

WEST DUNBARTONSHIRE  
**Local Development  
Plan 2**

Strategic Environmental  
Assessment:  
Environmental Report



April 2017



# Environmental Report

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## Non-Technical Summary

Strategic Environmental Assessment (SEA) is concerned with the protection of the environment. It is a beneficial and thorough assessment process which ensures that environmental considerations are taken on board at an early stage in the Local Development Plan preparation process, to ensure development takes place in the right location with minimal environmental impact. It aims to ensure that the environment is given the same level of consideration as social and economic factors in the preparation of plans and decision-making. This document is the **Environmental Report**, a key stage of SEA, which provides information on the content of the plan being assessed and identifies, describes and evaluates the likely significant effects on the environment of implementing the plan and reasonable alternatives to it.

Comments on the Environmental Report are invited by **22<sup>nd</sup> September 2017**.

**The Plan** (Section 2 of the Environmental Report) being assessed is the West Dunbartonshire Local Development Plan 2 (LDP 2). LDP 2 will guide the future use of land and appearance of West Dunbartonshire (excluding the area within the Loch Lomond and the Trossachs National Park); indicate where development, including regeneration, should happen and where it should not; and contribute to sustainable development and tackling climate change. When adopted, LDP 2 will replace the West Dunbartonshire Local Plan (2010) and the Local Development Plan (Proposed Plan) 2016.

The Main Issues Report (MIR) is the first milestone in the preparation of LDP 2. Together with the Environmental Report, it seeks to facilitate and inform the preparation of the LDP 2 by outlining and assessing preferred options and reasonable alternative options arising from 18 identified 'Main Issues'. It is these options which have been assessed.

LDP 2 will sit within a hierarchy of other plans, programmes and strategies. The key environmental objectives have been identified from the review of legislation, policies, plans and strategies which are relevant to LDP 2 and inform its preparation and assessment.

**The Environment** (Section 3) of the Plan area, including existing environmental problems, has been considered in order to establish the environmental effects of options outlined in the MIR. Key environmental features and problems of the West Dunbartonshire area include the Inner Clyde SPA: extensive intertidal flats of international importance that support large numbers of wintering wildfowl; 198 ha of derelict and urban vacant land across 94 sites; sites likely to be affected by a 1 in 200 year flood event; and the Antonine Wall, an extension to the trans-national Frontiers of the Roman Empire World Heritage Site.

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

Not implementing LDP 2 could lead to increasing pressure for unsustainable and inappropriate development with harmful effects on the environment. Furthermore,

the positive potential of a 'new' Plan to deliver environmental improvements, for example through the Central Scotland Green Network, may not be realised without LDP 2 and the likely changes to the environment could be significantly less beneficial.

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

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

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

An approach to the mitigation of significant adverse effects on the environment has been outlined. The approach seeks to first avoid negative effects and will inform the remaining stages of the preparation of LDP 2 and, following adoption of the plan, subsequent SEAs of lower level plans (e.g. masterplans), project level Environmental Impact Assessments (EIA) and planning applications.

Monitoring the significant environmental effects of the implementation of LDP 2 is an important part of the SEA process. Indicators to be used within a monitoring framework are suggested in Section 7 of the report.

# 1. Introduction

## 1.1 Purpose of the Environmental Report

The West Dunbartonshire Council Local Development Plan 2 (LDP 2): Main Issues Report requires to undergo a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment (Scotland) Act 2005. SEA is concerned with the protection of the environment. It is a beneficial and thorough assessment process which ensures that environmental considerations are taken on board at an early stage in the Local Development Plan preparation process, to ensure development takes place in the right location with minimal environmental impact.

SEA is an integral part of, and will be taken into account throughout, the LDP 2 process. At key stages, the public will be able to comment on the environmental assessment and all comments will be taken on board. The public will be able to see how their comments have influenced the SEA process, as SEA requires the environmental assessment to be transparent and accountable.

## 1.2 SEA activities to date

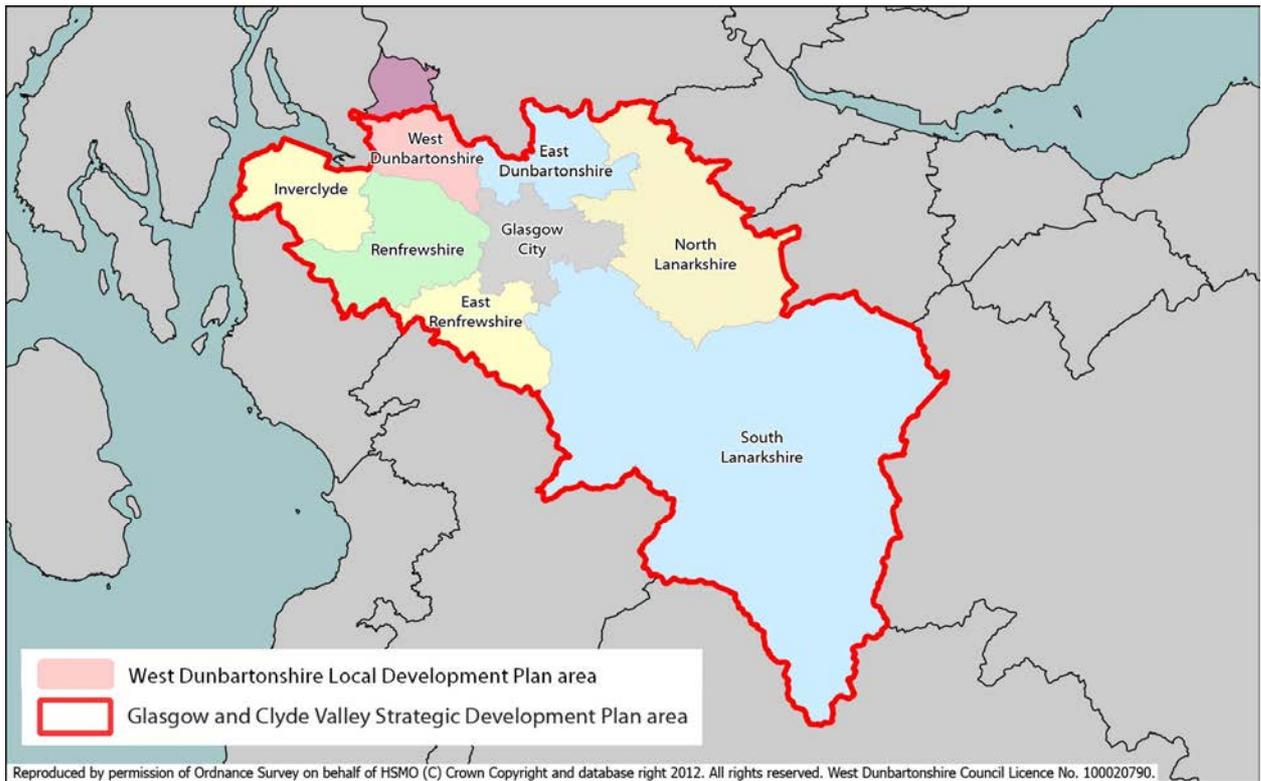
The Scoping Report was published on 29 November 2016 and comments from the Consultation Authorities were received on 20 December 2016. The Consultation Authorities comments have been taken into account in the preparation of this Environmental Report. Appendix C details the responses to the Consultation Authorities comments.

## 2. The Plan

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

<i>Name of Responsible Authority:</i>	West Dunbartonshire Council (WDC)
<i>Title of draft plan, programme or strategy (PPS):</i>	Local Development Plan 2 (LDP 2)
<i>Requirement for the PPS:</i>	Legislative requirement of the Planning etc. (Scotland) Act 2006
<i>Subject of the PPS:</i>	Land use planning
<i>Period covered by the PPS:</i>	2019 – 2024
<i>Frequency of updates:</i>	Every five years
<i>Geographic area covered by the PPS:</i>	West Dunbartonshire Council area, excluding that part within the Loch Lomond & The Trossachs National Park, extending to approximately 12,500 ha.
<i>Purpose and/or objectives of PPS:</i>	To guide the future use of land and appearance of West Dunbartonshire; indicate where development, including regeneration, should happen and where it should not; and contribute to sustainable development and tackling climate change.
<i>Contact:</i>	Antony McGuinness Team Leader- Forward Planning Planning and Building Standards 3 Aurora House, Queens Quay, Clydebank, G81 1BF  Tel: 0141 951 7948 Email: <a href="mailto:antony.mcguinness@west-dunbartonshire.gov.uk">antony.mcguinness@west-dunbartonshire.gov.uk</a>

Map 1 – Local Development Plan coverage



## 2.2 Content of the Main Issues Report and Local Development Plan

The Main Issues Report (MIR) is the first stage in the preparation of the West Dunbartonshire Local Development Plan 2, the plan which will supersede the West Dunbartonshire Local Plan adopted in March 2010 and the Local Development Plan (Proposed Plan) 2016. The Main Issues Report seeks to facilitate and inform the preparation of Local Development Plan 2, setting out the spatial strategy – general proposals for development and reasonable alternatives – and site-specific proposals.

Together, the Main Issues Report and Environmental Report outline and assess a preferred option and one or more reasonable alternatives (where relevant) arising from 18 identified 'Main Issues'. These main issues have been grouped into five chapters (chapter 1 is the introduction) and can be summarised as follows:

- ***Delivering our Changing Places:*** This section reviews the existing strategies for 'Our Changing Places'. The Main Issues Report outlines the progress made on the delivery of the existing strategy and seeks views on whether the strategy, or parts of the existing strategy for these sites needs to be revised. The sites are Queens Quay, Clydebank; Dumbarton Town Centre and Waterfront; Esso Bowling and Scott's Yard; Lomondgate, Dumbarton; Vale of Leven Industrial Estate, Dumbarton; Clydebank Town Centre, Youngs Farm, Dumbarton; Bowling Basin, Bowling; Carless, Clydebank; Lomond Canal and Alexandria Town Centre.

The Main Issues Report also contains new issues on Clyde Crossing City Deal and Stanford Street, Clydebank and the Forth and Clyde Canal

- ***Strengthening our Communities and Economy.*** This section considers how to create places and raise the standard of design, as well as, how the communities can be involved in placemaking. It also considered whether the private housing land supply should be extended to include new sites and also whether there should be an Affordable Housing Policy. The need for more business and industrial land or, where appropriate, existing business and industrial areas being reallocated to alternative uses. Furthermore, the MIR explores whether or not the retail policy for Clydebank and Dumbarton Town Centres should be relaxed within the core area for Class 1 uses.
  
- ***Climate Change:*** Within this section heat energy and heat networks is discussed and the issues looks at how Local Development Plan 2 can contribute towards achieving the Scottish Government’s targets in relation to heat generation and heat networks. The MIR also explores if new allotments/community gardens should be identified and safeguarded and also if a new policy for residential development sites should be developed which requires developers to consider setting aside an area for an allotment/community garden.
  
- ***Review of Development Sites.*** The MIR reviews the allocations within the Proposed Plan (2016). It proposes to allocate 27 new sites; re-designate 6 sites and deallocate 45 sites. A preferred use/designation is listed for most of the sites with the exception of those sites proposed for deallocation.

Informed by the Main Issues Report, Environmental Report and consultation responses, LDP 2 will provide a framework for development and regeneration in West Dunbartonshire, excluding the area within the National Park, and focus on specific main proposals for a period of up to 5 years from its adoption (programmed for September 2019). The plan will promote development in appropriate locations and identify where development should not take place. The timetable for producing LDP 2 is set out below.

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

The programme for the preparation of LDP 2 and Environmental Report is outlined in the Development Plan Scheme and in Table 1 below. The publication of a Main Issues Report (MIR) and Environmental Report is the first formal stage in the preparation of LDP 2.

