

LOCAL DEVELOPMENT PLAN 2

Habitats Regulation Appraisal

West 
Dunbartonshire
COUNCIL

August 2020



**West Dunbartonshire Local Development Plan 2
Habitats Regulations Appraisal Record
August 2020**

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West Dunbartonshire Local Development Plan

Habitats Regulations Appraisal Record

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1. Introduction

- 1.1 The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was adopted in 1979, and came into force in 1982. The Convention established internationally a binding legal framework for the conservation and protection of flora and fauna and their natural habitats. To implement the Bern Convention in Europe, the European Community adopted Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive) in 1979, and latterly Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive) in 1992.
- 1.2 The Habitats Directive aims to protect the habitats and species considered to be of European interest and listed in the Directive's annexes while the Birds Directive seeks to protect all European wild birds and the habitats of species it lists. The directives led to the establishment of Special Areas of Conservation (SAC) and Special Protection Areas (SPA) which together form a network of protected sites across the European Union called Natura 2000, also referred to as 'European sites'.
- 1.3 Article 6(3) of the Habitats Directive requires that plans or projects likely to have a significant effect on one or more Natura 2000 site, either individually or in combination with other plans or projects, shall be subject to an 'appropriate assessment' of its implications for the site in view of the site's conservation objectives. The requirements of the Directive have been transposed into domestic legislation in Scotland by the Conservation (Natural Habitats, & c.) Regulations 1994, as amended.
- 1.4 A Habitats Regulations Appraisal (HRA) determines whether a plan or project should be subject to appraisal; outlines the 'screening' process for determining whether an appropriate assessment is required, as well as, any appropriate assessment. An appropriate assessment is only required where the plan-making body determines that the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, and the plan is not directly connected with or necessary to the management of the site.
- 1.5 *Habitats Regulations Appraisal of Plans – Guidance for plan-making bodies in Scotland* describes a 13 stage appraisal process (see fig. 1) that meets the procedural requirements of Article 6(3) and the Regulations in most instances. The appraisal of the West Dunbartonshire Local Development Plan 2 (WDLDP2) has followed this guidance. This Habitats Regulations Appraisal Record has been updated to reflect the recommendations of the Reporter, as set out in the 27th April 2020 Examination Report, and this final Appraisal Record represents **Stage 13** of the process. The Reporter's recommendations have been incorporated into the Plan and the conclusion that there will be no adverse effects alone or in combination on any European Site is still valid.

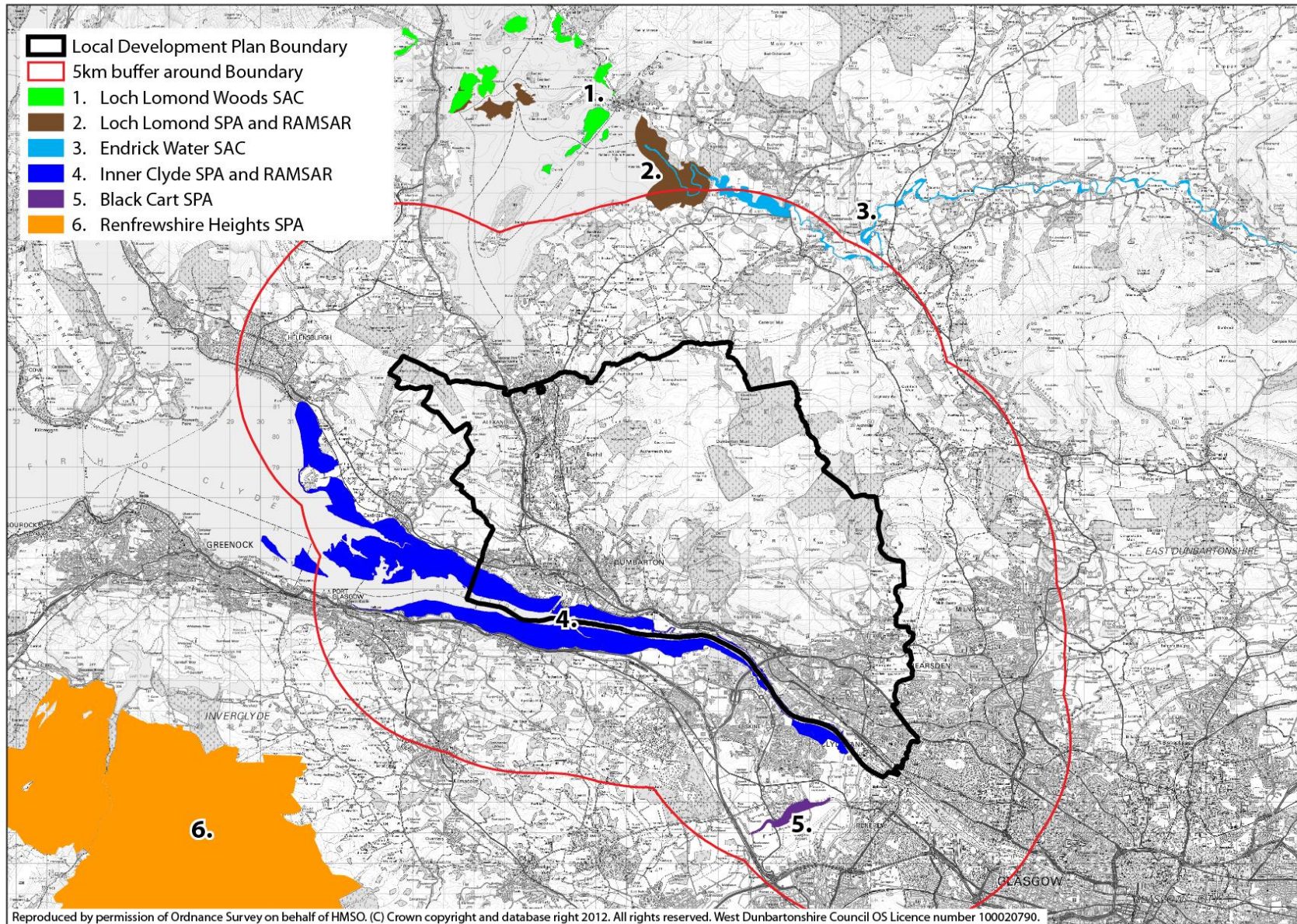
Comments have been received from Scottish Natural Heritage (SNH), at various stages of the HRA process, which have been taken into account in this HRA and within Local Development plan 2.

Table 1 – Appraisal process

Stage 1	Decide whether plan is subject to HRA ↓
Stage 2	Identify European sites that should be considered in the appraisal ↓
Stage 3	Gather information about the European sites ↓
Stage 4	Discretionary consultation on the method and scope of the appraisal ↓
Stage 5	Screen plan for likely significant effects on a European site ↓
Stage 6	Apply mitigation measures ↓
Stage 7	Re-screen plan ↓
Stage 8	(If significant effects still likely): Undertake an appropriate assessment in view of conservation objectives ↓
Stage 9	(If significant effects still likely): Apply mitigation measures until there is no adverse effect on site integrity ↓
Stage 10	Prepare draft record of HRA ↓
Stage 11	Consult on draft HRA Record ↓
Stage 12	Screen any amendments for likelihood of significant effects. Carry out appropriate assessment and re-consult if necessary ↓
Stage 13	Modify HRA Record in light of representations and any amendments to the plan and complete and publish final/revised HRA Record

1.6 **Stage 1** of the process establishes whether a plan should be subject to HRA. In this instance, the appraisal of the effects of land use plans (including local development plans) on European sites is required by regulation 85A of Part IVA of the Conservation (Natural Habitats, & c.) Regulations 1994, as amended. This position is confirmed in Planning Circular 6/13: Development Planning. A Habitats Regulations Appraisal has therefore been carried out for the West Dunbartonshire Local Development Plan 2 – Proposed Plan.

Map 1 – Nature 2000 sites in relation to the Plan area



2. Nature 2000 sites

2.1 Map 1 illustrates the closest Natura 2000 sites to the WDLDP2 area. It shows that there is one Natura site within the plan area and further three sites within 5km. Following consultation with SNH it is considered the following two sites should be considered in the appraisal:

2.2 Inner Clyde Special Protection Area (SPA)

Description: The Inner Clyde estuary consists almost entirely of tidal mudflats, covering over 1,800 ha and extending 20km westwards from Newshot Island to Craigendoran Pier on the north shore and to Newark Castle on the south shore. In West Dunbartonshire, all inter-tidal land downstream of Queens Quay is part of the SPA.

2.3 *Qualifying interest:* The Inner Clyde is of considerable importance for wintering waterfowl, notably supporting an internationally significant population of redshank (*Tringa totanus*). It is this redshank population, one of the highest density wintering populations of redshank in Britain, which qualifies the Inner Clyde as an SPA.

2.4 *Conservation objectives:* The conservation objectives for the Inner Clyde SPA are to avoid significant disturbance to the redshank or deterioration of its habitat thus ensuring that the integrity of the site is maintained and, in the long term, maintaining:

- the population of redshank as a viable component of the site;
- the distribution of redshank within the site;
- the distribution and extent of habitats supporting redshank; and
- the structure, function, and supporting processes of habitats supporting redshank.

2.5 *Condition:* The condition of the Inner Clyde's redshank populations has been assessed as 'favourable maintained' as the mean peak winter numbers have been maintained above an earlier minimum.

2.6 *Threats:* Human activities that are believed to have a negative impact on the wintering redshank include those resulting in **habitat loss** and **modification** and **disturbance**. Studies of wintering redshank in the UK have shown that the species is site-faithful, both within and between winters, making the species particularly vulnerable to habitat change.

2.7 In common with other waders, redshank may be frequently disturbed by human activities including recreation, particularly in more urbanised wintering sites such as parts of the Inner Clyde SPA. Loud noise and the operation of machinery associated with construction and industrial activity is another source of disturbance, with abrupt or intermittent noise particularly disturbing. Constriction work has therefore been found to significantly affect densities and feeding activity. Visual disturbance is also an issue, e.g. from vehicular movement, human activity and lighting.

2.8 The maximum distance at which disturbance has been identified in research is 150m and redshank can become habituated to activities that cause disturbance.

2.8.1 Endrick Water Special Area of Conservation (SAC)

Description: The Endrick Water – or River Endrick – rises in the headstreams of the Gargunnoch and Fintry Hills in Stirlingshire and flows westwards for around 50 km, entering the south east end of Loch Lomond. The SAC commences at a steep waterfall at Gartcarron and continues downstream to the Endrick mouth, west of Drymen.

2.9 *Qualifying interests:* Three species qualify the Endrick Water as an SAC: brook lamprey (*Lampetra planeri*), river lamprey (*Lampetra fluviatilis*) and Atlantic salmon (*Salmo salar*).

2.10 The Endrick Water is considered to be one of the best areas in the United Kingdom for brook and river lamprey, with the brook lamprey population particularly strong and healthy. The bulk of the Endrick Water river lamprey population are quite different from the normal form, being much smaller. For this reason they have been referred to as 'dwarf river lamprey'. This dwarf river lamprey population is unique to the Endrick Water and of particular interest and conservation value as rather than migrating to sea like other populations, it has become landlocked and migrates only as far as Loch Lomond, where it spends one season feeding mainly on powan and other freshwater fish.

