57 has also been superseded by the introduction of the Controlled Activities Regulations (the regulations). The regulations require all surface water from new development to be treated by a Sustainable Urban Drainage Systems (SUDS) before it is discharged into the water environment, except for single houses or where the discharge will be into coastal water.	The responsibility of planning policy is to flag up the requirement for SUDS and to secure positive outcomes in terms of amenity and biodiversity.
Flood plains / main flooding areas (including coastal areas)	Areas shown on SEPA's 2 nd Generation Indicative River and Coastal Flood Map (Scotland)	SEPA	The most important source of baseline information is the SEPA Indicative River and Coastal Flood Map for Scotland. http://classic.multimap.com/clients/places.cgi?client=sepa The Council commissioned a Strategic Flood Risk Appraisal. This was published in 2007. There are significant flood risks across the region from Langholm to Stranraer. http://www.dumgal.gov.uk/index.aspx?articleid=8939	Concern about climate change means that the significant flood risk across the region cannot be ignored. Policy for development management and the allocation of sites in this Local Development Plan will need to operate to ensure that flood risk is not increased. In the short term this may be a difficult choice. Over the longer term it should mean that limited public resources can be focussed on sustainable flood management. There should be particular concern that flood risk in coastal locations is not unnecessarily increased. Settlements in Dumfries and Galloway have developed at river bridging points and areas of coastal access: The traditional balance of benefits against the obvious risks is being upset by the effects on river flows and sea level resulting from climate change.

Data	Description	Source	Baseline in D&G	Issue in D&G?
		SEA Issue		
		Air		
Air Quality Management	Number / extent of air quality management areas	DGC – Environmental Health	There are no Air Quality Management Areas (AQMA) at present.	AQMA(s) may be required in the future at or near three road junctions in Dumfries depending upon the results of monitoring to be carried out over the next year.
Key air pollutants	Levels of key air pollutants by sector and per capita	SEPA DGC – Environmental Health DGC Air Quality Progress Report 2009 (to be completed)	See Updating and Screening Assessment 2009 at www.dumgal.gov.uk/index.aspx?articleid=1733 . Detailed Assessment for PM10 is ongoing. The 2010 Progress Report is being prepared.	PM10 (particulate matter) has been predicted by modelling to exceed air quality objectives at or near three road junctions in Dumfries; Buccleuch Street/Whitesands; Glasgow Street/Galloway Street; and, Annan Road/Brooms Road.
		SEA Issue: Climatic Factors		
Carbon dioxide (CO2) emissions by sector/ per capita	Emissions of carbon dioxide for D&G. Compare with Scotland	DEFRA	All 2008 figures in Kg/capita Energy 2921.93 D&G, 4217.17 Scotland Waste & waste water management 73.23 D&G, 114.25 Scotland Animal & vegetable products 188.79 D&G, 67.89 Scotland Other (surface treatment using organic solvents) 68.44 D&G, 1.966 Scotland This is accounted for by Gates Power Transmission Ltd in Dumfries, the only plant in this category in Scotland. Source: SEPA, Scottish Pollutant Release Inventory, available at http://www.sepa.org.uk/air/process_industry_regulation/pollutant_release_inventory.aspx Transport 3.73 D&G, 1.89 Scotland. Source www.decc.gov.uk/en/content/cms/statistics/regional/road_transport.aspx	The main issue from the SEPA figures on the left is treatment and processing of milk under 'Animal and Vegetable Products', at almost 3 times the Scottish figure. Treatment of milk from the high amount of dairy farming in the region at eg: the Lockerbie and Rowan Glen Creameries. Transport is also an issue for the region compared with the Scottish figures. This is likely to be due to the rural nature of the area with people dependent on own transportation. Please see below for the issues in the region with greenhouse gases as a whole.
Greenhouse Gases	Levels of greenhouse gas emissions	SEPA – Scottish Pollutant Release Inventory	All public bodies will have a new duty under Section 44 of the Climate Change (Scotland) Act 2009 to act in the way best calculated to contribute to the delivery of	Greenhouse gases appear less per capita than Scotland. However, being a dairy farming region, the amount of methane produced by livestock is