*Table 1 – Timetable for LDP 2 & SEA preparation*

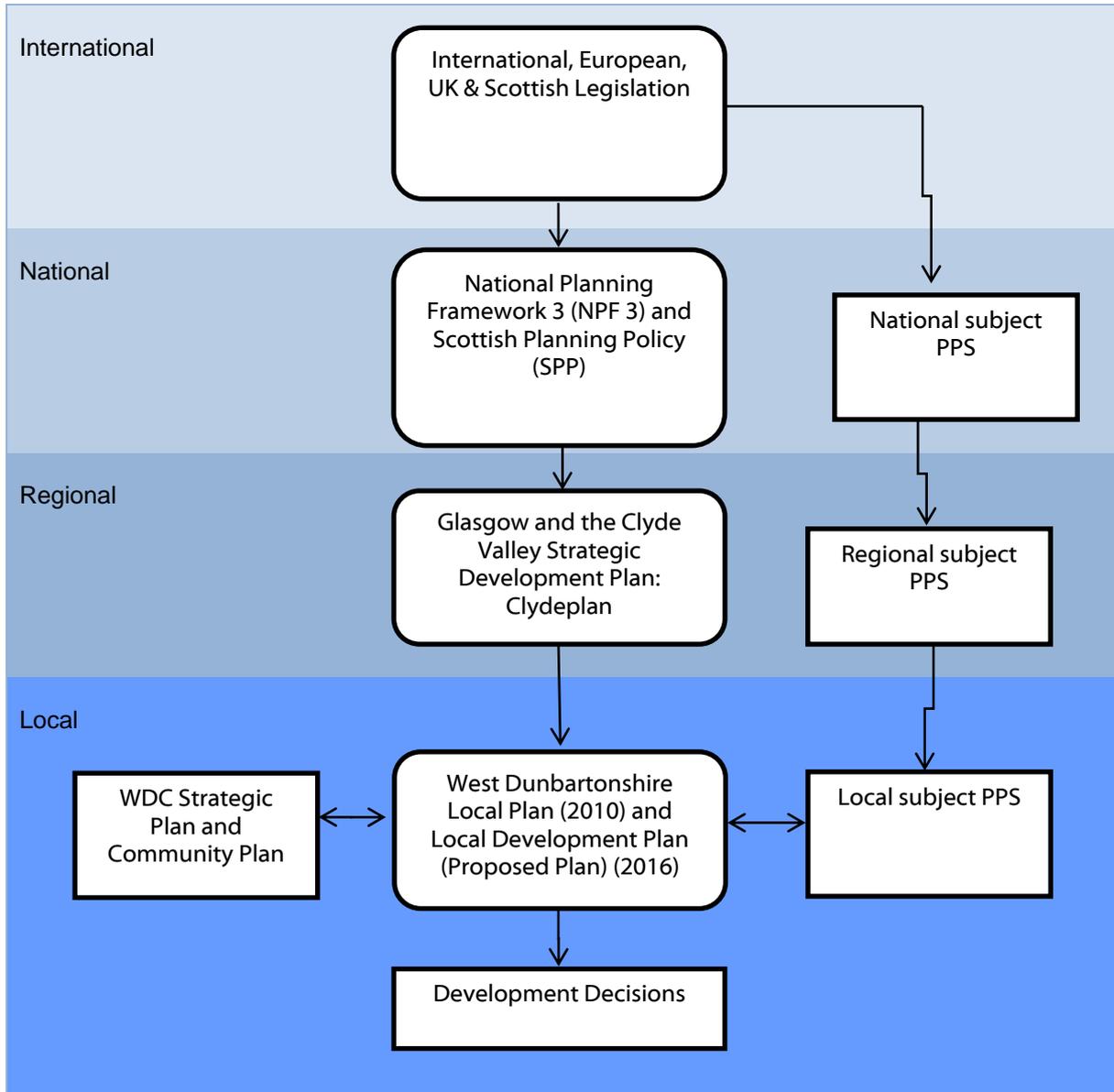
	<b>WDLDP</b>	<b>SEA/ Habitats Regulations Appraisal</b>
<b>June 2017</b>	Publish <b>Main Issues Report &amp; Monitoring Statement</b>	Publish <b>Environmental Report</b> and submit to SEA Gateway.
12 weeks	<b>CONSULTATION</b>	
	Consider representations. Prepare Proposed Plan and Action Programme.	Consider responses. Environmentally appraise Proposed Plan and undertake Habitat Regulations Assessment (HRA). Amend Environmental Report if necessary.
<b>May 2018</b>	Publish <b>Proposed Plan and Proposed Action Plan.</b>	Publish <b>Environmental Report</b> and <b>HRA</b> . Submit Environmental Report to SEA Gateway
6 weeks (min)	<b>CONSULTATION</b>	
	Consider representations. Prepare Summary of Unresolved Issues and Report of Conformity with Participation Strategy.	Consider responses.
<b>November 2018</b>	Submit <b>Proposed Plan, Action Plan and Report of Conformity</b> to Scottish Ministers. Advertise submission of Plan.	Submit HRA record to Ministers
<b>November 2018</b>	<b>Examination</b> of Proposed Plan.	
	Report published and submitted to WDC.	
	WDC considers recommendations and prepares Modifications, Proposed Plan as modified and Statement of Explanation for not accepting any recommendations.	Environmentally appraise modified plan if necessary.
	Publish <b>Modifications and Proposed Plan as modified.</b> Advertise intention to adopt Plan.	Publish and send to Ministers <b>revised Environmental Report</b> (and revised record of <b>HRA</b> ) if required
<b>September 2019</b>	<b>West Dunbartonshire Local Development Plan</b> adopted by WDC.	Publish <b>Post-Adoption SEA Statement</b> and submit to SEA Gateway.

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

LDP 2 will sit within a hierarchy of other plans, programmes and strategies (PPS). Considering the relationship of the LDP 2 to other PPS allows key environmental protection objectives to be identified for consideration during the preparation process.

Figure 1, below, identifies the place of LDP2 in the planning hierarchy and its relationship with other relevant national, regional and local PPS.

Figure 1 – Relationship with other relevant PPS:



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

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

- **Biodiversity:** West Dunbartonshire Council has a duty under the Nature Conservation (Scotland) Act 2004 to further the **conservation of biodiversity**.

- *Climate Change:* The Climate Change (Scotland) Act 2009 sets a framework for the reduction of greenhouse gas emissions and a transition to a low carbon economy. The Act introduces a new duty for all public bodies to exercise their functions in a way that is best calculated to contribute towards **greenhouse gas reduction** targets of 42% by 2020 and 80% by 2050 and help deliver the Scottish Government’s climate change adaptation programme.
- *Flooding:* The Flood Risk Management (Scotland) Act sets in place a statutory framework for delivering a sustainable and risk-based approach to managing flooding. West Dunbartonshire Council has a duty under the Act to exercise its functions with a view to **managing and reducing flood risk** and to promote sustainable flood risk management.
- *Green Network:* The Central Scotland Green Network (CSGN) is identified in the National Planning Framework for Scotland 3 (NPF 3) as a strategic development priority and is the only national development within the Plan area. LDP 2 must contribute to the delivery of the CSGN and its objectives: **creating a more attractive place to live, do business and visit; help to absorb CO<sup>2</sup>; enhance biodiversity; and promote active travel and healthier life styles.**
- *Other environmental objectives include:* protecting the Outstanding Universal Value of the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site; sustainable waste management; and conserving the water environment.

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

A key part of the SEA process is identifying the environmental parameters (from Schedule 3 of the Act) that are likely to be affected by the guidance. Taking into consideration whether the environmental effects, both positive and negative, of LDP 2 are likely to be significant **all the environmental parameters** have been scoped into the assessment. Further detail is provided in the Scoping Report prepared in November 2016.