2.11 The Endrick Water also supports a significant presence of Atlantic salmon (*Salmo salar*), which are a qualifying feature but not a primary reason for site selection.

2.12 *Conservation objectives:* The conservation objectives for the Endrick Water SAC are to avoid significant disturbance to river lamprey, brook lamprey and Atlantic salmon or deterioration of their habitat thus ensuring that the integrity of the site is maintained and, in the long term, maintaining:

- the population of river lamprey, brook lamprey and Atlantic salmon as a viable component of the site;
- the distribution of the river lamprey, brook lamprey and Atlantic salmon within the site;
- the distribution and extent of habitats supporting river lamprey, brook lamprey and Atlantic salmon; and
- the structure, function, and supporting processes of habitats supporting river lamprey, brook lamprey and Atlantic salmon.

2.13 *Condition:* The last assessed condition of the brook and river lamprey in the Endrick Water was favourable and maintained. The condition of the Atlantic salmon is assessed as unfavourable but recovering, although information on the current status of the population is limited.

2.14 *Threats*: The catchment of the Endrick Water SAC partly falls within the WDLDP2 area and the River Leven is downstream of the Endrick. Development impacting upon the **morphology** and **river flow** or **water quality** of the River Leven could have an adverse effect upon the SAC, particularly with regard to river lamprey (though see 2.11 above) and Atlantic salmon which are anadromous, migrating downstream out of the River Leven into the Clyde estuary to feed and mature. Indeed, previously, migrating salmon have been reported turning back at the mouth of the River Leven. This was thought to be caused by unfavourable water quality conditions and unnatural flow rates linked to the operation of the River Leven barrage.

2.15 Other sites

Development proposals may come forward during the life of the local development plan that could have a significant effect on other Natura 2000 sites. In particular, wind farm projects in the plan area will need to consider their potential impact on the qualifying species of Special Protection Areas at Black Cart, Renfrewshire Heights and Loch Lomond in terms of the movement of birds to and from these sites.

3. Screening

3.1 **Stage 5** of the Habitats Regulations Appraisal screens the plan for likely significant effects on European sites, the purpose being to identify those elements of the plan where a likely significant effect on a European site cannot be ruled out. Policies and proposals within the plan which would not be likely to have a significant effect on a European site, either alone or in combination with other aspects of the same plan or other plans and projects, do not require further assessment. A 'likely effect' is one that cannot be ruled out, while a 'significant effect' is one that could undermine a site's conservation objectives.

3.2 A three step screening process is outlined in the guidance and has been followed to screen the WDLDP2:

- Step 1:** screening out general policy statements;
- Step 2:** screening out projects referred to in, but not proposed by, the plan;
- Step 3:** screening out aspects of a plan that could have no likely significant effect.

Policies and proposals screened out at step 3 have been so for a number of different reasons, categorised as follows:

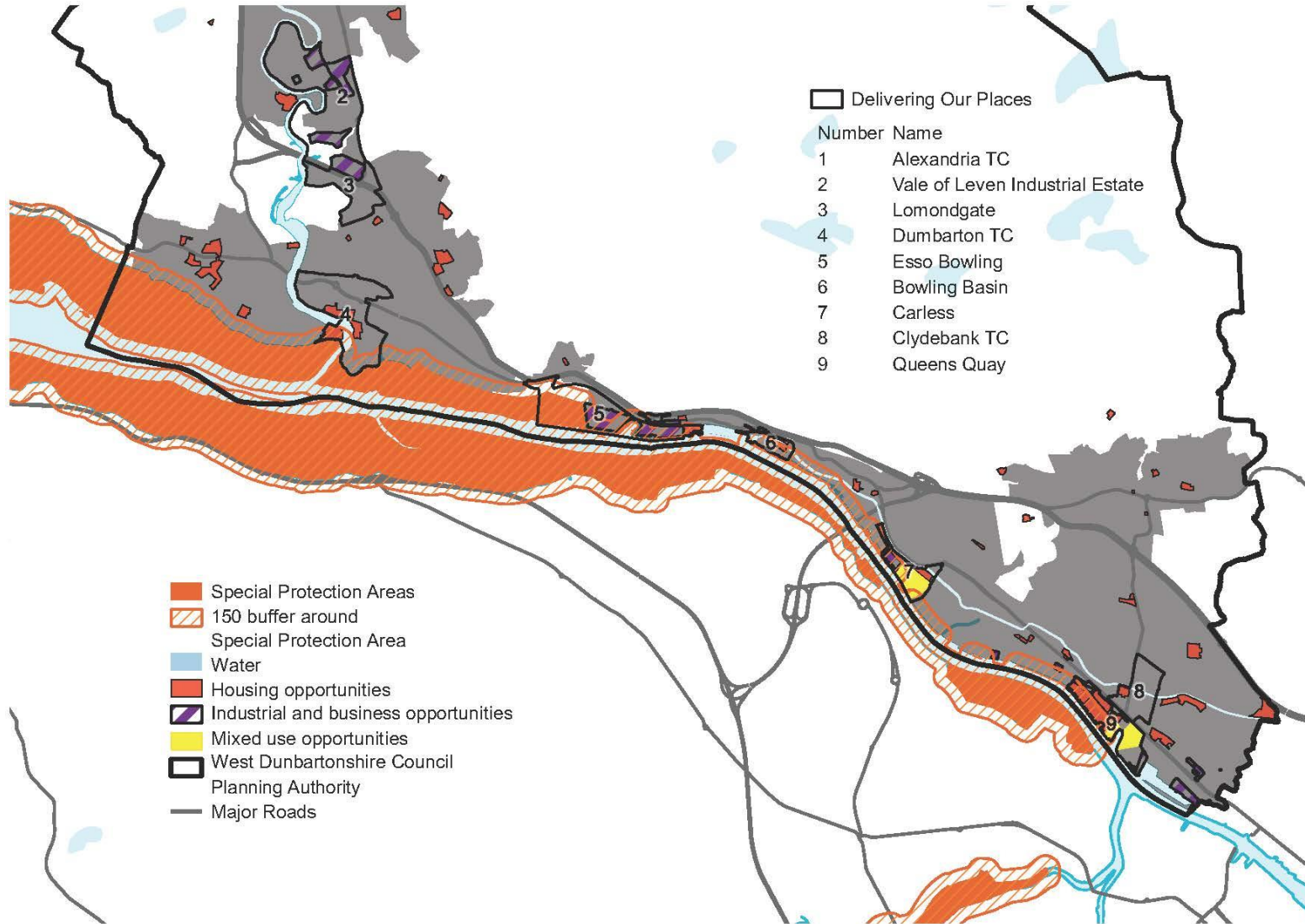
- 3a:** Aspects which protect the natural environment, including biodiversity, or conserve or enhance the natural, built or historic environment;
- 3b:** Aspects that will not lead to development or other change;
- 3c:** Aspects which make provision for change but could have no conceivable effect on a European site, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect or would not otherwise undermine the conservation objectives for the site;

- 3d: Aspects which make provision for change but which could have no significant effect on a European site (minor residual effects), because any potential effects would be so restricted that they would not undermine the conservation objectives of the site;
- 3e: Aspects which are too general so that it is not known where, when or how the aspect of the plan may be implemented, or where any potential effects may occur, or which European sites, if any, may be affected.
- 3.3 Sites where planning permission has been granted have not been included in the screening process because they have been subject to project-level HRA where appropriate at the development management stage. These sites (indicated in orange in Appendix 1) would not, on their own, have a significant effect on a Natura 2000 site.
- 3.4 **Appendix 1** records the screening procedure undertaken for the WDLDP2. The following proposals have not been screened out of the HRA at this stage are shown on
- 3.5 **Map 2:**
- 1) Bowling Basin
 - 2) Carless, Old Kilpatrick
 - 3) Cable Depot Road, Clydebank
 - 4) Clydebank Industrial Estate
 - 5) Dumbarton Waterfront
 - 6) Esso Bowling & Scott's Yard
 - 7) Queens Quay

The following policies have not been screened out of the HRA at this stage:-

- Policy WD1: Waterfront Development
- Policy E3: Golden Jubilee National Hospital

Map 2 – Proposals with a likely significant effect on a European site



Consideration of likely effects in combination

The Habitats Directive recognises that policies and proposals may also have likely significant effects *in combination* (including with other plans and projects). An in-combination test of policies and proposals in the WDLDP2 therefore addresses the possible cumulative effects of the Plan upon European sites.

3.6 With the exception of the policies and proposals listed at paragraph 3.4, where it is not possible to eliminate the likelihood of a significant effect on a European site, all other policies and proposals of the WDLDP2 have been screened out of the assessment, either because they are general policy statements (step 1); are projects referred to in, but not proposed by, the WDLDP2 (step 2); have no likely significant effects on any European site (step 3); or because the proposal has permission and therefore has already been subject to project-level HRA.

3.7 The policies, proposals and projects which need to be assessed in terms of likely effects in combination are:

A: WDLDP2 policies or proposals categorised at step 3 as making provision for a change that would have only a minor residual effect on a European site, because any effects would not undermine the conservation objectives of the site (category 3d);

No policies or proposals fall into this category.

B: Other Plans and Projects. In this regard, the Renfrewshire Local Development Plan (RLDP) has been identified as a plan/project which, in combination with the WDLDP2, could lead to likely significant effects upon a European site;

The Habitats Regulations Appraisal of the RLDP assessed that policies E1 – Economic Investment Locations, E3 – Transition Areas and C1 – Core Town Centre at Erskine waterfront would have likely significant effects upon the Inner Clyde SPA. No policies or proposals were screened as making provision for a change that would have only a minor residual effect on a European site.

C: Proposals and projects which have been screened out of the appraisal because they have planning permission (and have therefore undergone project-level HRA) or are not included in the WDLDP2 because they have planning permission or construction has commenced.

D: Sites included within the Appropriate Assessment (listed at paragraph 3.4 and shown in Map 2) post-mitigation.

3.8 **Appendix 2** considers the potential in-combination effects of policies, proposals and projects falling into categories B, C, & D.

4. Mitigation

- 4.1 Where likely significant effects have not been ruled out by the screening steps 1-3 in stage 5, **stages 6 & 7** make provision for the application of straightforward mitigation measures and the re-screening of policies and proposals. **Mitigation at this stage concerns the avoidance of likely significant effects** and examples include: deleting the policy or proposals that may cause the likely significant effect; changing the nature, type or scale of a potentially damaging proposal; programming development to manage or avoid possible effects; or requiring buffer zones.
- 4.2 The proposals listed at paragraph 3.4 are vital to the sustainable economic growth and regeneration of West Dunbartonshire. They represent a significant proportion of available development land, including for new housing, in the area. For these reasons it is not preferred to apply straightforward mitigation measures to eliminate likely significant effects on European sites and an appropriate assessment is required.

