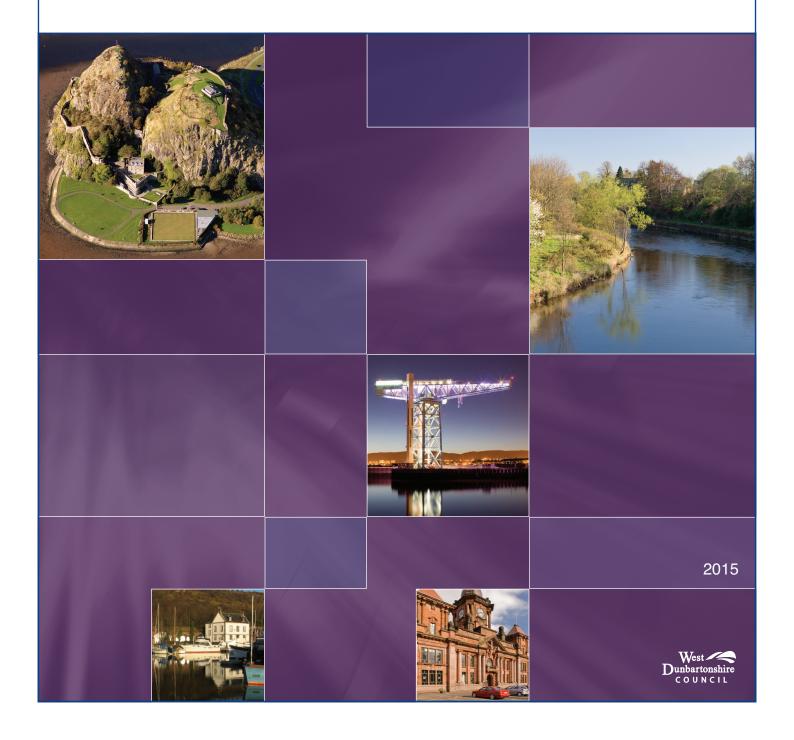
## West Dunbartonshire Local Development Plan

# **Environmental Report**



### **Environmental Report**

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### **Summary**

Strategic Environmental Assessment (SEA) is a method for considering and dealing with the likely environmental effects of certain plans, programmes and strategies. It aims to ensure that the environment is given the same level of consideration as social and economic factors in the preparation of plans and decision-making. This document is the **Environmental Report**, a key stage of SEA, which provides information on the content of the plan being assessed and identifies, describes and evaluates the likely significant effects on the environment of implementing the plan and reasonable alternatives to it.

This Environmental Report has been revised since it was first published alongside the Main Issues Report in March 2012, to take account of responses received from the Consultation Authorities (see Appendix D) and in order to review new material included within the Proposed Plan which has not previously been assessed. The main changes to the Environmental Report are highlighted in blue in this version.

On 26<sup>th</sup> February 2014 a modification was made to the Proposed Plan to delete the housing opportunity BC1(78) Duntiglennan Fields. It is not considered that this modification would have a significant environmental impact.

Examination of the Proposed Local Development Plan took place between August 2014 and January 2015, following which a range of modifications to the plan were recommended to the Council. The modifications have been assessed in respect of the SEA, with the outcome presented in the Addendum to this report.

The Plan (Section 2 of the Environmental Report) being assessed is the West Dunbartonshire Local Development Plan – WDLDP. The WDLDP will guide the future use of land and appearance of West Dunbartonshire (excluding the area within the Loch Lomond and the Trossachs National Park); indicate where development, including regeneration, should happen and where it should not; and contribute to sustainable development and tackling climate change. When adopted, the WDLDP will replace the West Dunbartonshire Local Plan.

The Main Issues Report (MIR) was the first milestone in the preparation of the WDLDP. Together with the Environmental Report, it sought to facilitate and inform the preparation of the WDLDP by outlining and assessing preferred options and reasonable alternative options arising from 30 identified 'Main Issues'. These options are assessed by the Environmental Report. The Proposed Plan is the settled view of the Council as to how West Dunbartonshire should be developed over the next 5 years and beyond.

The WDLDP will sit within a hierarchy of other plans, programmes and strategies. The key environmental objectives have been identified from the review of legislation, policies, plans and strategies which are relevant to the WDLDP and inform its preparation and assessment.

**The Environment** (Section 3) of the Plan area, including existing environmental problems, has been considered in order to establish the environmental effects of options outlined in the MIR. Key environmental features and problems of the WDLDP area

include the Inner Clyde SPA: extensive intertidal flats of international importance that support large numbers of wintering wildfowl; 198 ha of vacant and derelict land across 94 sites; sites likely to be affected by a 1 in 200 year flood event; and the Antonine Wall, an extension to the trans-national Frontiers of the Roman Empire World Heritage Site.

The main environmental problems identified are chiefly focused along the Clyde corridor, where large areas of vacant, derelict and potentially contaminated land form the Council's Key Regeneration Sites. These sites are, in parts, at risk of flooding and are adjacent to sensitive inter-tidal habitats.

Not implementing the WDLDP could lead to increasing pressure for unsustainable and inappropriate development with harmful effects on the environment. Furthermore, the positive potential of a 'new' Plan to deliver environmental improvements, for example through the Central Scotland Green Network, may not be realised without the WDLDP and the likely changes to the environment could be significantly less beneficial.

**Assessment** (Sections 4 & 5). A framework of objectives and criteria relating to specific elements of the environmental (SEA topics) has been used to predict the environmental effects of the options outlined in the MIR.

The significant environmental effects predicted in the assessment of the options outlined in the MIR include likely negative effects upon the Inner Clyde SPA arising from the development of Key Regeneration Sites; negative effects upon air quality and amenity arising from increased traffic resulting from development; significantly positive effects on soils through the remediation of contaminated sites; major negative effects in respect of managing and reducing flood risk, with a number of development sites within areas at risk of a 1 in 200 year flood event; and negative impacts upon landscape relating to development that would affect the setting of the urban area.

Detailed results of the assessment are described in Section 5 and Appendix B.

An approach to the mitigation of significant adverse effects on the environment has been outlined. The approach seeks to first avoid negative effects and will inform the remaining stages of the preparation of the WDLDP and, following adoption of the plan, subsequent SEAs of lower level plans (e.g. masterplans), project level Environmental Impact Assessments (EIA), and planning applications.

Monitoring the significant environmental effects of the implementation of the WDLDP is an important part of the SEA process. Indicators to be used within a monitoring framework are suggested in Section 7 of the report.

### 1. Introduction

### 1.1 Purpose of the Environmental Report

As part of the preparation of the West Dunbartonshire Local Development Plan (WDLDP), West Dunbartonshire Council is carrying out a Strategic Environmental Assessment (SEA). SEA is a systematic method for considering the likely environmental effects of certain plans, programmes and strategies (PPS). SEA aims to ensure that the environment is given the same level of consideration as social and economic factors within the plan, and to:

- integrate environmental factors into PPS preparation and decision-making;
- improve PPS and enhance environmental protection;
- increase public participation in decision making; and
- facilitate openness and transparency of decision making.

SEA is required by the Environmental Assessment (Scotland) Act 2005 (the Act). The Environmental Report is a key stage of the SEA. The purpose of the Environment Report is to:

- provide information on the content of the WDLDP;
- identify, describe and evaluate the likely significant effects on the environment of implementing the WDLDP and its reasonable alternatives; and
- provide an early and effective opportunity for the public and consultation authorities to offer views on any aspect of the relevant documents.

The report has been prepared in accordance with Section 14 and Schedule 3 of the Act.

#### 1.2 SEA activities to date

**Screening**: Under Section 5(3) of the Act the WDLDP requires an SEA.

**Scoping**: This stage established, in consultation with Scottish Natural Heritage, Historic Scotland and the Scottish Environmental Protection Agency (the consultation authorities), the scope and level of detail of the Environmental Report and the first consultation period. A draft Scoping Report was circulated among the consultation authorities and the Scottish Government's Environmental Assessment Team in April 2011 for advice on whether the Report met the requirements of the Act and also, more generally, how the proposed approach to assessment could be improved in the interests of proportionality and efficiency.

Taking account of feedback from Historic Scotland, SEPA, Historic Scotland and the Government's SEA Technical Support Unit, the Scoping Report was finalised and submitted to the SEA Gateway in May 2011. Comments from the consultation authorities received via the Gateway were incorporated into the final assessment methodology (see Section 4).

**Environmental Report**: The Environmental Report was prepared alongside the Main Issues Report and first published in March 2012.

### 2. The Plan

### 2.1 Key facts relating to the Local Development Plan

Name of Responsible Authority: West Dunbartonshire Council (WDC)

Title of draft plan, programme or

strategy (PPS):

West Dunbartonshire Local Development Plan

(WDLDP)

Requirement for the PPS: Legislative requirement of the Planning etc.

(Scotland) Act 2006

Subject of the PPS: Land use planning

Period covered by the PPS: 2015 – 2025

Frequency of updates: Every five years

Geographic area covered by the

PPS:

West Dunbartonshire Council area, excluding that part within the Loch Lomond & The Trossachs

National Park, extending to approximately 12,500

ha.

Purpose and/or objectives of PPS: To guide the future use of land and appearance of

West Dunbartonshire; indicate where

development, including regeneration, should happen and where it should not; and contribute to sustainable development and tackling climate

change.

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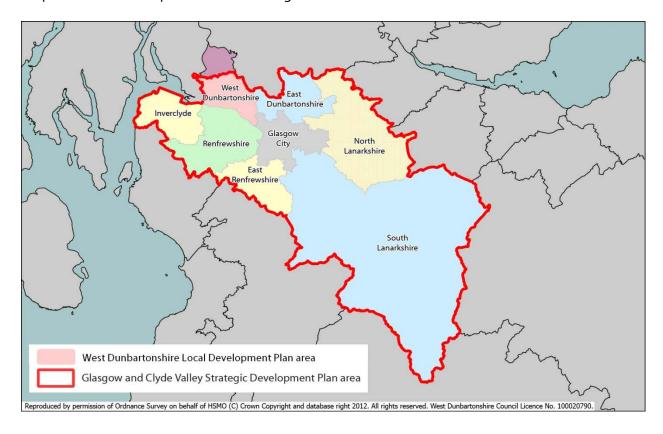
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Map 1 – Local Development Plan coverage



### 2.2 Content of the Proposed Local Development Plan

The Main Issues Report (MIR) was the first milestone in the preparation of the West Dunbartonshire Local Development Plan, the plan which will supersede the West Dunbartonshire Local Plan. The Main Issues Report sought to facilitate and inform the preparation of the Local Development Plan, setting out the spatial strategy – general proposals for development and reasonable alternatives – and site-specific proposals.

Together, the Main Issues Report and Environmental Report outline and assess a preferred option and one or more reasonable alternatives (where relevant) arising from 30 identified 'Main Issues', grouped into seven sections.

The Proposed Plan broadly follows this subdivision, with additional sections on the proposed outcomes and overall strategy of the Plan and the protection of built heritage, which was not identified as a Main Issue. Table 1 records the cross-over between the Main Issues Report and Proposed Plan.

Table 1 – Relationship between Main Issues Report & Proposed Plan

Main Issues Report	Proposed Plan
Introduction Description of LDP process, timetable, how main issues have been identified and structure of the document; context and preferred strategy; accompanying	Introduction Purpose and structure of the LDP; accompanying documents.
documents	
	Outcomes List of outcomes the Plan seeks to achieve and the policies which support them.
Our Key Regeneration Sites Six 'Key Regeneration Sites' are identified by the MIR as central to the social and economic regeneration of West Dunbartonshire. They are: Lomondgate, Dumbarton Waterfront, Esso Bowling, Bowling Basins, Carless and Queens Quay.	Our Changing Places: The Proposed Plan focuses on the areas of West Dunbartonshire that the Council wants or expects to change over the next 5- 10 years, providing a policy framework for these locations.
The MIR includes options for how development of these sites could be facilitated and accelerated, for example through changes to boundaries or proposed land uses. The Strathleven Corridor and Lomond Canal as longer-term regeneration opportunities are also highlighted.	The Plan's 'Changing Places' are: the six 'Key Regeneration Sites' included in the MIR (Issues 1 – 5); the three town centres – Alexandria, Clydebank and Dumbarton (Issues 13 – 15); The Lomond Canal (Issue 7), Young's Farm (Issue 29), the Green Network (Issue 18) and the Kilpatrick Hills.
	Developing Sustainably: This section concerns the location and design of new development in West Dunbartonshire and the creation of successful, sustainable places.
	It includes policies on air quality, renewable energy and heat, including a spatial framework for wind energy development (Issue 23), flooding (Issue 25), contaminated land and soil.
Growing our Economy: Options identified within this section concern the amount of land allocated for new and expanding business; the types of uses that might be allowed in established industrial and business use locations; and the definition of 'Strategic Economic Investment Locations' – identified by the Strategic Development Plan – in West	Growing our Economy: The Proposed Plan identifies sites for new and expanding businesses (Issue 10), the extent of the Lomondgate and Clydebank Riverside Strategic Economic Investment Locations (Issues 8 & 9) as well as guidance on non-industrial uses within established industrial and business locations. There are also policies on roadside services, tourism

Main Issues Report	Proposed Plan
Dunbartonshire.	and Glasgow Airport.
Supporting our Town Centres: Preferred and alternative strategies for Alexandria, Clydebank and Dumbarton town centres are presented in this section, along with options for an overall approach to the network of centres within the Plan area. The town centre strategies address their future development including matters relating to town centre boundaries, development sites and core retail areas while the network of centres strategy recognises the importance of locations	Supporting our Centres: A network of centres retail strategy is outlined (Issue 12). Core retails areas, town centres, commercial centres, local centres and retail development opportunities are identified.
with different roles and functions supporting and complementing each other.  Building our Communities: The issue of whether the WDLDP should allocate new sites for housing is included in the MIR under this section. Options for delivering affordable housing are also outlined.	Building Our Communities: This section of plan seeks to meet the area's housing requirements by allocating sites for new housing development (Issues 16 & 17) and other community facilities.
Enhancing our Green Network: The Central Scotland Green Network is one of 14 national developments in the National Planning Framework for Scotland and the only project within West Dunbartonshire. The MIR includes options relating to a number of the component features of the Green Network. These are: the identification of the Green Network and opportunities and priorities for its enhancement; the provision of open space; the green belt boundary; local nature conservation sites; and the Kilpatrick Hills Regional Scenic Area.	Enhancing our Green Network: The Proposed Plan sets out a framework to protect and enhance the valuable components of the green network including open space, the habitat network (Issue 21) and geodiversity, landscape (Issue 22), forestry, woodland and trees, the water environment and outdoor access.
Delivering Sustainably: A number of issues are identified in the MIR which relate to the delivery of sustainable economic development. Options are outlined in	Protecting our Built Heritage: The Antonine Wall, scheduled monuments and archaeology, listed buildings, conservation areas and gardens and designed landscapes are protected by policies within this section of the Plan.  Supporting Development: The transport network (Issue 25 & 26), waste, communications infrastructure, minerals, aggregates and coal, are all

Main Issues Report	Proposed Plan
relation to the WDLDP's approach to wind energy and reducing greenhouse gas emissions from new buildings; two infrastructure projects: Fastlink and improvements to Kilbowie Roundabout; and developer contributions. Views are also sought on the WDLDP's proposed approach to flooding.	important issues for supporting development in West Dunbartonshire and are covered in this section of the Proposed Plan.
Development Sites: The MIR identifies 127 development sites, 35 of which are 'new' sites not identified in the West Dunbartonshire Local Plan. A preferred use/designation is listed for most of the sites.	(Development sites are included within the above sections)

Informed by the Main Issues Report, Environmental Report and consultation responses, the WDLDP provides a framework for development and regeneration in West Dunbartonshire, excluding the area within the National Park, and focuses on specific main proposals for a period of up to 10 years from its adoption (programmed for late 2014). The plan will promote development in appropriate locations and identify where development should not take place. The timetable for producing the WDLDP is set out below.

### 2.3 Timescales for Local Development Plan and SEA preparation

The programme for the preparation of the WDLDP and Environmental Report is outlined in the Development Plan Scheme. The publication of a Main Issues Report (MIR) and Environmental Report was the first formal stage in the preparation of the WDLDP.

Table 2 – Timetable for WDLDP & SEA preparation

	WDLDP	SEA/
		Habitats Regulations Appraisal
March 2012	Publish Main Issues Report &	Publish Environmental Report
	Monitoring Statement	and submit to SEA Gateway.
12 weeks	CONSU	LTATION
	Consider representations.	Consider responses.
	Prepare Proposed Plan and	Environmentally appraise
	Action Programme.	Proposed Plan and undertake
		Habitat Regulations Assessment
		(HRA). Amend Environmental
		Report if necessary.
September 2013	Publish <b>Proposed Plan</b> and	Publish revised Environmental
	Proposed Action Programme.	Report and draft HRA. Submit
		Environmental Report to SEA
		Gateway
9 weeks	CONSULTATION	

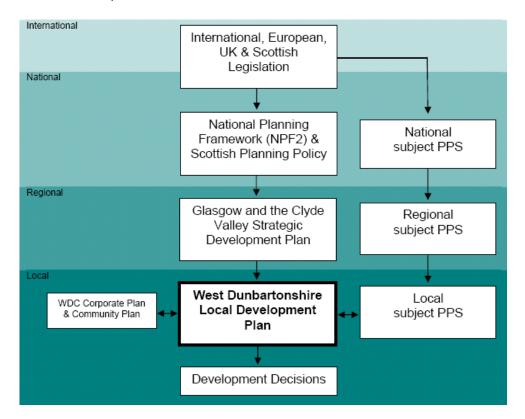
	WDLDP	SEA/
		Habitats Regulations Appraisal
	Consider representations.	Consider responses.
	Prepare Summary of	
	unresolved Issues and Report	
	of Conformity with	
	Participation Strategy.	
March 2014	Publish Modified <b>Proposed</b>	
	Plan	
6 weeks	CONSU	LTATION
	Consider representations.	
	Prepare Summary of	
	unresolved Issues and Report	
	of Conformity with	
	Participation Strategy.	
June 2014	Submit Proposed Plan, Action	Submit HRA record to Ministers
	Programme and Report of	
	Conformity to Scottish	
	Ministers. Advertise	
	submission of Plan.	
Summer/Autumn	<b>Examination</b> of Proposed Plan.	
2014	·	
Early 2015	Examination Report published	
, ,	and submitted to WDC.	
	WDC considers	Environmentally appraise
	recommendations and	modified plan if necessary.
	prepares Modifications,	,
	Proposed Plan as modified and	
	Statement of Explanation for	
	not accepting any	
	recommendations.	
	Publish <b>Modifications</b> and	Publish and send to Ministers
	Proposed Plan as modified.	revised Environmental Report
	Advertise intention to adopt	(and revised record of <b>HRA</b> ) if
	Plan.	required
	West Dunbartonshire Local	Publish Post-Adoption SEA
	<b>Development Plan</b> adopted by	Statement and submit to SEA
	WDC.	Gateway.
		- Catomay.

### 2.4 Relationship with other relevant plans, programmes and strategies

The WDLDP will sit within a hierarchy of other plans, programmes and strategies (PPS). Considering the relationship of the WDLDP to other PPS allows key environmental protection objectives to be identified for consideration during the preparation process.

Figure 1 identifies the place of WDLDP in the planning hierarchy and its relationship with other relevant national, regional and local PPS.

Figure 1 – Relationship with other relevant PPS:



Appendix A details the relevant PPS and associated environmental objectives considered as part of the SEA process. PPS above the national level have not been considered in detail primarily because it is assumed the environmental protection framework provided by European legislation has been transposed into national and regional plans, policies and guidance.

The <u>key</u> environmental objectives identified from the review of legislation, policies, plans and strategies are:

- Biodiversity: West Dunbartonshire Council has a duty under the Nature Conservation (Scotland) Act 2004 to further the conservation of biodiversity.
- Climate Change: The Climate Change (Scotland) Act 2009 sets a framework for the reduction of greenhouse gas emissions and a transition to a low carbon economy. The Act introduces a new duty for all public bodies to exercise their functions in a way that is best calculated to contribute towards greenhouse gas reduction targets of 42% by 2020 and 80% by 2050 and help deliver the Scottish Government's climate change adaptation programme.
- Flooding: The Flood Risk Management (Scotland) Act sets in place a statutory framework for delivering a sustainable and risk-based approach to managing flooding. West Dunbartonshire Council has a duty under the Act to exercise its functions with a view to managing and reducing flood risk and to promote sustainable flood risk management.

- Green Network: The Central Scotland Green Network (CSGN) is identified in the National Planning Framework for Scotland 2 as a strategic development priority. The WDLDP must contribute to the delivery of the CSGN and its objectives: creating a more attractive place to live, do business and visit; help to absorb CO<sup>2</sup>; enhance biodiversity; and promote active travel and healthier life styles.
- Other environmental objectives include: protecting the Outstanding Universal Value of the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site; sustainable waste management; and conserving the water environment.