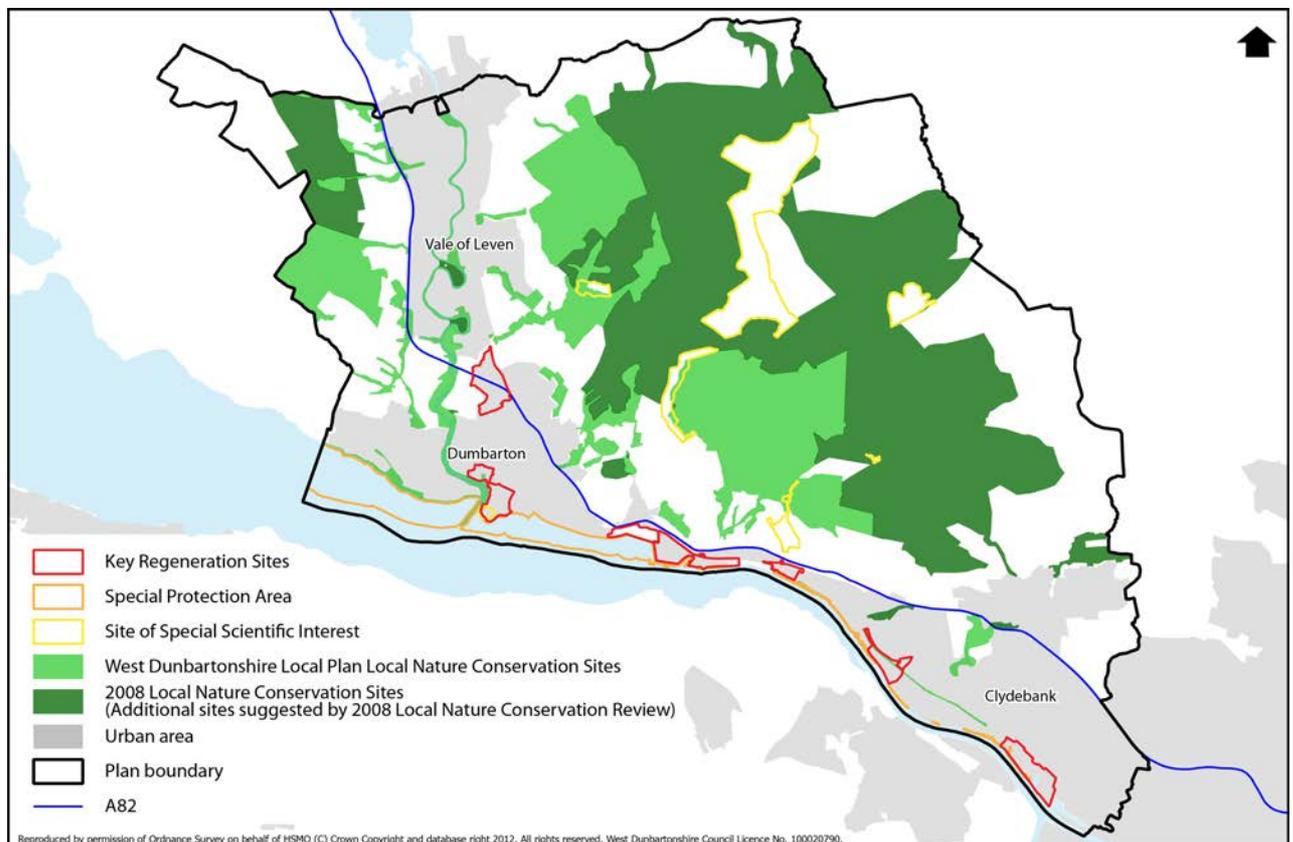
### 3. The Environment

#### 3.1 Environmental Baseline and Issues

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

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

Map 2 – Designated Habitats

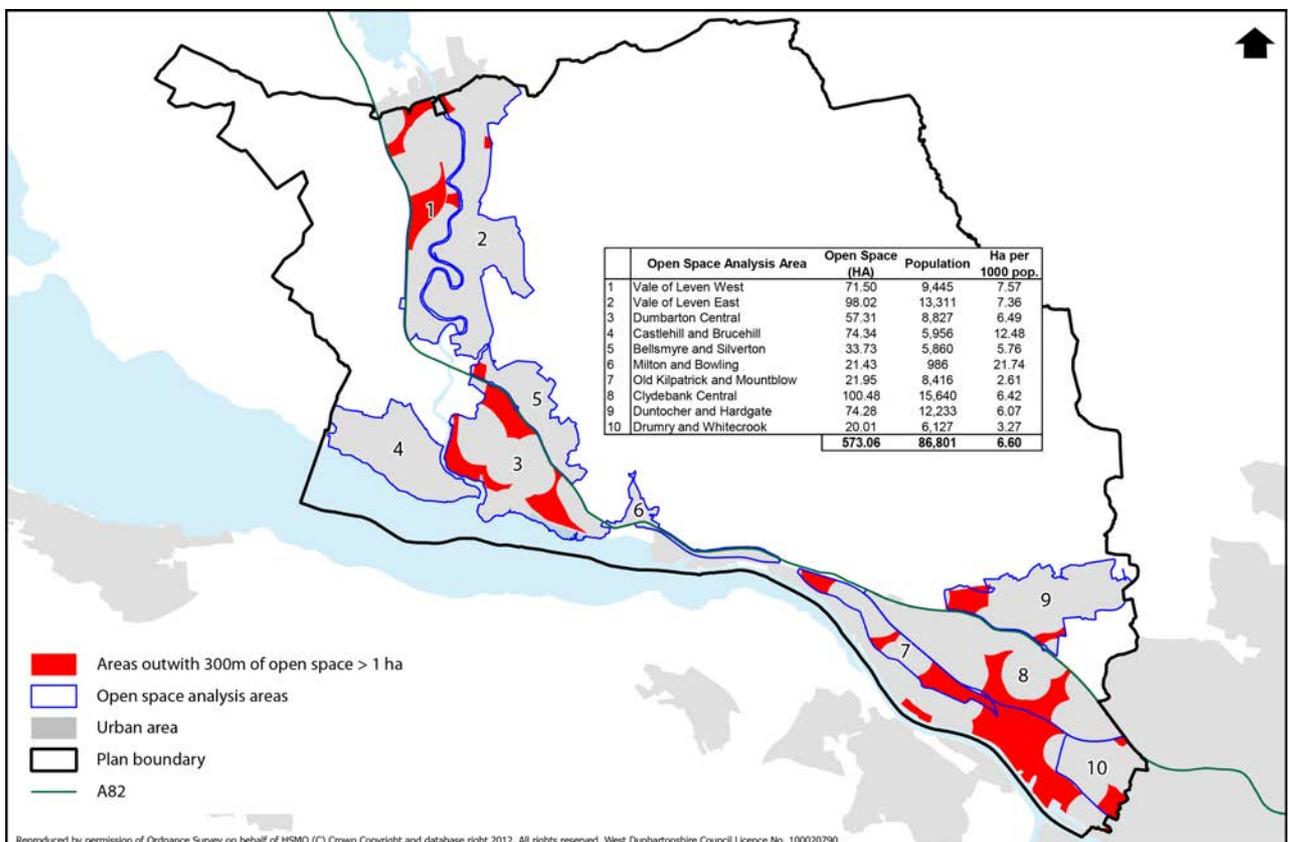


The Inner Clyde is also designated as a SSSI in addition to a further seven sites within the Plan area. The total area of the SSSI extends to 2,010 ha and incorporates 17 separate notified natural features. 12 of these features are assessed as being in favourable condition, one unfavourable and recovering, two unfavourable and declining, while two are yet to be assessed (see Monitoring Statement for details).

An extensive network of locally important Local Nature Conservation Sites (LNCS) totalling approximately 460 ha has been identified and is partly recognised in the West Dunbartonshire Local Plan (2010). The fragmentation of habitats has been identified as the main problem for wildlife at the landscape level, thus virtually all the significant areas of semi-natural habitats in West Dunbartonshire, including extensive moorlands to the east and west of the River Leven have been designated as LNCS so as to maintain a complete a network as possible (see Review of Local Nature Conservation Sites).

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

Map 3 – Access to Open Space



Proximity to pollution, noise and other factors affecting amenity also influences human health, including derelict and contaminated land. The 2015 identifies that 64% of the population in West Dunbartonshire lives within 500 metres of derelict land, the highest proportion of all local authorities in Scotland.

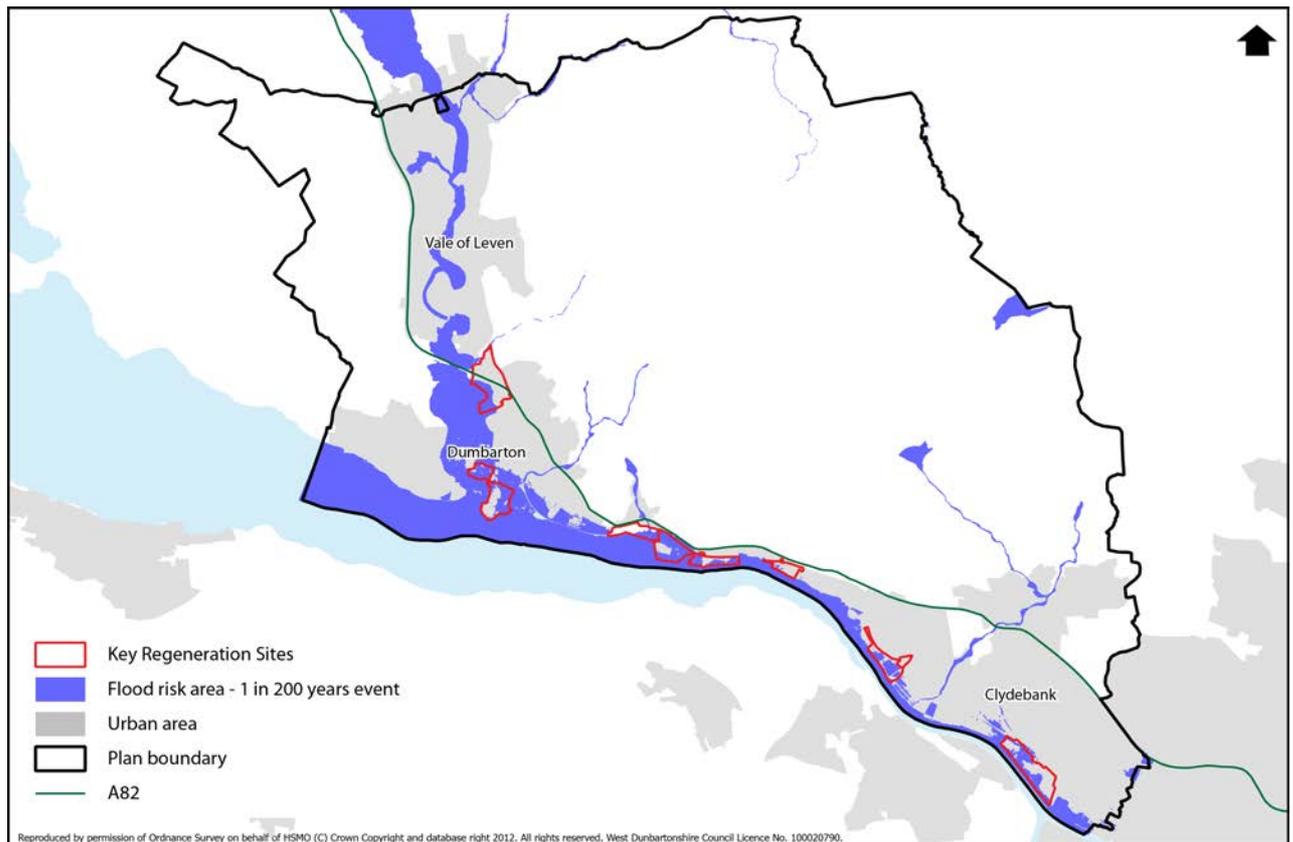
- *Soil:* West Dunbartonshire's industrial past has left a legacy of **vacant, derelict and contaminated land**, with a number of large sites that have remained undeveloped for many years. The most recent survey of vacant and derelict land in Scotland recorded 182 ha of derelict and urban vacant land in West Dunbartonshire, split between 79 sites. Two sites in the area are notified under the Environmental Protection Act as being contaminated: the former Carless oil refinery in Old Kilpatrick and a site on Kilbowie Road.

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

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

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

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



- *Air:* Monitoring carried out in West Dunbartonshire shows that national air quality objectives were not exceeded in recent years. No Air Quality Management Areas have been established in West Dunbartonshire. Road traffic represents the biggest threat to air quality in terms of both overall volume and at locations where traffic is stationary. Kilbowie Roundabout in Clydebank is identified as one of a number of locations where air quality objectives may be exceeded due to traffic levels.
  
- *Climatic Factors:* The installed capacity for renewable energy in West Dunbartonshire is limited to approximately 3 MW at Auchincarroch landfill site. No information on and greenhouse gas emissions at the local level and the effects of future climate change/long-term adaptation to climate change impacts has been identified.
  
- *Material Assets:* No specific data has been collected on this environmental topic. The Green Network is identified as a particular asset likely to bring positive environmental effects related to a number of the environmental topics.
 

Auchincarroch Landfill site is an important asset with regard to the management of waste at a regional scale. It is one of a number of waste management sites in West Dunbartonshire.
  
- *Cultural Heritage:* In July 2008, the **Antonine Wall** was inscribed by UNESCO as a World Heritage Site, becoming an extension to the trans-national Frontiers of the Roman Empire World Heritage Site. While designation as a World Heritage Site confers no additional statutory protection, inscription recognises the

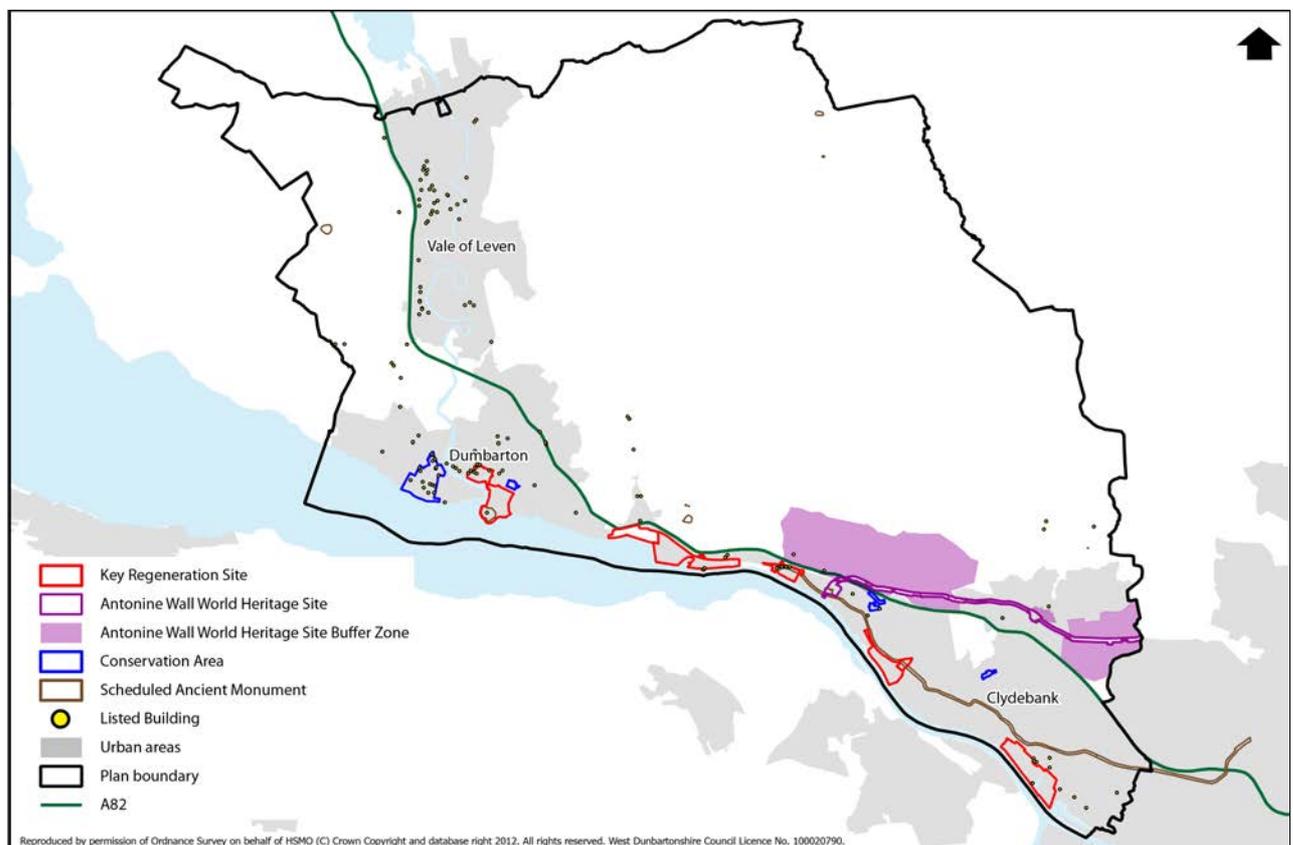
international cultural and archaeological significance of the Antonine Wall. A Buffer Zone seeks to protect the setting of the Antonine Wall.

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

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

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

Map 5 – Cultural heritage interests



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

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

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

LDP 2 will provide a framework for decision-making, development and regeneration in West Dunbartonshire (excluding the area within the National Park) and focus on specific main proposals for a period of up to 5 years from its adoption in 2019. The plan will promote development in appropriate locations, with due consideration to statutory obligations and factors that may be overlooked by market forces. While the adopted Local Plan (2010) will remain relevant, for example in the protection it affords to both natural and built heritage interests in the plan area, it will become increasingly out-of-date as it will not take account of changed circumstances and priorities, including emerging environmental objectives.

