

West Dunbartonshire Local Plan
Strategic Environmental Assessment
Environmental Report

Non – Technical Summary

March 2010

West Dunbartonshire Local Plan

Strategic Environmental Assessment

Environmental Report – March 2010

Non – Technical Summary

This is the non-technical summary of the West Dunbartonshire Local Plan Environmental Report, part of the Strategic Environmental Assessment (SEA) of the West Dunbartonshire Local Plan (WDLP). SEA is a requirement of European and Scottish legislation. The legislation places a responsibility on public agencies to assess the environmental impacts of certain plans and programmes, of which the WDLP is one.

West Dunbartonshire Council (WDC) formally started preparation of the West Dunbartonshire Local Plan in October 2004. A Scoping Report was circulated to consultees for comment in December 2004. Following the scoping stage, consultants were appointed to produce a SEA for the Consultative Draft Local Plan, which was published alongside the WDLP in December 2005. The Forward Planning Section subsequently revised the SEA in light of consultation responses received and amendments to the WDLP, including the proposed pre-inquiry modifications published as part of the Local Plan process, and the revised Environmental Report was published in May 2008. The WDLP was adopted on 3rd March 2010.

The West Dunbartonshire Local Plan

Key Facts about the West Dunbartonshire Local Plan

Name of Responsible Authority	West Dunbartonshire Council
Title of plan	West Dunbartonshire Local Plan
Legislative Requirement	The Town and County Planning (Scotland) Act 1997
Subject	Land Use Planning and Development Management
Period covered by plan	Five years
Frequency of updates	Minimum of Five-Yearly
Plan area	12,546 Ha – West Dunbartonshire Council area excluding that part within the Loch Lomond and the Trossachs National Park
Plan purpose and/or objectives	See below
Contact	Alan Williamson, Section Head – Forward Planning and Regeneration West Dunbartonshire Council Garshake Road Dumbarton, G82 3PU

The principal purpose of the Local Plan is to set out WDC's detailed policies and proposals for the use, development, protection and improvement of land. The WDLP sets out a detailed land-use framework for development to 2015 and replaces the Clydebank Local Plan (adopted September 2004) and the Dumbarton District, District Wide Local Plan (adopted March 1999).

The WDLP also supports and enhances key WDC aims and objectives and incorporates the key objectives of the Community Planning process and key features of the Council's Corporate Plan.

The policies and proposals contained in the local plan have been developed in accordance with Scottish Planning Policy (SPP) and Planning Advice Notes (PANs) in addition to Structure Plan requirements. They also reflect requirements that have been established in other plans, programmes and strategies that are of relevance to the plan as discussed below.

SEA Methodology

The methodology presented is based on best practice, WDC and Jacobs Babbie's knowledge and experience, feedback from Consultees during the scoping process and drawing on several key national documents which provide guidance for carrying out the SEA process. These are:

- A Draft Practical Guide to the Strategic Environmental Assessment Directive. (Office of The Deputy Prime Minister (OPDM) 2004)
- Environmental Assessment of Development Plans: Interim Planning Advice. David Tyldesley and Associates (August 2003). Scottish Executive.
- Planning Circular 2/2004. Strategic Environmental Assessment for Development; the Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004. (Scottish Executive 2004).

In addition to these documents are the Directive and the Regulations themselves, which also provide information on what is required for the SEA process. The methodology outlined here complies with the requirements of the SEA legislation.

A requirement of the SEA is to assess cross-boundary impacts into other EU member states but this has been scoped out, as West Dunbartonshire's boundary is not with another EU member state and the plan is unlikely to impact on any other EU member state.

Establishing an Environmental Baseline

West Dunbartonshire Council established the environmental baseline using the available information from the WDC GIS database and organisations including SEPA, SNH and Historic Scotland, who store and provided relevant environmental information. The data collected and used in the SEA provides a snapshot of the environment in the plan area and, used in conjunction with local knowledge, it provides an overview of the plan area and highlights the key environmental issues.

Scoping

Scoping is the process where an initial assessment is carried out of what the SEA process will address and how it is to be approached. The scoping process was documented in a Scoping Report, which was circulated to Statutory Consultees for comment in December 2004.

Comments received from the scoping process were considered and, where appropriate, incorporated into the assessment and Environmental Report.

Relationship with other relevant plans and programmes

The WDLP is influenced in various ways by other relevant plans, programmes, strategies and legislation established at international, national, regional and local levels. These plans, programmes and strategies set out environmental objectives, which the local plan must take into consideration. Appendix 2 of the Environmental Report identifies the national, regional and local environmental objectives that have been taken into account during the preparation of the WDLP and the SEA and the key international legislation which applies to the WDLP.