Data	Description	Source	Baseline in D&G	Issue in D&G?
			<p>the emission reduction targets and the climate change adaptation framework in exercising their functions. Whilst Circular 1/2009 does not specifically refer to the Climate Change Act, SPP has been significantly influenced by it. SPP states that, "The need to help mitigate the causes of climate change and the need to adapt to its short and long term impacts should be taken into account in all decisions throughout the planning system"</p> <p>D&G 3260.92 Kg per capita Scotland 4859.89 Kg per capita</p> <p>Source: SEPA, Scottish Pollutant Release Inventory, available at http://www.sepa.org.uk/air/process_industry_regulation/pollutant_release_inventory.aspx</p>	likely to be significant. The effects of greenhouse gases (GHGs) are non local due to the diffuse nature of air pollutants, from which D&G will be affected significantly – see below 'Temperature'.
Levels of car ownership	D&G Comparative Household Profile	SCROL http://www.scrol.gov.uk/scrol/common/home.jsp	Census 2001 shows that 25.32% of households have no access to a car (see table at end). This is a similar figure to that for the Scottish Borders and Highland local authority areas. In 1991 30% of households in D&G did not have access to a car.	The percentage of households with no access to a car is lower than the national average of 34.23 but significant given the largely dispersed, rural nature of D&G.
Temperature	Local temperature levels	Met Office	D&G temperatures 2009 Max 4.3 (winter) – 18.4 (summer)] Min 0.7 (winter) – 10.5 (summer)	Temperatures have increased by 10C in D&G since 1970. This is comparable with the UK average. Temperatures are predicted to rise by 3.50C for central UK by 2100 under a medium emissions scenario. D&G is particularly susceptible to this warming affect as being coastal it is already at risk of flooding, further enhanced by sea level rise. This will lead to loss of land through coastal erosion also. Farming and forestry

Data	Description	Source	Baseline in D&G	Issue in D&G?
				may be affected due to increasing temperatures making cultivation of present crop ranges or tree species less suitable.
Electricity and Gas Use	Electricity and Gas use in D&G	Department of Energy and Climate Change (DECC)	Average domestic consumption: Electricity 4667 kWh, Gas 18165 kWh Average commercial and industrial consumption: Electricity 46327kWh, Gas 979021kWh	D&G is a relatively progressive area with increasing electricity being supplied by renewables. However, in terms of heating, given that D&G is rural many areas do not receive mainline gas and so rely on liquid petroleum gas or oil being transported to them. This raises issues of continuing GHG emissions from continued use of these fossil fuels and additional emissions through transportation, and fuel poverty as fossil fuel prices rise. Alternatively these households may rely on electric heating such as storage heating which is relatively more expensive again raising issues of fuel poverty. The nature of the housing stock in D&G is also less efficient as it tends to be older and not readily insulated in many cases.
Generated Renewable Energy	Electricity generated from renewable energy sources. Compare with Scotland	DGC – Strategic Planning	In relation to larger scale schemes the following position is at July 2010: Operational On-shore wind farms = 190MW Operational Off-shore in the Solway = 180MW Other operational larger scale renewable sources (hydro and biomass) = 141MW Other approved larger scale on-shore wind farms but not yet operational = 393MW As at February 2009 Scotland had a capacity to generate 1652MW of energy from operational on and off shore wind farms.	The biggest issue in respect of D&G is that this is a constantly changing picture and therefore trying to keep up to date has become very difficult. The first half of this year, 2010, has seen a threefold increase in the number of turbine applications, often at the smaller end of the spectrum in terms of size and number. This will make monitoring of such developments in the future much harder, particularly in terms of those that are operational.
Renewable	Number of	DGC –	A search has been carried	

