



























































	<b>Objective</b>	<b>Criteria Question(s)</b>	<b>Indicator</b>	<b>Targets</b>
12	Reduce energy consumption	a) Is the aim/policy/proposal likely to reduce energy consumption or increase it?	<ul style="list-style-type: none"> <li>• HECA report (2 year review)</li> <li>• Energy Action Grants Agency – administer grants</li> <li>• Distance from transport links</li> <li>• Travel to work distance</li> <li>• Commercial and private consumption data</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure all development opportunities identified in the WDLP are accessible by public transport</li> <li>• Promote high density design ay key transport nodes</li> </ul>
13	Facilitate renewable energy	a) Is the aim/policy/proposal likely to facilitate renewable energy in appropriate locations or deter its development?	<ul style="list-style-type: none"> <li>• Number of renewable energy applications over 20 MW out with Structure Plan preferred areas</li> <li>• Number of renewable energy applications</li> <li>• Measure of integration into new build/refurbishment of renewable energy technologies</li> <li>• Measure of the number of properties generating renewable energy</li> </ul>	<ul style="list-style-type: none"> <li>• Promote sites for renewable energy in WDLP</li> </ul>
14	Reduce the need for travel and journey length	a) Is the aim/policy/proposal likely to reduce the need to travel or reduce journey length or is it likely to significantly increase travel?	<ul style="list-style-type: none"> <li>• Travel to work times and distances</li> <li>• % of population working and living in West Dunbartonshire</li> <li>• Distance of housing from public transport</li> <li>• Scottish Government transport indicators</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure all development opportunities identified in the WDLP are accessible by public transport</li> <li>• Promote high density design ay key transport nodes</li> </ul>
15	Encourage walking, cycling and use of public transport	a) Is the aim/policy/proposal likely to encourage walking, cycling or the use of public transport or is it likely to deter them?	<ul style="list-style-type: none"> <li>• Number of cycle paths</li> <li>• Improved access routes</li> <li>• Traffic growth levels (Scottish Government)</li> <li>• Number of Green Travel Plans</li> <li>• Length of paths</li> <li>• Number of cyclists using paths</li> </ul>	<ul style="list-style-type: none"> <li>• Improve key access routes</li> <li>• Encourage green routes in WDLP</li> <li>• Identify opportunities to enhance access network</li> </ul>

	<b>Objective</b>	<b>Criteria Question(s)</b>	<b>Indicator</b>	<b>Targets</b>
16	Reduce waste	a) Is the aim/policy/proposal likely to reduce waste including by re-using existing buildings or is it likely to increase waste arising?	<ul style="list-style-type: none"> <li>• Amount of waste disposed of in landfill</li> <li>• Recycling rates</li> <li>• Greenlight Business Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Promote reuse of land and buildings</li> <li>• Identify opportunities for recycling facilities</li> </ul>
17	Protect the environment from pollution	a) Is the aim/policy/proposal likely to protect the environment from pollution, including by avoiding potentially polluting developments in sensitive locations, or is it likely to increase the risk of pollution?	<ul style="list-style-type: none"> <li>• Air quality monitoring</li> <li>• Contaminated land register</li> <li>• Quality of water courses</li> <li>• Noise pollution</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor air quality</li> <li>• Ensure protection of watercourses in any development scheme</li> <li>• Ensure schemes are implemented as appropriate in and development schemes</li> <li>• Secure funding and decontaminate appropriate sites</li> </ul>
18	Develop within environmental capacity, applying precautionary principle where relevant	<p>a) Is the aim/policy/proposal likely to identify, and contain development within, the limits of acceptable change?</p> <p>b) Would the precautionary principle be applied?</p>	<ul style="list-style-type: none"> <li>• Number of Article 18 applications</li> <li>• Greenbelt review</li> <li>• Landscape Character Assessment</li> <li>• Species census (including common/nuisance species)</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor Article 18 developments</li> <li>• Undertake landscape assessment for urban fringe sites</li> </ul>





## **Appendix 8**

### **Cumulative Impact Assessment**

Cumulative Impact Indicative Mapping

- 1) Strathleven
- 2) Dumbarton Waterfront
- 3) Bowling
- 4) Carless
- 5) Queens Quay

(Mapping attached separately)

## Appendix 9

### Appropriate Assessment

#### Introduction

The European Court has confirmed that Article 6(3) and 6(4) of the Habitats Directive applies to development plans.

As a result of this ruling, West Dunbartonshire Council has followed the Scottish Executive Interim Guidance 'Assessing Development Plans in Terms of the Need for Appropriate Assessment' (May 2006) and with the assistance of Scottish Natural Heritage has prepared this report to assess the effects of the West Dunbartonshire Local Plan may have on European sites.

A European site is an area classified under the Habitats and Birds Directives as forming a network of protected areas, known as Natura 2000. This network includes Special Protection Areas (SPAs) classified under the Birds Directive and Special Areas of Conservation (SACs) introduced by the Habitats Directive. The Local Plan area has one Natura 2000 site, the Inner Clyde SPA, which extends for 20 km along the shores of the River Clyde including most of the shore line in the Plan area and contains extensive intertidal flats that support large numbers of wintering wildfowl. The site is also a Ramsar Site under the Ramsar Convention on Wetlands of International Importance to which the Scottish Executive have chosen to apply the same considerations to their protection as SPAs.

This report concludes that subject to the safeguards introduced in the Finalised Plan plus additional safeguards identified here, the West Dunbartonshire Local Plan will not adversely affect the integrity of any Natura 2000 site.

#### **1. The Geographical Scope of the Plan**

- 1.1 The West Dunbartonshire Local Plan covers the whole area of the West Dunbartonshire Council excluding the part within the Loch Lomond and the Trossachs National Park.

#### **2. European Sites That May be Affected**

- 2.1 One European site is affected by the Local Plan this being the Inner Clyde Special Protection Area (SPA) and Ramsar Site. There are several development sites on the north bank of the River Clyde which potentially could impact on the European site.



- 2.2 An appraisal of how the development areas may affect this Natura 2000 site has been undertaken considering the qualifying interests and conservation objectives of the site in the context of the Local Plan's aims, objectives, policies and proposals. Following consultation with SNH no Natura 2000 sites outwith the Local Plan area were considered to be significantly effected by the policies and allocations in the Local Plan.

### **3. The Local Plan's Aims and Objectives**

- 3.1 The Local Plan is the statutory document which sets out the land use planning framework for all of West Dunbartonshire with the exception of the part of the Council area within the Loch Lomond and the Trossachs National Park. The Plan indicates the Council planning policies and development opportunities including recent projects which have received planning consent for the period until 2012. The Plan complies with the Glasgow and the Clyde Valley Joint Structure Plan 2000 (and the 2006 Structure Plan Alteration) which provides the strategic development plan for the long term planning of the wider Glasgow conurbation. The Local and Structure Plans together comprise the Development Plan for West Dunbartonshire.
- 3.2 The 2006 Structure Plan Alteration was subject to an Alternative Assessment and it was concluded that the majority of the changes to the 2000 Structure Plan are unlikely to have a significant effect on a European site either directly or indirectly. Following the appropriate assessment of the SPAs and SACs it was concluded that no adverse effect will arise from the Structure Plan policy on their integrity.
- 3.3 The aims and objectives of the Local Plan are:

The aims of the Local Plan are as follows:

- To promote sustainable development and communities,
- To create economic well-being and a sustainable and competitive place through the development of strategic locations,
- To maintain and enhance the natural and built environment.

The identified key objectives are:

- To identify sustainable locations for key strategic developments,
- To enable sustainable economic and environmental regeneration,
- To ensure that sufficient land is available in appropriate locations to meet development requirements,
- To conserve environmental resources,

- To identify future areas of land use change,
- To promote and support improvements in environmental quality, and
- To ensure sustainable and integrated transport and infrastructure provision.

3.4 The main policies in relation to the natural environment include:

- Policy SUS 1 on sustainable development which seeks to maintain and enhance the quality of the environment within the Plan area.
- Policy E1 on the conservation of biodiversity.
- Policy E2A and E2B which seek to enhance wildlife habitats and protect and conserve wildlife and natural resources by safeguarding the environmental interest of the national and international nature conservation sites.
- Policy E3A and E3B on local nature conservation sites, local Nature reserves and the maintenance and enhancement of the environmental resources of the Plan area by the protection of habitats etc. which are vulnerable or specifically protected.
- Further policies on the retention of trees and woodland and their protection from development.
- Reference to the Water Framework Directive and River Basin Management Plans.