International Level

Development Plans are increasingly influenced by International Conventions, Protocols and legislation, particularly European Union Directives. Of particular relevance to the WDLP are the Habitats Directive, Water Framework Directive and Landfill Directive. European requirements which affect local plans are ordinarily transcribed into national legislation and objectives.

The Habitats Directive requires an appropriate assessment to be carried out where plans may have a significant effect on a protected Natura 2000 site. The Inner Clyde has been designated as a Special Protection Area (SPA, a Natura 2000 site) and as such the WDLP has been subject to an appropriate assessment, details of which are included in the Environmental Report.

National Level

At National level Scottish Planning Policy (SPP) and Planning Advice Notes (PAN) provide guidelines for development planning and development management relating to a wide range of topics, including housing, retail and the environment. Areas of guidance that are of particular importance to the WDLP include:

- Promoting Brownfield sites for development in preference to releasing Greenfield sites;
- Ensuring that town centres are the focus for retail development;
- Protecting and enhancing existing open spaces and providing high quality new spaces; and
- The integration of transport and land use planning, and providing a transport infrastructure.

Regional Level

The plan that has the greatest direct influence on the WDLP is the Glasgow and Clyde Valley Joint Structure Plan (GCVJSP). The Structure Plan sets the strategic context for all Local Plans in

the area that it covers. Where the GCVJSP identifies a strategic requirement for additional development land, this requirement is taken on board at a local level where a specific site or sites can then be identified for this purpose. Strategic requirements that have been identified through this process for the West Dunbartonshire area have been taken into account and provided for in the WDLP.

The GCVJSP has four strategic aims and the eight Local Authorities within the Structure Plan area are required to produce local plans that will go some way to achieving these aims. The Structure Plan's aims are:

- To increase Economic Competitiveness;
- To promote greater social inclusion and integration;
- To sustain and enhance the natural and built environment; and
- The integration of land uses and transportation.

A SEA has been carried out on the Structure Plan, which provides an environmental context and check for the strategic proposals. Where Structure Plan proposals are addressed at local level the environmental impact must also be assessed in a local context.

Local Level

At West Dunbartonshire level a number of plans, programmes and strategies are linked to the WDLP. The plans that are considered to be overarching in terms of their influence on the WDLP include the Community Plan and the Corporate Plan.

The Corporate Plan sets out priorities for West Dunbartonshire Council for a four-year period. It comprises six key themes for the Council and these must be borne in mind during the preparation and implementation of the WDLP to ensure that the development priorities are consistent with corporate aspirations.

Our West Dunbartonshire - the Community Plan – outlines a vision for 2017, stated as: **“Working in partnership we want to reduce poverty and exclusion, deliver better services and continue to improve the quality of life for everyone living in West Dunbartonshire whilst protecting our natural environment”**. The Community Plan identifies a series of key targets and the local plan will be expected to take forward the delivery of these targets relevant to development planning.

In addition to these plans there are issue specific plans that are essential to the operation and delivery of Council services in West Dunbartonshire. These plans include the Local Waste Strategy, Local Transport Strategy, Local Housing Strategy, Air Quality Strategy, Greenspace Strategy and the Vision for Dumbarton Waterfront. Where there are national targets for topics such as waste these are set out in the local strategies and any objectives/priorities in these plans are, where appropriate, translated into or reflected in Local Plan policy.

At a more local level there are town centre action plans and shop front design statements. These documents reflect the aspirations for particular areas in West Dunbartonshire and the aims and objectives of these plans are reflected in the WDLP.

Environmental Context

West Dunbartonshire Council established the environmental baseline using the available information from the WDC GIS database and organisations including SEPA, SNH and Historic Scotland, who store and provided relevant environmental information. The data collected and used in the SEA provides a snapshot of the environment in the plan area and, used in conjunction with local knowledge, it provides an overview of the plan area and highlights the key environmental issues.

Key Facts

Key facts relating to West Dunbartonshire are set out in Section 5 of the Environmental Report; there are gaps in the data, these can be filled, but in order to do so, a more intensive environmental study is required. Undertaking such a study was not a feasible option for the WDLP but should be considered for future plans. These key facts provide a snapshot of the state of the environment in West Dunbartonshire. A list of the environmental baseline data available for the SEA and the source of the data are presented in Appendix 5 of the Environmental Report.