Data	Description	Source	Baseline in D&G	Issue in D&G?
Energy Planning Consents	planning consents given for renewable energy projects	Strategic Planning;	out in relation to Development Management applications for various sources of energy. From the Acolaid system 75 applications were extracted that referred to heat pumps, solar or hydro (please note that turbines were excluded at this time). Of these 52 applications were granted consent, 2 were refused, 4 are pending consideration, 15 were withdrawn and 2 are invalid.	
Sustainable building technology	Number of new developments incorporating sustainable building techniques	DGC – Building Standards	Informed opinion (rather than numeric data) indicates that in D&G there have not been any applications which have significantly better energy performance and or CO2 emissions than minimum requirements. On the surface some applications may appear to offer good performance such as if a ground source heat pump is specified, but on further investigation it has been the case that other areas of the proposals have been of a poor performance leading to a close to minimum pass.	
Public transport patronage	Use of public transport	SCROL	There are currently 119 local bus contracts procured by SWestrans and a further 5 contracts held by other authorities to whom a financial contribution is provided. The annual gross cost of these socially necessary local bus services is some £3.8M with an income of some £0.5M. The contracts are provided by 15 contractors. Commercial bus services operate 70% of the Dumfries Town Network and on the main corridors to Lockerbie, Ayr and Carlisle. The Use of Public Transport is an indicator under Objective 5.1 of the SOA	The latest batch of tenders issued by SWestrans for 25% of the local bus network for commencement in April 2010 saw an initial average increase of 84% in costs which was reduced to 42% following some service reductions and re-tendering. If this level of increase is applied to the contracts due for expiry in 2012, the total budget required would be in the region of £5M to £6M /year. This level of expenditure is not sustainable and to enable decisions to be taken on the future

Data	Description	Source	Baseline in D&G	Issue in D&G?
			with a baseline usage of 4.13M passenger journeys per year and an aim to increase this to 5M journeys.	provision of local bus services in the region the SWestrans Board has agreed to carry out a full Policy and Root and Branch review of the local bus network. This review will define social need in respect of local bus services based on the objectives and priorities for the region set out by the Single Outcome Agreement (SOA) and the Regional Transport Strategy (RTS).
Climate change	Climate change predictions	Resources at Scottish Climate Change Impacts Partnership http://www.scip.org.uk/Default.aspx?pid=1 and UK Climate Projections - UKCP09 http://ukclimateprojections.defra.gov.uk/	Currently the average temperatures in the region have risen by 1 degree C since the 1970's and it is anticipated that they will mirror changes over the balance of the country and rise in line with global expectations.	The likely impacts in D&G will be loss of low lying coastal areas, impact on trunk roads from sea level rise, particularly in the west. It is also likely that we will suffer the extremes of weather including flooding, storms and other weather events. A significant number of settlements particularly those in coastal locations such as Annan and the low lying parts of Dumfries may be further affected by changes to sea levels.
		SEA Issue	Material Assets	
Minerals	Number / extent of mineral extraction sites	British Geological Survey	Sites with current consent are show in Figure 4 of the Monitoring Statement.	
Coal Authority Consultation Zones	Number / extent of zones	DGC GIS	Know coal reserves in Upper Nithsdale and Annandale & Eskdale.	
Waste disposed of in landfill	Quantity of waste sent to local landfill sites	SEPA DGC – Waste Officer	The Council's integrated Waste Management Strategy updated in Aug 2007 is based on the Waste Management /Recycling PFI Contract created in 2004 between the Council and Shanks Group plc. This provides in respect of municipal waste the Ecodeco Intelligent Transfer Station at Locharmoss near	