5. Appropriate Assessment

- 5.1 The appropriate assessment is an assessment of the implications of the WDLDP for the sites where a likely significant effect has been identified, in view of their conservation objectives. It covers **stages 8 & 9** of the appraisal process. Sources of information used to inform the evidence base for the assessment are noted at the end of this report and the conservation objectives of the two European sites included in this HRA are noted in section 2. The sites where a likely significant effect has been identified are listed at paragraph 3.4.
- 5.2 Table 2 outlines the scope of the appropriate assessment with regard to how each of the seven proposals and two policies included in the assessment could have a significant effect on the Inner Clyde SPA and/or Endrick Water SAC, considering the main threats to these European sites. This forms the basis for discussing the implications of the proposal upon the qualifying interests of the European sites in light of their conservation objectives; the mitigation measures taken into account and applied; and the conclusion as to whether it can be ascertained that the proposal would not adversely affect the integrity of the European site.

Table 2 – Scope of appropriate assessment

Proposal	Inner Clyde SPA <i>Qualifying interest: redshank</i>		Endrick Water SAC <i>Qualifying interests: brook lamprey, river lamprey, Atlantic salmon</i>	
	Disturbance	Pollution	Morphology/ river flow	Pollution
Bowling Basin	✓	✓		
Carless	✓	✓		
Cable Depot Rd.	✓			
Clydebank Industrial Estate	✓	✓		
Dumbarton Waterfront	✓	✓	✓	✓
Esso Bowling & Scott's Yard	✓	✓		
Queens Quay	✓	✓		
Policy				
WD1: Waterfront Development	✓	✓	✓	✓
E 3: Golden Jubilee National Hospital	✓	✓		

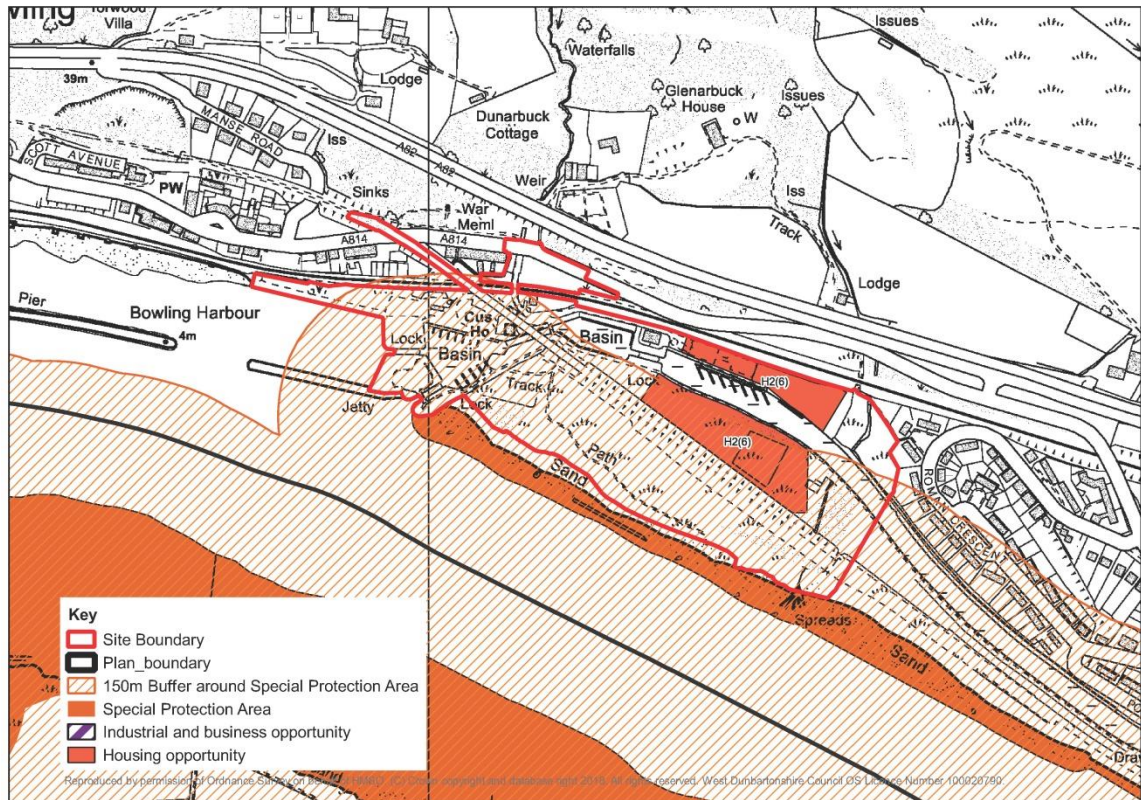
5.3 The WDLDP2 focuses on 10 'Delivering our Places'. These are the locations which the Council wants or expects to see change over the next 5-10 years. The WDLDP2 sets out the Council's strategy for these 10 areas which forms the policy framework for development proposals within these areas. Five of these Places are assessed as having likely significant effects upon a European site or sites. Two further business and industry opportunity sites are also assessed as having likely significant effects. Two Policies: WD1 and E 3 are likely to have significant effects upon a European site or sites. Each of these proposals are assessed below:

5.4 **Bowling Basin**

Description of site and proposal: Bowling Basin sits south of the A814 and railway line, between Bowling and Old Kilpatrick. The site is dissected by both the Forth & Clyde Canal and a disused railway lane. There is an upper canal basin and lower canal basin, with a sea lock linking the lower basin to Bowling Harbour and the Clyde. The disused railway crosses over the canal between the two basins. The area to the south of the disused railway is mainly wooded, running down to a beach at the foreshore. **Map 3** identifies the site in relation to the Inner Clyde SPA.

The WLDLP2's strategy for the site is to continue to implement and deliver the masterplan for the area, including new housing either side of the canal, and commercial and leisure uses centred around the lower basin and arches below the disused railway bridge. Significant green network enhancements form part of the proposals, including a liner park along the former railway line and to the woodland.

Map 3 – Bowling Basin



Implications for qualifying interest(s): Development of the Bowling Basin site can be expected to cause acoustic and visual disturbance to redshank roosting within 150 metres of the site, particularly during construction but also once new housing is occupied and human activity, including vehicular movement, increases. This applies to the winter months when redshank are present.

Pollution is also a potential cause of harm. This could have a direct impact upon the redshank through ingestion or fouling or, more likely, an indirect impact by modifying the habitat – either temporarily or permanently – including intertidal sediment quality.

Disturbance and the effects of pollution could significantly alter the redshank population as a viable component of the Inner Clyde SPA, or alter their distribution within the site. Both of these scenarios run contrary to the conservation objectives of the SPA.

Mitigation measures applied or taken into account: Little is known about the how redshank use the Bowling Basin site and therefore a wide range of mitigation measures may be appropriate. Noise and visual disturbance during the construction phase of the

development can be avoided by preventing works during the overwintering period, between September and April (inclusive). This extremely precautionary approach may be refined with a better understanding of the redshank's behaviour and less stringent mitigation measures may include:

- noise attenuation (including screening) or restrictions which prevent noise exceeding thresholds above which redshank are disturbed;
- phasing plans or agreed programmes of work which prevent activities likely to cause a noise disturbance such as piling from occurring during the overwintering period, or for example, working during high tides at springs between sunrise and sunset during that period.

Screening can also be employed to mitigate visual disturbance.

With regard to disturbance once the site has been developed, it may be necessary to prevent or restrict access to the river edge during September to April. This could be achieved by appropriate development layouts and the management of recreation, for example management planning, awareness-raising, signage and the deployment of a Ranger.

To prevent pollution events, there should be standard adherence to pollution control measures.

Conclusion: Taking account of the mitigation measures noted above it can be demonstrated that development of the Bowling Basin site could progress without significantly affecting the structure (size and distribution) or the functioning (normal patterns of feeding, roosting, immigration and emigration) of the redshank population within the Inner Clyde, or negatively affecting the habitats that support redshank. This mitigation will ensure no adverse effect on site integrity.

To ensure that this mitigation is applied at project level and that it can be demonstrated that development at Bowling Basin will have no adverse effect on site integrity, the Local Development Plan will state the following:

"Development must also not have an adverse effect on the Inner Clyde Special Protection Area (SPA) for which Redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA). This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this Proposed Plan, including measures potentially required to address disturbance both during construction and operation of the development."

The Council as 'Competent Authority' will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could harm

an internationally important site will only be approved in the exceptional circumstances detailed within Policy ENV1 Nature Conservation.

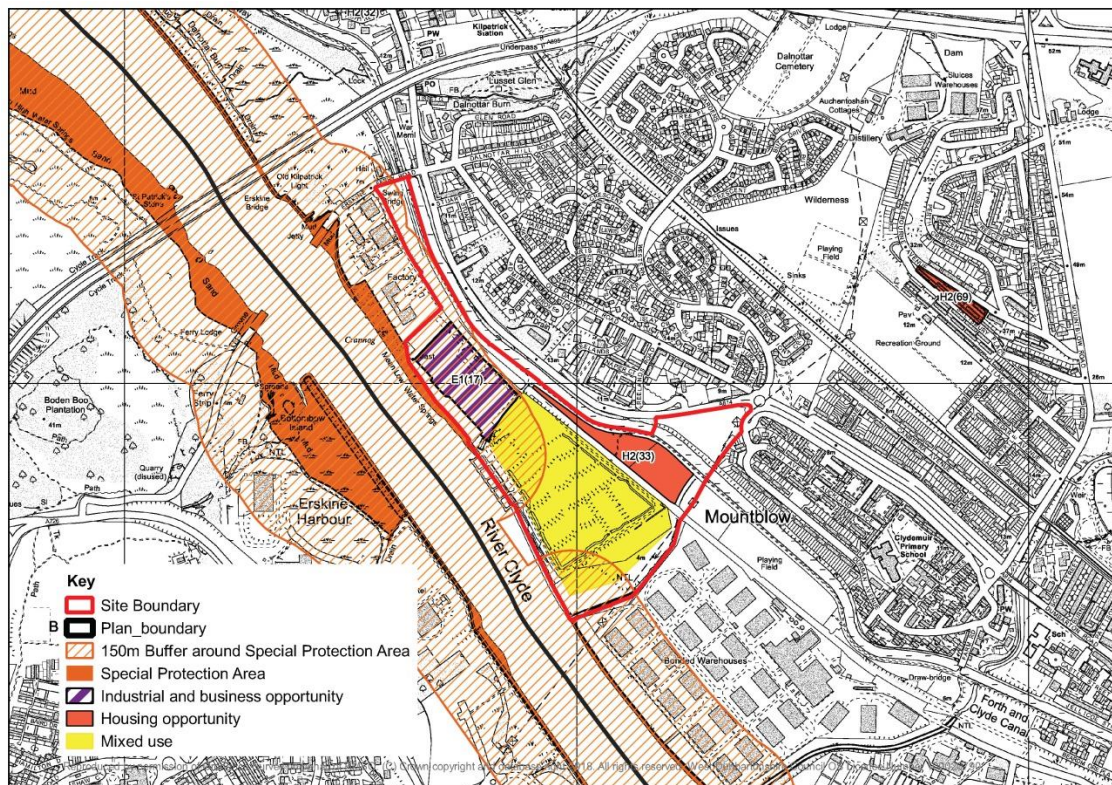
As little is known about how redshank use the Bowling Basin site and surrounding areas, the Plan (see above) , will also highlight that a study of redshank behaviour over at least one overwintering season is likely to be required to assess potential disturbance and inform project-level HRA and highly recommended pre-application discussion with SNH.