Existing Environmental Issues

The environmental issues that the WDLP addresses are identified in Section 6 of the Environmental Report. These issues represent the key areas of concern for the environment and are issues that can be addressed through the plan.

Evolution of the Environment in the Absence of the WDLP

The West Dunbartonshire Local Plan will provide a framework for all development in West Dunbartonshire over a 5-year period. The plan promotes development in appropriate locations, with due consideration to factors that may be overlooked by market forces.

Without the WDLP, development will still proceed, but the decision-making process will be severely weakened through reliance on out of date and irrelevant information. Response to planning applications will be reactionary and ad hoc and the resulting development is likely to be uncoordinated and inappropriate. In the absence of the WDLP, international, national, regional and local targets may be disregarded. Such targets refer to a variety of topics/issues including air quality, waste management, vacant and derelict land, protection of habitats, and greenbelt management. The effect on the environment of uncoordinated and inappropriate development will be substantially adverse; potentially resulting in the loss of important aspects of the environment in the plan area including Greenfield land, open space, historic buildings and wildlife habitats.

The WDLP updates two local plans (Clydebank Local Plan and Dumbarton District, District Wide Local Plan) taking into account more recent information than was available during the

preparation of these plans. Reliance on these local plans for West Dunbartonshire would be of detriment to the environment.

Establishing the environmental baseline is an important aspect of SEA; it sets the context for the plan and it provides data for use in monitoring the plan and how the environment has benefited over the plan period. This SEA has not benefited from the preparation/availability of a state of the environment report, which provide a detailed and up to date environmental baseline. Instead, the baseline has been compiled using existing information and easily accessed information from external sources.

SEA Objectives

SEA objectives establish environmental markers, which have been used as a benchmark for all aspects of the plan. These objectives are overarching in terms of their influence on the plan and they set the context for plan development. The SEA objectives, targets and indicators are set out in Appendix 6 of the Environmental Report. The environmental objectives that have been adopted for the WDLP are those identified in Appendix B of the Interim Planning Guidance and each of the 18 objectives has been retained. The criteria linked to the objectives in Appendix B of the Guidance have also been adopted, although they have been modified to form specific questions of relevance to the WDLP.

The SEA objectives ensure that the key environmental factors, identified in the Directive are priorities in the SEA and in the development of the WDLP. These factors are: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape, inter-relationship between these factors.

The SEA objectives have been used throughout the development of the WDLP to ensure that the plan aims and objectives, which provide the context for the development of plan policies and proposals, are consistent with the environmental objectives of the SEA. This approach is top-down, it ensures consistency at the highest tier of the plan, which in turn ensures consistency at all subsequent levels of the plan.

West Dunbartonshire Local Plan Objectives

The WDLP will ensure that there is a sustainable approach to development in West Dunbartonshire through the provision and implementation of a land use framework that brings about positive social and economic development for the benefit of all, whilst maintaining and enhancing environmental quality.

The aims and objectives of the WDLP correlate with those of the Glasgow and the Clyde Valley Joint Structure Plan and focus on the key areas i.e. environmental, social, commercial, economic and sustainability.

The WDLP objectives have been assessed against the SEA objectives to determine if the WDLP objectives are consistent, unknown or inconsistent with the SEA objectives. The initial assessment indicated that the consistency of a significant number of the WDLP objectives was unknown – meaning that their consistency depends on the implementation of the objective, through plan policy. Achieving consistency with the SEA objectives is the first critical stage in the local plan/SEA process and as such this outcome was considered unfavourable. A subsequent revision of the WDLP objectives was undertaken to actively ensure consistency with the SEA objectives.

The revised plan objectives are:

- 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;
- Identify sustainable locations for key strategic developments;
- Enable sustainable economic and environmental regeneration;
- Ensure that sufficient land is available in appropriate locations to meet development requirements;
- Conserve environmental resources;
- Identify future areas of land use change;
- Promote and support improvements in environmental quality; and
- Ensure sustainable and integrated transport and infrastructure provision.

Appendix 7 of the Environmental Report presents the assessment of the initial and revised WDLP objectives. The assessment indicates that the majority of the WDLP objectives are now consistent with the SEA objectives with only a small number depending on implementation. This is an improved set of objectives, which ensures that the WDLP policies and proposals are consistent with the SEA objectives and the changes will result in a benefit for the environment in the plan area.

Alternatives/Options

As a local development framework, the WDLP is required to meet strategic development requirements set out in the Structure Plan at a site-specific level, providing land for development, particularly in sectors where there is development pressure. The alternative options assessed in the SEA are only those that the Local Plan can influence, however, within this context, a number of options for development and implementation are available for the local plan.