3.5 The Plan also has Key Policies relating to urban renewal and regeneration priorities which follows from the Structure Plan in directing development to previously developed sites in the urban area in order to continue the process of urban renewal. In addition specific policies on housing, economic development and transport put forward opportunities for the potential development of sites and infrastructure.

3.6

#### **4 How the Plan Might Effect the Natura 2000 Site**

4.1 The Plan has Key Policies, subject related policies, proposals and opportunities listed in schedules under each of the subject headings. The policies not only support development on opportunity sites but will also allow development in certain specified circumstances on unallocated sites or alternative development on allocated sites. The following analysis considers the impact of these policies on the Natura site. This includes general policies that would apply for developments along the foreshore and alternative proposals on designated sites as well as more site specific proposals and opportunities.

4.2 UR1 Urban Renewal promotes the re-use of land and buildings in the urban area that become vacant, derelict or underused. This policy covers the urban area north of the Clyde adjacent to the Natura site. Whilst this policy

encourages redevelopment the detailed consideration of any development proposal would be subject to other Local Plan policies therefore there is little direct impact in the Natura site from the UR1 Policy.

- 4.3 RP1 Regeneration priorities identifies three areas north of the Clyde where redevelopment of underused, vacant or derelict land is supported in order that development opportunities are brought forward. The policy refers to designations of sites on the proposals map and conformity to other Local Plan policies therefore Policy RP1 would have little direct impact on the Natura site.
- 4.4 GB1 Greenbelt has a general presumption against development unless certain criteria are met including the following that may be relevant to the Greenbelt area near the Clyde:
- Agriculture and forestry;
  - a recreation, leisure or tourist proposal that is not contrary to other Local Plan policies;
  - there is a specific location requirement for development and it cannot be accommodated on an alternative site; and
  - there is an necessity for additional land for development having regard to the Structure Plan

The policy could impact on the Natura site if the criteria are met.

- 4.5 GD1 Development Control applies to all new development and covers a wide range of issues in order to determine planning applications. It includes the requirement that valuable species and habitats are conserved and that the proposal should be consistent with other Local Plan policies. There would therefore be a direct attributable impact on the Natura site if the sensitivities of the SPA are not considered in the determination of a planning application on the north bank of the Clyde.
- 4.6 LE1 Industrial & Business sites covers both existing and proposed industrial and business class sites with a presumption in favour of extending the permanent employment uses on such sites. LE2 Mixed Business and Retail uses within industrial/ business uses and LE3 Development outwith designated industrial and business use sites sets out criteria for mixed uses on industrial sites and industrial and business uses outwith designated areas. Criteria for alternative uses of the sites are set out essentially to ensure that there will be a sufficient supply of industrial and business land and that there are no adverse impacts. The development or redevelopment of these sites could therefore significantly impact on the Natura site.

- 4.7 LE8 Tourist industry development supports tourist industry applications subject to listed criteria particularly within the Firth of Clyde Tourist Development Area. Whilst the criteria are to avoid adverse impacts, any development on the Clyde coast could adversely affect the Natura site.
- 4.8 H1/H2/H3 Housing Land Supply indicates that if assessments of supply and demand indicate that additional sites be allocated then sites will be brought forward as required. This could impact on the Natura site particularly as preference is given to brownfield sites.
- 4.9 H4 and H5 set out criteria for the development of new housing and development within existing housing estates. Such detailed consideration of development along the Clyde would impact on the Natura site as the designated housing sites are developed or after they are built.
- 4.10 Retail policies direct development forwards town centres and it is not anticipated these policies would impact on the Natura site as such development is not near the Clyde except for the retail opportunities within the Queens Quay development, Clydebank.
- 4.11 T2 Access Improvements seeks to identify access improvements for the regeneration priority areas in policy RP1 and develop an alternative route to the A82 at Milton/ Bowling. The development of such routes close to the Clyde could impact on the Natura site.
- 4.12 Environment policies generally seek to conserve the natural and built environment however policy BE3 encourages and supports the renovation of derelict buildings and lists opportunities including Dunglass Castle which is adjacent to the Clyde. This policy could therefore significantly affect the Natura site.
- 4.13 R1 Retention of Open Space has a presumption against development on areas of open space and sets out criteria for development on such sites. The potential development on open space areas under these criteria could thus impact on the Natura site.
- 4.14 R4 Forth & Clyde canal sets out the general considerations required of development near the canal including the Bowling Basins area. Given the proximity to the Clyde these policies could impact on the Natura site.
- 4.15 R5 Access Opportunities encourages access for footpaths, cycle ways and bridleways with a special emphasis on riverside areas. There is to be an effort to create a Clyde riverside walking route under this policy therefore there is a potential to affect the sensitivities of the Natura site.

- 4.16 R7 Dumbarton Football Stadium presumes the retention of the stadium but sets out criteria for non-stadium related uses. If the stadium is further developed or redeveloped there could be an impact on the Natura site.
- 4.17 PS1 Public Service Provision sets to protect established public utility uses and considers alternative uses for the sites. The sewerage facilities adjacent to the Clyde designated under this policy could therefore have an impact on the Natura site.
- 4.18 DC4 Telecommunications sets out the criteria for the consideration of telecommunications equipment such as masts for mobile phone networks and such development could adversely affect the Natura site. Similarly DC6 Renewable Energy considers possible renewable energy development which could affect the Natura site.
- 4.19 Policies, F1, F2 and F3 on flooding and sustainable urban drainage has relevance for all development and as drainage could impact on the sensitivities of the Natura site, these policies would have a significant effect.
- 4.20 In addition the following opportunity sites under various different policies could significantly affect the Natura site:

	H1 (15)	Shed 7, Dumbarton
	H1 (17)	Castlegreen Street, etc. Dumbarton
	GD2 (13)	Dumbuck Bonds, Dumbarton
		Esso, Bowling
	BE4 (6)	Dunglass Castle, Bowling
LE4	GD2 (11)	Scott's Yard, Bowling
	GD2 (10)	Bowling Basins, Bowling
	H2 (22)	Carless, Old Kilpatrick
	LE1 (8)	Carless, Old Kilpatrick
	GD2 (7)	Erskine Ferry Road, Old Kilpatrick
	LE1 (1)	Riverside Industrial Estate, Clydebank
	LE1 (2)	Clydebank Industrial Estate, Clydebank
	H2 (9)	Cable Depot Road, Clydebank
	H2 (2)/ H2 (3)/ H4 (3)	Queen's Quay, Clydebank
	RET3 (4)	Queen's Quay, Clydebank

## 5 How the Natura 2000 Site is Likely to be affected by the Local Plan Allocations

### 5.1 The Inner Clyde SPA (and Ramsar Site)

5.2 The Conservation Objectives and the Sensitivities of the SPA were obtained from SNH and these are outlined in Appendix 3. The following table summarises the sensitivities:

Site Type	Qualifying Interests	Conservation Objectives	Sensitivities
SPA	Redshank ( <i>Tringa totanus</i> )	To avoid the deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring the integrity of the site is maintained; and to ensure for the qualifying species that the following are maintained in the long term: Population of the species as a viable component of the site; Distribution of the species within the site; Structure, function and supporting processes of habitats supporting the species; No significant disturbance of the species.	1) Disturbance: acoustic, visual, predator, seasonal. 2) Habitat loss: roosting loss (limited on northern shore); feeding loss. Possible effect of sea defences with sea level changes. 3) Pollution: wholly indirect impacts – impacts on prey species; main risks likely to be point impacts, high potential impacts from rare events. 4) Cumulative: very complex interactions at varying sites and carrying types and levels of impacts.

## 6 The Principal Safeguarding Policies

6.1 The sensitivities, identified in Appendix 3 and summarized in the above table, have been assessed against the principal safeguarding policies as shown below – see Appendix 1 and 2. Appendix 1 lists some of the potential effects on the sensitivities identifies for the SPA site and the potential mitigation measures that could be undertaken following an Appropriate Assessment for any proposed development. These potential mitigation measures do no cover all the measures that may be undertaken and do not exclude other mitigation measures. The measures have been chosen to show that the Local Plan policies meets the requirements of the Habitats Directive because it should be possible to implement all of the developments which could possibly affect the SPA in a manner which would not have significant effects, and the provisions of the Plan ensure that this is tested and delivered at the development control stage.