Data	Description	Source	Baseline in D&G	Issue in D&G?
			Dumfries and the composting facility at Galdenoch in the west of the Region. These facilities are supported by a network of transfer stations and recycling centres and the strategy underlying their creation and use centres on the main objective of diverting waste from landfill.	
Facilities available to deal with waste	Waste Facilities in D&G inc. Recycling Centres and Points	DGC – Waste Officer	Figure 17 in Monitoring Statement. Dumfries and Galloway Council is investing £2.9million as part of a four year plan to further enhance the waste facilities in the region and to move towards the Scottish Government's Zero Waste targets.	It is to be expected some existing sites may need to be extended and new sites will need to be found.
Vacant and Derelict sites	Number of sites and area on vacant and derelict land register	Scottish Government - Scottish Vacant and Derelict Land Survey Site Register DGC	http://www.scotland.gov.uk/News/Releases/2010/01/27101301	As D&G is a rural rather than urban/industrial area there is not a legacy of urban brownfield land. The prospect of development on rural brownfield land may raise different response to the issues from those in urban areas.
Settlements	Number and size of settlements	DGC – Strategic Planning	Dumfries and Galloway is the third largest region in Scotland covering 2,469 square miles (6,425 square kilometres). The regions population was 147,765 at the 2001 census which results in around 60 people per square mile compared with the Scottish average of 168. This is characterised by a dispersed settlement pattern. People live mainly in small communities of 4,000 or less or in the countryside. The biggest town is Dumfries with a population of 37,242, followed by Stranraer with 10,851 and then Annan with 8,389 (all from 2001 census). The current local plans have 120 settlements with inset	The reduction in greenhouse gas emissions required by the Climate Change Scotland (Act) 2009 will require a change across all areas of planning policy from the spatial strategy of the plan to the policies and associated supplementary planning guidance used to assess individual proposals if the targets set by the Climate Change Act are to be met. Both the National Planning Framework 2 and Scottish Planning Policy provide the context that LDPs need to take into account.

Data	Description	Source	Baseline in D&G	Issue in D&G?
			maps, this was based on a number of factors including the provision of services and facilities, the availability of infrastructure, environmental considerations and links to other settlements. The number of settlements that require an inset map is being reviewed as part of the work in preparing the LDP. It is being carried out using the same criteria.	
Pedestrian routes	Pedestrian routes	Core Paths Plan: DGC Access Team	The Dumfries & Galloway Proposed Core Paths Plan will be submitted to the Scottish Government autumn 2010. The Proposed Core Paths plan includes approx 2,000km of paths suitable for non motorised access. 641 recorded claimed, alleged or vindicated rights of way (1,790km) and other routes recorded on paths record databases (Scottish Path Records (SPR)); other informal paths, mapped or otherwise locally known and used; and sections of minor road/pavement which link sections of path in order to provide continuity of route.	There are no anticipated effects predicted on designated sites and protected species as a result of the adoption of the Core Paths Plan. The encouragement for walking provided by the Core Paths Plan should support the health of local people and the tourist economy.
SEA Issue: Cultural Heritage				
Archaeology records	Archaeological site data.	DGC – Archaeology Officer	At February 2009 there were 22,961 records in DGC Historic Environment Record. This figure includes archaeological and historic sites, battlefields, designed landscapes, buildings, and artefact find spots, Record for the whole of Scotland totalled 247,215. DGC therefore contains approx 9.3% of the recorded resource. (Source: Polygonisation The Shape of Things to Come, Mike Middleton for RCAHMS 2009)	Numbers alone are not particularly important. Local authorities in Scotland have put varying levels of resources to developing and maintaining their core record systems. Informed planning policy and decision making require an understanding of the significance and value of the resource.