5.5 **Carless, Old Kilpatrick**

Description of site and proposal: The site is situated between the Forth & Clyde Canal and the River Clyde, south of Old Kilpatrick. A former oil refinery, the site has been largely cleared since operations ceased in 1992, with only areas of hardstanding and a jetty/pontoons remaining. The site is recognised as being contaminated under the Environmental Protection Act 1990. **Map 4** identifies the site in relation to the Inner Clyde SPA.

The WDLDP2 sets a long-term strategy for the redevelopment of the site resulting in its remediation. A range of uses are deemed suitable. Green network enhancements, particularly along the Clyde waterfront and former railway corridor and access improvements, including a new road crossing over the Forth & Clyde Canal from Dumbarton Road are proposed by the WDLDP2. The plan requires that a comprehensive masterplan (through Policy CP3) be agreed to guide development of the site.

Map 4 – Carless, Clydebank



Implications for qualifying interest(s): Development of the Carless site can be expected to cause acoustic and visual disturbance to redshank roosting within 150 metres of the site, particularly during construction but also once new development is occupied/operational and human activity, including vehicular movement, increases. This applies to the winter months when redshank are present.

Pollution is also a potential cause of harm. This could have a direct impact upon the redshank through ingestion or fouling or, more likely, an indirect impact by modifying the habitat – either temporarily or permanently – including intertidal sediment quality.

Disturbance and the effects of pollution could significantly alter the redshank population as a viable component of the Inner Clyde SPA, or alter their distribution within the site. Both of these scenarios run contrary to the conservation objectives of the SPA.

Mitigation measures applied or taken into account: Permission was granted in 2012 for the development of an industrial building to the west of Carless at Erskine Ferry Road (Riverclyde House). A Habitats Regulations Appraisal carried out at the time found that redshank may roost and feed close to the site, albeit in small numbers. Carless was identified as a site that could act as a low-tide loafing or roosting zone for redshank displaced from the area adjacent to Riverclyde House.

An appraisal to inform the Appropriate Assessment of the development at Riverclyde House predicted that although the development could disturb low numbers of redshank, with regard to the Inner Clyde SPA's Conservation Objectives, this

disturbance would not be significant and, provided construction-phase pollution of the Clyde is ruled out, the proposals would not adversely affect the integrity of the SPA.

This conclusion was based on the availability of similar areas for roosting or loafing upstream (e.g. at the Carless site), outwith the then 300m zone of potential disturbance, which was applied at the time, which could be used by any redshank disturbed by the development. In this instance, mitigation of potential disturbance to redshank was not deemed necessary in order to rule out adverse effects on integrity.

The Carless site incorporates a larger riverside frontage and would potentially cause greater disturbance due to the scale of development proposed. Further information about the redshank's behaviour would be required to confidently rule out disturbance having a significant effect on the integrity of the SPA. Without this information it may be necessary to ensure noise and visual disturbance during the construction phase of the development can be avoided by preventing works during the overwintering period, between September and April (inclusive). Other mitigation measures may include:

- noise attenuation (including screening) or restrictions which prevent noise exceeding thresholds above which redshank are disturbed;
- phasing plans or agreed programmes of work which prevent activities likely to cause a noise disturbance such as piling from occurring during the overwintering period, or for example, working during high tides at springs between sunrise and sunset during that period;
- Screening to mitigate visual disturbance.

With regard to disturbance once the site has been developed, it may be necessary to prevent or restrict access to the river edge during September to April. This could be achieved by appropriate development layouts and the management of recreation, for example management planning, awareness-raising, signage and the deployment of a Ranger.

To prevent pollution events, there should be standard adherence to pollution control measures.

Conclusion: Mitigation measures noted above could allow development of the Carless site without significantly affecting the structure (size and distribution) or the functioning (normal patterns of feeding, roosting, immigration and emigration) of the redshank population within the Inner Clyde, or negatively affect the habitats that support redshank. This mitigation will ensure no adverse effect on site integrity.

To ensure that this mitigation is applied at project level and that it can be demonstrated that development at Carless will have no adverse effect on site integrity, the Local Development Plan will state the following:

"Development must also not have an adverse effect on the Inner Clyde Special Protection Area (SPA) for which Redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA). This may require a study of redshank behaviour in the

affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this Proposed Plan, including measures potentially required to address disturbance both during construction and operation of the development.”

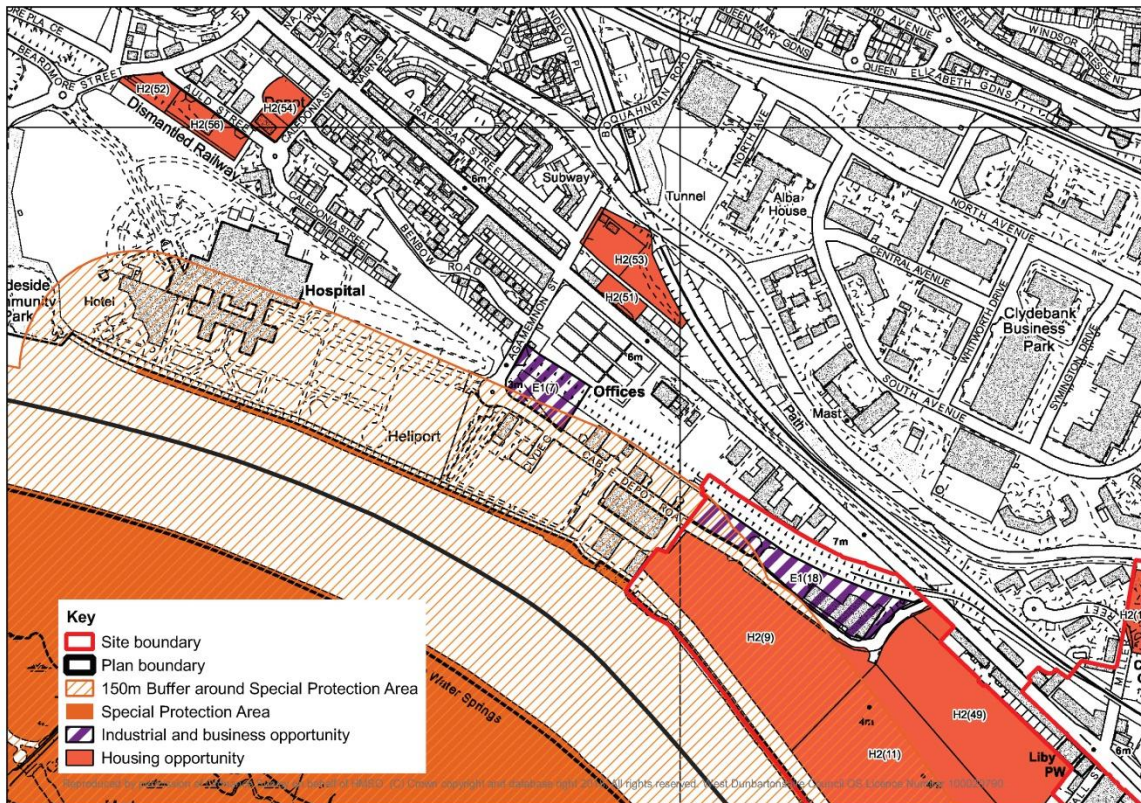
The Council as ‘Competent Authority’ will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could adversely affect the integrity of an internationally important site will only be approved in the exceptional circumstances detailed within Policy ENV 1 Nature Conservation.

5.6 Cable Depot Road, Clydebank

Description of site and proposal: Cable Depot Road is a development site at the corner of Agamemnon Street and Cable Depot Road in Clydebank. The site extends to 0.62 ha and is identified for new business and industrial uses (use class 4 or 5) in the WDLDP2.

It lies north of the Clyde Gate site (previously referred to as Hospital Gate), which was granted outline planning permission in 2007 for the development of office accommodation, changes to the road layout and landscaping which included a riverside walkway. The infrastructure and public realm works have been implemented and one business pavilion, currently operating as a children’s nursery on the ground floor, has been constructed. An Appropriate Assessment for the outline permission was carried out in 2006. **Map 5** identifies the site in relation to the Inner Clyde SPA.

Map 5 – Cable Depot Road, Clydebank



Implications for qualifying interest(s): Noise created by the development of the site could give rise to the disturbance of over-wintering redshank.

An appraisal carried out in 2009 in connection with the application to erect the office/day nursery building, which considered the Appropriate Assessment completed in 2006, concluded that while it could not be assumed the Appropriate Assessment was still valid (as roosting and feeding patterns of the redshank may have changed) the proposed development would not adversely affect the integrity of the SPA.

The Appropriate Assessment identified very occasional minor roosting on the north bank. Secondary roosts on the south bank may have changed locations in the intervening period, however, the lack of feeding and shelter there makes it very unlikely that the roosts have grown significantly. Furthermore, roosts on the south bank of the Clyde are beyond the 300m zone of potential disturbance from the development site that was applied at the time.

Mitigation measures applied or taken into account: The outline planning permission for the Clyde Gate is subject to a number of conditions designed to mitigate the impact of development upon the Inner Clyde SPA and redshank. These include the submission of a programme of works that does not allow for working during high tides at Springs between sunrise and sunset between September and April inclusive. Such mitigation measures may be appropriate for this site.

Conclusion: In considering previous HRA and Appropriate Assessments for development at this location it is considered the development of the Cable Depot Road site would

not adversely affect the integrity of the Inner Clyde SPA. Nevertheless, the Local Development Plan will state that:

Development at Clydebank Industrial Estate and Cable Depot Road must not have an adverse effect on the Inner Clyde Special Protection Area (SPA) for which redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA). This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this plan, including measures potentially required to address disturbance both during construction and operation of the development.