Changes to the environment without LDP 2 are therefore not likely to be significantly harmful as a development management and environmental protection regime will remain in place. However, there may be increasing pressure for unsustainable and inappropriate development that could be difficult to resist in the longer term and have consequential harmful effects on the environment. Furthermore, the positive potential of a 'new' Plan for West Dunbartonshire to deliver environmental improvements, for example through the Central Scotland Green Network, may not be realised without LDP 2 and the likely changes to the environment could be significantly less beneficial.

## 4. Assessment Approach and Method

### 4.1 Assessment method

The Main Issues Report presents 18 'issues'. 16 of these issues include a preferred option alongside at least one 'reasonable alternative'. 11 of these Main Issues look at the progress of existing 'Changing Places' within the Proposed Plan (2016). A new assessment has only been undertaken where there has been a significant alteration to the existing strategy. Where there hasn't been a significant alteration to the existing strategy for these sites, the existing assessment undertaken in relation to the Proposed Plan (2016) and contained within its Environmental Report, is still considered to be relevant and should be referred to as the assessment of the issue contained within this MIR.

All of the new options presented in the MIR have been assessed. Chapter 5 lists proposed development sites. Only new sites, which were not included within the Proposed Plan (2016), have been assessed with the exception of those sites that have the benefit of planning permission. Sites which have had their allocation changed to a different use and the sites suggested through the Call for Sites process have also been assessed.

The assessment has been carried out in two stages:

*Stage 1:* To streamline the environmental assessment process, all options were first 'screened' to identify those not likely to have significant environmental effects, taking into account the SEA objectives outlined in Table 2 and the baseline environmental data. Options considered unlikely to have a significant environmental impact on all of the SEA topics were not subject to further assessment.

Options assessed to have a likely significantly positive or negative environmental effects advanced to Stage 2.

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

An assessment as to whether any impact would be over the short, medium or long term and permanent or temporary has also been made and indicated within the table where relevant. The full assessment results are shown at Appendix B and the key findings are presented in Section 5.

### 4.2 Assessment Framework

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

Table 2 – SEA Framework

<b>SEA TOPIC</b>	<b>SEA OBJECTIVE SEA CRITERIA</b>
Biodiversity, Flora & Fauna	<p>To conserve and where possible restore and enhance biodiversity and accord to the protection of valued nature conservation habitats and species.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect a designated (international, national or local) nature conservation site?</li> <li>■ Will the proposal affect the connectivity of habitats?</li> </ul>
Population & Human Health	<p>To improve the living environment for all communities and promote improved health of the human population.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect access to open space?</li> <li>■ Will the proposal affect residential amenity, including noise?</li> <li>■ Will the proposal exacerbate or improve air, water or soil quality, green house gas emissions, flood risk or noise pollution in the area?</li> </ul>
Soil	<p>To safeguard the quality soil resource, geodiversity, and improve soil where contaminated.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect soil quality or areas of carbon rich soil, deep peat or priority peatland habitat?</li> <li>■ Will the proposal affect the diversity of geology, natural landforms and processes?</li> </ul>
Water	<p>To manage and reduce flood risk and protect the water environment.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect the ecological status of waterbodies?</li> <li>■ Will the proposal affect areas within the flood plain?</li> </ul>

Air	<p>To maintain and improve air quality.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect travel patterns?</li> <li>■ Is the proposal likely to minimise pollution?</li> </ul>
Climatic Factors	<p>To reduced greenhouse gas emissions and contribute to the adaptation of the area to climate change.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect carbon emissions?</li> <li>■ Will the proposal contribute to the mitigation of and adaptation to climate change?</li> </ul>
Material Assets	<p>To manage, maintain and promote efficient use of material assets.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect environmental resources, including minerals.</li> <li>■ Will the proposal affect the Green Network?</li> <li>■ Will the proposal protect and enhance outdoor access and recreation provision?</li> <li>■ Will the proposal reduce waste</li> </ul>
Cultural Heritage	<p>To protect and, where appropriate, enhance or restore the historic environment.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect the OUV of the Antonine Wall World Heritage Site?</li> <li>■ Will the proposal affect any scheduled monuments or other important archaeological sites?</li> <li>■ Will the proposal affect any listed buildings?</li> </ul>
Landscape	<p>To protect and enhance the character, diversity and unique qualities of the landscape.</p> <ul style="list-style-type: none"> <li>■ Will the proposal affect the Kilpatrick Hills Regional Scenic Area?</li> <li>■ Will the proposal affect the setting of an urban area?</li> <li>■ Will the proposal lead to a change to landscape character?</li> </ul>

### 4.3 Alternatives

The SEA process requires that the Environmental Report identifies, describes and evaluates the likely significant effects on the environment of implementing reasonable alternatives to the plan being assessed. As a statutory requirement there

is no reasonable alternative to LDP 2 itself, however, the MIR is required to contain one or more reasonable alternative sets of proposals.

The MIR represents the principal opportunity within the plan preparation process for engaging stakeholders on the content of the plan. At this stage of the process the Council has not reached a firm view as to LDP 2's spatial strategy and site-specific proposals and, as such, all options presented in the MIR represent alternative approaches. While in most instances a preferred option has been identified, no alternative options have been expressed with regard to the Vale of Leven Industrial Estate (Main Issue 5) and Clyde Crossing (Main Issue 9).

The options which have been generated through the preparation of the MIR take account of pre-MIR consultation, the environmental baseline and number of policy and strategy documents and are intended to represent approaches which are realistic, deliverable, consistent with other aspects of the plan, and consistent with higher-level plans and policies such as Clydeplan and national planning policy.

The assessment of these options (Section 5) and consultation responses to this Environmental Report will influence the options taken forward to the Proposed Plan.

## 5. Assessment Findings

### 5.1 Summary of results

This section seeks to summarise the key findings from the assessment of options in the MIR. The full assessment results are included at Appendix B, which also provides a commentary explaining the assessment of each option and a conclusion comparing the options under each issue. This conclusion has also been included in the MIR. The results are summarised below by SEA topic:

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

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

- *Population & Human Health:* The assessment of the effects of MIR options upon population and human health focused on access to open space and residential amenity. Town centre retail development included within Dumbarton Town Centre and Clydebank associated with Issues 2, 7, 9 and 16 are assessed as having minor or no negative effects arising from increased traffic and noise. Positive effects are envisaged arising from the options concerning the Vale of Leven Industrial Estate (Issue 5), Creating Places (Issue 12) Green Infrastructure: Allotments/Community Gardens (Issue 18) and the provision of a new football stadium complex in Dumbarton (Issue 6) which would potentially improve the availability, accessibility and quality of sporting facilities in the area.
- *Soil:* Many of the options identified are assessed as likely to have a positive effect on soils through the remediation of contaminated sites. This applies to the Key Regeneration Sites at Dumbarton Waterfront, Esso Bowling, Carless, and Queens Quay. No negative effects have been identified.
- *Water:* A number of options are identified as likely to have major negative effects in respect to managing and reducing flood risk, with a number of development sites, including the Key Regeneration Sites (see also Map 4) falling within areas at risk of a 1 in 200 year flood event. .

- *Air*: Options which would result in significant increased levels of traffic, including where major road infrastructure works are required have been assessed as likely to have a negative effect on air quality. These options include at Queens Quay (Issue 1), Dumbarton Town Centre and Waterfront (Issue 2), Esso Bowling (Issue 3), Young’s Farm (Issue 6) and Clydebank Town Centre (Issue 7).
- *Climatic Factors*: In similar terms to the environmental parameter above, options that would increase levels of traffic have been assessed as likely to have a negative effect upon the objective of reducing greenhouse gas emissions. However, Creating Places (Issue 12) and Heat Generation and Heat Networks (Issue 17) are predicted to have positive impacts on climatic factors.
- *Material Assets*: The assessment has identified few effects of a significant nature on the objective of managing, maintaining and promoting material assets, including Green Infrastructure: Allotments/Community Gardens (Issue 18).
- *Cultural Heritage*: No negative environmental effects upon the historic environment are predicted by the assessment. Some minor positive effects are identified in Dumbarton Town Centre and Waterfront (Issue 2) where options would improve the setting of Dumbarton Castle and other listed buildings.
- *Landscape*: Negative impacts upon landscape identified by the assessment are restricted to Esso Bowling (Issue 3) and Young’s Farm (Issue 6), where development would affect the setting of the urban area and Greenbelt respectively.

## 5.2 Mitigation

An important role of the Strategic Environmental Assessment is to identify measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. In view of this early stage of plan preparation an overall approach to mitigation is proposed rather than specific measures. This approach should inform the preparation of the Proposed Plan, including the wording of policies and, following adoption of LDP 2, subsequent SEAs of lower level plans (e.g. masterplans), project level Environmental Impact Assessments (EIA), or planning applications. The approach is based on the following hierarchy:



In the first instance, LDP 2 should seek to avoid significant adverse effects on the environment. Primarily, this can be achieved by altering or changing the policy or site-specific proposal causing the negative effect, for example by not identifying a particular site as a development opportunity. Where this is not practicable, adverse effects should be reduced, remedied and, as the last resort, compensated. Site-specific proposals for mitigation should be informed by appropriate survey material at the pre-application or application stage.

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

All new and re-allocated sites and those suggested through the Call for Sites process have been assessed and, where necessary, mitigation has been proposed to avoid, offset, reduce or compensate any significant adverse impact. These mitigation measures will be required to be undertaken when developing the site. Consideration will be given to including a specific policy within the Proposed Plan requiring the developer of the site to undertake the required mitigation.

## 6. Monitoring

Following the adoption of LDP 2, the Council as Responsible Authority is required to monitor the significant environmental effects of the implementation of the Plan in accordance with Section 19 of the Act. The monitoring should enable the identification of significant environmental effects arising from the implementation of the plan and any unforeseen effects, in order to allow remedial action to be taken where required.

The Planning etc. (Scotland) Act 2006 requires local planning authorities to prepare a Monitoring Statement, to be published alongside the MIR, focusing on the wider impact of the plan. It is intended that the monitoring requirements for the SEA and development plan will be integrated, with the Monitoring Statement for the next local development plan reporting on the significant environmental effects of the implementation of LDP 2. This will inform the identification of Issues for the plan making process.

The specific measures that are to be taken to monitor the significant environmental effects of the implementation of LDP 2 – and included within future Monitoring Statements – will form part of the post-adoption statement prepared as soon as reasonably practicable after the adoption of LDP 2 in accordance with Section 18 of the Act. It is envisaged that the following indicators will be included within the monitoring framework:

*Table 3 –Monitoring Indicators (to be developed)*

<b>SEA Topic</b>	<b>Indicator</b>	<b>Source</b>
Biodiversity, Flora & Fauna	Proportion of protected nature sites in favourable condition	SNH
Population & Human Health	Access to Open Space – % of population within 300m of 1ha of open space/Usable open space per 1000 residents  Proximity to vacant and derelict land - % of population within 500m	WDC  SVDLS
Soil	Area of land designated as contaminated	WDC
Water	Ecological status of water bodies  Proportion of development within land at risk of flooding	SEPA  WDC
Air	NO2 and PM10 Concentration  Traffic levels (tbc)	WDC (Air Quality Monitoring)  WDC

Climatic Factors	Installed renewable energy capacity (MW)	WDC (Planning applications monitoring)
Material Assets		
Cultural Heritage	No. of buildings at risk	RCHAMS
Landscape		
Other	Proportion of development built on brownfield sites	WDC (Planning applications monitoring)

## 7. Next Steps

The public consultation period on the MIR and this Environmental Report ends on **22<sup>nd</sup> September 2017** allowing for a 12 week consultation. During this time responses to the consultation can be submitted by:

- E-mail to: [ldp@west-dunbarton.gov.uk](mailto:ldp@west-dunbarton.gov.uk). In your subject box please type 'Environmental Report consultation'
- Writing to: Forward Planning, Planning and Building Standards, Aurora House, 3 Aurora Avenue, Queens Quay, Clydebank, G81 1BF

You may wish to comment on the following aspects of the Environmental Report:

- Are there any other environmental objectives included in other plans, programmes and strategies that LDP 2 and assessment should take account of?
- Have all the important aspects of the environment in West Dunbartonshire – including problems – been captured?
- Do you agree with the environmental assessment of the options?
- Are the mitigation measures identified to address negative impacts suitable?
- Do you have any views on how the significant effects of the implementation of LDP 2 should be monitored including the indicators to be used?