### 2.5 Scoping of the environmental topics to be included in the assessment

A key part of the SEA process is identifying the environmental parameters (from Schedule 3 of the Act) that are likely to be affected by the guidance. Taking into consideration whether the environmental effects, both positive and negative, of the WDLDP are likely to be significant all the environmental parameters have been scoped into the assessment. Further detail is provided in the Scoping Report prepared in May 2011.

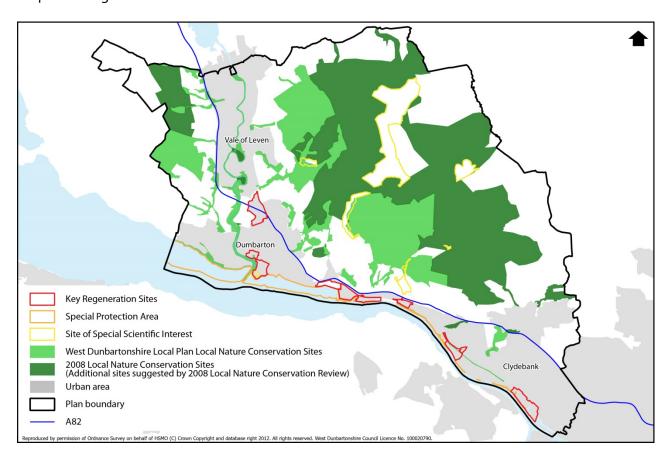
### 3. The Environment

### 3.1 Environmental Baseline and Issues

In order to establish the environmental effects of options outlined in the WDLDP it is necessary to understand the relevant aspects of the current state of the environment (the environmental baseline) and in particular any existing environmental problems and the characteristics of areas likely to be significantly affected. Baseline information has been gathered on aspects of the environment and the key environmental issues, problems and sensitivities of the WDLDP area can be summarised as follows:

Biodiversity, Flora & Fauna: Much of the northern shore line of the Inner Clyde estuary in the Plan area is designated as a Special Protection Area (SPA) under the EU Birds Directive. The Inner Clyde SPA contains extensive intertidal flats that support large numbers of wintering wildfowl, including an internationally important wintering population of redshank (Tringa totanus) which are the qualifying interest under the Directive. The site is also a Ramsar Site under the Ramsar Convention on Wetlands of International Importance. The conservation objectives of the Inner Clyde SPA are to avoid the deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained. Upstream of the River Leven, out with the plan area, the Endrick Water SAC is an important habitat for Atlantic salmon and River lamprey.

Map 2 - Designated Habitats

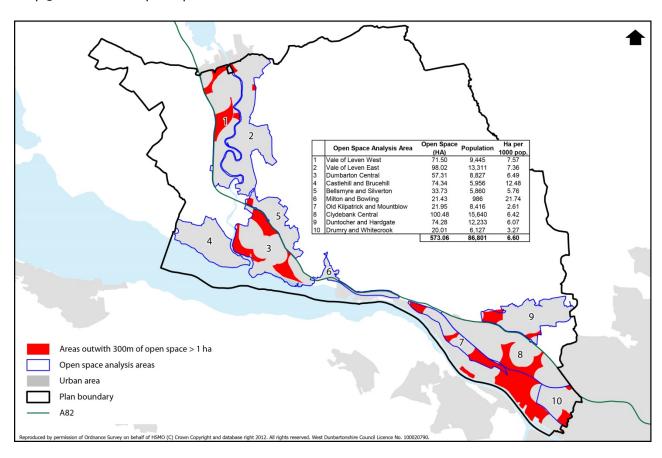


The Inner Clyde is also designated as a SSSI in addition to a further seven sites within the Plan area. The total area of the eight SSSI extends to 2010 ha and incorporates 17 separate notified natural features. 12 of these features are assessed as being in favourable condition, one unfavourable and recovering, two unfavourable and declining, while two are yet to be assessed (see Monitoring Statement for details).

An extensive network of locally important Local Nature Conservation Sites (LNCS) totalling approximately 460 ha has been identified and is partly recognised in the West Dunbartonshire Local Plan. The fragmentation of habitats has been identified as the main problem for wildlife at the landscape level, thus virtually all the significant areas of semi-natural habitats in West Dunbartonshire, including extensive moorlands to the east and west of the River Leven have been designated as LNCS so as to maintain a complete a network as possible (see Review of Local Nature Conservation Sites).

Population & Human Health: The environment provides a variety of services that are beneficial to human health including opportunities for education and recreation. Access to open space can help to promote healthier lifestyles having positive effects on both physical and mental health. Open space analysis (see Map 3 & Background Report to Main Issues Report) has shown that the majority of the population of West Dunbartonshire lives within 300 metres of an open space over 1 ha in size and that there is an average of 6.60 ha of open space per 1000 people.

Map 3 – Access to Open Space



Proximity to pollution, noise and other factors affecting amenity also influences human health. The Scottish Vacant and Derelict Land Survey 2011 identifies that 62% of the population in West Dunbartonshire lives within 500 metres of derelict land, the highest proportion of all local authorities in Scotland.

Soil: West Dunbartonshire's industrial past has left a legacy of vacant, derelict and contaminated land, with a number of large sites that have remained undeveloped for many years. The most recent survey of vacant and derelict land in Scotland recorded 198 ha of urban vacant and derelict land in West Dunbartonshire, split between 94 sites. Two sites in the area are notified under the Environmental Protection Act as being contaminated: the former Carless oil refinery in Old Kilpatrick and a site on Kilbowie Road.

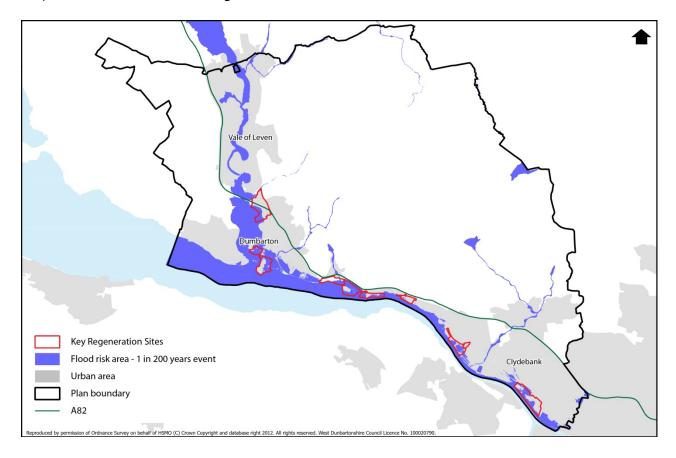
Carbon-rich soils within the Kilpatrick Hills are not only an important habitat but also function to reduce greenhouse gas emissions by taking in and locking up carbon.

Land Capability for Agriculture data from the MacAulay Land Use Research Institute shows there is no Class 1 or 2 agricultural land in West Dunbartonshire. Class 3 areas capable of producing a moderate range of crops, are potentially under development pressure, particularly where located on the urban edge.

Water: The nature of West Dunbartonshire's topography and urban form, alongside the Rivers Leven and Clyde, means the area is prone to **flooding** from these watercourses and their tributaries, including the Knowles and Gruggies Burns. Map 4 shows the areas of the Plan area likely to be affected by a 1 in 200 year flood event. One of the impacts of climate change is expected to be increased instances of flooding.

Fourteen water bodies within West Dunbartonshire come under the scope of the river basin management planning monitoring regime and have been assessed as to their water quality. Five of the six waterways are classified as poor or of poor ecological potential, including the River Leven; the Forth and Clyde Canal is classified as having good ecological potential; the Clyde Estuary is classified as moderate, while the Inner Clyde is classified as having moderate ecological potential. Further details can be found on the SEPA website.

Map 4 – Areas at risk of flooding



- Air: Monitoring carried out in West Dunbartonshire shows that national air quality objectives were met in 2010. No Air Quality Management Areas have been established in West Dunbartonshire. Road traffic represents the biggest threat to air quality in terms of both overall volume and at locations where traffic is stationary. Kilbowie Roundabout in Clydebank is identified as one of a number of locations where air quality standards may be exceeded due to traffic levels.
- Climatic Factors: The installed capacity for renewable energy in West Dunbartonshire is limited to approximately 3 MW at Auchincarroch landfill site. No information on greenhouse gas emissions at the local level or the effects of future climate change has been identified.
- Material Assets: The Green Network is identified as a particular asset likely to bring positive environmental effects related to a number of the environmental topics.

Auchincarroch Landfill site is an important asset with regard to the management of waste at a regional scale. It is one of a number of waste management sites in West Dunbartonshire.

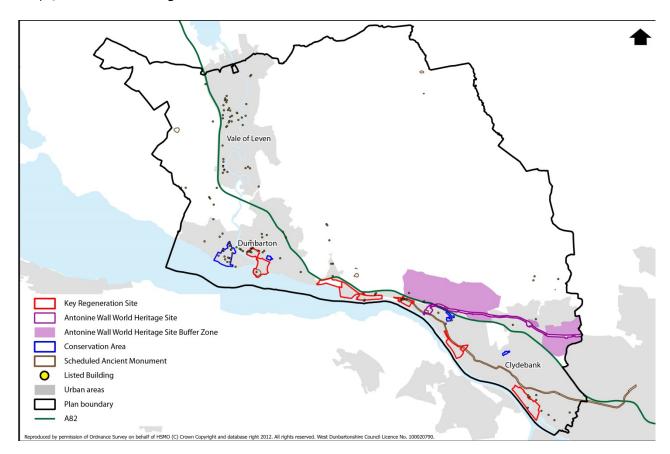
Cultural Heritage: In July 2008 the Antonine Wall was inscribed by UNESCO as a World Heritage Site, becoming an extension to the trans-national Frontiers of the Roman Empire World Heritage Site. While designation as a World Heritage Site confers no additional statutory protection, inscription recognises the international cultural and archaeological significance of the Antonine Wall. A Buffer Zone seeks to protect the setting of the Antonine Wall.

Dumbarton Castle and the Forth & Clyde Canal, including at Bowling Basin, are also designated as scheduled monuments along with six other sites in the Plan area.

The West Dunbartonshire Council area has sixteen Category A Listed Buildings, including Dumbarton Castle, the Titan Cantilever Crane, Denny Tank, Argyll Motor Works and a number of mansion houses. In total, there are over 140 listed buildings. Fifteen of these sites feature on the Buildings at Risk Register. Map 5 shows the spatial distribution of cultural heritage interests in West Dunbartonshire, including Conservation Areas.

Overtoun Estate appears on the Inventory of Gardens and Designed Landscapes and the area has a number of former estates with similar qualities.

Map 5 – Cultural heritage interests



Landscape: The scenic qualities of the Kilpatrick Hills have been recognised in previous Structure Plans through its designation as a 'Regional Scenic Area'.

The main **environmental problems** identified are chiefly focused along the Clyde corridor, where large areas of vacant, derelict and potentially contaminated land represent the Council's Key Regeneration Sites. These sites are, in parts, at risk of flooding risk and are adjacent to sensitive inter-tidal habitats. Flooding is also a problem along the River Leven, particularly to the south of the A82.

### 3.2 Likely future changes to the environment without the plan

The West Dunbartonshire Local Development Plan will provide a framework for decision-making, development and regeneration in West Dunbartonshire (excluding the area within the National Park) and focus on specific main proposals for a period of up to 10 years from its adoption in late 2014. The plan will promote development in appropriate locations, with due consideration to statutory obligations and factors that may be overlooked by market forces.

On adoption the WDLDP will replace the West Dunbartonshire Local Plan, which was adopted in March 2010 and looks forward to 2015. While the Local Plan will remain relevant beyond 2015, for example in the protection it affords to both natural and built heritage interests in the plan area, it will become increasingly out-of-date as it will not take account of changed circumstances and priorities, including emerging environmental objectives.

Changes to the environment without the WDLDP are therefore not likely to be significantly harmful as a development management and environmental protection regime will remain in place. However, there may be increasing pressure for unsustainable and inappropriate development that could be difficult to resist in the longer term and have consequential harmful effects on the environment. Furthermore, the positive potential of a 'new' Plan for West Dunbartonshire to deliver environmental improvements, for example through the Central Scotland Green Network, may not be realised without the WDLDP and the likely changes to the environment could be significantly less beneficial.

### 4. Assessment Approach and Method

#### 4.1 Assessment method

The Main Issues Report presents 30 'issues'. 26 of these issues include two or more options and in most instances a preferred option is indicated alongside 'reasonable alternatives'. All of the options presented in the MIR have been assessed. Issue 30 lists proposed development sites. 35 of these sites have been assessed, representing the 'new sites' not previously included and assessed in the Local Plan. The assessment has been carried out in three stages:

Stage 1: To streamline the environmental assessment process, all options were first 'screened' to identify those not likely to have significant environmental effects, taking into account the <u>SEA objectives</u> outlined in Table 2 and the baseline environmental data. Options considered unlikely to have a significant environmental impact on <u>all</u> of the SEA topics were not subject to further assessment. Under Issue 30, sites with planning permission were also excluded from further assessment.

Options assessed to have a likely significantly positive or negative environmental effect on one or more SEA topic advanced to Stage 2.

Stage 2: Each option assessed as likely to have a significant environmental impact at Stage 1 has been assessed in further detail, taking account of the <u>SEA criteria</u> listed in Table 2. The impact of each option and new development site upon each of the SEA topics has been considered and recorded as either a major or minor positive effect; a major or minor negative effect; a net neutral effect (positive and negative effects balanced) or unknown effects within an assessment matrix. Where an option is assessed as not likely to have a significant environmental impact on one-or-more of the SEA topics this has also been indicated.

An assessment as to whether any impact would be over the short, medium or long term and permanent or temporary has also been made and indicated within the table where relevant. The full assessment results, incorporating comments received from the Consultation Authorities during the consultation on the Main Issues Report, are shown in a revised matrix at Appendix B and the key findings are presented in Section 5.

Stage 3: This stage considered the policies and proposals (development sites) included in the Proposed Plan in relation to the assessment already carried out for the MIR. A

judgement has been made as to whether new material, that was not previously assessed and consulted upon as part of the MIR, is significant in the context of the whole plan and whether the likely environmental effect has been properly assessed.

This process is recorded at Appendix C.

Following receipt of the Examination Report in January 2015, each of the recommended modifications has been considered in respect of implications for SEA. The result of this process is set out in the Addendum to this report.

### 4.2 Assessment Framework

The following SEA objectives and criteria were employed as the basis against which the environmental effects of options included in the MIR and the policies and proposals of the Proposed Plan have been assessed. Development of the objectives and criteria has been informed by the review of relevant PPS and environmental objectives, the environmental baseline and taking account of comments from the consultation authorities:

Table 2 – SEA Framework

SEA TOPIC	SEA OBJECTIVE SEA CRITERIA	
Biodiversity, Flora & Fauna	To conserve and where possible restore and enhance biodiversity and accord to the protection of valued nature conservation habitats and species.	
	Will the proposal affect a designated (international, national or local) nature conservation site?	
	Will the proposal affect the connectivity of habitats?	
Population & Human Health	To improve the living environment for all communities and promote improved health of the human population.	
	Will the proposal affect access to open space?	
	Will the proposal affect residential amenity, including noise?	
Soil	To safeguard the quality soil resource, geodiversity, and improve soil where contaminated.	
	Will the proposal affect soil quality?	
	Will the proposal affect the diversity of geology, natural landforms and processes?	

Air	To manage and reduce flood risk and protect the water environment.  Will the proposal affect the ecological status of waterbodies?  Will the proposal affect areas within the flood plain?  To maintain and improve air quality.  Will the proposal affect travel patterns?
Climatic Factors	To reduced greenhouse gas emissions and contribute to the adaptation of the area to climate change.  Will the proposal affect carbon emissions?  Will the proposal contribute to the mitigation of and adaptation to climate change?
Material Assets	<ul> <li>To manage, maintain and promote efficient use of material assets.</li> <li>Will the proposal affect environmental resources, including minerals.</li> <li>Will the proposal affect the Green Network?</li> </ul>
Cultural Heritage	<ul> <li>To protect and, where appropriate, enhance or restore the historic environment.</li> <li>Will the proposal affect the OUV of the Antonine Wall World Heritage Site?</li> <li>Will the proposal affect any scheduled monuments or other important archaeological sites?</li> <li>Will the proposal affect any listed buildings or conservation areas?</li> <li>Will the proposal affect a site upon the Inventory of Gardens and Designed Landscapes?</li> </ul>
Landscape	To protect and enhance the character, diversity and unique qualities of the landscape.  Will the proposal affect the Kilpatrick Hills Regional Scenic Area?  Will the proposal affect the setting of an urban area?  Will the proposal lead to a change to landscape character?

### 4.3 Alternatives

The SEA process requires that the Environmental Report identifies, describes and evaluates the likely significant effects on the environment of implementing reasonable alternatives to the plan being assessed. As a statutory requirement there is no reasonable alternative to the WDLDP itself, however the MIR is required to contain one or more reasonable alternative sets of proposals.

The MIR represents the principal opportunity within the plan preparation process for engaging stakeholders on the content of the plan. At the MIR stage of the process the Council has not reached a firm view as to the WDLDP spatial strategy and site-specific proposals and as such all options presented in the MIR represent alternative approaches. While in most instances a preferred option has been identified (Option a), no such preferences have been expressed with regard to additional housing sites (Issue 17) and potential new stadium locations in Dumbarton (Issue 29).

The options which have been generated through the preparation of the MIR take account of pre-MIR consultation, the environmental baseline and number of policy and strategy documents (see Background Report: Context and Strategy) and are intended to represent approaches which are realistic, deliverable, consistent with other aspects of the plan, and consistent with higher-level plans and polices such as the Strategic Development Plan and national planning policy.

The assessment of these options (Section 5) and consultation responses to this Environmental Report have influenced the options taken forward to the Proposed Plan, which represents the settled view of the Council.

### 5. Assessment Findings

### 5.1 Summary of results

This section seeks to summarise the key findings from the assessment of options in the MIR and the Proposed Plan policies and proposals. The full assessment results are included at Appendix B (MIR) and Appendix C (Proposed Plan). The results are summarised below by SEA topic:

Biodiversity, Flora & Fauna: The most prevalent environment effect upon biodiversity identified through the assessment is a likely major negative effect upon the Inner Clyde SPA. Development of Key Regeneration Sites at Dumbarton Waterfront, Esso Bowling, Carless, and Queens Quay would all impact upon the SPA. These effects are assessed as being temporary and short-term, relating to the construction period and would not lead to the habitat being directly lost. At Esso Bowling (Option 3a), an additional longer term impact upon the SPA is noted due the extent of the habitat at this location and the potential impact of sea level rise. Further assessment of impacts upon the SPA and the identification of mitigation measures will be carried out through a Habitats Regulations Appraisal (see Section 7.2).

It is assessed that the Lomond Canal (Issue 7) would have potentially major negative environment effects on biodiversity, taking account of the River Leven and important habitats upstream, notably the Endrick Water SAC.

With the exception of the options noted above, other options presented in the MIR (preferred and alternative) generally would not have a significant effect upon designated nature conservation sites and the connectivity of habitats.

- Population & Human Health: The assessment of the effects of MIR options upon population and human health focused on access to open space and residential amenity. Town centre retail development included within Options 5b at Queens Quay and the Options associated with Issues 12 15 are assessed as having minor negative effects arising from increased traffic and noise. Positive effects are envisaged arising from the Lomond Canal, options concerning the Green Network (Issue 18) and Open Space (Issue 19), Fastlink and the provision of a new football stadium complex in Dumbarton (Issue 29) which would potentially improve the availability, accessibility and quality of sporting facilities in the area.
- Soil: Many of the options identified are assessed as likely to have a positive effect on soils through the remediation of contaminated sites. This applies to the Key Regeneration Sites at Dumbarton Waterfront, Esso Bowling, Carless, and Queens Quay. No negative effects have been identified.
- Water: A number of options are identified as likely to have major negative effects in respect to managing and reducing flood risk, with a number of development sites, including the Key Regeneration Sites (see also Map 4) falling within areas at risk of a 1 in 200 year flood event. The impact of the Lomond Canal upon this environmental parameter is judged to be neutral, with potential benefits in terms of managing flood risked balanced with impacts on the ecological status of the River Leven.
- Air: Options which would result in significant increased levels of traffic, including where major road infrastructure works are required have been assessed as likely to have a negative effect on air quality. These options include at Esso Bowling (Issue 3), Carless (Issue 4), and the options associated with the Town Centre Issues (Issue 12 15). The MIR includes options relating to Fastlink (Issue 26) and the Kilbowie Roundabout (Issue 27) that would bring about positive environmental effects on air quality.
- Climatic Factors: In similar terms to the environmental parameter above, options that would increase levels of traffic have been assessed as likely to have a negative effect upon the objective of reducing greenhouse gas emissions.
- Material Assets: The assessment has identified few effects of a significant nature on the objective of managing, maintaining and promoting material assets, including the Green Network.