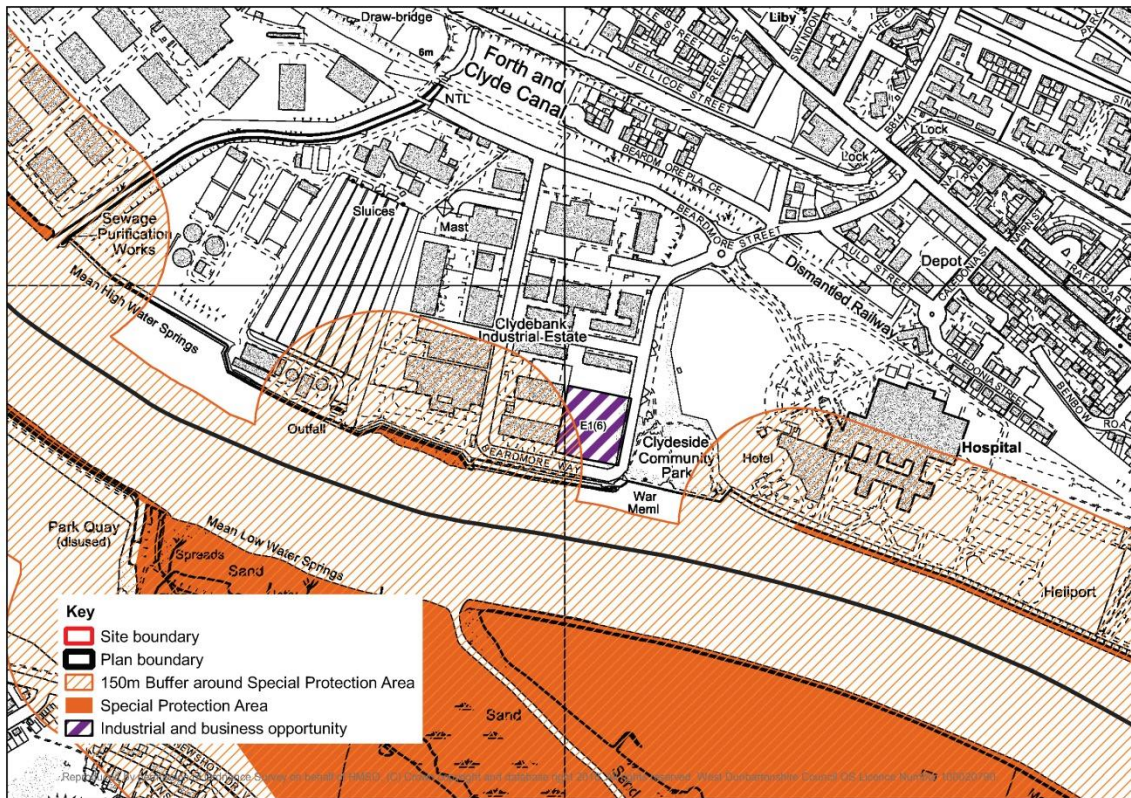
The Council as 'Competent Authority' will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could adversely affect the integrity of an internationally important site will only be approved in the exceptional circumstances detailed within Policy ENV 1 Nature Conservation.

5.7 **Clydebank Industrial Estate**

Description of site and proposal: This is an undeveloped site, 0.74 ha in size, within the Clydebank Industrial Estate. The site is designated in the WDLDP2 as a business and industry opportunity for class 4 or 5 uses. The site is bounded to the east and south by mature trees and Beardmore Way, which separates the site from the river edge.

Map 6 identifies the site in relation to the Inner Clyde SPA.

Map 6 – Clydebank Industrial Estate



Implications for qualifying interest(s): Noise created by the development of the site could give rise to the disturbance of over-wintering redshank. Newshot Inlet lies within 150 metres of the site on the other side of the River Clyde and is known to be a significant feeding and roosting location in the context of the Inner Clyde.

Operational effects are unlikely from this site since any redshank using the adjacent areas is likely to be habituated to frequent HGV movements on the intervening road and to operational noise from the adjoining premises.

Pollution events could have direct or indirect impacts on redshank and the SPA.

Mitigation measures applied or taken into account: Acoustic disturbance during the construction phase of the development can be avoided by preventing works during the overwintering period, between September and April (inclusive). It may be acceptable, however, to mitigate any noise disturbance if necessary through:

- noise attenuation (including screening) or restrictions which prevent noise exceeding thresholds above which redshank are disturbed;
- phasing plans or agreed programmes of work which prevent activities likely to cause a noise disturbance such as piling from occurring during the overwintering period, or for example, working during high tides at springs between sunrise and sunset during that period.

Maintaining the existing tree line along the southern edge of the site would mitigate some of the noise created during both construction and operational phases.

To prevent pollution events, there should be standard adherence to pollution control measures.

Conclusion: The mitigation measures noted above would ensure development of the Clydebank Industrial Estate site would not have significant effects upon the Inner Clyde SPA: the structure or the functioning of the redshank population or the habitats that support redshank. This mitigation will ensure no adverse effect on site integrity.

To ensure that this mitigation is applied at project level and that it can be demonstrated that development at Clydebank Industrial Estate will have no adverse effect on site integrity, the Local Development Plan will state that:

Development at Clydebank Industrial Estate and Cable Depot Road must not have an adverse effect on the Inner Clyde Special Protection Area (SPA) for which redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA). This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this plan, including measures potentially required to address disturbance both during construction and operation of the development.

The Council as 'Competent Authority' will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could adversely affect the integrity of an internationally important site will only be approved in the exceptional circumstances. detailed within Policy ENV 1 Nature Conservation..

5.8 **Dumbarton Waterfront**

Description of site and proposal: The WDLDP 2's strategy for Dumbarton Town Centre and Waterfront covers a wide area, from Sandpoint Marina on the western side of the River Leven to Dumbarton Rock and Castle on the eastern side, to the Town Centre itself to the north. Within this area there are a number of sites identified by the WDLDP2 for development. The following waterfront sites are included within the scope of this assessment as they could have a significant effect on the Inner Clyde SPA and/or Endrick Water SAC:

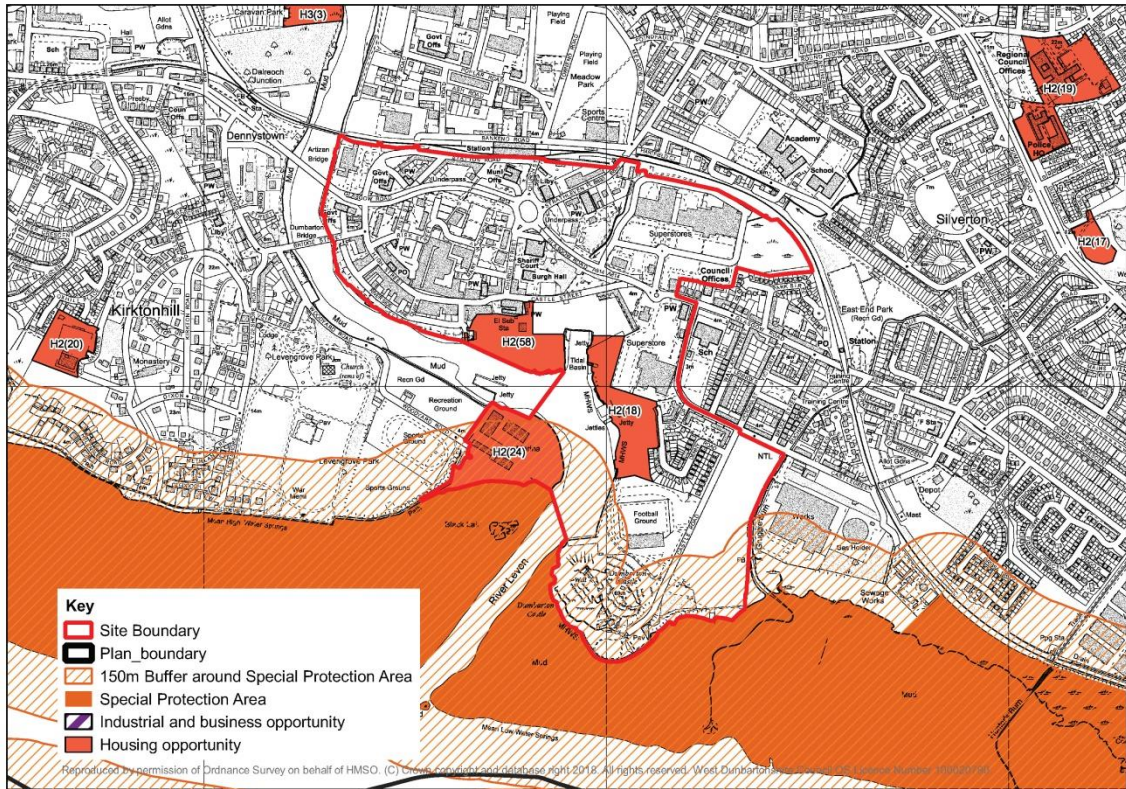
Sandpoint Marina H2 (24) – currently in industrial use, Sandpoint Marina is identified as a housing opportunity. The requirements associated with the site are the provision of a waterfront path.

Castlegreen Street H2 (18) – currently vacant land, Castlegreen Street is identified as a housing opportunity. Although it lies just beyond the 150m SPA buffer area it is included because it is directly adjacent to the buffer area and will have a direct link into

the buffer area through the provision of a riverside footpath from the site to Dumbarton Castle.

Map 7 shows the relationship between the development sites and the Inner Clyde SPA and River Leven.

Map 7 – Dumbarton Town Centre and Waterfront



Implications for qualifying interest(s): The development of sites around Dumbarton Harbour may have implications for both redshank, the qualifying species of the Inner Clyde SPA, and brook lamprey and Atlantic salmon, the qualifying species of the Endrick Water SAC. Developing the sites is likely to cause acoustic and visual disturbance to redshank roosting or feeding in close proximity between the months of September and April. Construction will cause particular disturbance, but this could also arise once development is complete and human activity increases at the water's edge – albeit redshank in the area are likely to be habituated to a degree of noise disturbance.

Brook lamprey and Atlantic salmon may also be disturbed by in-channel noise or lighting relating to any seawall upgrade at the Sandpoint Marina site and works to stabilise the basin and harbour walls at Castle Street. Such works may also cause indirect modifications to the habitat by altering river flow.

Pollution is also a potential cause of harm, either directly upon redshank or fish species through ingestion or fouling or, more likely, an indirect impact by modifying the habitat – either temporarily or permanently – including water and intertidal sediment quality.

Mitigation measures applied or taken into account: Noise and visual disturbance to redshank during construction can be avoided by preventing works during the overwintering period, between September and April (inclusive). This precautionary approach may be refined with a better understanding of the redshank's behaviour and less stringent mitigation measures may include:

- noise attenuation (including screening) or restrictions which prevent noise exceeding thresholds above which redshank are disturbed;
- phasing plans or agreed programmes of work which restrict activities likely to cause a noise disturbance, for example avoiding only certain activities (such as piling) throughout the overwintering period, or avoiding some or all activities during periods when redshank roosts are most liable to be affected (e.g. during high tides at springs and/or between sunrise and sunset).

Similar restrictions on the timing and methods of works could mitigate in-channel effects upon fish species. Screening can also be employed to mitigate visual disturbance, along with restrictions and controls on any lighting.

With regard to disturbance once sites have been developed, it may be necessary to prevent or restrict access to the river edge during September to April. This could be achieved by the management of recreation, for example management planning, awareness-raising, signage and the deployment of a Ranger.

To prevent pollution events, there should be standard adherence to pollution control measures. Works within the Leven and Clyde, such as to sea walls, may require non-standard pollution control measures and to be specifically regulated by SEPA.

Indirect modifications to the River Leven arising from modifying river flow should be avoided.