The development of options has resulted in the identification of Framework and Topic options. This separation provides a distinction between the options for the broad local plan framework and the specific issue related options. The framework and topic options and associated assessment are provided in section 11 of the Environmental Report. The framework options

provide the strategic choices for policy formulation and the topic options provide more subject specific choices for policy formulation.

In choosing the preferred strategic alternatives, environmental issues were at the forefront of the assessment. In accordance with the regulations, the Strategic Environmental Assessment has focused on those proposals likely to give rise to significant environmental effects. Proposals include those based on a strategic requirement within the Structure Plan, and those considered significant under Schedule 9 of that Plan.

For framework and topic options the preferred option has been identified. The preferred option represents the most environmentally beneficial approach. In many cases the WDLP adopts the preferred option as the plan approach, thus ensuring that the plan is as environmentally robust as possible. Where the preferred option is not being adopted by the WDLP or where the preferred option is combined with one or more of the other options, the reasons for the WDLP approach have been set out.

The preferred framework option has been tested for consistency with the SEA objectives. Each of the topic options is consistent with the preferred framework option; therefore it is not necessary to test the topic options for consistency with the SEA objectives. This approach is in proportion with the scale of Strategic Environmental Assessment and it also avoids repetition in the assessment, which would have no tangible benefit to the SEA.

Policy Assessment

All the WDLP policies have been assessed for this SEA. The policy assessment has been undertaken on the assumption that 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 SEA Directive: biodiversity; population; human health; fauna; flora; soil; water; air; climate factors; material assets; cultural heritage; landscape; and the inter-relationships between these factors.

The assessment indicates where the policy is likely to have an impact on an environmental parameter, but does not provide detail of the likely form of that impact. Taking the assessment to this level was considered to involve detailed analysis of a nature disproportionate to the scale of the SEA.

The policy assessment provides the basis for the proposal assessment. Where a policy relates specifically to a proposal, the policy has not been assessed because the proposal assessment will provide a more realistic view of the likely environmental impact. Where the environmental impact of a policy is dependent on implementation this is an issue for the WDLP to monitor during the plan period.

Summary

The policy assessment indicates that none of the policies is likely to have a negative effect on the environment. However, the assessment makes a number of assumptions – listed in the Environmental Report – and there are a number of instances where it is unknown whether or not the policy will affect the environmental parameter. This is something that depends on how the policy is implemented and should therefore be considered in more detail during policy implementation.

Proposal Assessment

As part of the SEA process, development proposals were assessed for their positive and negative environmental impacts. To identify the local plan proposals which required detailed consideration through the SEA process and to omit from further assessment proposals that are unlikely to have a significant environmental effect, GIS analysis of all proposal sites was carried out, with sites being categorised based on proximity to an number of environmental assets.

Category A sites are assessed as likely to have a significant environmental effect; Category B sites are assessed as possibly having a significant environmental effect; and Category C sites are assessed as unlikely to have a significant environmental effect [this category includes sites where the environmental effect is likely to be positive]. Based on additional assessment sites in Category B have been reallocated to Category A or C

The GIS analysis established the percentage of the site impinging on the environmental assets. Where this percentage was 100% the sites were categorised as Category A - likely to have a significant environmental effect. The detail of the proposals is not known, so the precautionary principle was implemented assuming that for each site the proposal is to develop the entire site thus having a detrimental effect on the environmental assets.

General mitigation measures have been identified for all Category A sites, however, it is beyond the scope of this SEA to recommend detailed mitigation measures for these proposals as the extent and nature of the proposal is unknown at this time. Where potential adverse impacts have been identified, relevant surveys will be required as part of the planning application process to clearly identify impacts and actions emerging will be considered as part of any planning consent. In most circumstances it may be possible to fully mitigate the negative impacts of the development.

Category C sites do not conflict with any of the environmental assets. These sites have therefore been scoped out from detailed assessment. However, when the nature and scale of proposals are determined they may necessitate further environmental assessment at planning application stage.

Summary

The environmental assessment of proposals for this SEA is by no means conclusive in terms of defining the detailed environmental impacts of the Local Plan proposals. It does however provide a strategic level assessment of potential environmental conflicts. Where proposals are likely to have a significant environmental impact on one or more environmental asset, mitigation for that proposal has been provided. The assessment identifies where a significant impact is likely to occur and the environmental asset that may be affected.