- Cultural Heritage: No negative environmental effects upon the historic environment are predicted by the assessment with the exception of two development sites identified under Issue 30 (Carleith and Great Western Road). This relates to their proximity to the Antonine Wall WHS. Some minor positive effects are identified in Dumbarton (Issue 2 & 15) where options would improve the setting of Dumbarton Castle and other listed buildings including the Old Academy Buildings.
- Landscape: Negative impacts upon landscape identified by the assessment are restricted to green field sites (Option 17a and Issue 30), at Esso Bowling (Issue 3) and the Lomond Canal (Issue 7) where development would affect the setting of the urban area. Options with likely positive impacts upon landscape identified include 22a and 22b by designation of a local landscape area.

### 5.2 Mitigation [whole section revised]

An important role of the Strategic Environmental Assessment is to identify measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. The overall approach to mitigation is based on the following hierarchy:



In the first instance the WDLDP seeks to avoid significant adverse effects on the environment. Primarily, this has been achieved by altering or changing the policy or site-specific proposal causing the negative effect, for example by not identifying a particular site as a development opportunity. Where this is not practicable, the provisions of the Plan seek to reduce, remedy and, as the last resort, compensate any adverse effects. Site-specific proposals for mitigation should be informed by appropriate survey material at the pre-application or application stage.

Drafting the Proposed Plan has been an iterative process, and environmental protection has been a key consideration throughout. Environmental safeguards are built into the plan in the form of specific policies relating to our environmental assets and requirements associated with Our Changing Places and development sites. Specific mitigation measures which have been included in the plan are listed below:

- Biodiversity, Flora & Fauna
  - The Proposed Plan states that all sites identified by the HRA as likely to have a significant effect upon a Natura 2000 sites (the Inner Clyde SPA or Endrick

- Water SAC) must be accompanied by an expert appraisal to inform a project level HRA.
- o Green infrastructure uses are proposed for the western end of the Esso Bowling site to provide a buffer between development and the sensitive intertidal areas which form part of the SPA.
- o Land to the east of the Esso Bowling site is not identified for development as was the preferred option in the MIR.
- o Habitat improvement and management will be required on non-developable parts of the Lomondgate Area 5 site.

### Population & Human Health

o Walking and cycling routes will be required at a number of sites.

### Water

- o For development sites where flood risk has been identified as a negative environmental effect, a Flood Risk Assessment will be required to demonstrate that no development is at risk of flooding or will cause flooding elsewhere.
- o Buildings on the Queens Quay site within the 1:200 year flood area will be expected to be 'designed appropriately' to protect them from flood risk.
- o Land to the east of the Esso Bowling site is not identified for development as was the preferred option in the MIR.

#### Air

 The plan states that on larger sites currently not served by public transport (Carless, Esso Bowling & Scott's Yard, and Lomondgate Area 5) financial contributions may be required to support bus operations.

#### Material Assets

 An 'Integrating Green Infrastructure' approach to masterplanning is strongly supported on the Bowling Basins site, and other sites, to protect and enhance the green network.

### Cultural Heritage

- Development at Sandpoint Marina must be accompanied with a design statement reflecting the proximity of the site to Dumbarton Castle.
- o Development at Rosebery Place must be accompanied with a design statement reflecting the proximity of the site to the Forth & Clyde Canal.
- o Proposals for development at Carleith and Great Western Road have been rejected to their impact on the Antonine Wall World Heritage Site.

### Landscape

 Structural planting to provide a strong green belt boundary will be required at green field release sites (Stirling Road, Lomondgate Area 5 and Duntiglennan Fields).

Mitigation of the significant adverse effects of the plan upon the Inner Clyde SPA has been developed through a Habitats Regulations Appraisal.

### 6. Monitoring

Following the adoption of the WDLDP, the Council as Responsible Authority is required to monitor the significant environmental effects of the implementation of the Plan in accordance with Section 19 of the Act. The monitoring should enable the identification of significant environmental effects arising from the implementation of the plan and any unforeseen effects, in order to allow remedial action to be taken where required.

The Planning etc. (Scotland) Act 2006 requires local planning authorities to prepare a Monitoring Statement, to be published alongside the MIR, focusing on the wider impact of the plan. It is intended that the monitoring requirements for the SEA and development plan will be integrated, with the Monitoring Statement for the next local development plan reporting on the significant environmental effects of the implementation of the WDLDP. This will inform the identification of Issues for the plan making process.

The specific measures that are to be taken to monitor the significant environmental effects of the implementation of the WDLDP – and included within future Monitoring Statements – will form part of the post-adoption statement prepared as soon as reasonably practicable after the adoption of the WDLDP in accordance with Section 18 of the Act. It is envisaged that the following indicators will be included within the monitoring framework:

Table 3 - Monitoring Indicators

SEA Topic	Indicator	Source
Biodiversity, Flora & Fauna	Proportion of notified features of protected nature sites (SSSI & SPA) in favourable condition.	SNH
	Extent of LNCS where integrity of the interest feature(s) is not adequately maintained as a result of new development.	WDC (Planning applications monitoring)
Population & Human Health	Access to Open Space — % of population within 300m of 1ha of open space/Usable open space per 1000 residents	WDC
	Proximity to vacant and derelict land - % of population within 500m	SVDLS
Soil	Area of land designated as contaminated	WDC

Water	Ecological status of water bodies	SEPA
	Proportion of development within land at risk of flooding	WDC
Air	NO2 and PM10	WDC (Air Quality
	Concentration	Monitoring)
	Traffic levels (tbc)	WDC
Climatic Factors	Installed renewable energy	WDC (Planning
	capacity (MW)	applications monitoring)
Material Assets	Proportion of new	WDC
	developments enhancing	
	the Green Network (in	
	according with standards	
	to be developed as part of	
	Supplementary Guidance)	
Cultural Heritage	Change in number of buildings at risk	RCHAMS
	Number of planning	WDC/Historic Scotland
	applications consented	-,
	where adverse impacts on	
	noted built heritage assets	
	are predicted.	
Landscape	Number of developments	WDC
	failing to protect or	
	enhance the special	
	qualities of the Kilpatrick Hills	
Other	Proportion of development	WDC (Planning
	built on brownfield sites	applications monitoring)

### 7. Next Steps

As per Section 18(2) of the Environmental Assessment (Scotland) Act 2005, following adoption of the Local Development Plan, the Council will prepare and publish a post-adoption statement. This will confirm how the findings of the Environmental Report have helped to shape the Plan and will give consultees a final opportunity to comment informally on arrangements for monitoring.

### 7.1 Supplementary Guidance

Supplementary Guidance on the following areas is proposed:

Dumbarton Town Centre and Waterfront Strategy – LDP reference: Our Changing Places

This guidance will set out a land use and design framework for key sites in Dumbarton town centre and waterfront, along with actions for improving the town centre.

- The guidance will provide more detailed mapping of the green network; identify key locations and projects for its enhancement; and establish general principles for green network delivery across West Dunbartonshire, including through the Integrating Green Infrastructure approach to designing new development. Standard for open space provision will be a key element of the guidance.
- Kilpatrick Hills LDP reference: Policy Our Changing Places & Policy GN<sub>4</sub>
  The purpose of the guidance is to set a framework for the protection and enhancement of the Kilpatrick Hill's special qualities, which are described in the Statement of Importance.
- Renewable Energy LDP reference: Policy DS5
  The purpose of this guidance is to expand upon the criteria-based policy DS5.
- Heat Mapping LDP reference: Renewable Heat section
  If deemed necessary, guidance will be brought forward identifying sources of renewable or surplus heat, potential users and details on the provision of networks to provide renewable heat to new and existing development.
- Flooding-LDP reference: Policy DS6 Guidance will promote sustainable approaches to water and flood risk management, including sustainable drainage schemes (SuDS).
- Residential Development: Principles of Good Design LDP reference: Policy BC1 & 2 Applies to housing developments over 3 units and seeks to inform developers of the standards of required and the criteria used by planners to assess applications.
- Forestry, Woodland and Trees LDP reference: Policy GN5

  This guidance will provide a framework for the expansion and management of woodland and forestry, tree felling and the protection of trees that are important in terms of amenity, including during development.
- Antonine Wall LDP reference: Policy BH1
  Existing Supplementary Planning Guidance adopted in October 2011. SEA has been carried out for this document.

Supplementary Guidance provides further information and detail in respect of policies and proposals set out in the LDP and assessed by this SEA. The policy or section of the LDP that each piece of supplementary guidance relates to is noted above. The requirement for further assessment under the provisions of the Environmental Assessment (Scotland) Act will be considered during the preparation of the guidance.

### 7.2 Habitats Regulations Appraisal

Article 6(3) of the EC Habitats Directive requires that any plan, which is not directly connected with or necessary to the management of a European site, but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, shall be subject to an 'appropriate assessment' of its implications for the European site in view of the site's conservation objectives.

A Habitats Regulations Appraisal (HRA) has been carried out for the WDLDP, considering its effect on the Inner Clyde SPA and Endrick Water SAC.

SNH have produced guidance on the Habitats Regulations Appraisal of plans which outlines a thirteen stage appraisal process. The appraisal has been carried in line with the SNH guidance and a draft record incorporating a determination of the likely significant effects has been published for consultation. The HRA will be submitted to Scottish Ministers alongside the Plan.

**Appendix A** – Relevant legislation, PPS and environmental objectives

Legislation & Plans, Programmes or Strategies SEA Topic	Summary of Environmental Objectives
Biodiversity, Flora & Fauna	
EU Birds Directive & EU Habitats Directive	The Habitats Regulations transpose the provisions of the EU Habitats and Birds Directives into Scottish Law and require that local development plans are subject to an appropriate assessment of their implications for Natura sites.
Nature Conservation (Scotland) Act 2004	To conserve biodiversity and protect the nation's precious natural heritage. Implementation is linked to the national biodiversity strategy.
Convention on Biological Diversity  UK Biodiversity Action Plan/ Scotland's Biodiversity – It's In Your Hands.  Unbartonshire Local Biodiversity Action Plan	Conserve species and habitats in Dunbartonshire that are considered vulnerable or threatened on a local or national basis, and in turn contribute to the conservation of our global biodiversity; promote awareness of local natural resources; promote community engagement in, and ownership of, the practical conservation of natural resources; and promote the sustainable and wise use of resources.
Population & Human Health	
Land Reform (Scotland) Act 2003  ↓  West Dunbartonshire Core Paths Plan	Establishes the statutory rights of access to land and inland water for outdoor recreation. Prepared under the Act, the Core Paths Plan provides a system of path in West Dunbartonshire which, as a whole, gives the public reasonable access throughout the plan area.
Soil	

### Scottish Soil Framework (2009) To promote the sustainable management and protection of soils consistent with the economic, social and environmental needs of Scotland, achieved through targeted activities including reducing soil erosion; greenhouse gas emissions from soil; and contamination. Water To prevent deterioration in the status of the EU Water Framework Directive water environment, including rivers, lochs, Water Environment and Water Services estuaries, coastal waters and groundwaters (Scotland) Act 2003 (WEWS) Act and protect, enhance and restore all surface water bodies to 'good' status. Scotland River Basin Management Plan (2009)The area management plan supplements the river basin management plan (RBMP) for the Clyde Area Management Plan Scotland river basin district in the delivery of Water Framework Directive requirements. To reduce and manage the risks that floods **EU Floods Directive** pose to human health, the environment, Flood Risk Management (Scotland) Act cultural heritage and economic activity 2009 through improved assessment and the sustainable and coordinated management of flood risk. The Act imposes a new duty on local authorities to exercise their flood risk related

functions with a view to reducing overall flood risk and establishes the requirement to prepare plans to manage flood risk which will provide a framework for coordinating actions across catchments to deal with all

forms of flooding and its impacts.

EU Marine Strategy Framework Directive (MSFD)

 $\downarrow$ 

Marine (Scotland) Act 2010

Firth of Clyde Marine Spatial Plan (FoCMSP)

Aims to achieve good environmental status of the EU's marine waters by 2020 and to protect the resource base upon which marine-related economic and social activities depend. The Marine (Scotland) Act transposes the Directive into Scots law and makes provision for a new statutory marine planning system to sustainably manage demands on the marine environment. The FoCMSP is a forerunner to these statutory plans.

#### Air

EU Air Quality Directive

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) Air quality targets have been set at the European and UK levels. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets objectives for Particulate Matter (PM), oxides of nitrogen (NOx), sulphur dioxide (SO<sub>2</sub>) and ozone (O<sub>3</sub>) amongst others.

### **Climatic Factors**

Climate Change (Scotland) Act 2009



Land Use Strategy : Getting the best from our land

The Act introduces a new duty on the Council (and all public bodies) to exercise their functions in a way that is best calculated to contribute towards the greenhouse gas reduction targets of reducing emissions by at least 80 per cent by 2050.

A national land-use strategy has been prepared under the Act. This identifies key principles for the sustainable use of land, including: encouraging land uses which deliver multiple benefits; land highly suitable for primary uses should be recognised in decision-making; and examining options for restoring derelict or vacant land should be a priority.

### **Material Assets**

Scottish Forestry Strategy 2006	Environmental objectives include reducing the impact of climate change; make access to and enjoyment of woodlands easier for all to improve health; protect the environmental quality of our natural resources; and help to maintain, restore and enhance Scotland's biodiversity.
Zero Waste Plan	To achieve a zero waste Scotland, where we make the most efficient use of resources by minimising Scotland's demand on primary resources, and maximising the reuse, recycling and recovery of resources instead of treating them as waste.
Cultural Heritage	
Scottish Historic Environment Policy (SHEP)	The three key outcomes presented in the Policy are that the historic environment is cared for, protected and enhanced for the benefit of our own and future generations; greater economic benefits from the historic environment; and that the people of Scotland and visitors to our country value, understand and enjoy the historic environment.
Antonine Wall Management Plan	Seeks to establish the management requirements and policies needed to meet the requirements for the long term protection and conservation of the World Heritage Site.
Landscape	
European Landscape Convention	To promote the protection, management and planning of all landscapes, including natural, managed, urban and peri-urban areas, and special, everyday and also degraded landscape.
Other Relevant PPS	

National Planning Framework 2 (2009)	The National Planning Framework 2 aims to guide Scotland's development to 2030 and sets out strategic development priorities to support the Government's goal of sustainable economic growth. The Framework will play a key role in coordinating policies with a spatial dimension and will help move Scotland towards a low carbon economy.
Scottish Planning Policy	The SPP sets out the Scottish Government's planning policy on nationally important land-use planning matters. This places planning within the wider context of the Scottish Government's overarching aim to increase sustainable economic growth.
Glasgow and the Clyde Valley Strategic Development Plan	To continue the regeneration and transformation of the city region's urban areas, whilst securing positive action on the natural environment; minimising the development and carbon footprints of the city-region, meeting climate change targets and supporting a drive to a low-carbon economy.
Our West Dunbartonshire Community Plan 2007 — 2017	The Community Plan sets out a vision for West Dunbartonshire which includes protecting the natural environment.
West Dunbartonshire Council Strategic Plan 2012 - 2017	The Council's Vision is of a prosperous West Dunbartonshire recognised as a dynamic area within a successful Scotland. The priorities of the Council are to improve economic growth and employability; life chances for children and young people; care for and promote independence with older people; local housing and environmentally sustainable infrastructure and the wellbeing of communities and protect the welfare of vulnerable people.

# **Appendix B** – Full assessment results

# Key to assessment tables:

Major positive effect(s)	<b>^</b>
Minor positive effect(s)	<b>^</b>
Major negative effect(s)	-
Minor negative effect(s)	lacksquare
Net Neutral effect	<b>←→</b>
Unknown	?
Scoped out of assessment	X
(no significant effect)	

Long term effect(s)	L
Medium term effect(s)	M
Short term effect(s)	S

Temporary effect(s)	Т
Permanent effect(s)	Р

Site with Planning Permission	
Revised/new assessment	
Assessed at MIR stage	

Issue 2 – Dumbarton Waterfront	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 2a</b> Revised Dumbarton Waterfront Design Framework adopted as SPG.	?	?	?	?	?	?	?	?	?
<b>Option 2b</b> Existing Dumbarton Waterfront Design Framework retained as indicating the preferred land uses and design framework.	<b>↓</b> ST	<b>↑</b> M	<b>↑</b> M	<b>↓</b> ↓ P	X	X	X	↑ M	<b>↑</b> M
<b>Option 2c</b> Withdraw the Dumbarton Waterfront Design Framework. Establish preferred land uses for individual sites / assess applications on a site-by-site basis.	?	?	?	?	?	?	?	?	?

The current Dumbarton Waterfront Design Guide, specifically the development of identified key sites, is assessed as having both positive and negative environmental impacts. The Design Guide seeks to enhance the setting of Dumbarton Castle and the urban environment but may have negative impacts on the Inner Clyde SPA and flood risk.

A revised Design Guide (Option 2a) or the withdrawal of the Guide all together (Option 2c) would have uncertain environmental effects.

#### Conclusion:

The Dumbarton Waterfront Design Guide seeks to enhance the setting of Dumbarton Castle and the urban environment but the development of key sites would also have negative environmental impacts, relating to flood risk and the Inner Clyde SPA. A revised Design Guide (Option 2a) or the withdrawal of the Guide all together (Option 2c) would have uncertain environmental effects.

Issue 3 – Esso Bowling	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 3a</b> Extend the developable area of the Esso Bowling site to include land to the west up to Dumbuck junction but south of the A82.	<b>↓</b> ST ( <b>↓↓</b> L)	X	<b>←→</b>	<b>↓</b> ↓ L	ΨL	ΨL	<b>V</b> P	?	<b>↓↓</b> P
Option 3b Limit the developable area of the Esso Bowling site to that shown in the West Dunbartonshire Local Plan.	VST	X	ΛP	<b>↓</b> ↓ L	ΨL	↓L	₩P	?	Ų₽

Any impact on population and human health has been scoped out for both options, as neither will have a significant effect on residential amenity, open space or core paths. Both options are likely to have a negative effect on biodiversity, in particular disruption to the Inner Clyde SPA during construction. The extension site has potential for longer term damage due to the extent of the habitat at this location and the potential impact of sea level rise. Given the scale of development proposed, there will also be a negative impact on air quality and carbon emissions. Both options will result in development on the flood plain, and will have a negative impact on the landscape character and green network, with Option 3a in particular extending the urban area into currently an open landscape.

Remediation of contaminated land will have a positive effect on soil quality, however, Option 3a could see extensive in-filling to raise the extended site above flood levels. This would bury semi-natural soils, including wetlands. A net neutral impact on Soil is therefore predicted for this option.

The impact upon the main cultural heritage feature, Dunglass Castle assessed as unknown.

#### Conclusion:

Both of these options will have a number of negative environmental impacts related to increasing the level of development at this location, particularly on the water environment because the land is within the flood plain.

Option 3a is assessed as having greater negative impacts in the long-term, arising from potential effects to the ecological status of the Inner Clyde.

Issue 4 – Carless	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 4a</b> Extend the site to include open space to north and west to facilitate access to the site.	<b>↓</b> ST	Х	<b>↑↑</b> P	<b>↓</b> ↓ L	ΨL	ΨL	↑ P	ΨL	Х
<b>Option 4b</b> Retain site boundary as currently designated within the West Dunbartonshire Local Plan.	VST	Х	<b>↑</b> ↑ P	<b>↓</b> ↓ L	ΨL	ΨL	Х	ΨL	Х

The former oil terminal at Carless is a site with a number of environmental sensitivities relating to its location next to the River Clyde and Forth & Clyde Canal and its previous use. As with all riverside sites, there is potential for negative impacts upon the Inner Clyde SPA, particularly during construction. This is in addition to the impact development may have on a locally important wildlife corridor which runs through the site. Any redevelopment will require extensive remediation to remove contaminants which will have a positive impact on soil quality and also on the ecological status of the River Clyde, however the site is within the flood plain of the River. The scale of development is likely to significantly increase traffic movement, leading to negative impacts on air quality and carbon emissions along the already busy Dumbarton Road corridor. Although the site is used informally for recreation, population and human health has been scoped out of the assessment as no significant impacts are envisaged, as have material assets and landscape.

The site currently has limited green network value and development may result in a positive contribution in this regard. Development is likely to require a second access, crossing over the Forth & Clyde Canal, a scheduled monument. The West Dunbartonshire Local Plan previously proposed this (Schedule T<sub>3</sub>). Option 4a would increase the size of the Carless site identified for development, incorporating the site of second access and crossing. The new crossing could have an indirect, and possibly direct, impact on the scheduled monument.

#### Conclusion:

The extension of the development opportunity at Carless (Option 4a) is not expected to have additional significant negative or positive environmental impacts when compared to the site as identified in the West Dunbartonshire Local Plan.

<u>Issue 5 – Queens Quay</u>	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 5a</b> The regeneration of the site should be housing-led	<b>↓</b> ST	Χ	↑P	<b>↓</b> ↓ L	X	<b>4</b>	<b>↑</b> P	X	X
<b>Option 5b</b> A more mixed use approach should be promoted, including retail and commercial leisure uses	<b>↓</b> ST	Ψ	ΛP	<b>↓</b> ↓ L	ΨL	<b>+</b>	ΛP	Х	Х

Any development on Queens Quay is likely to result in disruption to the Inner Clyde SPA (biodiversity), will be within the flood plain (water) and will increase carbon emissions (climatic factors). If the majority of the site is developed for housing, this is less likely to have an adverse impact on adjacent residential amenity (Population and Health) and travel patterns (air quality). Conversely, a major foodstore would be likely to create greater disturbance to adjacent residential areas and cause travel patterns more likely to reduce air quality. Development of the site will be positive for soil quality, with the site currently understood to contain contaminates.