Conclusion: There are proposals for development included in the WDLDP₂ for Dumbarton Waterfront that are likely significant effects on the Inner Clyde SPA, Endrick Water SAC and their respective qualifying interests either alone or in combination. Therefore, the plan needs to contain wording to refer to potential mitigation identified in the HRA, and wording ensuring that a project level HRA is undertaken to demonstrate that no adverse effect on integrity either alone or in combination on the two Natura sites.

The Local Development Plan will therefore state:

"Development at Dumbarton Town Centre and Waterfront and must not have an adverse effect on the Endrick Water Special Area of Conservation (SAC) for which Atlantic salmon, brook lamprey and river lamprey are the qualifying interests, nor on the Inner Clyde Special Protection Area (SPA) for which redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats regulation Appraisal (HRA). This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this Proposed Plan, including

measures potentially required to address disturbance both during construction and operation of the development.”

The Council as ‘Competent Authority’ will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could harm an internationally important site will only be approved in exceptional circumstances detailed within Policy ENV1 Nature Conservation.

“Development at Castlegreen Street and Sandpoint Marina, Dumbarton, annotated with a ‘3’ must not have an adverse effect on the Endrick Water Special Area of Conservation (SAC) for which Atlantic salmon, brook lamprey and river lamprey are the qualifying interests or on the Inner Clyde Special Protection Area (SPA) for which redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA). This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this plan, including measures potentially required to address disturbance both during construction and operation of the development.

The Council as ‘Competent Authority’ will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could harm an internationally important site will only be approved in exceptional circumstances detailed within Policy ENV1 Nature Conservation.”

5.9 City Deal Project: Esso Bowling & Scott’s Yard

Description of site and proposal: The Esso Bowling (a former fuel distribution terminal) and Scott’s Yard (a former shipyard) are located on the Clyde waterfront between Milton and Bowling. Clearance of the larger Esso site was completed in 2001 and partial remediation of the site recently commenced. Within the site is Dunglass Castle, an uninhabited listed building.

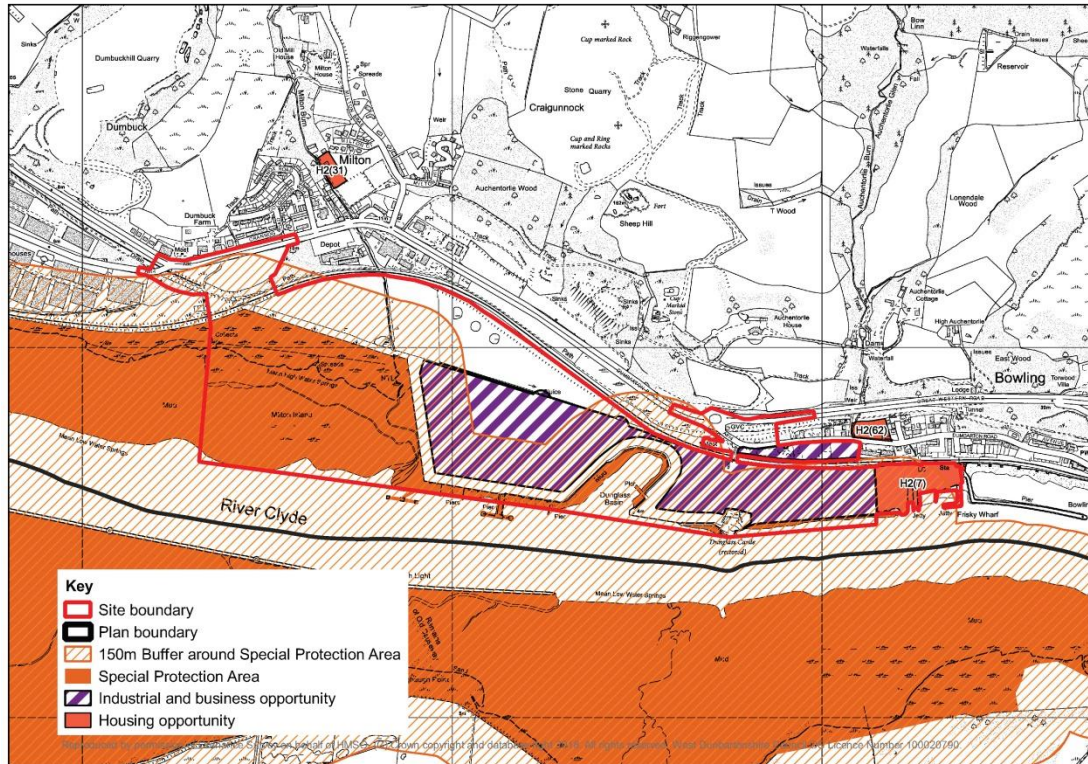
The mudflats and saltmarshes west of the Esso site form part of the Inner Clyde SPA, as does the foreshore below the sea wall. The extent of the mudflats and saltmarshes on both sides of the River Clyde mean the vast majority of the whole strategy area is within the zone of construction disturbance to redshank as identified in previous studies.

The strategy for these two sites contained within the WDLDP₂ is support for their redevelopment, primarily to increase business and industry opportunities within West Dunbartonshire. The Scott’s Yard site is additionally identified as suitable for housing. Key to the development of the site is the provision of a new road between the Dumbuck junction east of Dumbarton and the Dunglass roundabout west of Bowling,

linking up the A814. The area to the west of the Esso site will remain in the green belt, with no development proposed other than the link road.

The Local Development Plan requires, through Policy CP3, that a masterplan be agreed to guide the comprehensive development of the two sites.

Map 8 – Esso Bowling & Scott's Yard



Implications for qualifying interest(s): In the absence of survey data it is necessary to assume that significant roosts may be present at the terminal edge at certain times and that while roosts of hundreds of redshank seems unlikely, a roost of many cannot be ruled out. Development of the site is likely to cause disturbance – both visual and acoustic – to redshank. This would apply to both the construction and operational phases of development.

Pollution is also a potential cause of harm. This could have a direct impact upon the redshank through ingestion or fouling or, more likely, an indirect impact by modifying the habitat – either temporarily or permanently – including intertidal sediment quality.

Mitigation measures applied or taken into account: A recent Appropriate Assessment carried out at the start of 2012 determined that, with appropriate avoidance and mitigation, remediation works to decontaminate part of the site (known as Eastfield) would not adversely affect the integrity of the Inner Clyde.

A range of mitigation measures were imposed as conditions on the planning permission, including:

- the requirement that, from September to April inclusive, plant and machinery should not give rise to greater cumulative noise than the level calculated within the Appropriate Assessment Statement;
- works to reinforce the Clyde riverbank to be undertaken outwith September to April inclusive;
- the erection of visual screens along the seaward edge of the site and around the head of the Dunglass basin;
- the retention, undamaged, of trees and gorse identified on the site;
- restrictions on the use of haulage vehicles and large/heavy plant on certain parts of the site from September to April inclusive;
- the implementation of pollution control in accordance with SEPA's guidelines.

These measures are likely to be required in the future development of the site. Furthermore, a permanent buffer between development and the western edge of the site where the intertidal habitat is more extensive is considered necessary. In view of the long-term potential of the proposed westward extension of the Esso Bowling site to allow the 'migration' of Inner Clyde habitats in response to sea-level rise, described as a virtually unique opportunity within West Dunbartonshire for this to occur, no development is proposed on this part of the site.

With regard to disturbance once the site has been developed, it may be necessary to prevent or restrict access to the river edge during September to April. This could be achieved by appropriate development layouts and the management of recreation, for example management planning, awareness-raising, signage and the deployment of a Ranger.

Conclusion: Mitigation measures as described above could allow development to take place without the conservation objectives and integrity the Inner Clyde being undermined.

To ensure this is carried out at the project level and that it can be demonstrated that development will have no adverse effect on site integrity, the Local Development Plan will state that for both Esso Bowling and Scott's Yard:

"Development must not have an adverse effect on the Inner Clyde Special Protection Area (SPA) for which Redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA). This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this Proposed Plan, including measures potentially required to address disturbance both during construction and operation of the development."

The Council as 'Competent Authority' will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation

interests for which the area has been designated. Development which could adversely affect the integrity of an internationally important site will only be approved in the circumstances detailed in Policy ENV1 Nature Conservation.”

5.10 **Queens Quay**

Description of site and proposal: Queens Quay is a 40 hectare site located next to the River Clyde in Clydebank, extending from Cable Depot Road to Rothesay Dock. It was cleared in 2002. A new college and office buildings have been constructed at the eastern end of the site while another part is currently used for the importation and processing of construction and demolition waste.

The WDLDP2’s strategy for Queens Quay is for a mixed-use development, led by housing and subject to a comprehensive masterplan. Planning permission in principle was granted in September 2016 for up to 1,000 private and affordable dwellings, commercial, leisure uses and a new health quarter. The site will provide substantial new green infrastructure which will be integrated and provided throughout the site and includes a waterfront park, boulevard, pocket parks, public realm around the basin and cycle and pedestrian routes. Detailed consent for the spine road and public realm works was granted in 2017 and the Council have committed £16 million towards advance infrastructure to facilitate development on the site in line within this consent. The new leisure centre, next to Clydebank College, opened in 2017 and planning consent was granted for a District Heating System and new Health Centre in December 2017 and May 2018 respectively.

The dock which Queens Quay surrounds marks the furthest upstream point of the Inner Clyde SPA, albeit the extent of the intertidal habitat on the north side of the river is limited. More significant is the proximity of the SPA on the southern bank of the River Clyde. Land to the east of the College, including the site of the leisure centre, lies out with the 150 metre zone of potential disturbance to redshank, however birds may roost outwith the SPA.

Conclusion: The mitigation measures as described above could allow development to take place without the conservation objectives and integrity of the Inner Clyde SPA being undermined.

To ensure this is carried out at the project level and that it can be demonstrated that development will have no adverse effect on site integrity, the Local Development Plan will state that:

“Proposals for development at Queens Quay must not have an adverse effect on redshank, which are the qualifying interest of the Special Protection Area. Proposals for development must be accompanied by an expert appraisal to inform a project-level Habitats Regulations Appraisal. This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Pre-application discussion with SNH regarding preparation of the appraisal is strongly recommended. Account should also be taken of the HRA of this Proposed Plan, including mitigation measures potentially required to address disturbance both during construction and operation of the development.”

The Council as ‘Competent Authority’ will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could harm an internationally important site will only be approved in the circumstances detailed in ENV 1 Nature Conservation.”

Policies

5.11 Policy WD1: Waterfront Development

Description of site and proposal: The Policy seeks to ensure watercourses are protected and that development strengthens and enhances its contributions to the key waterfronts in West Dunbartonshire.

Implications for qualifying interest(s): This Policy will primarily affect developments fronting onto the SPA and SAC and are similar to those implications described with regard to Queens Quay, Carless, Esso Bowling and Scott’s Yard, Bowling Basin and Dumbarton Town Centre and Waterfront and the sites described above. Those implications are all relevant to the assessment of this policy.