The assessment provides information for the local plan policy and decision makers to consider when formulating and implementing the plan. The information provided in the SEA will also be taken into account in future SEAs and when the plan is being modified changes can then be made to further benefit the environment. Full details of the assessment methodology and results are outlined in Section 13 of the Environmental Report.

Cumulative, Synergistic and Secondary Effects

Strategic Environmental Assessment must include an analysis of: short, medium and long-term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.

This is widely acknowledged to be a complex task and for the purposes of this SEA has been restricted to an analysis of the potential impacts of proposals using GIS analysis as per the approach for individual proposal sites. Appendix 8 of the Environmental Report illustrates key allocations in the local plan where cumulative impacts may arise if all identified sites in the area were developed. These are indicative diagrams designed to highlight general areas where cumulative impact may occur, based on clusters of major proposal sites and environmental assets/constraints. The following areas have been identified by the assessment:

- Strathleven
- Dumbarton Waterfront
- Bowling
- Carless
- Queen's Quay, Clydebank

Proposals for Monitoring

The Directive requires that significant environmental effects, implemented by the plan, must be closely monitored in order to maintain a clear understanding of potentially adverse environmental impacts.

Environmental monitoring is also important to future plan implementation. Monitoring enables decision-makers to answer such questions as:

- Were the assessment's predictions of environmental effects accurate?
- Is the plan benefiting the environment?

- Is the plan contributing to the achievement of desired environmental objectives and targets?
- Has implementation changed the environmental focus of the plan?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

A revised monitoring programme is presented in the Post-Adoption Statement.

Environmental benefit of the SEA

Whilst environmental factors have always been a consideration for planning policy and decisions, social and economic factors have been paramount in the policy and decision making process. West Dunbartonshire especially, due to its high level of socio-economic deprivation, has consistently maintained its strong focus on socio-economic factors.

However, with the known human health and living environment impacts associated with environmental degradation, it has now become crucial for environmental sustainability to be at the forefront of plan and policy maker's minds. This is not at the expense of social and economic factors, which are still key considerations in plan development.

The SEA process has raised the profile of the environment with policy makers and politicians; through the development of formalised, critical assessments, and the consideration of potential proposals, the SEA has effectively facilitated decision makers in their environmental awareness and understanding.

Throughout the local plan preparation process, the SEA has been influencing policy making and the direction of the plan. Information relating to the specific changes and improvements that have been made to the plan as a result of SEA information are provided in each section of this Environmental Report.

Perhaps the most significant change in local plan direction is the overarching plan objectives (See Section 10). The objectives were tested for consistency with the SEA objectives and were subsequently amended to have a more environmental focus. These changes are significant because the plan objectives provide the context for the entire local plan and all policies and proposals are written to achieve these goals.

The SEA and the WDLP processes have been integrated from the local plan inception through to the preparation of this Environmental Report. This integration has ensured that all aspects of the local plan have an environmental focus, which will benefit many areas of the environment through the decision making process.

The SEA does not have a direct influence over plan implementation, however as a result of the SEA the plan has been written with an environmental focus. When the plan is being

implemented it starts out with a positive environmental focus, which can only be enhanced by implementation.

Conclusions

The West Dunbartonshire Local Plan

As a land use development framework, the WDLP will have an impact on the environment. This SEA has identified where and why this impact is likely to occur and this information has been incorporated into the local plan and will inform plan implementation.

The SEA has had a beneficial influence on the WDLP, however, a number of areas remain where changes would result in improved environmental benefit, such as those identified in the topic option assessment. The SEA cannot force changes on the local plan, therefore it is unlikely that it will ever result in a plan where all recommendations for environmental improvement are adopted. This SEA has achieved important plan changes in key areas that will be permanent, carried forward from this local plan to successive plans.

The Strategic Environmental Assessment

The SEA process has raised the profile of the environment with policy makers, politicians and those involved in the local plan process. Mechanisms for considering environmental factors have been formalised and all aspects of the plan are critically assessed.

Throughout the local plan preparation, the SEA has been influencing policy making and the direction of the plan. Information relating to the specific changes and improvements that have been made to the plan as a result of SEA information are provided in each section of this Environmental Report.

The SEA is not a process with a beginning and end; it is a process that will always be operating alongside the local plan process. This continual process will ensure that policy development and decision-making processes incorporate the available environmental information and consider the likely environmental impacts.

The strength of SEA is that over time environmental benefit in a plan area and plan policy success will become apparent through trends in environmental data and planning application monitoring. Monitoring is a key aspect of SEA and one that will help to determine the success of the plan and the SEA. Monitoring will also provide essential information on which to base future SEA development.