The site currently has limited value to the green network. Development could bring positive benefits in terms of access, provision of open space and other Green Network enhancements.

No significant impact is predicted upon the setting of the urban area (landscape) and cultural heritage interests including the Titan Crane, although the detailed site development designs will be important.

#### Conclusion:

Both these options will result in some negative environmental impact, particularly on the water environment as part of the site falls within the floodplain. However, Option 5a is likely to have a lesser negative environmental impact than Option 5b which could include a major foodstore on part of the site. This would have a greater impact on residential amenity and air quality.

Issue 7 – Lomond Canal	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 7a Conditional support for Lomond Canal subject to full consideration of its environmental impact. Proposals affecting route of the Canal assessed in terms of economic impact and implications for canal being developed.	<b>↓↓</b> ₽	↑P	Х	?	Х	<b>↑</b> ∟	↑P	Х	<b>V</b> P
Option 7b Full support for proposed Lomond Canal, identification and safeguarding of proposed route.	<b>↓</b> ↓ P	↑P	Х	?	Х	ΛL	ΛP	Х	₩P
<b>Option 7c</b> The proposals for the Lomond Canal should not be included in the WDLDP.	X	X	X	X	X	X	X	X	X

Option 7c has been scoped out of the SEA as it would mean the exclusion of the Lomond Canal proposal from the WDLDP. Therefore there would be no significant environmental impact. No significant impacts are expected upon soil, air or cultural heritage resources.

Options 7a and 7b would support the Lomond Canal proposal, but to different degrees. The environmental impacts of the options are considered to be the same as they both promote the development of the Canal. The greatest concern with regard to the options 6a and 6b is the potential impact on biodiversity. The River Leven and its environs form a network of Local Nature Conservation Sites which could be adversely impacted upon by the construction of the Canal and its long term presence. The river is also links important habitats upstream including the Endrick Water SAC to the sea. The impact on the human population and material assets is considered to be positive owing to the creation of a recreational and open space resource.

The impact on the water environment itself is uncertain. The scheme is potentially adversely significant, but with potential flood management benefits which would also be positive in relation to how the plan area adapts to climate change.

The proposed Canal would change the landscape permanently introducing hard engineering, but not impacting on any designated resource.

#### Conclusion:

Option 7c has no significant environmental impact.

The proposed Canal will have significant environmental impacts particularly on biodiversity and the assessment of options 7a and 7b reflect this. There is a potential adverse impact on the water environment, but also an opportunity to improve water management. Any firm proposals for the Canal would require to be accompanied by an EIA.

Issue 8 – Lomondgate and Vale of Leven Industrial Estate	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 8a</b> The SEIL should be designated around Lomondgate <u>and</u> the Vale of Leven Industrial Estate with a mix of the defined key sectors and other employment-generating uses allowed in these locations.	Х	Х	Х	Х	Х	Х	Х	х	Х
<b>Option 8b</b> Lomondgate should be identified as the SEIL opportunity and reserved for the key sectors. The VoLIE should continue to be designated as a local industrial and business area.	Х	Х	Х	Х	Х	Х	Х	Х	Х

The Issue primarily concerns they strategic status of Lomondgate and the Vale of Leven Industrial Estate and the specific industrial and business uses that may be permitted by the Local Development Plan. No changes are proposed to the extent of the development opportunity sites. In this context it has been assessed that the options in themselves would not have a significant environmental impact and have been scoped out of the assessment.

### Conclusion:

The options are assessed as not likely to have a significant environmental impact.

Issue 9 – Clydebank Riverside	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 9a All land along the River Clyde in Clydebank from Rothesay Dock to Carless should be included within the SEIL designation with the key sectors promoted within this area alongside other planned uses.	Х	Х	Х	Х	Х	Х	X	×	X
Option 9b Clydebank Riverside should be specifically defined as one or more of the following locations:  • Clyde Gate • Carless • Rothseay Dock West	X	Х	Х	X	Х	X	Х	Х	Х

The Issue primarily concerns they strategic status of development sites along the River Clyde in Clydebank and the specific uses that may be permitted by the Local Development Plan. No changes are proposed to the extent of the development opportunity sites. In this context it has been assessed that the options in themselves would not have a significant environmental impact and have been scoped out of the assessment, however, it is acknowledged that all development along the River Clyde must considered in respect to the sensitivities of the Inner Clyde SPA.

#### Conclusion:

The options are assessed as not likely to have a significant environmental impact.

Issue 10 — Land for new and expanding businesses	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 9a Increase the supply of land identified to ensure at least a 10 year supply of land for industry and business over the Plan period.	X	X	X	X	X	X	X	X	Х
<b>Option 9b</b> The current supply of land for industry and business is sufficient.	X	X	X	X	X	X	X	X	Х

This issue concerns whether or not to increase the amount of land designated for industrial and business use. It has been assessed that the options themselves would not have a significant environmental impact and have been scoped out of the assessment. New industrial sites may have associated environmental impacts but these would be assessed on a site-by-site basis.

### Conclusion:

No significant environmental impacts are envisaged arising from either option.

Issue 11 — Non-industrial uses within industrial and business use areas	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 11a</b> Existing industrial and business areas should be categorised according to the type and extent of non-business and industrial uses appropriate within that location.	X	X	X	X	X	X	X	Х	Х
<b>Option 11b</b> Flexibility across all industrial and business areas for commercial uses with the exception of town centre uses.	X	X	X	X	X	X	X	X	Х
<b>Option 11c</b> A presumption against non- business, industrial or storage and distribution uses in existing industrial and business areas.	X	X	X	X	X	X	X	X	Х

This issue primarily concerns the use of industrial units within established industrial and business areas, although there may be instances where new build development is also proposed. While there may be some implications for traffic flows at a local level, the spatial impact of the options and any resultant impact on the environment is assessed as not significant.

### Conclusion:

No significant environmental impacts are envisaged arising from the options presented.

Issue 12 — Network of Centres	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 12a</b> Town centre focus with expressed roles and functions.	X	X	X	X	X	X	X	?	X
Option 12b No specific role and function identified for each of the three town centres, plus no goods type or unit size restrictions in Edge of Centre Commercial Centres.  Retail developments opportunities identified out with town centres plus wider range of centres/shops identified	X	¥L	X	X	ΨL	¥L	Х	?	X

The issue concerns the distribution of retail uses and other services in West Dunbartonshire and the role and function of town centres and other mostly commercial areas. No significant environmental impacts are envisaged in respect to biodiversity, soil, water, material assets, cultural heritage or landscape as a result of the policy approaches outlined in the two options. The impact upon cultural heritage is uncertain and relates to a number of listed buildings within the identified town centres, including the Argyll Motor Works in Alexandria and Old Academy Buildings in Dumbarton.

The environmental impacts predicted mainly concern resultant travel patters and the consequential impact on human health, air quality and carbon emissions. As town centres are the most accessible locations, best served by public transport, it is assessed that Option 12a will not have a significantly negative effect on human health, air quality and carbon emissions, however it is unlikely to have a significantly positive effect. A less strict approach to new retail and service uses in less assessable places may result in increased private car use, with minor negative effects.

#### Conclusion:

Option 12b may result in more private car journeys as development is located in less accessible locations rather than town centres. This would bring significant negative environmental impacts associated with air quality and carbon emissions. No significant impacts expected to arise from Option 12a.

Issue 13 - Alexandria Town Centre	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<ul> <li>Option 13a New town centre strategy incorporating:         <ul> <li>Consolidated Town Centre boundary;</li> <li>A new foodstore within Mitchell Way;</li> <li>Residential development on the Leven Cottage and Kippen Dairy sites;</li> <li>Mixed use redevelopment along the south side of Bank Street;</li> </ul> </li> </ul>	Х	Ψ	Х	Х	<b>y</b>	•	Х	Х	Х
<b>Option 13b</b> Retain existing town centre boundary.	Х	Ψ	X	X	Ψ	Ψ	X	X	X

Many SEA topics have been scoped out due to the town centre location of the proposed strategy, with no implications for open space/the green network. Both Option 12a and 12b are likely to have minor negative impacts arising from the proposed foodstore and potential mixed-use redevelopment site relating to noise and traffic with a potential increase in carbon emissions.

### Conclusion:

Both options may have some minor negative environmental impacts on residential amenity, travel patterns, air quality and carbon emissions due to development opportunities within the town centre including a food store opportunity. No differences in environmental impact are envisaged between the two options.

Issue 14 – Clydebank Town	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 14a Implement Town Centre strategy incorporating no change to town centre boundary; areas identified as preferred for retail use and mixed/commercial uses;	X	<b>Ψ</b>	X	Х	<b>+</b>	<b>+</b>	X	Х	Х
Option 14b Amended town centre boundary to include Clyde Retail Park and Queens Quay (part); No principal shopping or mixed use/ commercial area identified.	X	¥	X	X	<b>→</b>	<b>+</b>	X	X	X

Option 14a is likely to have some minor negative impacts because of the identification of a superstore development opportunity site with a possible increase is traffic impacting on traffic and travel patterns, air quality and carbon emissions.

Option 14b could allow for a possible further superstore development opportunity at Queens Quay through extension of the town centre boundary, with the impacts considered to be similar to Option 14a. Although two retail superstores would have a greater environmental impact than one it is not considered this would increase the impact from 'minor' to 'major'.

#### Conclusion:

Both options may have some minor negative environmental impacts on traffic and travel patterns, air quality and carbon emissions arising from major retail development opportunities. No significant differences in environmental impact are envisaged between the two options.

Issue 15 — Dumbarton Town Centre	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 15a</b> Implement Town Centre strategy incorporating no change to town centre boundary;	<b>↓</b> ST	<b>•</b>	X	<b>↓</b> ↓ L	•	4	X	<b>↑</b> LP	Х
Option 15b Additionally identify the area to the north of the Artizan Centre as a retail development opportunity but do not identify a principal shopping area.	<b>V</b> ST	<b>→</b>	X	<b>+</b>	<b>→</b>	<b>→</b>	X	<b>↑</b> LP	X

Options 15a and 15b are broadly similar, with Option 15b additionally identifying a redevelopment development opportunity north of the Artizan but no principal shopping area. Negative environmental impacts are envisaged in relation to waterfront (see also Issue 2) development sites and the Inner Clyde, in relation to air quality, residential amenity and carbon emissions in relation to the scale of development and the likely impact of this on traffic patters, and because the town centre is mostly within the flood plain. Positive impacts arise from the impact on listed buildings within the town centre, notably the Old Academy Buildings.

#### Conclusion:

No difference between the two options in terms of environmental impact is envisaged. Both options are considered to have likely negative environmental impacts on biodiversity, air quality and carbon emissions. A minor positive impact would be expected in relation to listed buildings.

Issue 16 – Affordable Housing	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 16a Include an affordable housing policy requiring contribution from private sector housing sites over a certain size, including those seeking renewal of existing consents.	Х	Х	Х	Х	Х	Х	Х	Х	Х
<b>Option 16b</b> Include an affordable housing policy requiring contribution from greenfield sites.	X	X	X	X	X	X	X	Х	Х
Option 16c No affordable housing policy.	X	X	X	X	X	X	X	X	X
<b>Option 16d</b> Identify land in the LDP specifically for affordable housing and encouraging provision by the private sector where appropriate.	Х	Х	Х	Х	Х	Х	Х	Х	Х

The adoption or otherwise of an affordable housing policy is not expected to have a significant environmental impact.

## Conclusion:

The adoption or otherwise of an affordable housing policy is not expected to have a significant environmental impact.

Issue 17 — Housing Land Supply	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 17a</b> The housing land supply should be supplemented by the allocation of additional sites for housing development.	?	?	?	?	?	?	?	?	?
<b>Option 17b</b> No further land allocated for housing development	X	X	X	X	X	X	X	X	X

Option 17a identifies 14 sites, some or all of which would be identified in the LDP to increase the housing land supply. The individual sites have been assessed under Issue 30. The environmental impact of this option is dependant on which sites are allocated and developed and for this reason the environmental impact is assessed as unknown.

Option 17b advocates no increases to the existing housing land supply and is assessed as not having an environmental impact, notwithstanding the impact developing individual sites within the land supply may have.

#### Conclusion:

The environmental impact of Option 17a is dependant the identified sites allocated and developed. These sites are assessed individually under Issue 30. Option 17b would not have any significant environmental impacts.

Issue 18 – Green Network	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 18a Identify a Green Network and use Green Network Opportunities Mapping methodology to identify priorities for its enhancement. Supported by Supplementary Guidance.	<b>^</b>	<b>ተ</b> ተ	<b>ተ</b> ተ	<b>^</b>	<b>^</b>	<b>^</b>	<b>^</b>	<b>^</b>	<b>^</b>
Option 18b The Local Development Plan should identify and protect open spaces but a Green Network should not be specifically identified.	Х	<b>^</b>	X	X	Х	Х	Х	Х	Х

Identifying the Green Network in the LDP and priority locations for its enhancement (Option 18a) is likely to lead to positive environmental impacts in relation to all the SEA Topics as Green Network projects can bring a range of environmental benefits.

# The Council's aspiration is that these benefits will be major.

Simply protecting open space (Option 18b) may bring about some of these benefits but without a co-ordinated, action-orientated approach this is uncertain and has been assessed as not having a significant environmental effect.

#### Conclusion:

Option 18a is assessed as likely to have major positive environmental impacts in relation to all the SEA Topics. The absence of a co-ordinated, action-orientated approach which identifies priorities for enhancement but protects open space would not have the same positive environmental impact.

<u>Issue 19 - Open Space</u>	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 19a Open space provision requirement based on 6ha per 1000 new residents, either on-site, off-site or financial determined with regard to analysis of quantitative, qualitative or accessibility deficiencies.	Х	<b>↑↑</b> P	Х	Х	Х	Х	<b>↑</b>	Х	<b>↑</b>
<b>Option 19b</b> Open space requirements negotiated on a site-by-site basis having regard to open space provision in the locality.	X	ΛP	Х	Х	Х	Х	<b>^</b>	Х	Х
<b>Option 19c</b> On-site open space provision requirement based on 6ha per 1000 new residents.	X	ΛP	X	X	X	X	<b>↑</b>	X	Х

Several environmental factors have been scoped out as the issue is specifically focused on open space provision/quality. Option19a is assessed as having positive impacts where it will enhance open space provision and quality throughout West Dunbartonshire, contributing to the living environment and health of the population and as a component of the Green Network (with relevance also to Landscape). Option 19b and 19c would have similar positive environmental effects but less so as there is no focus on the quality of existing open space.

#### Conclusion:

All three options will have positive environmental impacts where new open space will contribute to the local environment and as a component of the Green Network. Option 19a is likely to have a more positive impact where it seeks to improve quality as well as provision.

Issue 20 – Green belt	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 20a</b> The green belt should be amended at the locations identified.	X	X	X	X	X	X	X	X	X
List A – Green belt extension sites	X	X	X	X	X	X	X	X	X
List B – Green belt release sites	<b>↓</b> ST	Х	Х	₩₽	<b>V</b>	<b>V</b> P	ФР	Х	<b>↓</b> ↓ P
Option 20b The green belt boundary should remain as set out in the West Dunbartonshire Local Plan.	Х	Х	X	Х	Х	X	Х	Х	Х

The environmental impacts of changing the green belt boundary are likely to be secondary, relating the designation and potential future development of land either included or excluded from the green belt. In locations where the green belt would be extended (List A), it is considered that there would be no significant environmental impact as the changes are relatively minor and in most instances relate to land already protected as open space. Where land would be released from the green belt (List B), notably at Lomondgate and the western extension of the Esso Bowling site, development of this land is likely to have significant negative environmental effects.

It is assessed that retaining the existing green belt boundary would not have significant environmental impacts.

#### Conclusion:

There are not considered to be any significant environmental impacts resulting directly from changing the green belt boundary. Instead, secondary impacts may arise in relation to the proposed use of land removed from the green belt. Where a development use is proposed this is assessed elsewhere (Issues 3 and 16). There are no significant environmental impacts arising from retaining the existing green belt boundary.

Issue 21 – Local Nature Conservation Sites	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 21a</b> The Plan should clearly identify and protect the network of Local Nature Conservation Sites.	<b>↑</b>	Х	Х	Х	Х	Х	Х	Х	Х
Option 21b Locally important nature conservation sites should not be shown on the Plan. Instead the impact of all development upon local biodiversity should be assessed having regard to available survey material.	?	Х	Х	Х	Х	Х	Х	Х	Х

The Issue concerns whether designated Local Nature Conservation Sites should be specifically identified and protected in the Local Development Plan. Any likely significant environmental impact therefore relates primarily to these sites and consequently all SEA topics have been scoped out with the exception of 'Biodiveristy, Flora and Fauna'. There may, however, be indirect effects upon soil, water (particularly ecological status) and landscape.

Identifying and protecting LNCS through the LDP (Option 21a) is likely to be positive in the sense that this important network of habitats would be better protected from fragmentation and degradation, with some potential for natural enhancement or regeneration. The environmental impact of Option 21b is uncertain, relying on the general protection afforded to natural heritage in the LDP. Not affording LNCS a status reflecting their importance in the LDP may increase the potential for significant environmental negative effects.

#### Conclusion :

The assessment indicates that Option 21a is preferable with a minor positive effect on the environment predicted through the protection of LNCS. Not identifying LNCS and giving them a status within the LDP would result in uncertain impacts, with potential for significant negative environmental effects.

Issue 22 – Landscape	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 22a</b> A Local Landscape Area with amended boundaries should be identified, in addition to green belt or countryside policy.	Х	Х	Х	Х	Х	Х	Х	Х	↑L
<b>Option 22b</b> The existing Regional Scenic Area should be identified as a Local Landscape Area and remain the primary land use designation in that area.	X	X	X	X	X	X	X	X	↑L
Option 22c No landscape area should be identified for enhanced protected, with all applications affecting the landscape assessed with regard to the Landscape Character Assessment, other survey material and advice.	Х	Х	Х	Х	Х	Х	X	X	?

All SEA topics are scoped out with the exception of landscape due to the specific focus of the Issue. Options 18a and 18b are considered to offer greater protection to landscape areas of special character. The absence of a landscape designation proposed by Option 18c is assessed as having an uncertain impact on landscape character.

### Conclusion:

The assessment indicates that Option 22a and 22b would have a minor positive effect on the environment predicted through the protection of landscape character. Not identifying a Local Landscape Area in LDP would result in uncertain impacts.

Issue 23 — Renewable Energy	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 23a — Criteria-based policy.	?	?	?	X	X	?	X	?	?
Option 23b — Spatial Framework for wind farms with green belt identified as requiring significant protection and the designated landscape area as an area with potential constraints. Remaining land should be identified as an area of search.	?	?	?	Х	Х	?	Х	?	?

This option relates to the policy approach assessing wind farms in West Dunbartonshire. The main environmental impacts are likely to relate to biodiversity, population and human health (relating the impact turbines may have on residential amenity), soil, climatic factors, cultural heritage and landscape. Other SEA Topics have been scoped out of the assessment. Option 22a would see applications for wind turbines assessed against criteria. Option 22b would additionally create preferred and non-preferred areas for the development of wind turbines.

The environmental implications of Option 22a are dependant on the wording of the criteria and are thus uncertain. The same applies to Option 22b, although the creation of non-preferred areas which would include green belt and the designated landscape area would provide an added level of protection to the environmental assets of these areas.

# Summary:

The different policy approaches outlined in Options 23a and 23b are both assessed as having an uncertain environmental impact, dependant on the wording of criteria.

Issue 24 - Energy Reduction	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 24a LDP should require the inclusion of low and zero carbon technology within new buildings so that greenhouse gas emissions will be a minimum of 5% less than the target emission rate established by building standards regulations.	Х	Х	Х	Х	Х	<b>↑</b> P	Х	Х	Х
Option 27b The Local Development will reinforce the building standards regulations target emissions rate.	Х	Х	Х	Х	Х	↑P	Х	Х	Х

At a local scale both options will contribute to a reduction in greenhouse gas emissions when compared with buildings constructed under previous Building Standards Regulations, so there will be a positive impact in relation to Climatic Factors. However, the different standards required by each option are not so different as to have a different impact in relation to this factor. In relation to the other topics it is not considered that a variation in standards locally will have a significant impact.

#### Conclusion :

Both options will have a minor positive impact on climatic factors but no significant impact on other SEA topics.