<b>Sensitivity</b>	<b>Safeguarding Policies</b>
All sensitivities	Policy E 2A Development likely to have a significant effect on an international nature conservation site (Natura 2000 site) will be subject to an appropriate assessment. Where an assessment is unable to conclude that the development will not adversely affect the integrity of the site, development will only be permitted where: (a)there are no alternative solutions; (b)there are imperative reasons of overriding public interest. These can be of a social or economic interest except where the site has been designated for a European priority habitat or species. Consent can only be issued in such cases where the reasons for the overriding public interest relate to human health, public safety, beneficial consequences of primary importance for the environment or other reasons subject to the opinion of the European Commission (via Scottish Ministers).
Pollution	Policy E2A addition: Proposed developments or engineering works that would have an adverse effect on the water quality, ecological status or riparian habitat of a Natura 2000 site will be refused.
Pollution/Drainage	Policy F2 4 <sup>th</sup> Paragraph 2 <sup>nd</sup> bullet point add: '(for significant effects on a Europa 2000 site see Policy E2A )'.

- 6.2 NPPG 14 Natural Heritage indicates that planning authorities are required to meet the requirements of the Habitats and Birds Directives and Guidance is given in SOEnd Circular 6/1995 (as updated in 2000). The Conservation (Natural Habitats etc.) Regulations 1994 require that where an authority concludes that a development proposed unconnected with natural heritage management is likely to have a significant effect on a Natura 2000 site, it must undertake an appropriate assessment of the site. This assessment is of the implications for the conservation interests for which the area was designated. NPPG 14 indicates the circumstances when development which could have a significant effect on the conservation interests should be permitted. The SEDD Pilot Model Policy Study – Conclusions and Next Steps (January 2006) sets out the model policy following the NPPG 14 guidance on the need for appropriate assessment.
- 6.3 The above policy E2A follows the model policy guidance which is considered will safeguard the Inner Clyde SPA from potential developments along the north bank of the Clyde which may significantly effect the conservation objectives of the site. Currently the detail of the potential development of the opportunity sites covered in Appendix 1 is not known. As indicated in the Interim Guidance for Assessing Development Plans in Terms of the Need for Appropriate Assessment (SEDD May 2006) where the outcomes from the policy proposals are not apparent until a later stage a broader level of assessment for development plans as a whole is acknowledged by the EC in their Article 6 Guidance.

6.4 It is recognized that the Local Plan does not consider pollution of nature conservation site specifically therefore it is considered appropriate to add a paragraph in Policy E2A on the possible pollution related to Natura 2000 sites in order to protect the sensitivity related to the pollution of the prey species (see Section 6). This additional paragraph seeks to safeguard the conservation objectives concerning the 'structure, function and supporting processes of habitats supporting the species.' Related to pollution is the drainage of development sites therefore a reference to Policies E2A is felt appropriate for Policy F2 on Sustainable Urban Drainage, Drainage Impact Assessments and Culverts

## **7 How the Plan Might Affect the Site**

7.1.1 It has been identified that the policies and proposals in the Local Plan listed in Appendix 1 are likely to have a significant effect on the Inner Clyde SPA and Ramsar site. The sensitivities of the site are shown in the Appendix 1 Table having regard to the sites conservation objectives. The development of housing, business and industry, retailing and leisure uses on sites adjacent to the Europa site may affect the site. In addition the more general policies of the Plan which would influence development on other sites near to the SPA or on alternative development of the sites listed in Appendix 1 could affect the site.

### **7.2 Safeguarding**

7.2.1 Safeguarding against the effects identified is provided by Policy E2A and the amendment to Policy F2 as described in Section 6 above.

### **7.3 Additional Safeguarding**

7.3.1 Policy LE 1 refers to development sites LE1(2) Riverside Industrial Estate, Clydebank and LE1(18) Carless, Old Kilpatrick adjacent to the Inner Clyde SPA. There is current activity investigating the development of these sites therefore it is considered appropriate to refer to the requirements of Policy E2A within the Policy by adding the following statement:

“Proposals for sites adjacent to the Inner Clyde SPA must satisfy the requirements of Policies E2A.”

7.3.2 Similarly site LE4 the former Esso Bowling Terminal, Bowling is currently being considered as part of a Masterplanning exercise for Bowling and therefore it is considered that it would be appropriate to refer to the safeguarding policies within Policy LE4. The following wording has been added to Policy LE4:

“Proposal for the Esso Bowling Terminal site must satisfy the requirements of Policy E2A relating to the Inner Clyde Special Protection Area and Ramsar site adjacent to the site.”



- 7.3.3 Policy GD2 refers to the comprehensive development of sites for mixed uses and refers to sites GD2(13) Dumbuck Warehouses, Dumbarton, GD2(11) Scott's Yard, Bowling, GD2(10) Bowling Basins and GD2(7) Erskine Ferry Road, Old Kilpatrick. It is therefore considered appropriate to add the following phrase to Policy GD2 to ensure compliance with the safeguarding policies above:  
"Proposals for sites adjacent to the Inner Clyde SPA must satisfy the requirements of Policies E2A."
- 7.3.4 Policy H1 refers to the development of housing sites and includes sites H1(15) Shed 7, Dumbarton, H1(17) Castlegreen Street/Diamond Power/ Mary Fisher Crescent, Dumbarton, H2(22) Carless, Old Kilpatrick, H2(9) Cable Depot Road, Clydebank and H2(2)/H2(3)/H4(3) Queens Quay, Clydebank which and all adjacent or near to the Inner Clyde SPA. It is felt appropriate, therefore, to add the following phrase to Policy H1 in order to highlight the need for compliance with the requirements of the safeguarding policies above:  
"Proposals for sites adjacent to the Inner Clyde SPA must satisfy the requirements of Policies E2A."
- 7.3.5 For all built development Appendix 1 indicates that there is potential disturbance during the building phase. Given that the requirements of the conservation objectives of the SPA relate to the over-wintering of redshank it is appropriate to indicate the potential requirement of restricting building operations between September and April inclusive. This restriction will depend on the nature and extent of the building works which would be considered more closely in the Appropriate Assessment for any individual site.
- 7.3.6 Various types of development shown in Appendix 1 could potentially result in cumulative and pollution impacts. In order to mitigate the potential adverse impacts on the feeding habitat from pollution it is appropriate to indicate the potential requirement for discharge management of any runoff from developments on or near the north bank of the River Clyde adjacent to the Inner Clyde SPA. This requirement will depend on the nature of the runoff or discharges from the development sites which would be considered more closely in the Appropriate Assessment for any individual site.
- 7.3.7 As it is not known what form the development will be on the above development site adjacent to the River Clyde and the Inner Clyde SPA it is considered inappropriate to prepare development briefs for all these sites. The sites are likely to have some mix of uses even though the designation of the sites may be for residential or business and industrial uses. The use type and the scale of development would be considered in the Appropriate Assessment for the sites as required by Policies E2A and the references in each of the above development site policies. It is considered that this cross referencing to the Policies relating to the need for Appropriate Assessment if the Natura 2000 site is likely to be significantly affected by development is a robust safeguarding of the Conservation Objectives and Sensitivities identified for the Inner Clyde SPA.

## **8 Conclusion**

- 8.1 It has been identified that the policies and proposals of the West Dunbartonshire Local Plan are likely to result in significant effects on the qualifying interests of the Inner Clyde SPA (and Ramsar site). However, the assessment of the Plan's policies and proposals, together with the safeguarding mechanisms outlined in Section 7.3 above, indicate that the Plan could be implemented without adverse effects on the integrity of the Inner Clyde SPA (and Ramsar site) and the Plan is capable of implementation without adverse effects on the Natura 2000 site.