Table 1, above, outlines the proposed timetable for the preparation of LDP 2 and Environmental Report. Following the consultation period set out above, the Proposed Plan will be prepared and published for further consultation.

The Proposed Plan and any subsequent changes will be screened to consider if they raise significant environmental issues that have not already been considered, with amendments made to this document if required.

### 7.1 Policies and Supplementary Guidance

The MIR does not include the wording of the policies that are likely to appear later in the Proposed Plan. Section 2 of the Monitoring Statement includes an appraisal of the policies included in the Local Plan (2010) and Proposed Plan (2016). It is intended that most policies will be revised or merged to form a policy framework that remains robust but contains fewer policies.

As part of screening of the Proposed Plan for matters raising significant environmental issues that have not already been considered by the SEA, the policy wording included in the Proposed Plan will also be considered, as well as, any Supplementary Guidance that may be required.

### 7.2 Habitats Regulations Appraisal

As detailed above, SNH have advised that a Habitats Regulations Appraisal does not require to be undertaken as part of the assessment of the Main Issue Report as long as any impacts have been considered when formulating the Main Issues. Within the Main Issues Report any impact on Natura 2000 sites has been identified and the

requirements for mitigation have been noted. It should also be remembered that the Habitats Regulation Appraisal for the Proposed Plan (2016) still remains relevant and that the assessment results of the Appropriate Assessment of that Plan still remain relevant and, in many respects, are unaltered as many of the sites contained within that Plan are also contained within the Main Issues Report with some slight amendments to the existing strategy.

However, LDP 2: Proposed Plan will undertake a full Habitats Regulation Appraisal and, where required, an Appropriate Assessment.

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

Legislation & Plans, Programmes or Strategies <b>SEA Topic</b>	Summary of Environmental Objectives
<b>Biodiversity, Flora &amp; Fauna</b>	
EU Birds Directive & EU Habitats Directive ↓ Habitats Regulations  Conservation (Natural Habitats & c) Regulations 1994 (as amended)	The Habitats Regulations transpose the provisions of the EU Habitats and Birds Directives into Scottish Law and require that local development plans are subject to an appropriate assessment of their implications for Natura sites.
Nature Conservation (Scotland) Act 2004	To conserve biodiversity and protect the nation's precious natural heritage. Implementation is linked to the national biodiversity strategy.
Convention on Biological Diversity ↓ UK Post-2010 Biodiversity Framework/Scottish Biodiversity Strategy	Conserve species and habitats in Dunbartonshire that are considered vulnerable or threatened on a local or national basis, and in turn contribute to the conservation of our global biodiversity; promote awareness of local natural resources; promote community engagement in, and ownership of, the practical conservation of natural resources; and promote the sustainable and wise use of resources.
<b>Population &amp; Human Health</b>	
Land Reform (Scotland) Act 2003 ↓ West Dunbartonshire Core Paths Plan	Establishes the statutory rights of access to land and inland water for outdoor recreation. Prepared under the Act, the Core Paths Plan provides a system of path in West Dunbartonshire which, as a whole, gives the public reasonable access throughout the plan area.
<b>Soil</b>	
Scottish Soil Framework (2009)	To promote the sustainable management and protection of soils consistent with the economic, social and environmental needs of Scotland, achieved through targeted activities including reducing soil erosion; greenhouse gas emissions from soil; and contamination.
<b>Water</b>	

<p>EU Water Framework Directive ↓ Water Environment and Water Services (Scotland) Act 2003 (WEWS) Act ↓ Scotland River Basin Management Plan (2009) ↓ Clyde Area Management Plan</p>	<p>To prevent deterioration in the status of the water environment, including rivers, lochs, estuaries, coastal waters and groundwaters and protect, enhance and restore all surface water bodies to 'good' status.</p> <p>The area management plan supplements the river basin management plan (RBMP) for the Scotland river basin district in the delivery of Water Framework Directive requirements.</p>
<p>EU Floods Directive ↓ Flood Risk Management (Scotland) Act 2009 ↓ Clyde and Loch Lomond Local Plan District – Flood Risk Management Plan</p>	<p>To reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity through improved assessment and the sustainable and coordinated management of flood risk.</p> <p>The Act imposes a new duty on local authorities to exercise their flood risk related functions with a view to reducing overall flood risk and establishes the requirement to prepare plans to manage flood risk which will provide a framework for coordinating actions across catchments to deal with all forms of flooding and its impacts.</p>
<p>EU Marine Strategy Framework Directive (MSFD) ↓ Marine (Scotland) Act 2010 ↓ Firth of Clyde Marine Spatial Plan (FoCMSP)</p>	<p>Aims to achieve good environmental status of the EU's marine waters by 2020 and to protect the resource base upon which marine-related economic and social activities depend. The Marine (Scotland) Act transposes the Directive into Scots law and makes provision for a new statutory marine planning system to sustainably manage demands on the marine environment. The FoCMSP is a forerunner to these statutory plans.</p>
<b>Air</b>	
<p>EU Air Quality Directive ↓ The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)</p>	<p>Air quality targets have been set at the European and UK levels. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets objectives for Particulate Matter (PM), oxides of nitrogen (NOx), sulphur dioxide (SO2) and ozone (O3) amongst others.</p>
<b>Climatic Factors</b>	

<p>Climate Change (Scotland) Act 2009 ↓ Getting the best from our land: A land use strategy for Scotland 2016-2021</p>	<p>The Act introduces a new duty on the Council (and all public bodies) to exercise their functions in a way that is best calculated to contribute towards the greenhouse gas reduction targets of reducing emissions by at least 80 per cent by 2050.</p> <p>A national land-use strategy has been prepared under the Act. This identifies key principles for the sustainable use of land, including: encouraging land uses which deliver multiple benefits; land highly suitable for primary uses should be recognised in decision-making; and examining options for restoring derelict or vacant land should be a priority.</p>
<p><b>Material Assets</b></p>	
<p>Scottish Forestry Strategy 2006</p>	<p>Environmental objectives include reducing the impact of climate change; make access to and enjoyment of woodlands easier for all to improve health; protect the environmental quality of our natural resources; and help to maintain, restore and enhance Scotland's biodiversity.</p>
<p>Zero Waste Plan</p>	<p>To achieve a zero waste Scotland, where we make the most efficient use of resources by minimising Scotland's demand on primary resources, and maximising the reuse, recycling and recovery of resources instead of treating them as waste.</p>
<p><b>Cultural Heritage</b></p>	
<p>Scottish Historic Environment Policy (SHEP)</p>	<p>The three key outcomes presented in the Policy are that the historic environment is cared for, protected and enhanced for the benefit of our own and future generations; greater economic benefits from the historic environment; and that the people of Scotland and visitors to our country value, understand and enjoy the historic environment.</p>
<p>Antonine Wall Management Plan</p>	<p>Seeks to establish the management requirements and policies needed to meet the requirements for the long term protection and conservation of the World Heritage Site.</p>
<p><b>Landscape</b></p>	
<p>European Landscape Convention</p>	<p>To promote the protection, management and planning of all landscapes, including natural, managed, urban and peri-urban areas, and special, everyday and also degraded landscape.</p>
<p><b>Other Relevant PPS</b></p>	

National Planning Framework 3	The NPF 3 guides the spatial development of Scotland for the next 20 – 30 years and sets out strategic development priorities to support the Scottish Government's ethos of promoting sustainable economic growth.
Scottish Planning Policy	The SPP sets out the Scottish Government's planning policy on nationally important land-use planning matters. This places planning within the wider context of the Scottish Government's overarching aim to increase sustainable economic growth.
Clydeplan Strategic Development Plan (currently at post-examination stage)	To continue the regeneration and transformation of the city region's urban areas, whilst securing positive action on the natural environment; minimising the development and carbon footprints of the city-region, meeting climate change targets and supporting a drive to a low-carbon economy.
Our West Dunbartonshire Community Plan 2007 – 2017	The Community Plan sets out a vision for West Dunbartonshire which includes protecting the natural environment.
West Dunbartonshire Council –Strategic Plan 2012-2017	The Council will seek to improve economic growth and employability, to improve opportunities and the well-being of its population and to improve an environmentally sustainable infrastructure.

## Appendix B – Full assessment results

Key to assessment tables:

Major positive effect(s)	↑↑
Minor positive effect(s)	↑
Major negative effect(s)	↓↓
Minor negative effect(s)	↓
Net Neutral effect	↔
Unknown	?
Scoped out of assessment (non-significant or consented)	X

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

Temporary effect(s)	T
Permanent effect(s)	P

Main Issue 1 – Queens Quay	Biodiversity, & Flora Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Preferred Option: to continue to implement the existing strategy but also to reallocate areas of land to different uses.	↓ ST	↓	↑ P	↓↓ L	↓ L	↓	↑ P	X	X
Alternative Option: to continue to implement the existing strategy.	↓ ST	↓	↑ P	↓↓ L	↓ L	↓	↑ P	X	X
<p><b>Commentary:</b>  Any development on Queens Quay is likely to result in disruption to the Inner Clyde SPA (biodiversity), will be within the flood plain (water) and will increase carbon emissions (climatic factors). If the majority of the site is developed for housing, this is less likely to have an adverse impact on adjacent residential amenity (Population and Health) and travel patterns (air quality).</p> <p>Development of the site will be positive for soil quality, with the site currently understood to contain contaminates. No significant impact is predicted upon material assets, the setting of the urban area and cultural heritage interests including the Titan Crane, although the detailed site development designs will be important.</p> <p>The site currently has limited value to the green network. Development could bring positive benefits in terms of access, provision of open space and other Green Network enhancements.</p>									
<p><b>Conclusion:</b>  Both these options will result in some negative environmental impact, particularly on the water environment as part of the site falls within the floodplain and air quality.</p>									

Main Issue 2 – Dumbarton Waterfront and Town Centre	Biodiversity, & Flora Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Preferred option:</b> to update and revise the existing strategy and include new proposals which have come forward.	↓ ST	↓	↑ P	↓↓ L	↓ L	↓	↑ P	↑ M	↑ M
<b>Alternative option:</b> to include support for a retail development opportunity to the east of St James Retail Park and for the revision of existing floorspace within the retail park as part of the revised strategy.	↓ ST	↓	↑ P	↓↓ L	↓ L	↓	↑ P	↑ M	↑ M
<p><b>Commentary:</b>  The revised strategy will continue to promote the development key sites within the town centre and waterfront and is likely to have positive and negative environmental impacts. The revised strategy seeks to continue to protect Dumbarton Castle and the urban environment but may have negative impacts on the Inner Clyde SPA and flood risk.</p> <p>It is anticipated that the alternative option will have the same environmental impacts as the preferred option</p>									
<p><b>Conclusion:</b>  The preferred and alternative option seek to enhance the setting of Dumbarton Castle and the urban environment but the development of key sites would also have negative environmental impacts, relating to flood risk and the Inner Clyde SPA.</p>									

Issue 3 – City Deal Project: Esso Bowling and Scott’s Yard	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Preferred Option:</b> to reflect the route of the re-aligned road to accord with City Deal proposals and the draft masterplan and to retain the existing strategy for Scott’s Yard	↓ ST (↓ ↓ L)	X	↔	↓ ↓ L	↓ L	↓ L	↓ P	?	↓ ↓ P
<b>Alternative Option:</b> the alternative option is to retain the existing strategy, for both Esso Bowling and Scotts yard, with no change to the road alignment within the Esso site.	↓ ST	X	↑ P	↓ ↓ L	↓ L	↓ L	↓ P	?	↓ P
<p><b>Commentary:</b> Any impact on population and human health has been scoped out for both options, as neither will have a significant effect on residential amenity. Both options are likely to have a negative effect on biodiversity, in particular disruption to the Inner Clyde SPA during construction. The extension site has potential for longer term damage due to the extent of the habitat at this location and the potential impact of sea level rise. Given the scale of development proposed, there will also be a negative impact on air quality and carbon emissions. Both options will result in development on the flood plain and will have a negative impact on the landscape character and green network.</p> <p>Remediation of contaminated land will have a positive effect on soil quality; however, the preferred option could see extensive in-filling to raise the extended site above flood levels. This would bury semi-natural soils, including wetlands. A net neutral impact on Soil is therefore predicted for this option.</p> <p>The impact upon the main cultural heritage feature, Dunglass Castle assessed as unknown.</p>									
<p><b>Conclusion:</b> Both of these options will have a number of negative environmental impacts related to increasing the level of development at this location, particularly on the water environment because the land is within the flood plain.</p>									