Issue 26 - Fastlink	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 26a</b> Support the implementation of Fastlink by identifying route and requiring provision for it within development sites through which it runs.	X	<b>↑</b> L	X	X	<b>↑</b> M	<b>↑</b> M	Х	Х	Х
Option 26b Fastlink route not reserved by LDP. No requirement for provision to be made in development sites.	Х	Х	X	Х	Х	Х	Х	Х	Х

The issue of Fastlink has potential environmental impacts upon the population and human health, air and climatic factors SEA Topics, with all others scoped out. The development of Fastlink supported by Option 26a would bring some positive impacts as a more sustainable transport method contributing to reducing traffic congestion, noise and air pollution. Impacts will be dependent on the specific route chosen.

There are no direct environmental impacts arising from the LDP not making provision for Fastlink (Option 26b), however, in making delivery of the scheme less likely potentially positive environmental impacts may not be realised.

### Conclusion :

Option 26a supports the Fastlink scheme which is expected to have positive environmental impacts by reducing traffic congestion, noise and air pollution. There are no direct environmental impacts arising from the LDP not making provision for Fastlink (Option 26b), although the potential benefits of Fastlink may not be realised.

Issue 27: Kilbowie Roundabout	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 27a Reconfigured roundabout.	X	<b>y</b>	X	X	<b>1</b>	<b>1</b>	X	X	X
Option 27b No physical interventions.	X	X	X	X	<b>↑</b> S	<b>↑</b> 5	X	X	X

Option 27a is assessed as having likely positive impacts on air quality and carbon emissions as the proposed improvements are designed to reduce congestion and stationary traffic. Negative effects may arise from the loss of open space where the new junction proposed west of the roundabout onto A82 is proposed. Option 27b provides only some minor positive impacts where traffic management changes may make some short-term improvements to the congestion.

### Conclusion:

Option 27a is assessed as likely to have significant positive impacts by reducing traffic issues in the area leading to improvements in air quality and fewer carbon emissions. Option 27b would bring similar impacts, to a lesser degree.

Issue 28 - Developer Contributions	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Option 28a Contributions shall only be sought in relation to open space requirements and transport infrastructure improvements essential to facilitate the development.	X	X	X	X	X	X	X	X	Х
<b>Option 28b</b> In addition to the requirements set out in 28a, contributions will be sought towards infrastructure requirements with details included in Supplementary Guidance.	X	X	X	X	X	X	X	Х	X

The level of contribution that would be achieved is unlikely to lead to development that would have a significant environmental impact. All topics are therefore scoped out.

### Conclusion :

The level of contribution that would be achieved is unlikely to lead to development that would have a significant environmental impact.

Issue 29 – Dumbarton Football Club	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Option 29a</b> The Plan should identify Esso Bowling as an appropriate location for a new stadium with enabling mixed-uses.	Х	<b>↑</b>	<b>↑</b> P	<b>↓</b> ↓ L	ΨL	ΨL	Х	?	<b>V</b> P
<b>Option 29b</b> The Plan should identify Dumbuck as an appropriate location for a new stadium with enabling mixed-uses.	?	<b>↑</b>	<b>↑</b> P	<b>↓</b> ↓ L	Х	Х	Х	Х	Х
<b>Option 29c</b> The Plan should identify Young's Farm, Dalreoch as an appropriate location for a new stadium with enabling mixed-uses.	<b>4</b>	<b>^</b>	X	ΨL	Х	Х	<b>↓</b> P	Х	<b>↓</b> P
Option 29d No site to be identified	Х	Х	Х	Х	Х	Х	Х	Х	Х

Options 29a-c represent potential new development and have been assessed against all SEA Topics. Option 29d has been scoped out of the assessment as it does not promote new development, however, relocation of the football stadium may have benefits for the setting of Dumbarton Castle and local residential amenity. These are unlikely to be significant.

Given the scale of development proposed, there would be a negative impact on air quality and carbon emissions, arising primarily from new road infrastructure. The site at Bowling lies almost entirely within the flood plain while it is assessed there would also be a negative impact on the landscape character, extending the urban area into currently an open landscape. The nature of any impact upon Dunglass Castle which lies on the edge of the development site is uncertain.

The site at Dumbuck (Option 29b) is adjacent to the Inner Clyde but no significant effects upon Biodiversity are envisaged due to screening provided by the railway bank to the south. Redevelopment of the site would have a positive environmental impact on the land which is through to be contaminated, however part of the site is also within the flood plain.

Option 29c, development of the greenfield site at Young's Farm is assessed as having minor negatives effects on biodiversity and water in relation to the parts of the site prone to flooding and with local nature conservation interest; on material assets due to the loss of agricultural land and also on landscape, with the change in the character of the land from semi-rural to urban affecting the setting of Dumbarton.

All three options are assessed as having a positive effect on Population and Human Health with any new stadium development potentially improving to the availability, accessibility and quality of sporting facilities.

#### Conclusion:

Of the three redevelopment option, Option 29b is assessed as having the least likely environmental impact. Options 29a and 29c show similarities in terms of predicted impact, with likely negative effects on biodiversity, water and landscape. The environmental impact of new road infrastructure to serve the site would also have negative impacts on air quality and climatic factors for Option 29b.

No significant environmental impacts would arise from Option 29d.

# Appendix C – Proposed Plan assessment

Policy Propo	sal	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
Our cr	nanging places Alexandria town centre										The MIR preferred option (13a) is reflected in the Proposed
	/ dexamina town centre					Issue 13	1				Plan.
	Clydebank town centre					Issue 14	÷				The Proposed Plan strategy for Clydebank town centres broadly follows the preferred option in the MIR (14a).
	Dumbarton town centre & waterfront				ls	sue 2 & :	15				The Proposed Plan sets out a strategy for Dumbarton town centre and waterfront. The strategy for the town centre follows that outlined in the MIR (Option 15b). Extending beyond the town centre boundary, waterfront development is proposed at Sandpoint Marina (see Issue 30 for assessment), the Shed 7 site and Dumbarton Football Club (see below for assessment).  Detail on the strategy will be provided as supplementary guidance as per Option 2a.
	Queens Quay					Issue 5					The MIR preferred option for this site (5a) is reflected in the Proposed Plan.
	Carless					Issue 4					The MIR preferred option for this site (4a) is reflected in the Proposed Plan.
	Bowling Basins	<b>→</b>	X	?	<b>\</b>	X	X	<b>+</b>	•	X	Site is adjacent to the Inner Clyde SPA, RAMSAR and SSSI site, giving rise to potential disturbance to wading birds during both construction and occupation. Although the site itself is not designated as a nature conservation site, it has value as a component of the habitat network and Green Network.  The canal and basins are scheduled, with the basins also listed. Development could affect these structures, including

Propo Policy Propo		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
											their setting. The site's foreshore is subject to flooding.
	Esso Bowling & Scott's Yard					Issue 3					The MIR preferred option (3a) was to extend the developable area of Esso Bowling to the west. The Proposed Plan, however, reflects the alternative option (3b).
	Lomond Canal					Issue 7					The Proposed Plan supports the investigation by Scottish Canals of the Lomond Canal subject to full consideration of its environmental impact. (Option 7c of the MIR).
	Lomondgate and the Vale of Leven Industrial Estate					Issue 8					The MIR preferred option for this site (8a) is reflected in the Proposed Plan. The strategy for that area includes development of identified sites for housing (Lomondgate Area 5) and business/industry (VoLIE).
	Young's Farm (Dumbarton FC)					Issue 29					The Proposed Plan supports the investigation by Dumbarton FC of the Young's Farm site in respect to its suitability for the development of a new football stadium and ancillary/enabling uses (Option 29c). A masterplan will be required if these investigations show the site to be viable with regard to access, flooding, and environmental impact. The site remains in the green belt.
	Green Network					Issue 18					The Proposed Plan's strategy follows the MIR preferred option (18a). The Our Changing Places are identified as opportunities for the enhancement of the network and Supplementary Guidance will be developed, developing the Opportunities Mapping shown in the MIR.

Propo Policy Propo Ref.	sed Plan Section	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
	Kilpatrick Hills	<b>↑</b>	1	Х	Х	Х	Х	<b>↑</b>	Х	1	The Proposed Plan's strategy is to protect and enhance landscape character, the integrated network of habitats and geology sites and improve access to the Hills. The can have a positive effect on the SEA topics indicated. Issue 22 in the MIR considered the identification of the Kilpatrick Hills as a Local Landscape Area.
DS1	Sustainably Sustainable Design	X	<b>↑</b>	Х	х	Х	<b>↑</b>	<b>↑</b>	<b>↑</b>	Х	Sets out criteria to be considered when preparing and assessing development proposals. Relates to the six qualities of successful places.  Good design can bring positive effects to the environment and it is assessed that the application of this policy will have positive significant effects on a number of SEA Topics
	Low and Zero carbon generating technologies (Annex 1)	X	X	X	X	X	٨L	X	X	X	Requires low and/or zero carbon generating technology shall to be installed in a range of new developments. In the long term this can have a positive effect on carbon emissions.
DS <sub>2</sub>	Settlement Strategy	Х	X	↑L	X	X	↑L	<b>↑</b>	X	X	Directing development to the urban area can have positive long-term effects on greenhouse gas emissions by promoting more sustainable travel patterns, the remediation of contaminated soils in urban areas and the efficient use of land.
DS <sub>3</sub>	Accessibility	Х	X	X	Х	X	Х	X	X	Х	Promotes the use of public transport but would not have significant effects with regard to greenhouse gas emissions.
DS4	Air Quality	Х	X	X	X	X	X	X	X	X	Seeks to maintain air quality by stating that development that would exacerbate existing air quality problems will not be permitted without adequate mitigation.

Propo Policy Propo	sed Plan Section	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
DS <sub>5</sub>	Renewable Energy	X	X	X	X	X	X	X	X	X	Supports renewable energy developments where it avoids adverse impact on the environment, avoiding significant negative effects.
	Spatial Framework for wind energy					Issue 23	}				A Spatial Framework for wind energy developments was the alternative option considered under MIR Issue 23.
DS6	Flooding	X	X	X	X	X	X	X	X	Х	States development will not be supported on the functional floodplain or where it would have a significant probability of being affected by flooding or increasing the probability of flooding elsewhere.
DS <sub>7</sub>	Contaminated Land	Х	Х	X	X	X	X	Х	X	Х	Seeks to ensure development does not occur on contaminated land.
Growi	ng Our Economy										
GE1	Opportunities for new and expanding businesses	Х	Χ	Χ	Х	Х	Х	Χ	Х	Х	Individual sites reserved for development assessed below
GE1 (1-5)	Vale of Leven IE sites	Х	X	Χ	Χ	Χ	Х	Χ	Χ	Χ	Part of Lomondgate and Vale of Leven Industrial Estate Changing Place.
GE1 (6)	Lomondgate				Planni	ng Pern	nission				Part of Lomondgate and Vale of Leven Changing Industrial Estate Place.
GE1 (7)	Dennyston Forge, Dumbarton				Planni	ng Pern	nission				
GE1 (8)	Clydebank Business Park	•	X	Χ	Χ	Χ	Х	Х	Χ	Х	Impact on Inner Clyde SPA addressed in HRA
GE1 (9)	Clydebank Industrial Estate	Ψ	X	?	X	X	Х	Х	Х	Х	Site is within close proximity to the Inner Clyde with potential
GE1 (10)	Cable Depot Road, Clydebank	•	X	Χ	X	X	Х	Х	Х	Х	Impact on Inner Clyde SPA addressed in HRA
GE1 (11)	Clyde Gate, Clydebank				Planni	ng Pern	nission	1	1		Site has outline consent and one of the units has been developed.

Proposition Proposition Ref.	sed Plan Section	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
GE1 (12)	John Knox Street, Clydebank	X	X	Χ	X	X	X	X	X	Х	No significant environmental effects predicted.
GE1 (13)	Rothesay Dock	X	Χ	Χ	<b>4</b>	X	X	X	X	X	Site is within floodplain and therefore could have negative impacts on flood risk if developed.
GE1 (14)	Main Street, Jamestown	X	Χ	Χ	X	Χ	X	X	X	X	No significant environmental effects predicted.
GE1 (15)	North Kilmalid	X	Χ	Χ	X	Χ	Χ	Χ	Χ	X	Site is on the edge of floodplain and LNCS but no significant environmental effects predicted.
GE1 (16)	Lomond IE, Alexandria	•	Х	X	•	Х	Х	Х	X	X	Although not designated, this site is semi-natural and its position next to the River Leven LNCS infers potential biodiversity value. The site is also within the floodplain.
GE1 (17)	Birch Road, Broadmeadows IE, Dumbarton	X	X	Χ	X	Χ	X	X	X	Χ	No significant environmental effects predicted.
GE1 (18)	Bankend Road, Dumbarton	Χ	X	Χ	X	Χ	X	X	X	Χ	No significant environmental effects predicted.
GE2	Existing industrial areas	X	Χ	Χ	X	X	X	X	X	X	Supports Class 4, 5 and 6 uses in existing business and industrial areas and alternative uses with regard to their impact on exiting uses.
GE <sub>3</sub>	Roadside services	X	Х	Χ	X	X	X	X	X	X	Policy supports roadside services development at Milton and Lomondgate where it does not significantly impact on trade within town centres.
GE4	Tourism	X	Χ	Χ	X	X	X	X	X	X	Plan supports tourist uses in appropriate locations which avoid adverse impact to the green network and built heritage.
GE <sub>5</sub>	Glasgow airport	X	Χ	X	X	X	X	X	X	X	Relates to development that would adversely impact on the operations of Glasgow Airport or would be adversely affected by aircraft noise.

Proposed Plan Section Policy Proposal  Ref.		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BC1	Meeting Housing Requirements	Х	X	X	X	X	X	X	X	X	Supports development of reserved sites in Schedules 2- 4 for housing development subject to compliance with the Residential Development: Principles for Good Design Supplementary Guidance.
BC1 (1)	Heather Avenue, Alexandria.	Planning Permission									
BC1 (2)	Wilson Street, Alexandria	Х	Х	Х	Х	Х	Х	Х	Х	Х	No significant environmental effects predicted.
BC1 (3)	Bonhill Quarry, Bonhill	Planning Permission									
BC1 (4)	311 Main Street, Bonhill	Planning Permission									
BC <sub>1</sub> (5)	34 Burn Street, Bonhill	Planning Permission									
BC1 (6)	Levenbank Terrace, Jamestown	Х	X	Х	Х	Х	X	X	X	X	No significant environmental effects predicted.
BC1 (7)	Jamestown IE	Х	X	Х	Х	Х	X	X	X	X	No significant environmental effects predicted.
BC1 (8)	Napierstone Farm, Jamestown	Planning Permission									
BC1 (9+ 48)	Dalqhurn, Renton	Planning Permission									
BC1 (10)	Notre Dame Convent, Dumbarton	X	X	X	X	X	X	X	•	X	Category C(S) listed building is contained within the sites. Site is also situated north of the Brucehill cliffs LNCS.
BC1 (11)	Lomondgate (Phase 2)	Planning Permission									

Proposed Plan Section Policy Proposal Ref.		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BC1 (12+ 55)	Castle Street, Dumbarton	Planning Permission									
BC1 (13)	Mary Fisher Crescent, Dumbarton	Planning Permission									
BC1 (14)	Dumbarton FC	•	X	X	•	X	X	X	Ψ	X	Site falls within 200 year floodplain with potential impacts on flooding and water quality. Development may affect the setting of Dumbarton Castle. Whole site is within 300 metres of the Inner Clyde SPA/SSSI and could cause disruption, particularly temporarily during construction. See also HRA  Part of Dumbarton Town Centre & Waterfront Changing Place. A section of the site has planning permission.
BC1 (15)	Garshake Waterworks,	Planning Permission									
BC1 (16)	Pinetrees, Dumbarton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
BC1 (17)	Shed 7 Castle Road, Dumbarton	•	Х	Х	+	Х	х	х	<b>Ψ</b>	Х	Site falls within 200 year floodplain with potential impacts on flooding and water quality. Development may affect the setting of Dumbarton Castle. Whole site is within 300 metres of the Inner Clyde SPA/SSSI and could cause disruption, particularly temporarily during construction. See also HRA  Part of Dumbarton Town Centre & Waterfront Changing Place

Proposition Proposition	sed Plan Section	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BC1 (18)	Castlegreen Street, Dumbarton	X	Χ	X	•	X	X	X	X	X	Site is within 300m of the Inner Clyde but limited disturbance is predicted due to railway line. See also HRA Site within 1 in 200 year floodplain.
BC1 (19)	Cottage Hospital, Dumbarton					Issue 30	)				Site 016
BC1 (20)	Crosslet House, Dumbarton	?	Х	Х	Х	Х	Х	Х	Х	Х	No significant environmental effects predicted. Site is adjacent to LNCS and has
BC1 (21)	Milton Brae, Milton	Х	Х	X	Х	Х	Х	Х	Х	Х	No significant environmental effects predicted. Woodland to the north and south of the site is protected by a TPO and should be preserved.
BC <sub>1</sub> (22)	Lusset Glen, Old Kilpatrick				Planni	ng Pern	nission				
BC1 (23)	Carless, Old Kilpatrick					Issue 4					Housing forms part of the proposals for this Changing Place.
BC1 (24)	Carleith, Clydebank	Х	X	X	X	X	X	X	•	Х	The site is adjacent to the Antonine Wall WHS/Buffer Zone and development could affect the setting of this Cultural Heritage resource.
BC1 (25)	William Street, Duntocher	Х	Х	Χ	Х	Х	Х	Χ	Х	Х	No significant environmental effects predicted.
BC <sub>1</sub> (26)	Old Mill Garage, Hardgate				Planni	ng Pern	nission			•	
BC1 (27)	Hardgate Hall, Hardgate	Х	Х	X	Х	Х	X	X	•	Х	Hardgate Hall is a C(S) listed building. Unsympathetic conversion or demolition could have a negative impact on Cultural Heritage.
BC <sub>1</sub> (28)	Thor Ceramics, Clydebank		Planning Permission								
BC1 (29)	Clydebank College, Clydebank				Planni	ng Pern	nission				

Propo Policy Propos		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BC1 (30)	North Douglas Street, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
BC1 (31)	Graham Avenue, Clydebank				Planni	ng Pern	nission				
BC <sub>1</sub> (32)	John Knox Street, Clydebank	X	Χ	X	X	Χ	Χ	Χ	Χ	Χ	No significant environmental effects predicted.
BC <sub>1</sub> (33)	834 Dumbarton Rd, Clydebank				Planni	ng Pern	nission				
BC1 (34+ 63)	Queens Quay, Clydebank					Issue 5					Part of Queen's Quay Changing Place.
BC <sub>1</sub> (35)	Former Transfer Station, Dalmuir	X	X	X	Х	X	X	Χ	Χ	Χ	No significant environmental effects predicted. The site is adjacent to a LNCS (Disused Railway wildlife corridor).
BC <sub>1</sub> (36)	Cable Depot Road, Clydebank					Issue 5					Part of Queen's Quay Changing Place.
BC1 (37+ 64)	St Andrews HS, Clydebank	X	X	X	X	X	X	X	X	Х	No significant environmental effects predicted.
BC1 (38+ 65)	Braidfield HS, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
BC1 (39+ 66)	St Eunans PS, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
BC1 (40)	Miller Road, Haldane		Planning Permission								
BC1 (41)	Kippen Dairy, Alexandria		Issue 13							Part of Alexandria Town Centre Changing Place.	

Proposition Proposition	sed Plan Section	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BC <sub>1</sub> (42)	Leven Cottage, Alexandria					Issue 13					Part of Alexandria Town Centre Changing Place.
BC <sub>1</sub> (43)	Susannah Street, Alexandria				lss	ues 13&	30				Site 002. Part of Alexandria Town Centre Changing Place.
BC1 (44)	Mitchell Way, Alexandria					Issue 13					Part of Alexandria Town Centre Changing Place.
BC <sub>1</sub> (45)	Golfhill Drive, Bonhill	Х	Х	X	Х	Χ	X	Χ	X	Χ	No significant environmental effects predicted.
BC1 (46)	Bonhill PS, Bonhill	Х	Х	Х	Х	Χ	X	Χ	X	Χ	No significant environmental effects predicted.
BC <sub>1</sub> (47)	Croft Street/Raglan Street, Bonhill	Х	Х	Х	Х	Х	X	Χ	X	Х	No significant environmental effects predicted.
BC <sub>1</sub> (49)	Village Square, Renton				Planni	ng Pern	nission				
BC <sub>1</sub> (50)	John Street Depot, Renton	Х	Х	Х	X	X	X	X	?	X	No significant environmental effects predicted. Site falls within WoSAS consultation area.
BC <sub>1</sub> (51)	Valeview Terrace, Bellsmyre				Planni	ng Pern	nission				
BC1 (52)	Auchenreoch Avenue, Bellsmyre	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
BC <sub>1</sub> (53)	Penniecroft Avenue, Dumbarton	X	X	X	X	Х	Χ	X	X	Χ	No significant environmental effects predicted.
BC1 (54)	Muir Road, Bellsmyre	Х	Х	Х	Х	Х	X	Х	Χ	Х	Adjoins Bellsmyre Grassland LNCS but no significant effect upon the biodiversity interest of the site is predicted.
BC1 (56)	Dalreoch Quarry North, Dumbarton	•	Х	Х	X	Х	X	Х	X	Х	The site has noted local bio- and geological interests which could be harmed as a result of development.
BC <sub>1</sub> (57)	Hill Street, Dumbarton	X	Х	X	X	X	X	X	X	X	No significant environmental effects predicted.