**Appendix I – West Dunbartonshire Local Plan Appropriate Assessment  
Assessment of Potential Effects of Development and Potential Mitigation Measures**

<b>Ref No.</b>	<b>Policy</b>	<b>Potential Development Issues</b>	<b>Potential Effects on Sensitivities</b>	<b>Potential Mitigation Measures (not exclusive)</b>
1	GB1 Greenbelt	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff.	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;
2	LE1 Business and Industry	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events).	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations;
3	LE 8 Tourist Development	Built development; Increased movement of people; Increased drainage and	Disturbance during building phase; Lights causing visual intrusion;	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea

		runoff; River/flood defences; Harbour development and use; Movement late at night; Dredging harbour.	Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds.	defence design; Additional water treatment; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic;
4	H1/H2/H3 Housing	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;
5	H4/H5 Housing development	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff.	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;

6	T2 Access Improvements	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Increased traffic movement; Increased air pollution; Increased drainage and pollution from road runoff.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Continuing acoustic and visual disturbance particularly at night; Cumulative and pollution impacts.	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Amended design to mitigate noise/visual impacts; Additional water treatment;
7	BE3 Listed Building Opportunities	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Use of building for housing, business or tourism (as per LE1, LE8, H1/H2/H3 above)	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events). Habitat loss to enable harbour development and use; Increased night disturbance;	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Appropriate pollution controls;

			Increased waterborne traffic disturbing feeding grounds; Visual and pollution from fires particularly in autumn and winter	
8	R1 Retention of Open Space	Increased use of site; Barbeques/fires; Kite flying; Sports activities; Part built development; Increased movement of people; Floodlighting.	Disturbance from acoustic and visual sources due to increased people movements and games; Disturbance from fires; Visual disturbance from kite movement and sports.	Restrictions on sports/leisure activities; Appropriate pollution controls;
9	R4 Forth and Clyde Canal	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Increased use of site; Barbeques/fires; Kite flying; Sports activities; Part built development; Increased movement of people; Floodlighting; Use of building for housing, business or tourism (as per LE1, LE8, H1/H2/H3 above),	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events);	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Changes in lighting design; Amended design for emergency situations; Appropriate pollution controls;

			Visual and pollution from fires particularly in autumn and winter.	
10	R5 Access Opportunities	Construction works; Dog walking/horseriding; Increased people movements.	Disturbance during building phase; Possible lighting causing increased visual disturbance; Predator disturbance from animals; Disturbance, both visual and acoustic, from people.	Phasing development; Appropriate changes in lighting design; Restrictions on animals; Amended design to mitigate noise/visual impacts;
11	R7 Dumbarton Football Club	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Issues dependant on development use.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; As development use as above	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;
12	PS1 Public Service Provision	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Issues dependant on development use.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; As development use as	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;

			above	
13	DC4 Telecommunications	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Tall structures	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual disturbance from size of structure.	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Restrictions on high/scale/massing of structures;
14	DC6 Renewable Energy/DC7 Micro-renewables	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Tall structures; Windfarm and micro-renewable blade movement	Visual disturbance and potential blade impact; Acoustic disturbance	Locational/design reassessment of turbines to mitigate impact; Design changes to mitigate noise impacts;
15	F1/F2/F3 Flooding and Drainage	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Increased drainage;	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level;	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Amended design for emergency



		Water treatment and septic tank construction and use; Land raising and flood defences.	Possible cumulative effect of increased drainage and runoff; Potential pollution from accident (rare event); Pollution and cumulative impacts;	situations; Additional water treatment for cumulative impacts;
16	H1(15) Shed 7, Dumbarton; H1(17) Castlegreen St./etc. Dumbarton	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;
17	GD 2 (13) Dumbuck Warehouses 1 &7, Dumbarton	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques; Or: Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter; Disturbance from industrial	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;Noise mitigation measures; Changes in lighting design; Amended design for emergency situations;

			<p>noise;  Visual intrusion of security lighting;  Pollution from accidents (rare events).</p>	
18	LE4 Esso Bowling	<p>Built development;  Increased movement of people;  Increased drainage and runoff;  River/flood defences;  Security lighting;  Industrial noise;  Tall buildings;  Storage of hazardous materials.  Harbour development and use;  Movement late at night;  Dredging harbour.  Increased traffic movement;  Increased air pollution;  Increased drainage and pollution from road runoff;  Barbeques/fires;  Kite flying;  Sports activities;  Part built development;  Floodlighting.</p>	<p>Disturbance during building phase;  Lights causing visual intrusion;  Possible habitat loss from sea defences in combination with rising sea level;  Possible cumulative effect of increased drainage and runoff;  Disturbance from industrial noise;  Visual intrusion of security lighting;  Pollution from accidents (rare events);  Habitat loss to enable harbour development and use;  Increased night disturbance;  Increased waterborne traffic disturbing feeding grounds;  Continuing acoustic and visual disturbance particularly at night;  Cumulative and pollution impacts;  Disturbance from acoustic and visual sources due to increased people</p>	<p>Phasing development;  Appropriate changes in lighting design;  Appropriate changes in sea defence design;  Additional water treatment;  Appropriate pollution controls;Noise mitigation measures;  Changes in lighting design;  Amended design for emergency situations;  Amendments to harbour design and use;  Amended design to mitigate noise;  Restrictions on water traffic;  Restrictions on sports/leisure activities;  Amended design to mitigate noise/visual impacts at night;</p>

			<p>movements and games; Disturbance from fires; Visual disturbance from kite movement and sports.</p>	
19	BE4(6) Dunglass Castle, Bowling	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Use of building for housing, business or tourism (as per LE1, LE8, H1/H2/H3 above)</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events). Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds; Visual and pollution from fires particularly in autumn and winter</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Amended design to mitigate noise/visual impacts at night;</p>
20	GD2(11) Scott's Yard, Bowling	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences;</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;</p>

		<p>Harbour development and use;  Movement late at night;  Dredging harbour;  Burning garden waste/barbeques;</p>	<p>with rising sea level;  Possible cumulative effect of increased drainage and runoff;  Habitat loss to enable harbour development and use;  Increased night disturbance;  Increased waterborne traffic disturbing feeding grounds;  Visual and pollution from fires particularly in autumn and winter</p>	<p>Appropriate pollution controls;  Noise mitigation measures;  Changes in lighting design;  Amended design for emergency situations;  Amendments to harbour design and use;  Amended design to mitigate noise;  Restrictions on water traffic;  Amended design to mitigate noise/visual impacts at night;</p>
21	GD2(10) Bowling Basins	<p>Built development;  Increased movement of people;  Increased drainage and runoff;  River/flood defences;  Harbour development and use;  Movement late at night;  Dredging harbour;  Burning garden waste/barbeques;  Increased use of site;  Barbeques/fires;  Kite flying;  Sports activities.</p>	<p>Disturbance during building phase;  Lights causing visual intrusion;  Possible habitat loss from sea defences in combination with rising sea level;  Possible cumulative effect of increased drainage and runoff;  Habitat loss to enable harbour development and use;  Increased night disturbance;  Increased waterborne traffic disturbing feeding grounds;  Visual and pollution from fires particularly in autumn and winter;  Disturbance from acoustic and visual sources due to increased people</p>	<p>Phasing development;  Appropriate changes in lighting design;  Appropriate changes in sea defence design;  Additional water treatment;  Appropriate pollution controls;  Noise mitigation measures;  Changes in lighting design;  Amended design for emergency situations;  Amendments to harbour design and use;  Amended design to mitigate noise;  Restrictions on water traffic;  Restrictions on sports/leisure activities;  Amended design to mitigate noise/visual impacts at night;</p>

			<p>movements and games; Disturbance from fires; Visual disturbance from kite movement and sports.</p>	
22	H2(22) Carless, Old Kilpatrick	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques;</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;</p>
23	GD2(7) Erskine Ferry Road, Old Kilpatrick	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques; or Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amended design to mitigate noise; Restrictions on water traffic;</p>

			(rare events).	
24	LE1(1) Riverside IE, Clydebank; LE1(2) Clydebank IE, Clydebank	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events).	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations;
25	H2(9) Cable Depot Road, Clydebank; H2(2)/H2(3)/H4(3) Queens Quay, Clydebank	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;
26	RET3(4) Queens Quay, Clydebank	Built development; Increased movement of people; Increased drainage and runoff;	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design;

		River/flood defences; Increased traffic movements, heavy vehicles.	sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff.	Additional water treatment;
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## Appendix II – West Dunbartonshire Local Plan Appropriate Assessment – Assessment of Potential Effects of Development Summary