<u>Issue 4 – Lomondgate, Dumbarton</u>	<b>Biodiversity, Flora &amp; Fauna</b>	<b>Population and Human Health</b>	<b>Soil</b>	<b>Water</b>	<b>Air</b>	<b>Climatic Factors</b>	<b>Material Assets</b>	<b>Cultural Heritage</b>	<b>Landscape</b>
<b>Preferred Option:</b> to allow part of the Business Park area to be used for alternative uses, such as commercial leisure and tourism uses.	X	X	X	X	X	X	X	X	X
<b>Alternative Option:</b> to continue to safeguard the business park as an industrial/business opportunity reserved for use classes 4 and 5.	X	X	X	X	X	X	X	X	X
<p><b>Commentary:</b></p> <p>The Issue primarily concerns with the option to re-designate part of an existing development site and the specific uses that may be permitted by Local Development Plan 2. No changes are proposed to the extent of the development opportunity sites. In this context it has been assessed that the options in themselves would not have a significant environmental impact and have been scoped out of the assessment.</p>									
<p><b>Conclusion:</b></p> <p>The options are assessed as not likely to have a significant environmental impact.</p>									

Issue 5 – Vale of Leven Industrial Estate, Dumbarton	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<p><b>Preferred Option:</b> to review the Greenbelt and Local Nature Conservation Site designation boundaries in light of the recent consent and to give significant protection to the remaining areas of open space and habitats, the woodland setting of the Vale of Leven Industrial Estate and its current recreational use.</p>	 LP	 LP	x	 LP	x	x	 LP	x	x
<p><b>Alternative Option:</b> No alternative option</p>									
<p><b>Commentary:</b></p> <p>The review of the greenbelt and local nature Local Nature Conservation Site designation boundaries could have a net neutral effect as some areas will be lost due to the recent consent but that any new boundary will give significant protection to the remaining areas. The preferred option will also protect the water environment of the River Leven and maintain the path network thus protecting the green network.</p>									
<p><b>Conclusion:</b></p> <p>The preferred option is likely to have significant positive impacts overall, despite the loss of an area of Greenbelt and within the Local Nature Conservation Site designation.</p>									

Issue 6 – Young’s Farm	Biodiversity, & Flora Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Preferred Option:</b> To not allow residential development on the site but to continue to support the relocation of the Football Club	↓ L	↑	↓ L	↓↓ L	↓↓ L	X	↓ P	X	↓ P
<b>Alternative Option:</b> is to allow houses on the site as enabling development for the stadium but limited to the minimum amount of housing required.	↓↓ L	↑	↓↓ L	↓↓ L	↓↓ L	X	↓↓ P	X	↓↓ P
<p><b>Commentary:</b>  The Preferred Option will still result in development of the greenfield site at Young’s Farm but is assessed as having minor negative effects on biodiversity and water in relation to the parts of the site prone to flooding and with local nature conservation interest; on material assets due to the loss of agricultural land and also on landscape, with the change in the character of the land from semi-rural to urban affecting the setting of Dumbarton. The preferred option is also assessed as having a positive effect on Population and Human Health with any new stadium development potentially improving to the availability, accessibility and quality of sporting facilities.</p> <p>The majority of the impacts are considered to be the same as the preferred option; however, the introduction of residential development within with the site is likely to escalate the negative impacts from minor to major due to the potential scale of residential development and the associated impacts of additional people and traffic within a predominantly greenfield location.</p>									
<p><b>Conclusion:</b>  The preferred option and alternative option are likely to have negative environmental impacts on a host of factors with the alternative approach considered to have major negative impacts when compared to the preferred option.</p>									
Issue 7 – Clydebank Town Centre Strategy	Biodiversity, & Flora Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape

<b>Preferred Option:</b> to update the town centre strategy.	X	↓	X	X	↓	↓	X	X	X
<b>Alternative option: to retain the existing strategy</b>	X	↓	X	X	↓	↓	X	X	X
<b>Commentary:</b>									
<p>The preferred option is likely to have some minor negative impacts because of the proposals for the Playdrome site with a possible increase in traffic impacting on traffic and travel patterns, air quality and carbon emissions.</p> <p>The alternative option is likely to have some minor negative impacts because of the identification of a superstore development opportunity site with a possible increase in traffic impacting on traffic and travel patterns, air quality and carbon emissions.</p>									
<b>Conclusion:</b>									
Both options may have some minor negative environmental impacts on traffic and travel patterns, air quality and carbon emissions arising from major retail development opportunities. No significant differences in environmental impact are envisaged between the two options.									

Issue 8 – Clyde Crossing City Deal Project	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Preferred Option:</b> to understand the proposals for the new crossing and how this will impact on Clydebank as a result of forthcoming studies. The Council then take an informed decision on how best to proceed.	X	X	X	X	X	X	X	X	X
<b>Alternative Option:</b> no alternative option									
<p><b>Commentary:</b></p> <p>The Issue explores how the Council should consider the proposed Clyde Crossing. In this context, the preferred option would not have a significant environmental impact and has been scoped out of the assessment.</p>									
<p><b>Conclusion:</b></p> <p>The preferred option is not likely to have a significant environmental impact.</p>									

Issue 9- Stanford Street, Clydebank and Forth and Clyde Canal	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<p><b>Preferred Option:</b> to undertake a design led approach to provide a cohesive approach to better connect Stanford Street, the Forth and Clyde Canal, the Clyde retail park and the town centre</p>	X	X	X	X	X	X	X	X	X
<p><b>Alternative Option:</b> to continue with the existing strategy within the Proposed Plan (2016)</p>	<p>See assessment within Proposed Plan (2016) Environmental Report</p>								
<p><b>Commentary:</b></p> <p>The Main Issue seeks to establish whether a design-led approach should be undertaken to provide a cohesive approach to better connect Stanford Street, the Forth and Clyde Canal, the Clyde retail park and the town centre. The approach will also consider how best to establish evening and leisure uses along the Forth and Clyde Canal and into the town centre, to improve the night time economy within Clydebank. Although the preferred option could ultimately lead to development that may have significant impacts, the actual issue itself is unlikely to have a significant environmental impact and have been scoped out of the assessment, as it is not proposing any development or proposals that can be assessed.</p> <p>The current strategy is to maintain the status quo and the development sites within this location. These sites have been previously assessed within the Proposed Plan (2016) Environmental Report and these allocations have not changed.</p>									
<p><b>Conclusion:</b></p> <p>The preferred option is not likely to have a significant environmental impacts.</p>									

Issue 10 – Lomond Canal	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Preferred Option:</b> The proposals for the Lomond Canal should not be included in LDP 2.	X	X	X	X	X	X	X	X	X
<b>Alternative Option:</b> Full support for proposed Lomond Canal, identification and safeguarding of proposed route.	↓↓ P	↑ P	X	?	X	↑ L	↑ P	X	↓ P
<p><b>Commentary:</b>  The preferred option has been scoped out of the SEA as it would mean the exclusion of the Lomond Canal proposal from LDP 2. Therefore, there would be no significant environmental impact.</p> <p>The alternative option would support the Lomond Canal proposal, but to different degrees. The environmental impacts of the options are considered to be the same as they both promote the development of the Canal. The greatest concern is the potential impact on biodiversity. The River Leven and its environs form a network of Local Nature Conservation Sites which could be adversely impacted upon by the construction of the Canal and its long term presence. The river is also links important habitats upstream including the Endrick Water SAC to the sea. The impact on the human population and material assets is considered to be positive owing to the creation of a recreational and open space resource.</p> <p>The impact on the water environment itself is uncertain. The scheme is potentially adversely significant, but with potential flood management benefits which would also be positive in relation to how the plan area adapts to climate change.</p> <p>The proposed Canal would change the landscape permanently introducing hard engineering, but not impacting on any designated resource.</p>									
<p><b>Conclusion:</b>  The preferred option has no significant environmental impact.</p> <p>The alternative approach will have significant environmental impacts particularly on biodiversity and the assessment reflects this. There is a potential adverse impact on the water environment, but also an opportunity to improve water management. Any firm proposals for the Canal would require to be accompanied by an Environmental Impact Assessment.</p>									

<u>Issue 11 – Remaining Changing Places: Kilpatrick Hills</u>	<b>Biodiversity, Flora &amp; Fauna</b>	<b>Population and Human Health</b>	<b>Soil</b>	<b>Water</b>	<b>Air</b>	<b>Climatic Factors</b>	<b>Material Assets</b>	<b>Cultural Heritage</b>	<b>Landscape</b>
<b>Preferred Option:</b> Wind energy proposals will be supported where they involve small/medium scale turbines located within less visually prominent parts of the Kilpatrick Hills.	?	?	?	X	X	?	X	?	?
<b>Alternative Option:</b> to have a more open approach to large and very large scale wind turbines where the benefits of providing renewable energy are considered to outweigh the impact on the local landscape	?	?	?	X	X	?	X	?	?
<p><b>Commentary:</b></p> <p>The preferred option is following the approach set out within the Renewable Energy Planning Guidance, which was subject to an SEA. The main environmental impacts are likely to relate to biodiversity, population and human health (relating the impact turbines may have on residential amenity), soil, climatic factors, cultural heritage and landscape. However, the precise impacts are unknown at this stage as they will be dependent on the location, the number of turbines and the height of the turbines. Other SEA Topics have been scoped out of the assessment.</p> <p>The likely environmental impacts for the alternative option are exactly the same as the preferred option.</p>									
<p><b>Conclusion:</b></p> <p>The preferred and alternative options are both assessed as having uncertain environmental impacts, as the precise impacts will be dependent on the location, the number of turbines and the height of the turbines.</p>									

Issue 12 – Creating Places	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<p><b>Preferred Option:</b> to take a design-led approach to creating places and implementing a policy framework that ensures that high quality development is delivered on the ground. It also looks at options on how to involve the communities in placemaking.</p>	X	↑	X	X	X	↑	↑	↑	X
<p><b>Alternative Option:</b> to continue with the approach advocated in the Proposed Plan (2016).</p>	X	↑	X	X	X	↑	↑	↑	X
<p><b>Commentary:</b></p> <p>The preferred option is likely to have significant positive effects on a number of SEA Topics. By implementing a place and people first approach and ensuring that new development sites are integrated with existing area can bring positive effects to the environment through good design and layouts which create.</p> <p>The alternative option is likely to have the exact same impacts as the preferred option as Policy DS 1 of the Proposed Pan (2016) set out criteria to be considered when preparing and assessing development proposals and related to the six qualities of successful places.</p>									
<p><b>Conclusion:</b></p> <p>The preferred and alternative options are likely to have significant positive impacts on a host of SEA topics.</p>									

<u>Issue 13 – Private Sector Housing Land</u>	<b>Biodiversity, Flora &amp; Fauna</b>	<b>Population and Human Health</b>	<b>Soil</b>	<b>Water</b>	<b>Air</b>	<b>Climatic Factors</b>	<b>Material Assets</b>	<b>Cultural Heritage</b>	<b>Landscape</b>
<b>Preferred option:</b> The private housing land supply should be supplemented by the allocation of additional sites for housing development.	?	?	?	?	?	?	?	?	?
<b>Alternative Option 1:</b> In addition to the sites within the preferred option, four other sites should be allocated.	?	?	?	?	?	?	?	?	?
<b>Alternative option 2:</b> No additional sites will be allocated.	X	X	X	X	X	X	X	X	X
<p><b>Commentary:</b> The preferred option identifies 8 sites, some or all of which would be identified in LDP 2 to increase the housing land supply. The individual sites have been assessed below within the section on development sites proposed for inclusion within LDP 2. The environmental impact of this option is dependent on which sites are allocated and developed and for this reason the environmental impact is assessed as unknown.</p> <p>Alternative Option 1 identifies 12 sites and would have the same conclusions as the preferred option.</p> <p>Alternative Option 2 advocates no increases to the existing housing land supply and is assessed as not having an environmental impact, notwithstanding the impact developing individual sites within the land supply may have.</p>									
<p><b>Conclusion:</b> The environmental impact of the preferred option and alternative option 1 is dependant the identified sites allocated and developed. These sites are assessed individually with the assessment of development sites proposed for inclusion within LDP 2. Alternative Option 2 would not have any significant environmental impacts.</p>									

Issue 14 – Affordable Housing	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Preferred Option</b> Not to introduce an Affordable Housing policy	X	X	X	X	X	X	X	X	X
<b>Alternative Option</b> Include an affordable housing policy requiring a percentage contribution from every private sector housing site.	X	X	X	X	X	X	X	X	X
<b>Commentary:</b> The adoption or otherwise of an affordable housing policy is not expected to have a significant environmental impact.									
<b>Conclusion:</b> The adoption or otherwise of an affordable housing policy is not expected to have a significant environmental impact.									