Propos Policy Propos		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BC1 (58)	Townend Road, Dumbarton	X	X	Χ	X	X	Х	X	X	Χ	No significant environmental effects predicted.
BC <sub>1</sub> (59)	Auld Street Dalmuir				Planni	ing Pern	nission				
BC1 (60)	Beardmore Place East, Dalmuir	•	X	X	Х	Х	X	X	<b>y</b>	X	Site sits between the Forth & Clyde Canal and a LNCS (Disused Railway), with part of the site as mapped within the scheduled monument. Development could have negative impacts upon the connectivity between two wildlife corridors and upon the setting of the canal.
BC <sub>1</sub> (6 <sub>1</sub> )	Boquhanran Road, Dalmuir		Issue 30							Site 013	
BC <sub>1</sub> (6 <sub>2</sub> )	Caledonia Street, Dalmuir	X	Χ	X	X	X	Х	X	X	X	No significant environmental effects predicted.
BC <sub>1</sub> (6 <sub>7</sub> )	Granville Street, Clydebank				Planni	ing Pern	nission				
BC <sub>1</sub> (68)	354 Dumbarton Road, Clydebank	Х	X	Χ	Х	Х	Х	Х	Χ	Χ	See BC1(61)
BC <sub>1</sub> (69)	Salisbury Place, Clydebank	Х	X	X	Х	Х	Х	Χ	X	Χ	No significant environmental effects predicted.
BC <sub>1</sub> (70)	101 Wilson Street Alexandria				Planni	ing Pern	nission				
BC <sub>1</sub> (71)	Stirling Road, Bonhill		Issue 30								Site 005.
BC <sub>1</sub> (72)	Lomondgate Area 5		Issue 30							Site 019	
BC <sub>1</sub> (73)	Garshake Road, Dumbarton		Issue 30								Site 017
BC <sub>1</sub> (74)	Sandpoint Marina, Dumbarton		Issues 2 & 30								Site 021. Part of Dumbarton Town Centre and Waterfront Changing Place

Policy Propos		Biodiversity, Flora & Fauna	& Fauna Population and Human Health Soil Air  Climatic Factors  Material Assets  Cultural Heritage  Landscape						Landscape	Commentary	
BC <sub>1</sub> (75)	Islay Kerr House, Dumbarton				Planni	ing Pern	nission				
BC <sub>1</sub> (76)	Bowling Basin			9	See Our	Changir	ng Place	s			
BC1 (77)	Bowling Church, Bowling				Planni	ing Pern	nission				
BC1 (78)	Duntiglennan Fields, Duntocher					Issue 30	)				Site 025 Site removed by Modification to Proposed Plan
BC1 (79)	Rosebery Place, Clydebank					Issue 30	)				Site 007
BC1 (80)	Stanford Street, Clydebank					Issue 30	)				Site oo8
BC1 (81)	Aitkenbar PS, Bellsmyre	Χ	Χ	X	X	X	X	X	X	X	Adjoins Bellsmyre Grassland LNCS but no significant effect upon the biodiversity interest of the site is predicted.
BC1 (82)	Rothesay Dock				•	Issue 30	)				Site 009. Part of Queen's Quay Changing Place
	Affordable Housing					Issue 16	5				
BC <sub>2</sub>	Particular Housing Needs	X	X	Х	Х	Х	Х	X	Х	Х	Particular needs housing will be supported on the sites in Schedule 5 and other suitable sites subject to compliance with the Residential Development: Principles for Good Design Supplementary Guidance
BC <sub>2</sub> (1)	Heather Avenue, Alexandria - Sheltered housing		Planning Permission								
BC2 (2)	Lomondgate, Dumbarton - Sheltered housing		Planning Permission								
BC <sub>2</sub>	Dalreoch, Dumbarton - Travellers site	•	X	X	•	X	X	X	X	X	Site is adjacent to River Leven LNCS and part of site is within floodplain leading to potential negative effects.

Proposed Plan Section Policy Proposal Ref.	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BC2 Garshake Waterworks, (4) Dumbarton - Care home				Planni	ng Pern	nission				
BC <sub>2</sub> Auchentoshan (5)	Х	Х	Х	Х	Х	Х	Х	Х	Х	No significant environmental effects predicted.
BC2 Cochno Waterworks, (6) Clydebank - Care home				Planni	ng Pern	nission				
Ensuring Quality Places to Live	X	<b>↑</b>	X	Х	Х	Х	Х	Х	Х	Residential Development: Principles for Good Design Supplementary Guidance. This guidance seeks to bring about positive environmental effects with regard to urban design and residential amenity and complements policy DS1
BC <sub>3</sub> Established Neighbourhoods	Х	Х	X	Х	Х	Х	Х	Х	Х	Policy states development that would significantly harm the residential amenity, character or appearance of existing neighbourhoods will not be permitted.
BC4 Community Facilities	X	X	Χ	Х	X	Χ	Χ	X	Χ	Supports development of community facilities listed below (BC <sub>4</sub> 1-4) and in appropriate locations.
BC4 Adj. VoL Cemetery - (1) extension	X	Х	Χ	Х	Χ	Χ	Χ	X	Х	No significant environmental effects predicted.
BC4 Howatshaws Road, (2) Dumbarton – new schools	X	Х	Χ	Х	Χ	Χ	Χ	X	Χ	No significant environmental effects predicted.
BC4 Garshake Road, Dumbarton (3) – new cemetery	X	X	Χ	Х	Χ	Χ	Χ	Χ	X	No significant environmental effects predicted.
BC4 Auchentoshan, Clydebank – (4) new school	Χ	Χ	X	Χ	Χ	Χ	Χ	Χ	Χ	School would replace existing building – no significant environmental effects predicted.
BC4 Queens Quay – new leisure (5) centre		Issue 5								Part of Queen's Quay Changing Place.
BC4 Boulevard, Clydebank – (6) special needs care centre  Supporting Our Town Centres		Planning Permission								

Policy Propo	sal	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
SC1	Network of Centres retail strategy					Issue 12					The Network of Centres strategy which formed the preferred MIR option (12a) is reflected in the Proposed Plan.
SC1 (1)	Mitchell Way, Alexandria					Issue 13					Additional retail floorspace. Part of Alexandria Town Centre Changing Place.
SC <sub>1</sub> (2)	Artizan Centre, Dumbarton				Planni	ing Pern	nission				Refurbishment. Part of Dumbarton Town Centre Changing Place.
SC1 (3)	Argyll Road/Chalmers Street, Clydebank				Planni	ing Pern	nission				Outline permission for superstore. Part of Clydebank Town Centre Changing Place.
SC <sub>1</sub> (4)	Sylvania Way South, Clydebank					Issue 14					Refurbishment of street. Part of Clydebank Town Centre Changing Place.
SC <sub>2</sub>	Core Retail Areas	Х	X	Χ	Х	X	X	X	X	X	Relates to ground floor COU applications with defined retail areas, seeking to retain retail focus of such locations.
SC <sub>3</sub>	Other uses and the Network of Centres	Х	X	X	X	X	X	X	X	Х	Supports non-retail uses in town and local centres, subject to the role and function of the town centre, amenity.
Enhan	cing Our Green Network										
GN1	Open Space and the Green Network	X	X	X	Χ	X	X	X	X	X	Development resulting in the loss of open space, including playing fields, will not permitted, subject to quality, value and potential.
GN <sub>2</sub>	Green Infrastructure	<b>1</b>	<b>1</b>	X	<b>1</b>	Х	X	<b>1</b>	X	Х	The Plan requires development to follow IGI approach to design. This can bring significant positive environmental effects in relation to a number of SEA topics, in the long term as large sites with WDC are developed.
GN <sub>3</sub>	The Habitat Network and Geodiversity	X	X	X	X	X	X	X	X	X	Development harming sites designated for nature conservation or protected species will not be permitted by the plan, other than prescribed circumstances.

Propo Policy Propos	sed Plan Section	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
GN4	Landscape	Х	×	Х	×	×	X	×	Х	X	Development with significant adverse impact on landscape character will not be permitted. Development effecting the Kilpatrick Hill required to protect, and where possible, enhance special qualities of the landscaspe. While this will prevent negative effects, significant positively effects may be unlikely.
GN <sub>5</sub>	Forestry, woodland and trees	X	X	X	X	X	X	Х	Χ	X	Requires clear justification for before loss of trees or woodland.
GN6	The Water Environment	X	X	X	<b>^</b>	Х	Х	X	X	Х	Policy includes a number of measures to protect and improve the water environment. This can also have positive effects on other SEA Topics (e.g. biodiversity, material assets).
GN <sub>7</sub>	Forth & Clyde Canal	Х	Χ	X	Х	Х	X	<b>↑</b>	X	Х	Development alongside the canal will be expected to enhance it as a green network asset.
GN8	Outdoor access	Х	<b>1</b>	X	X	X	X	<b>↑</b>	X	Х	Policy states development will not be permitted that would result in loss of core path or right of way and the new paths will be expecting in new development.
	Temporary Greening	ΛT	ΛT	X	X	X	X	ΛT	X	ΛT	The plan supports and encourages temporary green network uses on stalled development sites. This can have temporary positive environmental effects.
	ting Our Built Heritage										
BH1	The Antonine Wall	X	X	X	X	X	X	X	X	X	Development with an adverse impact on the Antonine Wall or its setting will not be permitted under this policy.
BH2	Scheduled Monuments & Archaeological Sites	Х	X	X	X	X	X	X	X	X	Policy states development adversely affecting a Scheduled Monument will not be permitted and that other archaeological sites should be preserved in situ, or appropriate measures taken where this is not possible.

Propo Policy Propo		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
BH <sub>3</sub>	Listed Buildings	X	X	X	X	Х	X	Х	X	Х	Policy states development (inc. demolition) that would adversely affect listed building will not be permitted, and the appropriate enhancement and work enabling restoration will be supported.
ВН4	Conservation Areas	X	×	Х	×	Х	Х	×	<b>↑</b>	Х	States development that would harm the character or appearance of a conservation area will not be permitted and that new development within or affecting a conservation area should be of a high standard of design and enhance the character of the area. This would have a minor positive significant effect on Cultural Heritage.
BH <sub>5</sub>	Gardens and Designed Landscapes	X	X	X	X	X	X	X	X	X	Policy applies to development affecting Garden and Designed Landscapes only and states development should protect and appropriately enhance important features of Gardens and Designed Landscapes.
	rting Development		ı		ı			ı			
SD1	Transport Network	X	X	X	X	X	X	X	X	X	Policy supports Local Transport Strategy schemes subject to the mitigation of adverse impacts on the environment. The LTS has undergone SEA.
SD2	Waste	X	X	X	X	X	X	X	X	X	Sets a framework for the development of waste management facilities which will avoid significant negative environmental effects. Locations identified in Schedule 8 have existing consent.
SD <sub>3</sub>	Communication and infrastructure	X	X	X	Х	Χ	Χ	X	X	X	Policy seeks to protect streetscape, residential amenity, the green network and built heritage.
SD4	Minerals, Aggregates and Coal	Х	X	X	X	X	X	X	X	X	Supports continuation of aggregate extraction at Dumbuckhill and Sheephill quarries and sets framework for new workings and extensions. Must avoid significant adverse impact on the green network, built heritage and residential amenity and include restoration and aftercare proposals.

Propos Policy Propos		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
SD <sub>5</sub>	Advertisements	Х	X	X	X	X	Χ	Х	X	X	Policy seeks to control advertisements. These would not be expected to have a significant environmental effect.

# **Appendix D** – Responses from Consultation Authorities

Report Section	
Consultation Authority	
Comment	WDC Response
General	
Historic Scotland (October 2013)	Noted.
Revised ER found to be well set out,	
clear and concise and particularly	
successful at identifying changes which	
had been made to the interim report.	
Content with the findings in terms of	
effects on the historic environment.	
SEPA (November 2013)	Noted.
Satisfied that an adequate assessment	
of the plan has been carried out.	
SNH (November 2013)	Noted.
Welcome the clear highlighting of	
assessment updates relative to the MIR-	
stage ER. In general, the assessment has	
gone some way to informing the Plan,	
however, we feel that for many	
proposals, the opportunity has been	
missed to devise specific mitigation for	
environmental effects.	
3.1 Environmental Baseline and Issues	
Historic Scotland (June 2012)	Reference to Overtoun Estate added to
Cultural heritage environmental baseline	the baseline, with reference to other
does not refer to Inventory Gardens and	estates with similar characteristics (p17).
Designed Landscapes or undesignated /	
locally important heritage assets. Expect	
these historic environment features to	
form part of the baseline for assessment.	
SEPA (June 2012)	Reference made to Auchincarroch
It would be useful to add information	landfill site as an important asset (p17).
under the material assets section on	
waste facilities in the area.	
SNH (June 2012)	Noted.
Suggest countryside and greenspace,	
including the Kilpatrick Hills, around	
settlements is seriously under-used for	
recreation, affecting people's health and	
quality of life.	
4.2 Assessment Framework	

Report Section	
Historic Scotland (June 2012) Criterion relating to Gardens and Designed Landscapes, listed in the scoping report, is not included in Table 2 – SEA Framework. Expect GDLs to be included in the assessment criteria.	The Assessment Framework has been updated (Table 2, p21).
5.2 Mitigation	
Historic Scotland (June 2012) Welcome the use of a mitigation hierarchy but would have expected the assessment findings to include a discussion of potential mitigation measures. It is not clear at which stage mitigation measures will be identified and reported, and consequently the degree to which they will be able to inform the plan making process is also unclear. Expect the revised ER to outline the mitigation measures which have been identified, and to explain how the Proposed Plan has been influenced by these findings.	This section has been expanded to include details on mitigation measures which have been identified.
SEPA (June 2012) Support the hierarchy based approach to mitigation of seeking to avoid significant adverse effects on the environment in the first instance. However, it would be useful for the ER to set out more specific mitigation measures. For example, for development sites where flood risk has been identified as a negative environmental effect, SEPA will require a Flood Risk Assessment to demonstrate that no development is proposed in the flood plain.	This section has been expanded to include details on mitigation measures which have been identified.
SNH (June 2012) Opportunity has been missed to at least signpost the main types of mitigation, to feed back into preparation of the Proposed Plan.	This section has been expanded to include details on mitigation measures which have been identified.

Report Section	
SEPA (November 2013) It is noted that the mitigation section has been extended since the first Environmental Report. We support the requirement of a Flood Risk Assessment (FRA) as a mitigation measure for development sites where flood risk has been identified as a negative environmental effect. For some sites, however, additional mitigation may be required such as the revision of site boundaries to ensure that no development is within the functional floodplain.	Noted
SNH (November 2013) "Structural planting to provide a strong green belt boundary as mitigation for effects of Green Belt release on Landscape is too open to interpretation. At one extreme, screen planting of untypical species might do very little to mitigate landscape impacts, at the other habitat create that fits with local landscape features, retains key views and provides a permeable new edge with multifunctional open space can result in net positive effects.	Noted.

Report Section Consultation Authority Comment	WDC Response
SEPA (November 2013) It would be useful if the assessment included further information on mitigation requirements. For a number of sites the commentary highlights that the site falls within the 200 year floodplain however it doesn't specify mitigation requirements.	Noted.  Further strategic assessment in respect to masterplans could help to address some of the shortcomings identified in the identification of mitigation for site specific proposals.
Historic Scotland (October 2013) It would have been helpful if the commentary relating to the assessment of each proposal/policy had included a summary of mitigation measures identified, and how they will be delivered. Where policies are expected to proved the principal mitigation, it would be helpful if this had been made more explicit.	
SNH (November 2013) To opportunity has been missed to have a specific heading of 'mitigation' in Appendix B. If mitigation had been directly addressed this would have led to the Plan and/or its Supplementary Guidance, incorporating more site-specific recommendations. Moreover, this would have made it more transparent how specific requirements in the Plan (e.g. Table 4) had been derived.	

Report Section Consultation Authority Comment	WDC Response
6. Monitoring	
Historic Scotland (June 2012) Indicators which focus on the baseline only (e.g. number of listed buildings, number of Buildings at Risk) are not likely to be closely enough linked with the predicted effects and objectives of the plan to fully reflect its actual effects. In order to achieve effective monitoring recommend the use of indicators, linked to the SEA objective, to measure change.	Noted. Further consideration will be given to refining the monitoring indicators.
Suggest that there should be a range of indicators to cover different types of heritage asset which may be affected by the Plan.	
SEPA (June 2012) The Council may want to think about including an indicator relating to the objectives and targets of the Zero Waste Plan under material assets.	Noted. Further consideration will be given to refining the monitoring indicators.
SNH (June 2012) The indicator proposed for biodiversity refers to favourable condition of protected nature sites and has significant drawbacks. Realistic monitoring of effects on biodiversity will require additional indicators.	Noted. Further consideration will be given to refining the monitoring indicators.
SNH (November 2013) For biodiversity we welcome the inclusion of an indicator relating to LNCs. However, habitat connectivity is not addressed, despite being one of the two criteria used for biodiversity in the assessment. Maintain it should be possible to devise suitable indicator(s) through reference to requirements set out in the Green Networks SG.	Noted. Further consideration will be given to refining the monitoring indicators.

Report Section	
SNH (November 2013) For Population & Human Health there is a conflict between the two proposed indicators. Proximity to vacant and derelict land has been used as a proxy for the potential negative effects of such land posing to a risk to human health, however, such sites, especially when well vegetated, serve as valuable informal open space. To avert the conflict, the second indicator should at least be restricted to sites with a specific identified health risk.	Noted. Further consideration will be given to refining the monitoring indicators.
7.1 Policies and Supplementary Guidance	e
SNH (June 2012) There is no indication of how the Supplementary Guidance might be treated in the SEA. Recommend at least the scope of these documents should be assessed within the Environmental Report. Historic Scotland (October 2013) It is not clear from the Environmental Report whether Supplementary Guidance has been assessed as part of the revised assessment or whether the assessment relates solely to their parent	Residential Development: Principles for Good Design Supplementary Guidance is included within the assessment on p.79.
policies. It is recommended that this should be clarified.	
Appendix B – Full Assessment Results	
Historic Scotland (June 2012) For issues where no reasonable alternatives the likely effects of the action/proposal could usefully be assessed and reported and, if appropriate, mitigation measures identified.	Stage 3 of the Assessment will ensure all the likely effects of all aspects of the WDLDP are assessed and reported.

Report Section	
Historic Scotland (June 2012) Would have been helpful for the individual site assessments to have been accompanied by a commentary. In some case where there is potential for a development site to directly or indirectly affect a heritage asset (e.g. Carless, Rosebery Place, Boquhanran Road – adjacent to scheduled Forth & Clyde Canal) cultural heritage has been scoped out. In these cases it is not clear on what basis the effects on cultural heritage have been assessed as non-significant. In order for the assessment to be as effective and transparent as possible, effects should be scored before any mitigation is applied.	Additional commentary has been provided.
Historic Scotland (June 2012) Cultural Heritage has been scoped out of the assessment of Issue 4, Carless. Option 4a proposes to extend the site to include land on the other side of scheduled Forth & Clyde Canal and a new crossing over the canal which would have an indirect, and possibly direct, impact on the scheduled monument.	Cultural Heritage has now been scoped in and the assessment updated.
SEPA (June 2012) It is noted that a number of the issues will have negative environmental impacts, however, it is not clear from the Environmental Report how these findings will be taken into account in the local development plan.	This is discussed in the revised section on mitigation (Section 5.2).
SNH (June 2012) The Bowling Basin Key Regeneration Site should have been assessed.	An assessment of this site is now included at Appendix C.

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Report Section Consultation Authority	
Comment	WDC Response
SNH (June 2012) Esso Bowling - Acknowledge that that the likely remediation of contaminated land within the proposed extension area would be a positive effect of the preferred option on Soil. However, much of this area is greenfield land, where semi-natural soils, could be buried under infill. Therefore assess the net effect on Soil as neutral.	Comments reflected in revised assessment.
Although the effects of both options on Water are Major Negative, see 3a as considerably more negative because the uprising of semi-natural soils, including wetland areas, could result in loss of coastal habitats, adversely affecting the ecological status of the Inner Clyde.	
Consider loss of green belt resulting from Option 3a would amount to a Major, rather than Minor Negative on Landscape.	
Do not agree that Option 3b would have no effect on Green Network – vegetation on the site already provides connectivity for wildlife and enhances the landscape, and it would be a specific challenge of development here to reinstate these Green Network functions.	
SNH (June 2012) Carless — Site has limited Green Network value and its development may well result in a positive contribution.	Comments reflected in revised assessment.
SNH (June 2012) Queen's Quay — A significant Green Network contribution seems likely at Queen's Quay as it is wholly without vegetation and has no public access. Suggest the effects of both options on Material Assets are Minor Positive, or even Major.	Comments reflected in revised assessment.