Policy	Built development	Increased movement of people	Increase drainage and runoff	Sea/Flood defences	Security lighting/floodlighting	Industrial noise	Tall buildings/structures	Storage of hazardous materials	Harbour development/Dredging	Water treatment	Land raising	Increased traffic movement	Increased air pollution	Increase drainage and pollution from run-off	Increased sport and recreation activity	Blade movement	Disturbance during building phase	Lights causing visual intrusion	Possible habitat loss: sea defences, rising sea level	Possible cumulative effect of increased drainage & runoff	Disturbance from industrial noise	Visual intrusion of security lighting	Pollution from accidents (rare events)	Possible habitat loss: harbour development and use	Increased waterborne traffic disturbing feeding grounds	Continuing acoustic and visual disturbance	Cumulative and pollution impacts	
GB1	●	●	●	●													●	●	●	●								
GD2(7)	●	●	●	●	○	○	○	○				○	○	○			●	●	●	●						●		
GD2(10)	●	●	●	●					○			○	○	○			●	●	●	●				●	●	●		
GD2(11)	●	●	●	●								●	●	●	●		●	●	●	●	●	●	●			●		
GD2(13)	●	●	●	●	○	○	○	○				○	○	○			●	●	●	●	●	●	●			●		
LE1	●	●	●	●	●	●	●	●									●	●	●	●	●	●	●					
LE4	●	●	●	●																								
LE8	●	●	●	●					●								●	●	●	●			●	●				
H1/2/3	●	●	●	●													●	●	●	●								
H4/5	●	●	●	●													●	●	●	●								
T2	●	●	●	●								●	●	●			●	●	●	●							●	
BE3	●	●	●	●													●	●	●	●	●	●	●	●	●			
BE4(6)	●	●	●	●																								
R1	○	●			○										●										●			
R4	●	●	●	●													●	●	●	●				●	●			
R5		●													●		●	●								●		
R7	●	●	●	●													●	●	●	●							●	
PS1	●	●	●	●													●	●	●	●								
DC4	●	●	●	●			●										●	●	●	●						●		
DC7/8	●	●	●	●												●	●	●	●							●		
F1/2/3	●	●	●	●						●	●			●			●	●	●	●			●	●				
RET3(4)	●	●	●	●								●					●	●	●	●							●	

○ Potential Development Issue – dependent on use



## Appendix III

### Conservation Objectives of the Inner Clyde SPA

To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained.

To ensure for the qualifying species that the following are maintained in the long term:

- Population of the species as a viable component of the site;
- Distribution of the species within the site;
- Distribution and extent of habitats supporting the species;
- Structure, function and supporting processes of habitats supporting the species;
- No significant disturbance of the species.

Qualifying Species: Redshank (*Tringa tetanus*)

### Inner Clyde SPA Sensitivities as identified by Scottish Natural Heritage

Sensitivities of Inner Clyde SPA - written with reference to potential impacts of development within West Dunbartonshire:

Requirements of the qualifying feature: over-wintering redshank - Sept to April inclusive (includes both autumn passage to other wintering locations, and 'true' over-wintering):

Roosting - redshank roost on intertidal areas when possible, but during high tides (especially springs) and/or bad weather (especially high winds) they need space for displacement onto coastal strip (can include built structures). If safe/sheltered roosting is not available, energy expended in moving when should be resting up.

Feeding - muddy intertidal supporting main prey species – some bias towards areas with freshwater input (close to mouths of burns). Follows tidal cycle both diurnally (therefore not set times of day) and longer-term; certain higher areas only. Busy feeding during springs but approaching highs they assume great importance and therefore any disturbance much more significant. Good feeding areas crucial in coldest weather because (a) highest energetic requirement, (b) invertebrate prey burrow deeper out of reach in frosts.

**Sensitivities:** These are defined as being the types of impacts that could threaten the conservation objectives. The following categories do not simply read-across to the conservation objectives, unfortunately.

1. *disturbance - often a combination of:*

acoustic - during development (including ground preparation), depends on continuity, abruptness/ unpredictability and volume relative to existing noise environment. After development, can expect some habituation of redshank to noise but also could reduce their use of an area in long-term (quieter areas may become more attractive).

visual - the above comments mostly apply. Site-specifics will be important - sightlines etc

predator - anything that increases presence of an actual predator, or apparent predator (e.g. humans, dogs), or perceived predator (other moving objects) could increase disturbance.

seasonality - redshank are most sensitive to disturbance (greatest potential mortality or loss of breeding success) not only in coldest weather, but also when numbers highest during the winter when there is less potential for disturbed birds to relocate whether feeding or roosting.

## *2. habitat loss or habitat physical disturbance*

Roosting - redshank numbers not especially likely to be limited by potential roosting sites along the Clyde's extensive north shore, so significance of loss of roost sites is relatively lower.

Feeding - significance of impact of loss/damage is highly dependent on quality of habitat, however habitat quality can shift location because (a) it's a geomorphologically active estuary - intertidal flats can change; (b) RELATIVE quality as experienced by redshank depends on how long a mudflat is exposed during tidal cycles.

It's worth noting that possible sea-level rise, in combination with the constraining of the Clyde within artificial banks / sea defences, could lead to loss of habitat through 'squeezing' of intertidal areas.

## *3. pollution*

Almost wholly indirect impacts (though obviously a major petroleum or chemical incident could directly affect birds through water contact). Mainly via impacts on prey species which filter estuary water and sediment. Chemical pollution of water & sea, and physical pollution – smothering of prey species. Main risks from development these days are most likely to be point impacts, high potential impacts from rare events e.g. failure of pollution control, or runoff exceeding design limits of SUDS / sewers.

## *4. cumulative*

Very complex, poorly understood interaction between conditions at varying sites, and varying types and levels of impacts as described above. Likely to be thresholds e.g. of widespread pervasive pollution damaging prey, or of widespread acoustic/visual disturbance meaning displaced birds have nowhere to go. It is necessary to understand, for birds using any one area or site (a) which other areas are important to them and when; (b) significance of those birds within the SPA population.

## Appendix 10

### Monitoring Programme

<b>Significant Environmental Indicator</b>	<b>SEA Objective(s)</b>	<b>Monitoring Activity to be Undertaken</b>	<b>Data Source</b>
Greenfield/Brownfield Development	1, 3, 7, 14	Monitor Planning Applications	WDC
Quality of rivers, canals and freshwater bodies	1, 3, 4	Monitor Water Quality	Scottish Water/SEPA
Habitat loss due to land degradation or development	1, 2, 3, 4, 6	Proportion of protected nature sites in favourable condition (National Indicator 33)	SNH
Area or number of vacant or derelict sites	1, 3, 7, 14	Vacant and Derelict Land Survey	WDC
Area or number of contaminated sites	1, 3, 7	Review changes in land use for known contaminated sites/conduct site investigations for potential contaminated sites	WDC
Percentage of West Dunbartonshire covered by design guides/Conservation Area Appraisals	7, 8, 9, 10	Consult Local Plan	WDC
Percentage of planning applications refused on design grounds	1, 5, 8, 9, 10, 11	Monitor Planning Applications	WDC
Installed renewable energy capacity	13, 18, 17, 18	Monitor Planning Applications (permissions granted)	WDC
Sustainable transport	14, 15, 17	Percentage of adults driving a car to work (National Indicator 39)	Scottish Household Survey
Sustainable transport	14, 15, 17	Percentage of children travelling to school by public or active transport	WDC/ Sustrans
Waste sent to landfill/recycling rates	16, 17, 18	Tonnage of biodegradable municipal waste landfilled (National Indicator 39); Percentage of municipal waste collected that was recycled/composted.	SEPA
Changes in Air Quality	17	Air Quality Monitoring – NO <sub>2</sub> and PM <sub>10</sub> Concentration	WDC

## Appendix 11

### Addendum to Environmental Report – September 2009

#### 1 Introduction

- 1.1 The West Dunbartonshire Local Plan Environmental Report is part of the Strategic Environmental Assessment (SEA) of the West Dunbartonshire Local Plan (WDLP). SEA is a requirement of the *Environmental Assessment (Scotland) Act 2005* which implements EC Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, also referred to as the SEA Directive.
- 1.2 This document forms an addendum to the Environmental Report published in May 2008, updating the SEA to take account of proposed modifications to the WDLP. In addition to the Environmental Report the addendum should be read alongside the WDLP Finalised Draft (August 2007) and the consolidated Proposed Modifications (September 2009).
- 1.3 The comments from the SEA Consultation Authorities received in June/July 2008 following publication of the Environmental Report are noted at Appendix 1 and in accordance with Article 8 of the SEA Directive, the Council has a duty to take account of these responses before adopting the local plan. It is not intended to revise the Environmental Report at this stage in order to reassess policies or proposals following the consultation, however it is acknowledged that improvements to the assessment process could be made. The purpose of this document is to assess the proposed modifications only.