Mitigation measures applied or taken into account: Again, the mitigation measures for this policy will be the same as they for the Delivering our Places and Sites Identified above

Conclusion: The mitigation measures as described above could allow development to take place without the conservation objectives and integrity of the Inner Clyde SPA and the Endrick Water SAC from being undermined.

To ensure this is carried out at the project level and that it can be demonstrated that development will have no adverse effect on site integrity, the Local Development Plan will state that:

Within bullet point d: Proposals which promote recreational use on or adjacent to watercourses will be supported, **subject to proposals having no adverse effect on the integrity of a Natura 2000 site** or the Forth and Clyde Canal Scheduled Monument and its setting; and

"Proposals for development which promote recreational access on or adjacent to the Inner Clyde Special Protection Area (SPA), for which redshank are the qualifying interest, and/or including the River Leven which is a tributary to the Endrick Water Special Area for Conservation (SAC), where Atlantic salmon, brook lamprey and river lamprey are the qualifying interest, must not have an adverse effect on any Natura Site. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA).

This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. . Account should also be taken of the HRA of this Proposed Plan, including measures potentially required to address pollution and disturbance both during construction and operation of the development.'

The Council as 'Competent Authority' will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could harm an internationally important site will only be approved in the circumstances detailed in ENV 1 Nature Conservation."

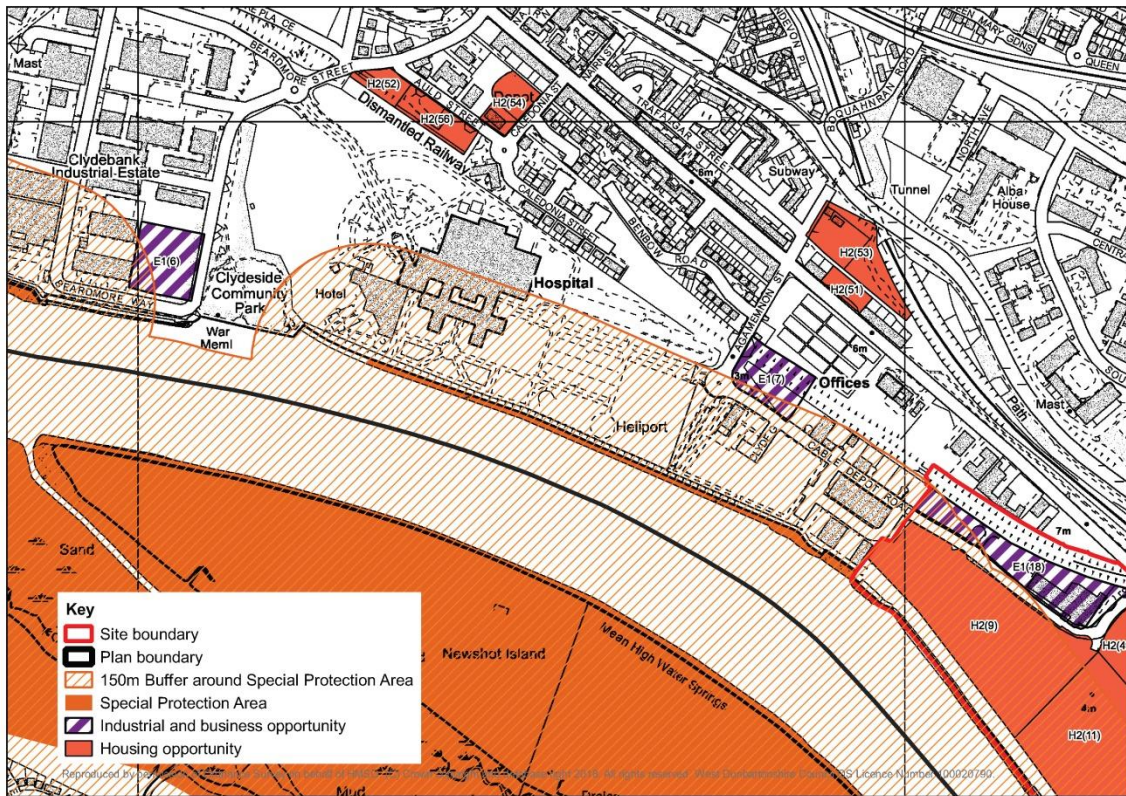
5.12 E3: Golden Jubilee National Hospital

Description of site and proposal: The Golden Jubilee National Hospital, Clydebank is located within the Clyde Waterfront SEIL. The hospital, which is a major employer in West Dunbartonshire, is home to regional and national heart and lung services and is a major centre for orthopaedics. As part of the Scottish Government's investment of £200 million to meet demand for elective procedures over the next 10 years, proposals for expansion at the hospital are currently being worked up so as to enable the hospital to expand its services.

The Policy seeks to support the expansion and enhancement of facilities at the Golden Jubilee Hospital and for alternative developments proposals, which are associated with the hospital, within the Clyde Waterfront SEIL at Cable Depot Road.

The area in which the Hospital and Cable Depot Road is located marks the furthest upstream point of the Inner Clyde SPA, albeit the extent of the intertidal habitat on the north side of the river is limited. More significant is the proximity of the SPA on the southern bank of the River Clyde.

Map 10 – Golden Jubilee National Hospital



Implications for qualifying interest(s): Overwintering redshank may roost near Queens Quay, particularly upon the southern back of the River Clyde which is within 150 metres of parts of the site. These birds might be liable to disturbance from the noise and activity of construction and the future use of parts of the site.

Water-borne pollution, for example from run-off from the site or spillages, could potentially alter water quality in the immediate area. This may amount to or contribute to a significant effect depending in the scale of development, taking consideration of tidal flushing and the use by redshank of large areas of the estuary.

Mitigation measures applied or taken into account: SNH’s appraisal of the proposal for the importation and processing of construction and demolition waste stated that because areas of potential disturbance were small, and used by redshank only occasionally and in small numbers, disturbance was not likely to significantly alter redshank distribution or their population as a component of the SPA.

Across the whole site, however, it may be necessary to specify noise restrictions during winter months and/or a phasing plan to minimise disturbance.

Appropriate control of water-borne pollution in line with SEPA’s pollution prevention guidelines should be employed.

Conclusion: The mitigation measures as described above could allow development to take place without the conservation objectives and integrity of the Inner Clyde SPA being undermined.

To ensure this is carried out at the project level and that it can be demonstrated that development will have no adverse effect on site integrity, the Local Development Plan will state that:

"Development within the Hospital Campus or within the Clydebanks Riverside Strategic Economic Investment Location must not have an adverse effect on the Inner Clyde Special Protection Area (SPA) for which redshank are the qualifying interest. Proposals for development must be accompanied by an expert assessment to inform a project-level Habitats Regulations Appraisal (HRA). This may require a study of redshank behaviour in the affected area of the SPA, which is likely to involve survey over at least one overwintering season. Account should also be taken of the HRA of this plan, including measures potentially required to address disturbance both during construction and operation of the development

The Council as 'Competent Authority' will carry out the HRA. If it is concluded that the proposal is likely to have a significant effect, the Council must then undertake an Appropriate Assessment of the implications of the development for the conservation interests for which the area has been designated. Development which could harm an internationally important site will only be approved in the circumstances detailed in ENV 1 Nature Conservation."

5.13 **General**

The mitigation measures considered above are based on information currently available about the habits and the qualifying interests of the Inner Clyde SPA and Endrick Water SAC. Mitigation and avoidance measures, particularly preventing works which would cause noise disturbance to redshank during the overwintering period may be over specified as a precautionary approach is required because of the limitations of the analysis undertaken to date. Further detailed field survey work will allow these mitigation measures to be refined, and may be required in some locations to enable project level HRA (including Appropriate Assessment as required where a likely significant effect is identified) to conclude proposals can proceed without adverse effect on the integrity of a European site.

In addition to the mitigation measures noted above, **Policy ENV 1** of the Local Development Plan states

"Development that adversely affects the integrity of sites designated for nature conservation or harms protected species will not be permitted except:

a) for Natura 2000 sites:

- where there are no alternative solutions;*
- there are imperative reasons of overriding public interest, including those of a social and economic nature; and*

- *compensatory measures are provided to ensure the overall coherence of the Natura network is protected.*

In this event, Scottish Ministers will be notified.”

The effect of this policy is that development that would adversely affect the integrity of a European site would be contrary to the Local Development Plan will therefore state, except in exceptional circumstances.

6. Conclusion

- 6.1 West Dunbartonshire Council, as the plan making body, concludes that it has been ascertained through this Habitats Regulations Appraisal that the implementation of the West Dunbartonshire Local Development Plan 2, alone or in combination, would have no adverse effect on the integrity of any Natura 2000 (European) site.

APPENDIX 1 - SCREENING (Stage 5 / Section 3.2)

Table a) The following table records the screening of the West Dunbartonshire Local Development Plan – Proposed Plan indicating where policies and proposals have been screened out of the HRA because they would have *no effect* or would *not be likely to have a significant effect* on a European site.

Proposed Plan Section Policy Proposal	Stage 1 General Statements	Policy	Stage 2 Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
Spatial Strategy: Delivering our Places					
Queens Quay	→		→	→ AA	Scope into Appropriate Assessment
City Deal Site - Esso Bowling & Scott's Yard	→		→	→ AA	Scope into Appropriate Assessment
Carless	→		→	→ AA	Scope into Appropriate Assessment
Dumbarton Town Centre and Waterfront	→		→	→ AA	Scope into Appropriate Assessment
Clydebank town centre	→		→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
Alexandria town centre	→		→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Development framework for Alexandria Town Centre would not undermine the conservation objectives of either site.
Bowling Basin	→		→	→ AA	Scope into Appropriate Assessment
Lomondgate	→		→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposals and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
The Vale of Leven Industrial Estate	→		→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposals and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
Spatial Strategy: Our Key Assets					
GB1	Greenbelt & Countryside	✓			General policy statement/vision not likely to have a significant effect on a European site.
WD1	Waterfront Development	→	→	→ AA	Scope into Appropriate Assessment
KH1	Kilpatrick Hills	✓			General policy statement/vision not likely to have a significant effect on a European site.
	Green Network Strategy	✓			General policy statement/vision not likely to have a significant effect on a European site.
	Strategic Green Network Projects	→	→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected. Assessment differed to Green Infrastructure Supplementary Guidance.
AW1	The Antonine Wall	→	→	✓	A: Intended to protect the natural/built environment
FCC1	Forth & Clyde Canal	→	→	✓	A: Intended to protect the natural/built environment
Communities and Place					
	Policy Framework: Locality Place Planning - Requirements for Adoption as Supplementary Guidance	✓			General policy statement/vision not likely to have a significant effect on a European site.
LPP1	Development Proposals within a Locality Place Planning Area	✓			General policy statement/vision not likely to have a significant effect on a European site.
Creating Places and Delivering Design Quality					
CP1	Creating Places	✓			General policy statement/vision not likely to have a significant effect on a European site.
CP 2	Green Infrastructure	✓			General policy statement/vision not likely to have a significant effect on a European site.
CP3	Masterplanning	✓			General policy statement/vision not likely to have a significant effect on a European site.