Report Section	
SNH (June 2012) Lomond Canal — Do not necessarily agree that the effects of Options 7a and 7b on Water are Net Neutral. Unclear on how the canal might help manage flooding.	Comments reflected in revised assessment.
SNH (June 2012) Green Network – Expect the Council's aspiration to be that Option 18a would have Major, rather than Minor, Positive effects on most topics.	Comments reflected in revised assessment.
SNH (June 2012) Open Space – Provided that 'quality' is interpreted in a Green Network concept, this could result in Minor Positive effects on Landscape.	Comments reflected in revised assessment.
SNH (June 2012) Fastlink – Delivering Fastlink would require loss of woodland along the current NCR and recreational access would be adversely affected temporarily, though possibly enhanced long-term. These Green Network impacts could amount to net Minor Negative effects on Material Assets, if not on Biodiversity and Landscape.	Noted. Effects dependent on exact route. MIR shows indicative route only.
SNH (June 2012) Dumbarton FC – The Inner Clyde SPA would be an important consideration for Option 29a but given the screening provided by the railway bank it seems unlikely that significant effects in SEA terms would arise.	Noted.
SEPA (November 2013) Young's Farm (Dumbarton FC) — It may be that the developable footprint of the site will need to be looked at as part of the site mitigation to avoid development within the fluvial floodplain. The commentary section should recognise the flood risk to the site and the fact the site boundary may need to change to avoid flood risk.	Noted.

Report Section	
SNH (June 2012)	Comments reflected in revised
Stirling Road – Not clear why the effect	assessment.
on Biodiversity is assessed as net neutral,	
rather than Minor Negative.	
Appendix C – Proposed Plan Assessment	
SNH (November 2013)	Noted.
Bowling Basins - consider that a	
negative effect should be identified on	
Landscape, in line with that identified for	
Cultural Heritage (which includes effects	
on landscape setting of the Canal and its	
basins). This is due to the likelihood of	
considerable replacement of woodland	
with built development.	
SNH (November 2013)	Noted.
GE1 (18) Clydebank Business Park – This	
site would not have significant effects on	
Biodiversity. It may have been assessed	
in error as potentially affecting the Inner	
Clyde SPA but it is too far from the Clyde	
to have such effects.	
SNH (November 2013)	Noted.
BC1 (20) Crosslet House — Negative	
effects should have been identified on	
Biodiversity, rather than uncertain. This	
would have led to the identification of	
mitigation in the form of retention of	
trees/woodland.	Natad
SNH (November 2013)	Noted.
BC1 (56) Dalreoch Quarry North – agree	
that the geological interest of the	
overlapping LNCS could be significantly	
impacted. Therefore a Negative effect on soil should be identified.	
	Noted
SNH (November 2013)	Noted.
GN <sub>3</sub> The Habitat Network and Geodiversity – the protection afforded	
by this policy to geodiversity is new	
relative to the Adopted Plan. Therefore	
Positive effects should be identified on	
Soil	
Joli	

Report Section Consultation Authority Comment	WDC Response
GN7 (November 2013) Forth & Clyde Canal – the requirement in this policy for Green Network enhancement of the canal goes significantly beyond policy R4 in the Adopted Plan. It could be assessed as leading to positive effects on not just Material Assets, but also Biodiversity and Landscape.	Noted.

#### **Addendum**

## Consideration of the Local Development Plan Examination Report, March 2015

## **Examination process**

In line with the requirements of Section 19(1) of the Planning etc (Scotland) Act 2006, the West Dunbartonshire Local Development Plan was submitted to Scottish Ministers for Examination of unresolved issues on 20 June 2014. A total of 354 unresolved representations were sent to the Scottish Ministers, grouped under 25 issues.

The Council received the Examination Report on 8 January 2015. The report recommends 88 modifications to the plan, a significant proportion of which were suggested to Ministers in the Councils submission to them. The recommendations contained in the Examination Report are binding, except in specific defined circumstances as set out in the Town and Country Planning (Grounds for declining to follow recommodations)(Scotland)Regulations 2009, which include where a recommendation is not acceptable having regard to the Environmental Assessment. The Council has examined closely the recommendations and has determined that it does not accept one of the modifications: the designation of the Duntiglennan housing opportunity site.

#### Review of SEA in light of the Examination Report

Following receipt of the Examination Report, each of the modifications has been considered in respect of the SEA. The outcome of this process is detailed in table 1 below. This process involved looking at each of the 88 modifications and considering them against the 3 questions below:

- (i) Are they are of a nature that SEA is applicable?
  - The Environmental Report assesses the impact of the policies and proposals of the LDP, including the policy framework set out in the Changing Places section of the Plan. A significant proportion of the recommended modifications are to the supporting text, which does not form part of the Environmental Assessment. These modifications do not, therefore, have implications for the SEA.
  - Several of the modifications are minor wording changes, clarifications or technical amendments. These modifications do not have implications for the SEA.

- (ii) Have they already been assessed as part of the Main Issues Report or Proposed Plan?
  - The approach taken to the SEA is clearly outlined in Section 4 of the main body of the Environmental Report. The SEA first assessed all options and alternatives set out within the Main Issues Report. The policies and proposals of the Proposed Plan were then considered in relation to the assessment already carried out for the MIR, with a judgement made as to whether new material was significant in the context of the whole plan.
  - Similar to the Proposed Plan stage, the modifications recommended by the Reporter have been considered in the context of the previous assessments that have been made. As evidenced in table 1, a significant number of the modifications are judged to have already been considered within the SEA process and therefore no re-assessment is required.
- (iii) Do they raise any potential significant impacts for the plan as a whole?
  - Taking into account steps (i) and (ii) above only two of the modifications were required to be reviewed for their environmental implications. These comprise of the introduction of two new policies; Soils and Housing Land Supply. As per the explanation detailed in table 2 below, the new policies are not judged to raise any potentially significant environmental effects.

## **Conclusion**

The review of the SEA in light of the Examination Report has not identified any potentially significant environmental effects that have not already been considered within the Environmental Assessment process. The key assessments, conclusions and mitigation measures set out in the Environmental Report remain entirely relevant.

<u>Table 1: Local Development Plan Examination Report – Recommendations and Implications for SEA</u>

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
BC1	Amend Policy BC1 as follows: The sites in Schedules 2 - 4 are reserved for housing development. Development of housing on these sites will be supported subject to consideration of the principles for good design of residential development, for which further information and detail will be provided in supplementary guidance.	Change to policy  Clarification regarding the status of Supplementary Guidance.	No SEA implication.
BC <sub>2</sub>	Amend Policy BC2 as follows: Particular needs housing will be supported on the sites in Schedule 5 and other suitable sites subject to consideration of the principles for good design of residential development, for which further information and detail will be provided in supplementary guidance.	Change to policy  Clarification regarding the status of Supplementary Guidance	No SEA implication.
GN2	Delete "and in accordance with supplementary guidance" from Policy GN2 and add a sentence at the end as follows:  Development will be considered in relation to further information and detail to be provided within supplementary guidance.	Change to policy  Clarification regarding the status of Supplementary Guidance	No SEA implication.
BH1	Amend Policy BH1 as follows: Development that would have an adverse impact on the Antonine Wall or its setting will not be permitted. Proposals affecting the wall will be considered in relation to further information and detail to be provided in supplementary guidance.	Change to policy.  Clarification regarding the status of Supplementary Guidance.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
1.7	Amend the first bullet point following paragraph 1.7 as follows: Supplementary Guidance – this provides further detail or information in respect of the policies of the local development plan. The Plan indicates those areas where supplementary guidance will be prepared in support of those matters which are set out within the policies of the plan.	Change to supporting text.	No SEA implication.
3.2.3	Remove "Supplementary" from paragraph 3.2.3 and replacing "Guidance" with "guidance".	Change to 'Changing Places' policy framework.  Minor wording change.	No SEA implication.
3.5.3	Removing the words "which are Supplementary Guidance" from paragraph 3.5.3.	Change to 'Changing Places' policy framework Minor clarification.	No SEA implication.
6.6.3	Replacing "are" with "will be"" in paragraph 6.6.3.	Change to Supporting text.	No SEA implication.
9.2.4	Replacing "has been approved" with "is being revised" in paragraph 9.2.4.	Change to Supporting text.	No SEA implication.
Glossary	Amend the text in the glossary under the heading of Appropriate Assessment as follows: see Habitats Regulations Appraisal.	Change to Glossary	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
Glossary	Amending the text in the glossary under the heading of Habitats Regulations Appraisal as follows: the process, or the written record, of assessing a plan or project that might have implications for a Natura site against the strict tests in the Habitats Regulations. Where a plan or project (for example built development) is assessed as "likely to have a significant effect", an appropriate assessment must be undertaken of whether it would "adversely affect the integrity" of the Natura site.	Change to Glossary	No SEA implication.
3.4.11	In paragraph 3.4.11, change the penultimate sentence to read: "Public access along the entire waterfront is a requirement of the development of this site as is the retention and stabilisation of the basin and harbour walls."	Change to 'Changing Places' policy framework.  Minor change to wording	The Dumbarton Waterfront 'Changing Places' framework was considered as part of the environmental assessment of the Main Issues Report (Main Issue 2).  The minor change to wording does not require any further assessment to be carried out.
Мар 5	In the written statement Map 5, Dumbarton Town Centre and Waterfront, delete the harbourside path on the east bank of the River Leven southwards from the point where the path meets the northern base of Dumbarton Rock.	Change to 'Changing Places' policy framework.  Change to extent of proposed path.	The Dumbarton Waterfront 'Changing Places' framework was considered as part of the environmental assessment of the Main Issues Report (Main Issue 2).  As a result of removing the section of the path that would need to be affixed to the Dumbarton Rock SSSI, the modification seeks to avoid any damage to the SSSI. The LDP will not identify any physical change for this sensitive area, therefore there is no requirement for any further environmental assessment.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
3.4.11	In the written statement paragraph 3.4.11, following the sentence ending "access to the waterfront and views to Dumbarton Castle." insert a further sentence as follows: "Throughout the area, green space creation will be an important consideration in achieving the stated objectives."	Change to 'Changing Places' policy framework.  Additional emphasis placed on the creation of green spaces.	The Dumbarton Waterfront 'Changing Places' framework was considered as part of the environmental assessment of the Main Issues Report (Main Issue 2).  The additional emphasis on ensuring that the creation of green space is integral to any redevelopment, is considered a positive inclusion, which does not impact on the original assessment at Main Issues stage. The change does not require a further assessment to be carried out.
3.5.8	In paragraph 3.5.8, alter the final sentence to read: "and, along with the embankment, contribute to the green network of the site, offering a path and wildlife connectivity."	Change to 'Changing Places' policy framework.  Explicit reference added to the need for this element of the site to contribute to the green network.	The Queens Quay 'Changing Places' framework was considered as part of the environmental assessment of the Main Issues Report (Main Issue 5).  The inclusion of reference to the green network is considered a positive addition and one which does not impact on the original assessment at Main Issues stage. A further assessment is not required.
3.6.7	Add a sentence after the second sentence of paragraph 3.6.7 to state:  Scottish Canal's input at an early stage will be required to ensure the crossing is designed in line with the navigational and access requirements of the canal.	Change to 'Changing Places' policy framework  Technical amendment for clarity.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
3.6.7	Amend the penultimate sentence of paragraph 3.6.7 to state: The provision of open space within the Carless site will compensate for any loss resulting from the creation of the access road including, if required, a sports pitch or playing field in accordance with Policy GN1.	Change to 'Changing Places' policy framework.  Explicit reference added for the inclusion of replacement sports pitches or playing fields.	The Carless 'Changing Places' framework was considered as part of the environmental assessment of the Main Issues Report (Main Issue 4).  The amendment to make clear the need to replace sports pitches or playing fields is considered a minor inclusion, which does not require a further assessment.
3.6.8	Add a sentence at the end of paragraph 3.6.8 to state: In addition, once the site has been remediated, planting to provide greening in advance of development will be supported and encouraged.	Change to 'Changing Places' policy framework.  Explicit reference to advance greening added.	The Carless 'Changing Places' framework was considered through the environmental assessment of the Main Issues Report (Main Issue 4).  The inclusion of support for advance greening is a positive recommendation. It is not of due significance to require any further assessment.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
3.7.8	Add a new paragraph after paragraph 3.7.8 as follows: Proposals for development should take into consideration the site's waterfront location and ensure that built development interacts with the riverside. Green network enhancements should be provided along the waterfront, potentially providing a link from the cycleway in the west to Bowling Station in the east, as shown on Map 8. In addition to providing recreational access, these enhancements should reflect the biodiversity and landscape character of the site.	Change to 'Changing Places' policy framework.  Additional text added to make provision for a cycleway between the site and Bowling Station.	The Esso Bowling 'Changing Places' framework was considered through the Environmental Assessment of the Main Issues Report (Main Issue 3).  The provision for a new cycleway is caveated by the need to ensure that recreational access respects existing landscape character and biodiversity. The inclusion is expected to help mitigate some of the negative impacts identified through the Environmental Assessment, in terms of supporting active travel and safeguarding landscape and biodiversity. This additional wording does not alter the overall principles of the policy framework for Esso Bowling, therefore there is no requirement for re-assessment.
3.7.9	Amend the final sentence of paragraph 3.7.9 as follows: The restoration of the Castle, including for leisure and tourism uses, is supported by the Plan.	Change to 'Changing Places' policy framework  Explicit reference to the use of the castle for leisure and tourism added.	The Esso Bowling 'Changing Places' framework was considered through the Environmental Assessment of the Main Issues Report (Main Issue 3).  The minor addition to give specific support for the leisure and tourism use of the Castle is not considered to require any re-assessment, particularly as the plan specifically states that any development should protect and enhance the castle and its setting.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
3.7.11	Amend the penultimate sentence of paragraph 3.7.11 as follows:  It may also have potential in the long-term to enable coastal realignment, mitigating the impact of climate change and allowing the migration of Inner Clyde habitats in response to sea-level rise.	Change to 'Changing Places' policy framework.  Minor wording clarification.	No SEA implication
Map 8	Amend Map 8 for Esso Bowling and Scott's Yard to include an indicative area showing green network enhancements along the southern boundary of the site.	Change to 'Changing Places' policy framework.  Area for green network enhancements added to map.	The Esso Bowling 'Changing Places' framework was considered through the Environmental Assessment of the MIR (Main Issue 3).  This amendment to show green network enhancements does not require any change to the existing conclusions.  No further assessment required.
3.8.2 3.8.4	<ul> <li>In section 3.8, Bowling Basin:</li> <li>In the third bullet point of paragraph 3.8.2 delete "low density housing within"</li> <li>In paragraph 3.8.4, delete the third sentence: "South of the former railway line, closer to the River Clyde, housing within a woodland setting will be supported."</li> <li>Amend the fourth sentence as follows: "Whilst not a designated nature the green network and provides a wildlife habitat which stretches eastwards into the Saltings Local Nature Reserve."</li> <li>Delete the final sentence "Development within the woodland should be designed to minimise the impact on the woodland's role as a habitat and include enhancements to this role."</li> </ul>	Change to 'Changing Places' policy framework  Changes to reflect the removal of part of the housing opportunity site.	The Bowling Basin site as a whole has already been assessed within the Environmental Report, at the Proposed Plan stage.  The recommendation to remove part of the housing opportunity site and instead show it as an area for 'green network enhancements' is intended to safeguard and enhance the environmental qualities of the site. By removing the housing designation, the plan no longer supports physical development on the site, therefore there is no need for the site to be re-assessed as part of the SEA.

Paragraph/	Reporter's Recommendation	Nature of change	Implication for SEA
Map 9	In Map 9, Bowling Basin:  • delete "Woodland Housing BC(76) along within the hatch denoting "Housing opportunity" and replace with "Green network enhancements (GN2)" over the entire site.	Change to 'Changing Places' policy framework.  Deletion of part of the housing site.	As per above.  No requirement to amend Environmental Report.
Schedule 4	In Schedule 4, New allocations for housing:  • amend the indicative capacity for site BC1 (76), Bowling Basin, to reflect the deletion of the woodland housing section of the site. Make adjustments as necessary in other local development plan tables and schedules.  •	See comments above.	As per above.  No requirement to amend Environmental Report.
3.9.2	Modify the local development plan by adding a sentence after the seventh line of paragraph 3.9.2 as follows: However, care would be needed to avoid this resource having an adverse effect on any existing recreational facilities associated with the River Leven.	Change to 'Changing Places' policy framework. Minor expansion of text.	The Lomond Canal proposal was considered through the Environmental Assessment of the Main Issues Report (Main Issue 7)  The minor expansion of text does not raise any requirement to amend the Environmental Report.
3.10.10	Add a sentence to the end of paragraph 3.10.10 of the local development plan as follows:  Any significant management or maintenance of the woodland within the Vale of Leven Industrial Estate will be preceded by an appropriate survey in order to protect the biodiversity of the area.	Change to 'Changing Places' policy framework.  Minor expansion of text.	The Lomondgate 'Changing Places' framework was scoped out of the Environmental Assessment of the MIR as the proposals did not involve any change to the extent of development opportunity sites identified in existing planning policy.  The minor expansion of text to provide additional safeguards for the biodiversity of the area does not raise any requirement to assess the site at this stage.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
3.10.13	Add a sentence to the end of paragraph 3.10.13 of the local development plan as follows: The council will also support appropriate measures to improve access through Lomondgate and the Vale of Leven Industrial Estate by foot and cycle, in the interests of providing sustainable transport access within the area.	Change to 'Changing Places' policy framework.  Minor expansion of text to provide foot and cycle linkages	The Lomondgate 'Changing Places' framework was scoped out of the Environmental Assessment of the MIR as the proposals did not involve any change to the extent of development opportunity sites identified in existing planning policy.  The minor expansion of text to support foot and cycle linkages, helping to promote active travel and the associated environmental benefits, does not raise any requirement to assess the site at this stage.
Table 4	Replace the third line of the specific requirements for Lomondgate Area 5, as set out in Table 4 of the local development plan, with the following: Requirement to engage with local bus operators and make all reasonable efforts to ensure bus services for Lomondgate development.	Minor clarification to table 4.	No SEA implication.
Table 4	Replace the second line of the specific requirements for Lomondgate Area 5, as set out in Table 4 of the local development plan, with the following: Habitat improvement and management on land to the north, west and south of the site as identified for open space and green network enhancements on Map 11.	Minor clarification to table 4.	No SEA implication.
3.11.4	In paragraph 3.11.4 replace "managing flood risk" with "avoiding flood risk".	Change to 'Changing Places' policy framework  Minor change in emphasis.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
3.11.4	Insert the following at the end of paragraph 3.11.4:  'Any development at Young's Farm must not have an adverse affect on the integrity of the Endrick Water Special Area of Conservation'	Change to 'Changing Places' policy framework. Minor clarification.	The Young's Farm site was assessed as a potential site for Dumbarton Football Club through the Environmental Assessment of the MIR (Main Issue 29)  The additional wording to support the SAC does not raise any requirement to amend the Environmental Report.
Map 12	Delete the brown hatched area on map 12, page and the corresponding reference in the key. Delete the existing label in the key- "Young's Farm Dumbarton FC" and replace with "Potential area for relocation of Dumbarton Football Club, subject to further detailed assessment".	Change to 'Changing Places' policy framework.  Show only the general area of search for the football stadium, omitting the detailed indication of where the stadium will go.	The Young's farm location was assessed as a potential site for the football club relocation through the Environmental Assessment of the MIR (Main Issue 29). The site included in the Assessment process was the wider boundary, which is the same as the one the reporter recommends using.  The change to the map does not require any amendments to be made to the Environmental Report.
GN1	Add the following text in brackets to Policy GN1 after quality and value (third line): (to be considered in relation to further information and detail which will be provided within supplementary guidance)	Change to policy  Clarification regarding the status of Supplementary Guidance.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
New paragraph	Add a new paragraph at the beginning of sub-section 8.4 as follows:  West Dunbartonshire has a rich diversity of species of fauna and flora, and it is important that these species, and the integrity of their habitats, is protected. There is a hierarchy of protection for these species and designated and non-designated habitats set out in Policy GN3, including statutory designations at international and national level, and local nature conservation sites. These are shown on the proposals maps.	Change to supporting text	No SEA implication.
8.4.1	Add a sentence at the end of paragraph 8.4.1 as follows: These sites are shown on the proposals map by a symbol, and the council will seek to identify appropriate boundaries for these sites in consultation with Strathclyde Geo-conservation Group.	Change to supporting text.	No SEA implication.
8.4.3	Deleting the first sentence of paragraph 8.4.3.	Change to supporting text	No SEA implication
8.4.4	Adding a new paragraph after paragraph 8.4.4 as follows: In the event that development adversely affects the integrity of a Natura 2000 site, but will be allowed because there are no alternative solutions and there are imperative reasons of overriding public interest, including those of a social and economic nature, Scottish Ministers will be notified, and compensatory measures necessary to ensure the overall coherence of the Natura network is protected must be provided.	Change to supporting text.	No SEA implication