#### 2 Background

- 2.1 The Notice of Intention to Start Preparation of the West Dunbartonshire Local Plan (WDLP) was published on 19 October 2004 and at that time a determination was made that SEA would be required. A **Scoping Report** for the SEA was then prepared by West Dunbartonshire Council and submitted to the consultation authorities in December 2004. In addition, although not required by the Regulations, the Scoping Report was published for public consultation in February 2005. Following the scoping stage of the SEA, Jacobs Babbie was appointed to carry out the remainder of the assessment.
- 2.2 The Consultative Draft WDLP and **Environmental Report** were published in January 2006 for a 10 week consultation period. Approximately 100 separate representations were received to the Environmental Report and a report of the representations received and the Council's response was included in the Statement of Publicity and Consultation (dated August 2007) that accompanied the Finalised Draft WDLP.
- 2.3 Alongside preparation of the Finalised Draft WDLP, the Environmental Report was revised to take account, where appropriate, of representations received and changes to the WDLP e.g. revised/new policies and proposals. Following consultation on the Finalised Draft and the preparation of Proposed Pre-Inquiry Modifications, a **Revised Environmental Report** was deposited with the Pre-Inquiry Modifications to the Finalised Draft WDLP in May 2008.

### **3 Proposed Modifications**

- 3.1 The Proposed Modifications placed on deposit in September 2009 represent a consolidated list of all proposed changes to the Finalised Draft WDLP. These include Proposed Pre-Inquiry Modifications (May 2008), which have previously been consulted upon; Further Proposed Pre-Inquiry Modifications (October 2008) and modifications recommended by the Reporter within the Local Plan Inquiry Report (March 2009). Additional modifications have also been proposed to take account of decisions taken on planning applications or Council commitments and to correct errors, clarify or factually update the Plan.
- 3.2 It is necessary to assess whether modifications to the WDLP proposed after the deposit of the finalised draft and environmental report (and therefore not previously assessed) would be likely to have a significantly different environmental effect.
- 3.3 The majority of proposed modifications relate to text which provides contextual information or the reasoned justification for the policies of the Plan and are not within the scope of the SEA, which assesses policies and proposals (development sites) only. An assessment of new and revised policies and proposals introduced by the proposed modifications has been carried out and is described in the following two sections.

### **4 Policies**

- 4.1 Section 12 of the Environmental Report outlines the assessment of the policies within the WDLP, including the May 2008 Proposed Pre-Inquiry Modifications. The policy assessment has been undertaken on the assumption that all policies, having been prepared to conform to the plan objectives, are consistent with the SEA objectives. The assessment identifies the likely impact that the policy will have on the environmental parameters established in the Directive. A number of additional assumptions are made in the assessment and these are listed at paragraph 12.5 of the Environmental Report.
- 4.2 An assessment of new and modified policies arising from the Proposed Modifications can be found at Appendix 2. Initially, the revised policies have been screened to determine whether the proposed modification significantly alters the likely environmental effect of the policy. As with the Environmental Report, where a policy relates specifically to a proposal the policy has not been assessed because the proposal assessment will provide detail of the likely form of that impact and reference should be made to section 13 of the Environmental Report and section 5 of this addendum.
- 4.3 The assessment carried out shows that the new policies which have not previously been assessed are not likely to have a negative effect on the environment and where the Proposed Modifications would alter an existing policy, the modification would not result in significantly different environmental effects.

## 5 Proposals

- 5.1 Section 13 of the Environmental Report assesses the likely positive and negative environmental impacts of 129 proposed development proposals contained in the WDLP Finalised Draft. The purpose of the proposal assessment is to identify local plan proposals (proposed development sites) which require detailed consideration through the SEA process and to omit from further assessment proposals that are unlikely to have a significant environmental effect.
- 5.2 All Schedules in the WDLP have been updated to reflect the position at 31<sup>st</sup> March 2009. The Schedules take account of: sites which have been completed or are under construction and are therefore no longer opportunities; new sites which have been granted planning permission or represent a Council commitment; and sites which have been included or amended as a result of negotiations with objectors and stakeholders.
- 5.3 Appendix 3 applies the assessment methodology used within the Environmental Report to consider new sites promoted through the Proposed Modifications and not previously assessed. Appendix 3a lists sites which are included with the Environmental Report but have been deleted through the Proposed Modifications. Proposals which have an extant planning permission have not been assessed.
- 5.4 Sixteen new development sites are introduced into the WDLP by the Proposed Modifications. Thirteen of these sites have planning permission and of the other three, all are assessed as Category A Sites. Paragraph 13.7 of the Environmental Report discusses these classifications further.

## 6. Cumulative, Synergistic and Secondary Effects

- 6.1 Annex I of the SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects. The Environmental Report has taken a map-based approach to the assessment of cumulative, synergistic and secondary effects by highlighting general areas where cumulative impacts may occur based on clusters of major proposed sites and environmental assets and constraints.
- 6.2 A review of the Proposals introduced by the Proposed Modifications – including those with planning permission – shows that the majority of the sites are relatively small and spatially dispersed. A number of sites, however, do fall within identified areas where cumulative impacts may occur, potentially increasing the likelihood of negative impacts on the environment. Within the Queen's Quay area, the Proposed Modifications identify additional residential development at Cable Depot Road West (H2 (9)), North Douglas Street (H2 (11)) and John Knox Street (H2 (14)) and the extension of the Riverside Industrial Estate – Clyde Gate (LE1 (2)) and Cable Depot Road (LE1 (10)). Additionally the expansion of the Kilmalid site (LE 5A) within the Strathleven Area is proposed. The environmental assets/constraints associated with each area are listed in Table 3 of the Environmental Report.

6.3 Mitigation measures have been identified for individual sites in Section 13 of the Environmental Report and Appendix 3 to address potential negative environmental effects of developing these sites. Within the areas identified in Section 13, it may be appropriate to take a more coordinated approach to mitigation in order to avoid negative cumulative effects.

## 7. Conclusion

7.1 The Proposed Modifications to the Finalised Draft West Dunbartonshire Local Plan are assessed as **not likely to have significantly different environmental effects**.

## 8. Next Steps

8.1 Consultation on this document will run alongside the consultation on the Proposed Modifications and will last for 6 weeks until 30<sup>th</sup> October 2008. In accordance with Article 8 of the SEA Directive, the Council has a duty to take account of any responses before adopting the local plan. Following adoption of the West Dunbartonshire Local Plan a Post Adoption SEA Statement will be prepared.

## Appendix 1 - Consultation Authority Responses, June/July 2008

### Historic Scotland

- Section 12.5: "application of the historic environment policies included within in the Plan" should be included within the list of assumptions. Will act to mitigate the potentially adverse effects of other policies and proposals in the plan.
- Unsure why a number of policies were assessed to have significant positive effects on the historic environment simply because they included criteria relating to avoiding adverse effects on the historic environment simply because they include criteria related to avoiding adverse effects on the historic environment. The remains the case and we do not agree with the following policy assessments: **T2, T5, E3A, E7, R6, R7, DC1, DC2, DC4, DC6 & DC7**. We consider that the effect of these policies on the historic environment would be more appropriately assessed as neutral.
- Filtering method used in the proposals assessment may not identify all the potential impacts on historic environmental features, in particular effects on the setting of scheduled monuments and listed buildings are unlikely to be captured.
- Although a number of our detailed comments on the proposals assessment are noted as having been accepted by the Council in Appendix 4, the table on pages 53-65 remains unchanged, including **H2(17-19)** and **GD(11)** and we would welcome clarification on this point.
- Alongside the mapping of potential cumulative effects it would be useful to include an assessment of the likely effect, and proposals for mitigation where appropriate.