Data	Description	Source	Baseline in D&G	Issue in D&G?
Listed buildings	Category: A, B, C. Compare with Scotland	DGC – Conservation Officer	In Dumfries and Galloway there are approximately 3,400 listed buildings. About 7% are category A, and about 53% are B. These percentages are similar to those for Scotland as a whole. However, by population There are 23 listed buildings per 1,000 population in D&G as compared to 9 for Scotland overall. Main issue is relatively high density of heritage buildings over population. Issue for D&G to re-survey LB stock and develop new guidelines on enforcement.	Survey in 1995 revealed high number of building that have been altered without consent (up to 29% of those examined by photographic record), usually replacement windows and/or doors. No follow-up survey undertaken to determine whether or not subsequent controls on new contraventions have been successful in reducing the proportion of buildings with unauthorised works.
Conservation Areas	Number of Conservation Areas. Compare with Scotland	DGC – Conservation Officer	In Dumfries and Galloway there are presently 38 Conservation Areas. 16 of these have been classified as "outstanding" by the Scottish Ministers. 0.25 CAs per 1,000 population in D&G, as compared to 0.11 for Scotland overall. Only 3 have formal appraisals completed. Up to present 8 town schemes were in operation offering small grants, jointly funded with Historic Scotland; limited budget reduced numbers of grants offered in recent years. Scheme to close completely in March 2011. Review and appraisal required for remainder of areas. Loss of town scheme grants – no funding for conservation works except through complex schemes such as THI or CARS which require considerable time and resources to set up / apply and required considerable match funding.	
Archaeologica	Number of	DGC GIS –	DGC has designated 32	Erosion of these areas or

Data	Description	Source	Baseline in D&G	Issue in D&G?
Ily Sensitive Areas	local archaeological sensitive areas. Compare with Scotland	Archaeological Survey	Archaeologically Sensitive Areas. (Source DGC Structure Plan 1999). 21 of these are rural areas with a high density of features or especially identified resource, and 11 are based on historic settlements. DGC is the only LA in Scotland to have identified such areas. These areas are identified to highlight areas of strategic interest, particularly where large scale land use change is being considered.	their settings through development of windfarms and other large scale, and/or highly visible land use changes e.g. forestry.
Scheduled Ancient Monuments	Number and outcome of applications for Scheduled Monument Consent	Historic Scotland DGC - Conservation Officer	There are 109 nationally important scheduled ancient monuments in Dumfries and Galloway. There are 8154 in the whole of Scotland. DGC therefore has 12.5% of the total. (Source Historic Scotland Nov 2010) DGC has identified a further 931 sites that are assessed as potentially meeting the criteria for designation (Sources: Dumfries and Galloway Council Historic Environment Record: None statutory register sites)	Designation is an ongoing process with monuments being both added and removed from the schedule. DGC has a relatively high number of designated sites, reflecting a high level of archaeological interest over a large area with a low population. The condition of the resource is an issue in D&G, as elsewhere in Scotland. DGC does not hold data on this.
Gardens and Designed landscapes	Number and outcomes of planning applications that affect gardens and designed landscapes		20 'Inventory Gardens & Designed Landscapes' sites exist within D&G. Re-survey identified 11 potential sites additional sites for possible inclusion. Review to be completed by 2014. 180 'Non-Inventory Gardens/ Designed Landscapes'. Pilot study of sites in Nithsdale, directed at validating earlier work.	Important and extensive landscape features in D&G.
Buildings at Risk Register and archaeological sites at risk	Number of buildings and archaeological sites at risk	Buildings at Risk Register DGC – Conservation Officer DGC – Archaeology Officer	In February 2011 there are 66 listed building on the At Risk Register. 26 A category, 32 B category, and 8 C(S) category. Work is in progress on 7. No data for archaeological sites.	
Historic Environment	See SHEP definition	Scotland's Historic	No recognised overall objective measure in 2012,	The overall quality and quantity of historic