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
GN <sub>3</sub>	Amend the first sentence of Policy GN <sub>3</sub> to state the following: Development that adversely affects the integrity of sites designated for nature conservation or harms protected species	Change to policy  Additional wording added to give greater clarity to the application of the policy.	Policy GN <sub>3</sub> was considered as part of the Environmental Assessment of the Proposed Plan.  The additional wording is <b>not of sufficient significance to raise a requirement for the policy to be assessed.</b>
GN <sub>3</sub>	Amend sub-section a) of Policy GN <sub>3</sub> as follows: imperative reasons of overriding public interest, including those of a social and economic nature;	Change to policy.  Minor clarification to reflect SPP.	Policy GN <sub>3</sub> was considered as part of the Environmental Assessment of the Proposed Plan.  The amended wording does not change the overall direction or principles of the policy and does not, therefore, raise a requirement for the policy to be assessed.
GN <sub>3</sub>	Amend sub-section b) of Policy GN3 as follows: for protected species, where relevant licensing tests or other legal provisions are met;	Change to policy.  Minor clarification.	Policy GN <sub>3</sub> was considered as part of the Environmental Assessment of the Proposed Plan.  The amended wording does not change the overall direction or principles of the policy and does not, therefore, raise a requirement for the policy to be assessed.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
GN <sub>3</sub>	Adding a new sub-section (e) to Policy GN <sub>3</sub> as follows: for Local Nature Reserves, where impacts are offset or compensated in a way that maintains the integrity of the interests affected and maintains the involvement of people.	Change to policy  Additional criterion added to give appropriate protection to Local Nature Reserves.	Policy GN3 was considered as part of the Environmental Assessment of the Proposed Plan.  The inclusion of the additional criterion does not change the overall direction or principles of the policy and does not, therefore, raise a requirement for the policy to be assessed.
GN <sub>3</sub>	Amend the final sentence of Policy GN <sub>3</sub> as follows: Development that adversely affects non-designated habitats identified in the Dunbartonshire Local Biodiversity Action Plan will be assessed against the level of net impacts. New development should seek to enhance biodiversity as part of the green network.	Change to policy  Minor clarification and additional emphasis on the biodiversity enhancement.	Policy GN3 was considered as part of the Environmental Assessment of the Proposed Plan.  The amended wording does not change the overall direction or principles of the policy and does not, therefore, raise a requirement for the policy to be assessed.
GN4	Amend Policy GN4 as follows: Development proposals shall take into account the local landscape character of the area, and ensure that the integrity of this landscape character is maintained or enhanced. Development that could affect the Kilpatrick Hills will be required to protect, and where possible enhance, their special landscape qualities. Proposals will be considered in relation to further information and detail on the Kilpatrick Hills to be provided within supplementary guidance.	Change to policy  Wording of the policy amended to be less prescriptive and better reflect the relationship with proposed supplementary guidance.	Policy GN4 was considered as part of the Environmental Assessment of the Proposed Plan.  The amendments to the policy are not of a significance that require the policy to be assessed at this stage.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
GN <sub>5</sub>	Amend the first paragraph of Policy GN5 as follows: The expansion and enhancement of woodland will be supported, where appropriate including the planting and management of native species. This will be considered in relation to further information and detail on the Kilpatrick Hills, and forestry, woodland and trees, to be provided within supplementary guidance.	Change to policy  Minor clarification to policy wording.	Policy GN5 was considered as part of the Environmental Assessment of the Proposed Plan.  The minor amendment to the wording does not require the policy to be assessed at this stage.
8.10	Changing the title of sub-section 8.10 to Advance and Temporary Greening.	Change to supporting text	No SEA implication.
8.10.2	Amending the first sentence of paragraph 8.10.2 as follows: This plan supports and encourages green infrastructure components of future development being put in before construction begins; known as advance greening.	Change to supporting text.	No SEA implication.
3.13.2	<ul> <li>Amending the third bullet point of paragraph 3.13.2 as follows:</li> <li>to protect and enhance the Hills as an accessible recreational resource.</li> </ul>	Change to supporting text.	No SEA implication.
3.13.5	Amending the fourth sentence of paragraph 3.13.5 as follows: Other sites will see new native woodlands created, and areas of commercial forestry producing timber will also remain.	Change to supporting text.	No SEA implication.
3.13.6	Amending the second sentence of paragraph 3.13.6 as follows: The fringes of the Kilpatrick Hills are on the doorstep of our settlements and locations such as Overtoun, Bellsmyre and Edinbarnet are important gateways.	Change to supporting text.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's R	ecommendation			Nature of change	Implication for SEA
DS1			d bullet point (tick) of er to Appendix 1 ratho		Change to policy.  Minor wording correction.	No SEA implication.
Appendix 1	Proposals for sustainability in which they to be an exceptorm a part of	new buildings shoul vistandards set out in viare submitted unles eption to the policy. T fithose emissions sav gulations in force in t	the table below for the sthe proposal is consoling the emissions savings vings required by the label the given year.	he year iidered should	Amendments to appendix 1 to provider greater detail of the sustainability standards the Council expects to be provided in new	In conjunction with policy DS1, Appendix 1 was assessed as part of the Environmental Assessment of the Proposed Plan. Whilst Appendix 1 as amended provides greater detail on low and zero carbon generating technology requirements, the overall direction and principles of the policy approach remain the same. The changes to the appendix do not,
	2015-16	Domestic  New buildings include a minimum 2% carbon dioxide emissions abatement through the use of low and zero carbon generating technology.	Non-domestic  New buildings include a minimum 2% carbon dioxide emissions abatement through the use of low and zero carbon generating technology.		buildings.	therefore, require to be re-assessed.
	2017-19	New buildings include a minimum 3%carbon dioxide emissions	New buildings include a minimum 3%carbon dioxide emissions abatement			

Paragraph/ Policy/ Map	Reporter's Re	commendation		Nature of change	Implication for SEA
	2020 onwards	abatement through the use of low and zero carbon generating technology.  New buildings include a minimum 5% carbon dioxide emissions abatement through the use of low and zero carbon generating technology.	through the use of low and zero carbon generating technology.  New buildings include a minimum 5% carbon dioxide emissions abatement through the use of low and zero carbon generating technology.		
DS1	(tick) under th	e heading Safe and I	OS1 after the first bul Pleasant as follows: astructure from flood	Change to policy  Additional criteria added to policy DS1, to address flooding.	Policy DS1 was assessed as part of the Environmental Assessment of the Proposed Plan. The policy principles of DS1 remain the same, but with flood risk identified as an additional consideration within the design process. It should also be noted that the detailed flood risk policy (DS6) is separately assessed within the Environmental Report. The addition to DS1 does not raise a requirement to re-assess the policy.
4.3.2	•		in paragraph 4.3.2 as ntial and for some thi	Change to supporting text.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
DS <sub>2</sub>	Add a bullet point before the first bullet point in Policy DS2 as follows: Housing development in accordance with new Policy BC1.	Change to policy  Cross-reference added to new housing policy BC1. (See comments under BC1).	No SEA implication.
4.4.3	Add a new sentence to the end of paragraph 4.4.3 as follows: All development should seek to promote the use of sustainable modes of transport including active travel.	Change to supporting text	No SEA implication.
DS <sub>3</sub>	Amend the third line of Policy DS3 to state: Where relevant, all development should include measures	Change to policy  Minor wording change	No SEA implication.
4.6.2	Amend the first sentence of paragraph 4.6.2 as follows: Renewable energy developments can often prove controversial and the environmental consequences should be addressed through the development management process.	Change to supporting text.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
DS <sub>5</sub>	Amending Policy DS <sub>5</sub> a) by adding a further bullet point as follows:  • sport and recreation interests	Additional bullet point added to policy criteria.	Policy DS5 has been considered as part of the Environmental Assessment at the Proposed Plan stage.  The Environmental Report scoped out DS5, concluding that as the policy is a protective policy that requires development to avoid adverse impacts on a range of environmental factors, the policy will prevent significant impacts from occurring, but will not in itself bring about positive or negative impacts. The inclusion of the additional bullet point does not alter the conclusions of the original assessment.  There is no requirement for re-assessment.
DS <sub>5</sub>	Add a new criterion after Policy DS5 e) as follows: f) avoids significant adverse impact on the setting of and views to and from the Loch Lomond and the Trossachs National Park and Loch Lomond National Scenic Area;	Change to policy  Additional policy criterion added to avoid any adverse impact on the National Park and NSA.	Policy DS5 has been considered as part of the Environmental Assessment at the Proposed Plan stage.  The Environmental Report scoped out DS5, concluding that as the policy is a protective policy that requires development to avoid adverse impacts on a range of environmental factors, the policy will prevent significant impacts from occurring, but will not in itself bring about positive or negative impacts. The inclusion of the new criterion does not alter the conclusions of the original assessment.  There is no requirement for re-assessment.

Paragraph/	Reporter's Recommendation	Nature of change	Implication for SEA
Policy/ Map			
DS <sub>5</sub> 4.7.1 to 4.7.4	Delete criterion f) of policy DS5.  Amend criterion (g) of Policy DS5 as follows: Proposals will also be considered in relation to further information and detail on the above to be provided through supplementary guidance. This will include a spatial framework for wind farms as detailed in paragraph 4.7.1.  Delete paragraphs 4.7.1 to 4.7.4 and Maps 15 and 16.  Insert a new paragraph 4.7.1 as follows: In accordance with Scottish Planning Policy (paragraph 161 and Table 1: Spatial Frameworks) a spatial framework for wind energy will be prepared as supplementary guidance. This supplementary guidance will identify:  • Areas of significant protection • Areas with potential for wind farm development and will constitute part of the supplementary guidance to be prepared in the context of Policy DS5, taking into account the criteria set out in that policy.	Change to policy.  The spatial framework for wind energy has been removed and wording added to ensure the Council prepares Supplementary Guidance that will include a spatial framework for wind farms, in line with SPP.	Consideration will be given to the need for future Supplementary Guidance on renewable energy to be subject to SEA.  In the absence of the spatial framework for wind farms within the LDP, applications will be assessed against the criteria based policy DS5, which has been considered within the Environmental Report. As DS5 is a protective policy that seeks to avoid significant adverse impacts on a range of environmental features, it is considered that irrespective of the exclusion of the spatial framework, the conclusion of the Environmental Assessment remains the same. There is therefore no requirement for the policy to be re-assessed.
4.9.5	Adding a new paragraph 4.9.5 as follows: The local development plan takes a precautionary approach to managing flood risk and seeks to reduce overall flood risk by considering flooding from all sources in accordance with the principles of sustainable flood management and in recognition that avoidance is the cornerstone of sustainable flood risk management. With regards to redevelopment proposals, land use vulnerability should be considered, focusing on changes of use to the less or same vulnerability combined with use of flood resilient materials and design.	Change to supporting text.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
4.11.2	Deleting the second sentence of paragraph 4.11.2.	Change to supporting text	No SEA implication.
DS8	Adding a new Policy DS8 as follows: All development should seek to make sustainable use of soils and development proposals that would affect peat and carbon rich soils should include measures to minimise soil disturbance. Development should also seek to enhance areas of peatland or other carbon rich soils.	Additional policy added	As per table 2 below, the new policy DS8 has been considered for environmental implications.  Whilst the inclusion of the policy will provide protection to valuable soils, taken on its own, it is unlikely to result in any physical change or result in any significant environmental effects.  The addition of the new policy will not have a significant environmental impact.
Vale of Leven Proposals Map	Retain the boundary of site GE1(14) but delete the area of open space to the south as detailed in the council's corrected plan as submitted to the examination on 24 September 2014.	Change to Proposals map  Removal of small area of open space incorrectly shown.	No SEA implication.
Schedule 1, Chapter 5	Include an asterisk link to the footnote for GE1(10) Cable Road Depot and remove the asterisk against GE1(8) Clydebank Business Park.	Technical clarification	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
Table 2	<ul> <li>Update Table 2 taking into account the 2013 housing land audit position with the following additional updates:</li> <li>Inclusion of an additional 100 units in the private sector supply in the period 2009-2020 to reflect the recommended inclusion of Duntiglennan Fields (recommendation Issue 17)</li> <li>Inclusion of an additional 40 units in the private sector housing land supply to 2020 to reflect the recommended change to BC1(82) through Issue 18.</li> <li>Consequent amendment to the total supply of private sector and affordable housing to reflect these changes.</li> </ul>	Change to supporting text.	No SEA implication.
6.2.5	In paragraph 6.2.4 delete the remaining text following after "These are set out in schedule 4". Replace the deleted text with that from paragraph 6.2.6 and include a corresponding update of the figures from revised table 2.	Change to supporting text.	No SEA implication.
6.2.6	Replace relocated paragraph 6.2.6 with the following text: 6.2.6 The strategic plan identifies a need only for private sector housing. Tables 2 and 3 show how this would be addressed. This is based on current programming assumptions. The council recognises that the current private sector supply to 2020 lacks any flexibility over and above the strategic requirement. Such flexibility is generally required to account for fluctuations and uncertainties in the delivery of housing sites. However the council has allocated a generous supply of land overall and will work with the housebuilding industry and other agencies to facilitate timely delivery of the established land supply. In addition, Policy BCX below includes a commitment to maintain a continuous 5 year land supply by enabling appropriate sites to come forward if required.	Change to supporting text.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
New policy	Include the following new policy BCX after new paragraph 6.2.6. This would then become BC(1) with consequent renumbering of polices BC1-4.  Policy BC1  A five year effective supply of housing land will be maintained at all times throughout the lifetime of the plan to enable delivery of the strategic housing requirement. This will be monitored and updated annually through the housing land audit.  The council will prioritise the early delivery of sites within the established land supply. If the audit identifies a shortfall in the five year effective housing land supply, the council will support housing proposals which:  • are capable of delivering completions in the next five years;  • can address infrastructure constraints;  • are in a sustainable location as guided by Diagram 4 of the Glasgow and Clyde Valley Strategic Development Plan; and do not undermine the strategic focus on urban regeneration and brownfield redevelopment.	New policy added.	This new policy has been reviewed for environmental implications, as demonstrated in table 2 below.  By requiring proposals to follow the framework set out in the Sustainable Location Assessment (Diagram 4) of the SDP, any new housing sites that come forward will be assessed in respect of key environmental considerations, as per Diagram 4. The assessment of such sites will also be subject to all other policies of the LDP, ensuring all environmental factors will be taken into account in decision making.  The new policy is a protective policy that puts in place safeguards should new housing sites come forward. The policy will not in itself bring forward new development.  The addition of the new policy will not have a significant environmental impact.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
Schedule 4	In Schedule 4 insert BC1(X) Duntiglennan Fields with consequent renumbering of the other site references. Include an indicative capacity of 100 and also add this to the column 2012-2020.	Change to Schedule.  Inclusion of additional housing site (Duntiglennan Fields) with capacity for 100 units.  The Council does not accept this recommodation.	As the Council has not accepted this modification, there is <b>no implication for the SEA</b> .
Clydebank Proposals Map	On the proposals map remove the associated area from the green belt and amend the settlement boundary to include this site as shown in the original proposed plan (CD18).	Change to Proposals Map.	As per response above.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
Table 4	In Table 4 add Duntiglennan Fields, Clydebank with the following specific requirements:  1. A comprehensive landscaping scheme and design statement should be submitted. To address landscape and visual impact on the setting of Duntocher and the Kilpatrick Hills the proposal should:  • include structural planting to strengthen the green belt boundary;  • retain key views and an appropriate transition to the green belt incorporating existing trees and stone walls;  • include a green corridor along the western boundary;  • address recreational access linking Craigielea Road to the access route to the north;  • restrict the developable area of the middle field to the southern third;  • avoid development in the northern most field; and  • include an appropriate setback, layout and design along the boundaries with the established residential area and the farm steadings.  2. In addition the proposal should include vehicular access from Farm Road with a possible secondary/emergency access and direct pedestrian access to Craigielea Road.	Change to supporting text.	As per response above.
Schedule 4	Schedule 4, under site BC1(82), Rothesay Dock, change the indicative tenure from "Affordable" to "Private". Make consequential adjustments to Table 2, rows I, J and K by reducing the affordable housing totals by 40 and increasing the private housing totals by 40.	Change to Schedule  Change to housing tenure of site  BC1(82)	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
Schedule 2	Amend BC1(14): Dumbarton Football Club in Schedule 2, page 66 from 39 to 100 with all output in the period 2019-2025 with consequent amendment to Table 3.	Change to Schedule  Increase the capacity of the site from 39 to 100 units. The boundary of the site remains the same.	The Dumbarton FC site was fully assessed as part of the Environmental Report at the Proposed Plan stage. The change to the density, to reflect the likely capacity of the site should the football club relocate, does not change the original assessment. The SEA and LDP makes clear that the development of the site will require to be led by a masterplan approach, reflecting the environmental sensitivities of the site.  No further assessment required
Table 4	In Table 4, change the second requirement in the second column to read "Structural planting to provide a strong green belt boundary but which avoids acting as a barrier to access and views" and the third requirement to read: "Development to front onto the A813, if possible". Include a new requirement to state "Assessment of potential recreational access opportunities through the woodland with implementation if feasible".	Change to supporting text	No SEA implication.
Vale of Leven Proposals Map	Delete site BC4 (1) from the Vale of Leven proposals map, retaining the designation of the land as green belt only.	Change to Proposals Map  Removal of site designation (cemetery extension) to allow for greater consideration of alternative sites.	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
6.8.2	Add a sentence in paragraph 6.8.2 after an extension to the Vale of Leven cemetery (tenth line) as follows:  A site for the extension to the Vale of Leven cemetery is still to be identified.	Change to supporting text.	No SEA implication.
Schedule 7	Change the title of "Schedule 7: Retail Development Opportunities" to: "Schedule 7: Town Centre Retail Development Opportunities"	Change to Schedule	No SEA implication.
Table 5	In Table 5: Network of Centres Retail Strategy, under "Destination commercial centre", change: "Lomond Galleries Antartex Village" to: "Lomond Galleries Antartex Village"	Change to supporting text	No SEA implication.
9.2.4	Delete the final sentence of paragraph 9.2.4.	Change to supporting text.	No SEA implication.
New paragraph	Insert an additional paragraph as follows: "9.2.5 The Antonine Wall Management Plan (2014-19) is the principal mechanism for proactively promoting the Antonine Wall. The Management Plan provides a framework for management, conservation and enhancement and includes objectives and actions to safeguard and enhance the Antonine Wall. The Management Plan aims to promote awareness and understanding by improving physical and intellectual accessibility and realise the full potential of the Antonine Wall as an education and learning resource.	Change to supporting text	No SEA implication.

Paragraph/ Policy/ Map	Reporter's Recommendation	Nature of change	Implication for SEA
Policy SD4	Change the second sentence of Policy SD4 to: "Expansion of mineral and aggregate extraction at these locations and new workings at other locations shall be accompanied by acceptable and fundable restoration and aftercare proposals and minimise significant negative impact on:".	Change to Policy  Minor wording change.	Policy SD4 was considered as part of the Environmental Assessment of the Proposed Plan.  The amended wording does not raise a requirement for the policy to be re-assessed.
Policy DS1	Change the first criterion in the Safe and Pleasant category of Policy DS1 to: "avoids unacceptable impacts on or from adjoining uses, including, noise, smell, vibration, dust, air quality, invasion of privacy and overshadowing;"	Change to Policy  Minor wording change to policy	Policy DS1 was assessed as part of the Environmental Assessment of the Proposed Plan.  The amended wording does not raise a requirement for the policy to be re-assessed.

Table 2 — Environmental implications of new policies

Local Development Plan Policy or Proposal	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
New Policy BC1 Housing land supply	X	X	X	X	X	X	X	X	x	New policy BC1 commits the Council to maintaining a five year effective land supply for housing development. Should annual monitoring reveal a shortfall, the Council will support housing development on non-identified sites, when these meet certain criteria.  Such housing sites will only be supported by policy BC1, when they are in sustainable locations as guided by the SDP's 'sustainable location assessment' diagram. This diagram ensures development proposals meet a range of sustainability and environmental criteria and specifically addresses 6 of the 9 SEA objectives.  Soil, cultural heritage and landscape are not specifically safeguarded within diagram 4 of the SDP. However, appropriate policy provision is in place elsewhere in the LDP (New policy DS8, policy GN4 and policies BH1 – BH5), to ensure these factors are taken into account in the assessment of any new housing sites.  The inclusion of this policy ensures that any development proposals coming forward on the justification that there is not an effective 5 year land supply in place will be assessed against a robust policy framework. The policy is a protective policy that provides safeguards should development proposals come forward. The policy will not in itself result in any positive or negative impacts and will not have a significant impact on the overall assessment of the plan.

New Policy DS8 Soil										New Policy DS8 gives specific emphasis to making sustainable use of soils, minimising soil disturbance and enhancing areas of carbon rich soils.
	x	x	x	x	x	x	x	x	x	The inclusion of this policy gives protection to valuable soils and will help to ensure the carbon retention benefits of peatlands are taken into account in the assessment of development proposals.
										The policy is a protective policy, which taken on its own, will not bring about any physical change and will not result in any significant environmental effects.