### SEPA

- It would have been useful if a description of what changes have been made to the report had been provided and where the ER has been revised.
- It should be noted that it is a requirement of Schedule 2(10) of the Regulations to provide a non-technical summary of the findings of the ER
- The Council may wish to consider the following additional PPS in the Environmental Report (Appendix 2): EU Floods Directive and the Water Environment Water Services (Scotland) Act 2003.
- As well as a summary of the environmental objectives and requirements of the PPS's the Environmental Report should outline the relationship between these PPS's and the Local Plan.
- Consider that there are some key facts missing from the environmental context outlined in chapter 5, including an outline of water quality, areas of fluvial or coastal flooding and air quality. SEPA supports the production of a detailed state of the environment report to be used as baseline data for future PPS's



- SEPA is surprised that no potential negative effects have been identified in the assessment of the plans objectives and policies. Some element of conflict would usually be expected between new development and the natural development.
- The SEA process includes the assessment of proposals using GIS assessment which is based on categorising proposals based on the proximity of sites to a number of environmental assets. However, this does not take into account all of the environmental issues covered by the SEA objectives. Using the SEA objectives would have given a more thorough assessment of the proposals.
- A number of the proposed sites are potentially at risk from flooding and this should be identified as a potential constraint. There may also be the need for a Strategic Flood Risk Assessment as a mitigation measure to inform Local Plan making in relation to specific site allocations and flood risk.
- Some of the sites proposed for development are on brownfield land and therefore may have contamination issues. Mitigation measures should refer to the need to carry out appropriate risk assessment and meditation.
- Table 3 and Appendix 8 identify areas where cumulative impacts may arise and list the environmental assets/constraints however there is no explanation of the potential impacts or how they could be mitigated.
- Monitoring programme and indicators set out in Appendix 10 does not include a number of the indicators listed in Appendix 6, for example flooding. The Council may wish to review the monitoring programme to include some of the indicators in Appendix 6.

## SNH

- Appreciate that this is an update of the December 2005 Environmental Report of the SEA of the Finalised Draft Local Plan, focused entirely on the subsequent Proposed Pre-Inquiry Modifications to have been entirely acceptable.
- Given the progress that has been made, paragraph 8.3 stating “there are no examples of SEA in Scotland” needs to be updated. We believe that some best practice examples should now be available. Consideration of these might have suggested ways of enhancing the SEA process and the Report.
- Section 6: we remain concerned that the list of issues focuses on problems *in* the environment whereas SNH consider that threats *to* the environment would be an important addition, e.g. threat of urban expansion. The Council’s previous response stated that new development is either on brownfield sites or has been assessed through the Local Plan and SEA process. However, neither of these provisions prevents impacts on the natural heritage, such as the locally valuable habitats that have arisen on many brownfield sites. If the issue of urban expansion were raised here it could be explicitly related to the analysis of cumulative impacts in Section 13.
- Section 11: the analysis continues to over-simplify the alternatives that must have been considered in formulating the Topic Options with regard to natural heritage assets and their protection. Table of Topic Options (p22 -27) does not in any way record the choice in the degree of protection afforded to such sites. As a result there is little indication of the SEA process having informed development of the Plan at this level.
- Section 12: the analysis of impacts of each policy still appears to be compared simply to the absence of that Policy. This leaves no room for considering the relative strength of the actual policy wording. Welcome improvements have been made to policies that protect natural heritage, but in contrast the impacts identified in the table (p30-48) have barely changed since the December 2005 report. The analysis of impacts clearly lacked the flexibility to allow the iterative process that is supposed to characterise SEA and make it a worthwhile tool.
- For many policies SNH question the identification of impacts on biodiversity and landscape as positive. Stipulations such as ‘no detrimental effects’ on these resources, or ‘assess against impacts on’ these resources (**DC4, DC8, R6**) will not necessarily result in positive impacts. The Transport and Flooding policies lack even that caveat yet their impact is still identified as positive. We believe ‘positive’ mainly only applies to policies directly related to the environmental resources. ‘Neutral’ would be more appropriate for a considerable number of policies.
- Section 13: we reiterate that environmental assessment and/or surveys do not on their own constitute mitigation for impacts. (This is commonly highlighted in EIA, where even the most comprehensive mitigation proposals in an Environmental Statement lack any application until they are enshrined in a planning consent.) Such work could, potentially, highlight such significant impacts on natural heritage interests that a proposal could not be implemented as anticipated in the Plan. Therefore it is the application of environmental policies in the Plan that

should provide for mitigation (including if necessary modification to proposed development) and this should be noted in the assessment.

- Wildlife corridors should be listed at 15.5 as an environmental asset.
- SNH cannot be responsible for monitoring loss or natural features or landscape character. SNH may be able to advise on how the Council could implement such monitoring under the terms of SOA and as part of a commitment to the rolling SEA process.
- Appendix 8: we appreciate that the relevant policies and proposals are now listed for each mapped area of cumulative impact. However there is no accompanying analysis as required by the SEA Regulations. In order to help inform the Local Plan, the nature of such impacts should be discussed, leading to how they might be avoided or mitigated. Without this, the SEA is providing no strategic benefit in this regard.
- Appendix 9: Recognise that the list of measures is not intended to be all-embracing, however, 'noise mitigation measures' would be a common requirement for most build development and we recommend it is specified for many more of the proposals than shown.
- Assume that 'phasing development' is intended to incorporate avoidance of winter working, but we suggest this could be worded more explicitly.
- SNH agree that for the policies and proposals with likely significant effects, it should be possible to mitigate potential impacts in a way that results in no adverse effect on integrity from the various proposed developments. We accept the conclusion of no adverse effect on integrity of Inner Clyde SPA from implementation of the Local Plan.
- Ensuring precise use of the language derived from the Habitats Regulations is essential in helping developers understand the nature and gravity of protection for Natura Sites. We recommend the following amendments:
  - Para 6.1: replace "significant effects" with "adverse effects on integrity"
  - Para 8.1: reword the concluding sentence: "...indicate that the Plan could be implemented without adverse effects on the integrity of the Inner Clyde SPA (and Ramsar site)". The phrase 'detrimental impact' is potentially confusing.

## Appendix 2 – Policy Assessment

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships	
NEW	Policy LE1B – Jamestown East	5.09	<b>NEW POLICY:</b> limits use of LE 1(10) site to expansion of adjacent sawmill.	See Environmental Report - Proposal Assessment (Reference 30)													
16	Policy LE5 - Specialised Economic Development Site: Kilmalid	5.15	Site LE5A(i) extended to 25 metres from the burn. Presumption against car sales deleted. 25m landscape buffer along western boundary required.	See Environmental Report - Proposal Assessment & Appendix 2 (Reference 40)													
21	Policy LE10 – Access and Design Quality of Industrial Estates and Business Sites	5.19	Lomond Gate added to list of specified industrial estates.	?	+	+	?	?	?	?	?	o	+	o	+	o	
				<p><b>NO CHANGE:</b> Policy LE10 applies to <i>all</i> industrial estates in the Plan area, not just those specifically named. It is assessed that the modification would therefore not result in significantly different environmental effects.</p>													
42	E2A – International Nature Conservation Sites (Natura 2000)	9.03	Last sentence of policy deleted.	+	+	+	+	+	+	+	+	o	o	o	o	+	+
				<p><b>NO CHANGE:</b> The deleted sentence was ambiguous and unnecessarily qualified the policy. It is assessed that modification would not result in significantly different environmental effects.</p>													
44	E3A – Local Nature Conservation Sites	9.04	Features important to local geodiversity identified as an environmental resource of the plan area.  Additional sentence states regard must be had to available survey work when considering proposals for the development of sites which may have importance for nature conservation but are not identified by the Plan	+	o	+	+	+	+	+	+	o	o	o	o	+	+
				<p><b>NO CHANGE:</b> The proposed modifications widen the environmental resources specifically defined by the Plan, potentially strengthening the positive effect the policy would have on <b>Biodiversity, Flora and Fauna</b>. Overall it is assessed that modification would not result in significantly different environmental effects.</p>													

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships	
				NB: Unrelated to Proposed Modification <b>Cultural Heritage</b> changed + → o following representations by Historic Scotland.													
NEW	E3C – Protection and Enhancement of the Fisheries Resource of the River Leven	9.05	<b>NEW POLICY:</b> seeks to protect and enhance the River Leven fisheries.	+	o	o	+	+	+	+	+	+	+	o	o	o	+
				It is assessed that the implementation of this Policy is likely to have a positive impact on many of the environmental parameters and no negative impacts													
50	Policy E8 – Environmental Improvement Opportunities	9.12	“Low use residential development” added to Proposed Use for E8(2) site, Cochno Waterworks. Site Area extended to north.	See Environmental Report - Proposal Assessment & Appendix 2 (Reference 108)													
F57	Policy BE6A – Antonine Wall	9.15	Minor amendment to wording to reflect fact Antonine Wall has now been inscribed as a World Heritage Site.	<b>NO CHANGE:</b> The Proposed Modification does not alter the likely impact of the Policy.													
58	Policy BE6B – Antonine Wall Buffer Zone	9.15	Minor amendment to wording to reflect fact Antonine Wall has now been inscribed as a World Heritage Site.	<b>NO CHANGE:</b> The Proposed Modification does not alter the likely impact of the Policy.													
62	Policy R2 – Open Space Provision	10.03 – 10.07	New sentence: ‘The requirement for each different type of provision should be added together to provide the minimum provision’. A Children’s Equipped Play Area – or Toddlers Play Area where less than 50 dwellings) will be acceptable as an alternative to a financial contribution for all developments less than 400m from a Children’s Equipped Play Area or amenity open space capable of locating such an area.	+	+	+	+	+	?	?	?	?	+	o	+	o	
				<b>NO CHANGE:</b> To Modification adds further detail and clarification to the policy without altering its likely impact. It is assessed that modification would not result in significantly different environmental effects.													