Data	Description	Source	Baseline in D&G	Issue in D&G?
		Environment Audit (SHEA)	but measurable objectives are now being developed (2015).	environment assets is high in D&G. Need to ensure this remains the case as it is a key asset for a sustainable economic development, social well being and environmental quality in DG.
Cultural and Arts: Theatres and venues	Number of arts facilities	DGC LDP Survey 2009 Dumfries & Galloway Arts Association http://www.dgaa.net/index.php	<p>There are 10 theatres and a similar number of other arts venues across Dumfries & Galloway. These relate to their communities and there is a range in scale. In terms of performing arts provision, there is an issue of theatre space. Overall, there has been little recent investment in performing arts facilities. There have been individual exceptions in Langholm and New Galloway and Sanquhar. There are 4 cinemas in the region and a growing number of alternative venues equipped for showing films.</p> <p>There has been concern and uncertainty about the future of the Theatre Royal in Dumfries as a theatre space for the 21st century. The Ryan Centre Theatre provides the only large scale theatre in the region with professional staff. DGOne is suitable for certain types of large scale entertainment but was not built as a theatre and does not have all theatre facilities.</p> <p>There are smaller scale theatres across the region, including Moffat, Dumfries Dalbeattie and Castle Douglas. They all provide venues for touring music and drama but struggle sometimes with marketing and consequently ticket sales as well as technical issues.</p> <p>Easterbrook Hall and Crichton Church are venues for occasional musical</p>	<p>Travel – both for audience members to come to the venue, and also for performers / films etc to travel to the venue</p> <p>Heating costs etc – most venues (with the exception of the CatStrand and Buccleuch Centre) are quite old and not designed for energy efficiency.</p> <p>Most venues are small to serve their small populations, with energy usage higher than a single, larger venue.</p> <p>On the other hand the increasing use of digital resources, including the internet and online, helps to reduce the environmental costs of running arts venues.</p>

Data	Description	Source	Baseline in D&G	Issue in D&G?
			events. Many events are held in community and church halls i.e at an appropriate scale and location for a very rural region.	
SEA Issue: Landscape				
Landscape Character	D&G Landscape Assessment	SNH DGC - Landscape Officer	The quality of the landscape is one of the regions major assets, providing an attractive environment for residents and tourists. The Landscape Character Assessment of Dumfries and Galloway was one of the first undertaken by SNH and is still highly regarded. It identified four broad regional character areas which are divided into 31 landscape types and subtypes. Some of these types may be reviewed as part of the landscape capacity study for wind farms which is currently being prepared.	Impact of land-use changes; eg onshore/offshore windfarms on character areas; afforestation
Gardens and Designed Landscapes	Inventory of Gardens (Historic)and Designed Landscapes	HS DGC GIS	There are 20 Inventory Designed Landscapes in D&G, 5.2 % of the total for Scotland. There are 386 throughout Scotland. (Source: Historic Scotland November 2010)	Designed Landscapes contribute a great deal to the scenery and amenity of D&G. There is a need to ensure that the resource is enhanced and in robust ecological condition as they will be affected by climate change
Non-inventory designed landscapes	List of Non-Inventory Gardens and Designed Landscapes	DGC GIS Garden History Society	In addition to those landscapes identified in the Inventory, 180 Non-inventory Designed Landscapes have been identified in D&G. The approximate total for Scotland is 2,300. D&G has approx 8 % of non inventory gardens and landscapes in Scotland.	Designed Landscapes contribute a great deal to the scenery and amenity of D&G. Need to ensure that the resource is enhanced and in robust ecological condition as they will be affected by climate change Non-Inventory landscapes are widespread and an important landscape issue. Also, there is concern about the loss of stately homes with resulting impact on designed landscapes.
National	Size, number	SNH	Dumfries and Galloway is	

Data	Description	Source	Baseline in D&G	Issue in D&G?
Scenic Areas	and locations of NSAs. Compare with Scotland	DGC GIS DGC - National Scenic Area Officer	the first region in Scotland to produce pioneering environmental documents for its nationally important landscapes. The Council, in partnership with Scottish Natural Heritage, has published Management Strategies for its three National Scenic Areas.	
Regional Scenic Areas	Size, number and locations of RSAs	DGC GIS	Dumfries and Galloway has ten Regional Scenic Areas, which were designated in the Structure Plan. These are described in more detail in Technical Paper No.6 of the Structure Plan; http://www.dumgal.gov.uk/index.aspx?articleid=3721	
Renewable energy areas	Area, type, location	SNH DGC	A map of operational and consented wind farms for Scotland is available at the SNH website	Consideration of impacts of windfarm proposal should take account of likely cumulative effects including from consented but un-built schemes. However, where a permission is being maintained but unlikely to be constructed it may form a block to new and better schemes.