<u>Issue 15 – Business and Industrial Land Supply</u>	<b>Biodiversity, Flora &amp; Fauna</b>	<b>Population and Human Health</b>	<b>Soil</b>	<b>Water</b>	<b>Air</b>	<b>Climatic Factors</b>	<b>Material Assets</b>	<b>Cultural Heritage</b>	<b>Landscape</b>
<b>Preferred Option</b> Undertake a comprehensive review of business and industrial land supply and based on the outcomes, allocate further business and industrial land or where appropriate, reallocate existing sites to suitable alternative uses.	X	X	X	X	X	X	X	X	X
<b>Alternative Option</b> To continue with the existing strategy within the Proposed Plan (2016)	X	X	X	X	X	X	X	X	X
<p><b>Commentary:</b>  This issue concerns whether or not to undertake a business and industrial land supply review and on the bases of the outcomes, increase the amount of land designated for industrial and business use or, where appropriate, reallocate existing sites to suitable alternative uses. It has been assessed that the options themselves would not have a significant environmental impact and have been scoped out of the assessment. New industrial sites may have associated environmental impacts but these would be assessed on a site-by-site basis. For the avoidance of doubt, no new sites have been identified in this MIR for business and industrial purposes.</p>									
<p><b>Conclusion:</b>  No significant environmental impacts are envisaged arising from either option.</p>									

<u>Issue 16 - Supporting Our Centres – Retail Core in Town Centres</u>	<b>Biodiversity, Flora &amp; Fauna</b>	<b>Population and Human Health</b>	<b>Soil</b>	<b>Water</b>	<b>Air</b>	<b>Climatic Factors</b>	<b>Material Assets</b>	<b>Cultural Heritage</b>	<b>Landscape</b>
<b>Preferred Option</b> Amend the retail core policy to be less restrictive towards uses which are considered as being suitable for a vibrant town centre, such as cafes and restaurants, dentists, offices for the visiting public. The policy (or similar) should also be in accordance with the provisions of the Pay Day Lending and Betting Shops planning guidance (2016).	X	X	X	X	X	X	X	X	X
<b>Alternative Option 1</b> Retain the existing retail core policy, which currently requires further (criteria-led) assessment of all non-Class 1 proposals within the identified ground floor units of the retail core.	X	X	X	X	X	X	X	X	X
<b>Alternative Option 2</b> Remove the retail core policy and have no policy restrictions in order to retain Class 1 uses within the town centres.	X	X	X	X	X	X	X	X	X
<b>Commentary:</b> The adoption or otherwise of a revised Retail Core Policy is not expected to have a significant environmental impact.									
<b>Conclusion:</b> The adoption or otherwise of a revised Retail Core Policy is not expected to have a significant environmental impact.									

Issue 17 – Heat Generation and Heat Networks	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<p><b>Preferred Option</b> Using heat mapping to investigate opportunity areas where significant developments should create or link into heat networks and to introduce a policy to support this and indicate what measures may be required if creating/linking into a heat network is not possible.</p>	X	X	X	X	X	↑ P	X	X	X
<p><b>Alternative Option</b> All new developments must create or link into heat networks, regardless of scale or location.</p>	X	X	X	X	X	↑ P	X	X	X
<p><b>Commentary:</b> At a local scale both options will contribute to a reduction in greenhouse gas emissions associated with heat, so there will be a positive impact in relation to Climatic Factors. However, the different standards required by each option are not so different as to have a different impact in relation to this factor. In relation to the other topics it is not considered that there will be a significant impact.</p>									
<p><b>Conclusion :</b> Both options will have a minor positive impact on climatic factors but no significant impact on other SEA topics.</p>									

Issue 18 – Green Infrastructure: Allotments/Community Gardens	Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
<b>Preferred option</b> to allocate new sites for allotments/community gardens and to introduce a policy/requirements to ensure new residential developments give consideration to including an area for allotment/community garden use.	X	↑↑ P	X	X	X	X	↑	X	X
<b>Alternative Option</b> to safeguard existing allotments/community gardens but not to allocate any new sites	X	↑ P	X	X	X	X	↑	X	X
<p><b>Commentary:</b> Several environmental factors have been scoped out as the issue is specifically focused on allotments/community gardens provision. The Preferred option is assessed as having positive impacts where it will enhance open space provision and quality throughout West Dunbartonshire, contributing to the living environment and health of the population and as a component of the Green Network (with relevance also to Landscape). The alternative option would have similar positive environmental effects but less so as there is no commitment given to allocate new allotments/community gardens.</p>									
<p><b>Conclusion:</b> All three options will have positive environmental impacts where allotments/community gardens will contribute to the local environment and as a component of the Green Network. The Preferred Option is likely to have a more positive impact where it seeks to improve provision.</p>									

Development Sites Policy Proposal		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
Ref.											
<b>New Allocations Proposed for Inclusion</b>											
	Creuval Court, Alexandria	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Carrochan Road, Balloch	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Former Highdykes Primary School, Bonhill	↓	X	X	X	X	X	X	X	X	The site is adjacent to trees covered by a TPO and development of the site could have an impact on these trees.
	<b>Assessment after mitigation</b>	↑									<b>Mitigation:</b> Any development of the site should have no adverse impact on the trees or lead to any trees being removed.
	Hamilton Street, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	West of Garth Drive, Clydebank	X	X	X	↓	X	X	X	X	X	Site falls within 1:200 year floodplain with potential impacts on flooding and water quality.
	<b>Assessment after mitigation</b>				↑						<b>Mitigation:</b> The developer will be required to provide a Flood Risk Assessment which details how fluvial/pluvial flooding will be dealt with in consultation with SEPA. Should SEPA and the Council be satisfied with the mitigation measures, then development of the site is likely to have positive impacts as it will have addressed flooding issues on the site.
	Second Ave/Singer St, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Cochno Waterworks, Clydebank	<b>Planning Permission</b>									
	Clydebank Health Centre, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Radnor Park Hotel, Clydebank	<b>Planning Permission</b>									
	East Barns Street, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.

Development Sites Policy Proposal		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
Ref.											
Carrick	Terrace/Hawthornhill Road, Dumbarton				↓			↓			Site falls within 1:200 year floodplain with potential impacts on flooding and water quality and is adjacent to the Forth and Clyde Canal, which is a Scheduled Monument
	<b>Assessment after mitigation</b>	X	X	X	↑	X	X	↑	X	X	<p><b>Mitigation:</b> The developer will be required to provide a Flood Risk Assessment which details how fluvial/pluvial flooding will be dealt with in consultation with SEPA. Should SEPA and the Council be satisfied with the mitigation measures, then development of the site is likely to have positive impacts as it will have addressed flooding issues on the site.</p> <p>The site will also have to provide a buffer zone to ensure that the Forth and Clyde Canal is not adversely affected and that its setting is maintained. Should this occur then there is likely to be also positive impacts on the Scheduled Monument as its setting will be enhanced with the no adverse impacts on the Canal.</p>
	Langcaigs Care Home, Dumbarton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Our Lady and St Patricks High School, Dumbarton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Crosslet Estate, Dumbarton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Talisman Avenue, Dumbarton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Milldam Road, Faifley	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Haldane Primary School, Haldane	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Hillview, Milton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Ashtree Court, Old Kiplatrick	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
Review of the Call for sites											

Development Sites Policy Proposal		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
Ref.											
	Auchenreoch Muir, Alexandria	?	?	?	?	?	?	?	?	?	The exact location, height and number of turbines has not been included with the call for sites; therefore, it is not possible to determine what the environmental impact would be. Should this site be allocated for windfarm use within the Proposed Plan, it will be assessed within that Environmental Report
	Overtoun Road, Alexandria		↓ L P								The site would result in the loss of an area of allocated open space, although it is not well used or a quality recreational open space.
	<b>Assessment after mitigation</b>	X	↔	X	X	X	X	X	X	X	<b>Mitigation:</b> Should the site be developed, alternative provision of a higher quality open space would be required to be provided to mitigate against the loss of the whole area as open space. The introduction of a higher quality of open space would mean there would be a net neutral effect overall.
	Bonhill Quarry, Bonhill	↓ ↓ LP	↓ L P	X	↓	X	X	X	X	X	The site is a Local Nature Conservation site of both biological and geological interest. It is bounded by a watercourse to the north, the Murroch Burn, which has the propensity to flood; therefore, the site is at risk of 1:200 flood event.

Development Sites Policy Proposal		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
Ref.											
	<b>Assessment after mitigation</b>	↑	↑		↑						<p><b>Mitigation:</b> Any development of the site should ensure that there is no adverse impact on the Local Nature Conservation Site during construction and also when the site is completed. A tight masterplan and environmental standards will be required to ensure that the Local Nature Conservation site and residential development can be integrated in a positive manner. This should result in positive impacts.</p> <p>The developer will be required to provide a Flood Risk Assessment which details how fluvial/pluvial flooding will be dealt with in consultation with SEPA. Should SEPA and the Council be satisfied with the mitigation measures, then development of the site is likely to have positive impacts as it will have addressed flooding issues on the site.</p>
	Littlemill Distillery Ph 3, Bowling	<b>Assessed Under Main Issue 18 above</b>									
	Beardmore Place, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Clydebank Health Centre, Clydebank	<b>Assessed above under New Allocations</b>									
	Hardgate Health Centre, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Strauss Avenue, Clydebank		↓		↓				↓		Site falls within 1:200 year floodplain with potential impacts on flooding and water quality and is adjacent to the Forth and Clyde Canal, which is a Scheduled Monument. The site would result in the loss of an area of allocated open space.

Development Sites Policy Proposal		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
Ref.											
	<b>Assessment after Mitigation</b>		↑		↑				↑		<p><b>Mitigation:</b> The developer will be required to provide a Flood Risk Assessment which details how fluvial/pluvial flooding will be dealt with in consultation with SEPA. Should SEPA and the Council be satisfied with the mitigation measures, then development of the site is likely to have positive impacts as it will have addressed flooding issues on the site.</p> <p>Should the site be developed, alternative provision of a higher quality open space would be required to be provided to mitigate against the loss of the whole area as open space. The introduction of a higher quality of open space would mean there would be a net neutral effect overall.</p> <p>The site will also have to provide a buffer zone to ensure that the Forth and Clyde Canal is not adversely affected and that its setting is maintained. Should this occur then there is likely to be also positive impacts on the Scheduled Monument as its setting will be enhanced with the no adverse impacts on the Canal.</p>
	Young's Farm, Dumbarton	<b>Assessed Under Main Issue 6 above</b>									
	Castle Road, Dumbarton	↓	X	X	↓	X	X	X	↓	X	<p>Site falls within 200 year floodplain with potential impacts on flooding and water quality. Development may affect the setting of Dumbarton Castle. Whole site is within 300 metres of the Inner Clyde SPA/SSSI and could cause disruption, particularly temporarily during construction.</p> <p>A section of the site has planning permission.</p>

Development Sites Policy Proposal		Biodiversity, Flora & Fauna	Population and Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Commentary
Ref.											
	<b>Assessment after Mitigation</b>	?			↑				↑		<p><b>Mitigation:</b> A project level HRA will require to be taken and, in tandem with the results of the Proposed Plan (2016) HRA, will require to provide mitigation measures to the satisfaction of SNH. As these measures and if SNH will approve them are not known at this juncture, it is difficult to predict what the assessment results would be after applying mitigation.</p> <p>The developer will be required to provide a Flood Risk Assessment which details how fluvial/pluvial flooding will be dealt with in consultation with SEPA. Should SEPA and the Council be satisfied with the mitigation measures, then development of the site is likely to have positive impacts as it will have addressed flooding issues on the site.</p> <p>The site will need to ensure that the setting of Dumbarton Castle is not adversely affected. Should this occur then there is likely to be also positive impacts on the Category A listed Castle.</p>
GE1(6)	Lomondgate Business Park, Dumbarton	<b>Assessed Under Main Issue 4 above</b>									
GE3	Lomondgate Roadside Services, Dumbarton	<b>Assessed Under Main Issue 4 above</b>									
	Townend Road, Dumbarton	<b>Assessed Under Main Issue 18 above</b>									
	Faifley Bowling Club, Faifley		↓ L P								The site would result in the loss of an area of allocated open space, although it is not well used or a quality recreational open space.
	<b>Assessment after Mitigation</b>	X	↔	X	X	X	X	X	X	X	<p><b>Mitigation:</b> Should the site be developed, alternative provision of a higher quality open space would be required to be provided to mitigate against the loss of the tennis court and bowling greens. The introduction of a higher quality of open space or alternative recreational facilities would mean there would be a net neutral effect overall.</p>

<b>Development Sites</b> Policy Proposal		<b>Biodiversity, Flora &amp; Fauna</b>	<b>Population and Human Health</b>	<b>Soil</b>	<b>Water</b>	<b>Air</b>	<b>Climatic Factors</b>	<b>Material Assets</b>	<b>Cultural Heritage</b>	<b>Landscape</b>	<b>Commentary</b>
Ref.											
	Dumbain Crescent, Haldane	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Former waterworks, Carman Road, Renton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
<b>Existing development opportunities where a new designation is proposed</b>											
	Castle St West/East, Dumbarton	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
a)	Graham Avenue, Clydebank	<b>Planning Permission</b>									
	Former Transfer Station, Dalmuir	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Cable Depot Road, Clydebank	<b>Assessed Under Main Issue 1 above</b>									
	St Andrews School, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.
	Braidfield School, Clydebank	X	X	X	X	X	X	X	X	X	No significant environmental effects predicted.