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships
67	Policy R4D – Forth and Clyde Canal	10.13	Second sentence of Policy deleted, which sought to discourage public access to the offside of the canal in public areas with a view to protecting natural habitats and promoting wildlife diversity.	?	+	+	?		o	+	o	o	+	+	+	+
				The likely impact of the policy on <b>Biodiversity, Fauna</b> and <b>Flora</b> is changed from positive (+) to unknown (?)												
74	Policy R5 – Access Opportunities	10.15	Policy reworded to omit reference to cycleways and bridleways. Council will additionally undertake to protect Core Paths.	+	+	+	o	o	o	o	o	o	+	+	+	+
				<b>NO CHANGE:</b> It is assessed that modification would not result in significantly different environmental effects.												
86	Policy DC6 – Renewable Energy	12.01	Proposal to be additionally assessed against impact on sport and recreation interests.	+	+	+	+	+	?		+	+	+	o	+	+
				<b>NO CHANGE:</b> The Proposed Modification may strengthen the positive effect the Policy would have on human health by safeguarding areas used for sport and recreation.												
				NB: Unrelated to Proposed Modification <b>Cultural Heritage</b> assessment changed + → o following representations by Historic Scotland. <b>Landscape</b> assessment changed + → o following representations by SNH.												

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships
88	Policy DC8 – Minerals	12.03	Proposal to be additionally assessed against impact on sport and recreation interests.	+	+	+	+	+	+	o	o	o	o	o	+	o
				<p><b>NO CHANGE:</b> The Proposed Modification may strengthen the positive effect the Policy would have on human health by safeguarding areas used for sport and recreation.</p> <p>NB: Unrelated to Proposed Modification <b>Cultural Heritage</b> assessment changed + → o following representations by Historic Scotland. <b>Landscape</b> assessment changed + → o following representations by SNH.</p>												

Key for assessment:

Postive effect	+
Neutral/No effect	o
Negative effect	-
Unknown effect	?

### Appendix 3 – Proposal Assessment

Environmental Report Ref:	Local Plan Site ID*	Site Location	Assessment Comment	Site Category	Environmental Assets/Constraints	Proposed Mitigation
NEW	GD2 (18)	Dumbarton, St Mary's Way/Risk Street/Church Court	NEW SITE	A	<b>Archaeology</b> – site is within a WoSAS consultation area.	<b>Archaeology</b> – Archaeological Survey
22	LE1 (2)	Clydebank, Clyde Gate	Extension of LE 1(2) site, Riverside Industrial Estate PLANNING PERMISSION			
22	LE1 (10)	Clydebank, Cable Depot Road	Extension of LE 1(2) site, Riverside Industrial Estate	A#	<b>Nature Conservation</b> – site extends into Inner Clyde SPA, RAMSAR and SSSI	<b>Nature Conservation</b> – Habitat and Species survey, Environmental Statement.
40	LE 5A	Kilmalid	Extension of LE5A(i) site to 25 metres from the burn	A	<b>Nature Conservation</b> – site is adjacent to Murroch Burn wildlife corridor	Nature Conservation – Habitat and Species survey/Environmental Statement
NEW	H1 (6)	Bonhill, Burn Street	NEW SITE PLANNING PERMISSION			
NEW	H1 (16)	Dumbarton, Valeview Terrace	NEW SITE PLANNING PERMISSION			
30	H1 (18)	Jamestown, Jamestown Industrial Estate	Part of site previously identified as Industrial and Business Class Opportunity Site – LE1 (10), Main Street	C	No constraints	N/A
NEW	H2 (9)	Clydebank, Cable Depot Road West	NEW SITE	A#	<b>Nature Conservation</b> – site extends into Inner Clyde SPA, RAMSAR and SSSI	<b>Nature Conservation</b> – Habitat and Species survey, Environmental Statement.
NEW	H2 (11)	Clydebank, North Douglas Street	NEW SITE PLANNING PERMISSION			



Environmental Report Ref:	Local Plan Site ID*	Site Location	Assessment Comment	Site Category	Environmental Assets/Constraints	Proposed Mitigation
NEW	H2 (12)	Clydebank, Graham Avenue	NEW SITE PLANNING PERMISSION			
NEW	H2 (13)	Clydebank, 834 Dumbarton Road/Scott Street	NEW SITE PLANNING PERMISSION			
NEW	H2 (14)	Clydebank, John Knox Street	NEW SITE PLANNING PERMISSION			
NEW	H2 (19)	Hardgate, Hardgate Hall	NEW SITE PLANNING PERMISSION			
NEW	H3 (6)	Bonhill, Golfhill Drive	NEW SITE PLANNING PERMISSION			
NEW	H3 (15)	Haldane, McInnis Street	NEW SITE PLANNING PERMISSION			
NEW	RET4 (5)	Lomond Galleries, Alexandria	NEW SITE PLANNING PERMISSION			
NEW	RET4 (6)	College Way/Risk Steet, Dumbarton	NEW SITE	<b>A</b>	<b>Archaeology</b> – site is within a WoSAS consultation area.	<b>Archaeology</b> – Archaeological Survey
108	E8 (2)	Cochno Waterworks	Site area increased to 1.2 ha - Proposed Uses now include low density residential development	<b>C</b>	No constraints	N/A
NEW	PS3 (9)	North Main Street, Alexandria	NEW SITE PLANNING PERMISSION			

<b>Environmental Report Ref:</b>	<b>Local Plan Site ID*</b>	<b>Site Location</b>	<b>Assessment Comment</b>	<b>Site Category</b>	<b>Environmental Assets/Constraints</b>	<b>Proposed Mitigation</b>
NEW	PS3 (10)	Boulevard Site, north of A82, Clydebank	NEW SITE PLANNING PERMISSION			
NEW	PS3 (11)	Lesser Boll of Meal Park, Alexandria	NEW SITE PLANNING PERMISSION			

\* refers to revised Schedules

# re-assigned following Consultation

### Appendix 3a – Proposal Assessment: Deleted Sites

Environmental Report Ref	Local Plan Site ID*	Site Location	Site Category
7	GD 2 (7)	Old Kilpatrick, Erskine Ferry Road	<b>A</b>
48	H1 (8)	Dumbarton, Castlehill	<b>C</b>
58	H1 (18)	Renton, Leven Street	<b>A</b>
61	H1 (21)	Renton, 245-251 Main Street	<b>C</b>
62	H2 (1)	Bowling, Littlemill Distillery (N)	<b>A</b>
71	H2 (11)	Clydebank, Cochno Street	<b>C</b>
73	H2 (14)	Clydebank, Milton Mains Road	<b>A</b>
74	H2 (15)	Dalmuir, Whiteinch Demolition	<b>A</b>
88	H3 (6)	Dumbarton, Stoneyflatt Road	<b>C</b>
91	H3 (11)	Haldane, Shearer Quadrant	<b>C</b>
100	H4 (4)	Clydebank, Cart Street	<b>A</b>

<b>Environmental Report Ref</b>	<b>Local Plan Site ID*</b>	<b>Site Location</b>	<b>Site Category</b>
102	H4 (7)	Clydebank, French Street	<b>A</b>
109	E8 (3)	Clydebank, The Boulevard	<b>C</b>

\* refers to Finalised Draft WDLP