## Appendix C: Responses to comments from the Consultation Authorities on the Scoping Report

Consultee	Consultee Response	Council Response
Scottish Environment Protection Agency	<p><b>Relationship with other Plans, Policies and Strategies (PPS)</b></p> <p>Some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the Local Development Plan. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.</p>	Noted.
	<p><b>Baseline Information</b></p> <p>SEPA holds significant amounts of environmental data which may be of interest to you in preparing the environmental baseline, identifying environmental problems, and summarising the likely changes to the environment in the absence of the PPS, all of which are required for the assessment. Many of these data are now readily available on SEPA's website.</p> <p>You should note that our Indicative River and Coastal Flood Map has been updated and is now referred to as SEPA Flood Maps.</p> <p>Additional local information may also be available for our Access to Information unit at our Corporate Office (Telephone 01786 457700 or email <a href="mailto:dataenquiries@sepa.org.uk">dataenquiries@sepa.org.uk</a>).</p> <p>Other sources of data for issues that fall within</p>	<p>Noted.</p> <p>All references to Indicative River and Coastal Flood Map will be amended to SEPA Flood Maps.</p> <p>Noted.</p> <p>Noted.</p>

	SEPA's remit are referenced in our Standing Advice for Responsible Authorities on Strategic Environmental Assessment (SEA) Scoping Consultations.	
	<b>Environmental problems</b>  We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.	Noted.
	<b>Alternatives</b>  We note that alternatives are still being considered. Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report.	Noted. All reasonable alternatives will be documented within the Environmental Report.
	<b>Scoping in / out of environmental topics</b>  We agree that in this instance all environmental topics should be scoped into the assessment.	Noted.
	<b>Methodology for assessing environmental effects</b>  Including a commentary section within the matrices in order to state, where necessary, the reasons for the effects cited and the score given helps to fully explain the rationale behind the assessment results. This allows the Responsible Authority to be transparent and also allows the reader to understand the rationale behind the scores given.  Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects this should be clearly set out in the Environmental Report.	Noted.  Noted.

	<p>We would expect all aspects of the PPS which could have significant effects to be assessed.</p> <p>We support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.</p> <p>When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered.</p> <p>It is helpful if the assessment matrix directly links the assessment result with proposed mitigation measures.</p> <p>We note the intention to undertake a Habitats Regulation Appraisal of the plan and that the findings will be reported separately.</p> <p>We are content with the proposed detailed assessment matrix and particularly welcome the commentary box to fully explain the rationale behind the assessment results. We also welcome the link between effects and mitigation / enhancement measures in the proposed assessment framework and the consideration of mitigation of impacts.</p> <p>We recommend that the wording of the following SEA objective(s) be revised as follows;</p> <p>Population and Human Health - we suggest the</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Any assessment difficulties will be clearly noted in the Environmental Report.</p> <p>Noted.</p> <p>Noted. SNH have advised that an HRA is not required at the MIR stages but all potential impacts on Natura 2000 sites should be noted in the MIR.</p> <p>Noted.</p> <p>Noted.</p> <p>SEPA's suggestions for additional bullet points will be added to the SEA Criteria for each SEA</p>
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	<p>addition of a bullet point to read.' Will the PPS affect any aspect of the environment which contributes to human health and wellbeing e.g. air, water or soil quality, greenhouse gas emissions or the risk of flooding?' This highlights the complex interrelationships between human health and the other SEA topics.</p> <p>Air – we suggest the addition of a bullet point to read 'Will the PPS contribute to reducing emissions of key pollutants to air?' This highlights that issues are not confined to AQMAs and may be affected by emissions in other areas.</p> <p>Material Assets - we suggest the addition of a bullet point to read 'Will the PPS promote waste minimisation?' We note that waste is not specifically mentioned in the material assets topic and this will ensure that it is taken into consideration.</p> <p>When it comes to assessment of the effects of allocations or sites we advocate a rigorous methodology which clearly assesses potential effects on all environmental topics. Our experience in relation to assessment of allocations is that it can be a much easier and useful exercise for the plan-maker if the assessment is made against a range of related questions, rather than directly against the environmental topics. This allows a very practical assessment to take place which clearly highlights the environmental benefits and costs of each individual allocation. As an example, assessing the allocation against the question "<i>Can the allocation connect to public sewage infrastructure?</i>" gives a clear practical view on how this allocation is likely to affect the</p>	<p>Topic area noted in their response.</p> <p>Noted.</p> <p>Noted.</p>
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	<p>water environment.</p> <p>We would draw your attention to the joint <a href="#">SEA and development plan site assessment proforma</a> which sets out the issues which we require to be addressed in more detail.</p>	
	<p><b>Mitigation and enhancement</b></p> <p>We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option; hence we support proposals for enhancement of positive effects as well as mitigation of negative effects.</p> <p>It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.</p> <p>We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).</p> <p>One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA.</p> <p>Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed</p>	<p>Noted.</p> <p>Noted. It is considered that this would be more appropriate for the Proposed Plan as development proposal will be firmed up at that point.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. However, this is more appropriate for the Proposed Plan where it can be linked to the action plan.</p>

	<p>mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. The inclusion of a summary table in the Environmental Report such as that presented below will help to track progress on mitigation through the monitoring process.</p>	
	<p><b>Monitoring</b></p> <p>Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators. It would be helpful if the Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan.</p>	Noted.
	<p><b>Consultation period</b></p> <p>We are satisfied with the proposal for a minimum 6 week consultation period for the Environmental Report.</p>	Noted. The MIR and Environmental Report will be subject to a 12 week consultation period between June and September.
Scottish Natural Heritage	<p><b>Scope of assessment and level of detail</b></p> <p>Subject to the specific comments below, SNH is content with the scope and level of detail proposed for the Environmental Report.</p>	Noted.
	<p><b>Consultation period for the environmental report</b></p> <p>We note that a minimum period of 6 weeks is proposed for consultation on the Environmental Report and we are content with this proposed period.</p>	Noted. The MIR and Environmental Report will be subject to a 12 week consultation period between June and September.

	<p><b>Alternatives</b></p> <p>We note that the Main Issues Report, as is required, will present at least one reasonable alternative to each of the options presented. Furthermore, the Environmental Report will seek to be clear where policy and land allocations are 'constrained' by the existing policy framework and focus only on genuine alternatives.</p>	<p>Noted.</p>
	<p><b>SEA objectives</b></p> <p>We note the current SEA objectives and these generally appear satisfactory. We suggest the following under the SEA topic:</p> <ul style="list-style-type: none"> <li>- <b>Soil:</b> We suggest the addition of a further bullet to read "<i>Will the proposal affect areas of carbon rich soil, deep peat and priority peatland habitat</i>".</li> <li>- <b>Material Assets:</b> We suggest the addition of a further bullet to read "<i>Will the proposal protect and enhance outdoor access provision</i>".</li> </ul>	<p>Noted. SNH's suggestions for additional bullet points will be added to the SEA Criteria for each SEA Topic area noted in their response.</p>
	<p><b>Proposed assessment methodology – (Appendix C – Proposed assessment matrix)</b></p> <p>We suggest that an additional, separate column be added to the matrix alongside 'Commentary' to include 'Mitigation'. It would also be useful if the mitigation column could identify what the mitigation is and how and when the identified mitigation will be applied.</p>	<p>Noted. However, it must be remembered that the assessment of Main Issues, dependent on the issue, can be of a high level and non-site specific. Therefore, it may not always be possible to provide mitigation for an issue but the assessment can highlight areas on which are required to be addressed at proposed plan stage if the preferred or the alternative option are taken forward.</p>

	<p><b>Habitats Regulation Appraisal (HRA)</b></p> <p>We note from section 5.4 that you intend to undertake a Habitats Regulation Appraisal of the Plan and will report on the findings separately. Please let us know if you need any help with this.</p>	<p>Noted. SNH have subsequently advised that an HRA is not required at the MIR stages but all potential impacts on Natura 2000 sites should be noted in the MIR.</p>
Historic Environment Scotland	<p><b>Scope and level of detail</b></p> <p>We welcome that the historic environment has been scoped into the assessment.</p> <p>On the basis of the information provided, we are content with this approach and are satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments provided below.</p>	<p>Noted.</p> <p>Noted.</p>
	<p><b>Assessment matrix</b></p> <p>We note that you proposed to use a similar assessment matrix to that employed in assessment of the previous iteration of the West Dunbartonshire local development plan. We are broadly content with this, but would encourage you to ensure that mitigation is recorded within the matrix (either through addition of a field or use of the comments field). We also recommend that you ensure that a text commentary is used to support and explain the scoring for all elements of the main issues report scoped into the assessment, including the spatial strategy allocations.</p>	<p>Noted. However, it must be remembered that the assessment of Main Issues, dependent on the issue, can be of a high level and non-site specific. Therefore, it may not always be possible to provide mitigation for an issue but the assessment can highlight areas on which are required to be addressed at proposed plan stage if the preferred or the alternative option are taken forward.</p>
	<p><b>APPENDIX B – Environmental Baseline Data</b></p> <p>Simply for information, references to Historic Scotland should be amended to Historic Environment Scotland. The Buildings at Risk register and Inventory of Gardens and Designed Landscapes are compiled and</p>	<p>Noted.</p>

	maintained solely by Historic Environment Scotland.	
	<p><b>Consultation period for the Environmental Report</b></p> <p>We are content with the minimum six week period proposed for consultation on the Main Issues Report and Environmental Report. Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.</p>	<p>Noted. The MIR and Environmental Report will be subject to a 12 week consultation period between June and September.</p>



## CONTACT DETAILS

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## OTHER FORMATS

This document can be made available on request in alternative formats such as large print, Braille, audio tape or computer disc as well as in five community languages.

本文件也可應要求，製作成其他語文或特大字體版本，也可製作成錄音帶。

अनुरोध पर यह दस्तावेज़ अन्य भाषाओं में, बड़े अक्षरों की छपाई और सुनने वाले माध्यम पर भी उपलब्ध है

ਇਹ ਦਸਤਾਵੇਜ਼ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ, ਵੱਡੇ ਅੱਖਰਾਂ ਵਿਚ ਅਤੇ ਆਡੀਓ ਟੇਪ 'ਤੇ ਰਿਕਾਰਡ ਹੋਇਆ ਵੀ ਮੰਗ ਕੇ ਲਿਆ ਜਾ ਸਕਦਾ ਹੈ।

درخواست پر یہ دستاویز دیگر زبانوں میں، بڑے حروف کی چھپائی اور سننے والے ذرائع پر بھی میسر ہے۔

هذه الوثيقة متاحة أيضا بلغات أخرى والأحرف الطباعية الكبيرة وبطريقة سمعية عند الطلب.