Proposed Plan Section Policy Proposal		Stage 1 General Statements Policy	Stage 2 Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
CP4	Place and Design Panel	✓			General policy statement/vision not likely to have a significant effect on a European site.
Successful, Sustainable: Delivering Homes					
H1	Housing Land Supply	✓			General policy statement/vision not likely to have a significant effect on a European site.
H2	Housing Sites				See sites allocated (below)
H2(1)	Bank Street, Alexandria	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(2)	Heather Avenue, Alexandria.	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3)	Mitchell Way, Alexandria	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4)	Haldane PS, Balloch	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(5)	Highdykes PS, Bonhill	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(6)	Bowling Basin, Bowling				Planning Permission Granted
H2(7)	Scott's Yard, Bowling				See Delivering Our Places – Esso, Bowling City Deal Site and Scott's Yard
H2(8)	Braidfield HS, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(9)	Cable Depot Road, Clydebank				Site forms part of the Delivering Our Places – Queens Quay site see above.
H2(10)	North Douglas Street, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC (Planning Permission lapsed)
H2(11)	Queens Quay, Clydebank				Site forms the majority of the Delivering Our Places – Queens Quay site see above.
H2(12)	Radnor Park Hotel, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(13)	Rosebery Place, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(14)	Thor Ceramics, Clydebank				Planning Permission Granted
H2(15)	East Barns Street, Clydebank				Planning Permission Granted
H2(16)	Castle Street, Dumbarton				Planning Permission Granted
H2(17)	Crosslet Estate, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(18)	Castlegreen Street, Dumbarton	→	→	→ AA	Scope into Appropriate Assessment - Delivering Our Changing Places – Dumbarton Town Centre and Waterfront
H2(19)	Garshake Road, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(20)	Keil School Phase 2, Dumbarton				Planning Permission Granted
H2(21)	Langcraigs, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(22)	Notre Dame Convent, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(23)	Our Lady and St Patricks High School, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.

Proposed Plan Section Policy Proposal		Stage 1 General Statements Policy	Stage 2 Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
H2(2 4)	Sandpoint Marina, Dumbarton	→	→	→ AA	Scope into Appropriate Assessment - Delivering Our Changing Places – Dumbarton Town Centre and Waterfront
H2(2 5)	Carleith, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(2 6)	Mildam Road, Faifley				Planning Permission Granted
H2(2 7)	Cochno Waterworks, Hardgate				Planning Permission Granted
H2(2 8)	Hardgate Hall, Hardgate				Planning Permission Granted
H2(2 9)	Jamestown IE	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3 0)	Levenbank Terrace, Jamestown	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3 1)	Hillview, Milton				Planning Permission Granted
H2(3 2)	Ashtree Court, Old Kilpatrick	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3 3)	Carless, Old Kilpatrick				See Delivering Our Places – Carless
H2(3 4)	Dalquhurn, Renton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3 5)	Church Street Former Social Work Office, Alexandria	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3 6)	Clydebank Health Centre, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3 7)	Hardgate Health Centre, Hardgate	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(3 8)	RHI Site, Stanford Street, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 0)	Main Street, Jamestown	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 1)	Glebe, Old Kilpatrick	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 2)	Carmen Waterworks, Renton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2 (43)	Creveul Court, Alexandria	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 4)	Haldane PS, Balloch	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 5)	Aitkenbar PS	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 6)	Muir Road, Bellsmyre	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 7)	Bonhill PS, Bonhill	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(4 8)	Golfhill Drive, Bonhill	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. (Planning Permission lapsed).
H2(4 9)	Queens Quay, Clydebank				Site forms the majority of the Delivering Our Places – Queens Quay site (see above).
H2(5 0)	St Andrew's HS, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. (Planning Permission lapsed).

Proposed Plan Section Policy Proposal		Stage 1 General Statements	Stage 2 Policy Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
H2(5 1)	354 Dumbarton Road, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2 (52)	Auld Street, Dalmuir				Planning Permission Granted
H2(5 3)	Boquhanran Road, Dalmuir	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(5 4)	Caledonia Street, Dalmuir	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(5 5)	Salisbury Place, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(5 6)	Auld Street Phase 2, Dalmuir	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(5 7)	Carrick Terrace, Dumbarton				Planning Permission Granted
H2(5 8)	Castle Street, Dumbarton				Planning Permission Granted
H2(5 9)	Dumbarton Cottage Hospital, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(6 0)	Westcliff/Talisman Avenue, Dumbarton				Planning Permission Granted
H2(6 1)	Dalquhurn, Renton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(6 2)	Littlemill Distillery Bowling,	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H2(6 3)	Faifley Bowling Club, Faifley	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H3	Homes for Particular Needs				See sites allocated (below)
H3(1)	Auchentoshan, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H3(2)	Queens Quay, Clydebank				See Delivering Our Places – Queens Quay
H3(3)	Dalreoch, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H3(4)	Cochno Waterworks, Hardgate	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
H4	Residential Amenity	✓			General policy statement/vision not likely to have a significant effect on a European site.
Successful, Sustainable: Revitalising our Economy					
E1	Economic Growth	✓			General policy statement/vision not likely to have a significant effect on a European site.
	Business and Industrial Sites				See sites allocated (below)
E1 (1-4)	Vale of Leven IE sites	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Part of Delivering Our Places – Vale of Leven Industrial Estate
E1 (5)	Lomondgate				Planning Permission in Principle. Part of Delivering Our Places – Lomondgate
E1 (6)	Clydebank Industrial Estate	→	→	→ AA	Scope into Appropriate Assessment
E1 (7)	Cable Depot Road, Clydebank	→	→	→ AA	Scope into Appropriate Assessment
E1 (8)	Rothesay Dock				Planning Permission Granted
E1(9)	Rothesay Dock	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Part of Delivering our Places – Queens Quay.

Proposed Plan Section Policy Proposal		Stage 1 General Statements	Stage 2 Policy Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
E1 (10)	John Knox Street, Clydebank				Planning Permission Granted
E1 (11)	Main Street, Jamestown	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
E1 (12)	North Kilmalid	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Part of Our Changing Places – Lomondgate
E1 (13)	Lomond IE, Alexandria	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
E1 (14)	Birch Road, Broadmeadows IE, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
E1 (15)	Bankend Road, Broadmeadow Industrial Estate, Dumbarton	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
E1(16)	Hamilton Street, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
E1(17)	Land West of Garth Drive, Clydebank	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Part of Delivering our Places – Queens Quay.
E2	Alternative Uses of Business and Industrial Land	✓			General policy statement/vision not likely to have a significant effect on a European site.
E3	Golden Jubilee National Hospital	→	→	→ AA	Scope into Appropriate Assessment
E4	Council Depot, Stanford Street	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Part of Delivering our Places – Queens Quay.
E5	Roadside Services	✓			General policy statement/vision not likely to have a significant effect on a European site.
E6	Tourism Development	→	→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
E7	Glasgow Airport and Aircraft Noise	→	→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
Successful, Sustainable: Supporting our Town Centres					
	Network of Centres Retail Strategy	✓			General policy statement/vision not likely to have a significant effect on a European site.
SC1	Sequential Approach	✓			General policy statement/vision not likely to have a significant effect on a European site.
SC2	Core Town Centre Areas	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Part of Delivering our Places – Clydebank Town Centre and Dumbarton Town Centre and Waterfront
SC3	Other Town Centre Areas	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC. Part of Delivering our Places – Clydebank Town Centre and Alexandria Town Centre
SC4	Local Centres	→	→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
SC5	Ancillary Retail Uses	→	→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
Successful, Sustainable: Protecting our Built Environment					
BE1	Scheduled Monuments and Archaeological Sites	→	→	✓	A: Intended to protect the natural/built environment
BE2	Listed Buildings	→	→	✓	A: Intended to protect the natural/built environment

Proposed Plan Section Policy Proposal		Stage 1 General Statements	Policy	Stage 2 Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
BE3	Conservation Areas	→		→	✓	A: Intended to protect the natural/built environment
BE4	Gardens and Designed Landscape	→		→	✓	A: Intended to protect the natural/built environment
Renewable Energy						
RE1	Renewable Energy Developments	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE2	Spatial Framework for Wind Energy	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE3	Wind Energy Proposals outwith the Spatial Framework	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE4	Heat Generation	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE5	Low and Zero Carbon Buildings	✓				General policy statement/vision not likely to have a significant effect on a European site.
Natural, Resilient: Green Infrastructure						
GI1	Safeguarded Open Space and Outdoor Sports Facilities	→		→	✓	A: Intended to protect the natural/built environment
GI 2	Open Space Standards	→		→	✓	B: Which will not themselves lead to development or other change
GI 3	Allotments	✓				General policy statement/vision not likely to have a significant effect on a European site.
GI 4	Developer Contributions – Green Infrastructure Provision	✓				General policy statement/vision not likely to have a significant effect on a European site.
	Types of Green Infrastructure Projects	→		→	✓	D: For which effects on any particular European site cannot be identified, because the proposal is too general. Assessment differed to Green Infrastructure Supplementary Guidance.
Natural, Resilient: Safeguarding our Environment						
ENV 1	Nature Conservation	→		→	✓	A: Intended to protect the natural/built environment
ENV 2	Landscape Character	→		→	✓	A: Intended to protect the natural/built environment
ENV 3	Forestry, Trees and Woodland	→		→	✓	A: Intended to protect the natural/built environment
ENV 4	Carbon rich soils	→		→	✓	A: Intended to protect the natural/built environment
ENV 5	Water Environment	→		→	✓	A: Intended to protect the natural/built environment
ENV 6	Flooding	✓				General policy statement/vision not likely to have a significant effect on a European site.
ENV 7	Advanced and Temporary Greening of Vacant and Derelict Land	✓				General policy statement/vision not likely to have a significant effect on a European site.
ENV 8	Air, Light and Noise Pollution	✓				General policy statement/vision not likely to have a significant effect on a European site.
ENV 9	Contaminated Land	✓				General policy statement/vision not likely to have a significant effect on a European site.
ENV 10	Unstable Land	✓				General policy statement/vision not likely to have a significant effect on a European site.

Proposed Plan Section Policy Proposal		Stage 1 General Statements	Policy	Stage 2 Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
ENV 11	Implementation of the SEA Environmental Report	✓				General policy statement/vision not likely to have a significant effect on a European site.
ENV 12	Advertisements	✓				General policy statement/vision not likely to have a significant effect on a European site.
Connected: Connectivity						
CON 1	Transportation Requirements for New Development	→		→	✓	C: Makes provision for change but which could have no conceivable effect. No link or pathway between the proposal and the qualifying interests of the Inner Clyde SPA or Endrick Water SAC.
CON 2	Local Transport Strategy - Transportation Schemes					Local Transport Strategy was adopted in 2013, which was before the preparation of this Plan. It is the responsibility of that Plan to assess if the transportation schemes are likely to have an impact on Natura 2000 Sites
CON 3	Core Paths and Natural Routes	→		→	✓	A: Intended to protect the natural/built environment
CON 4	Installation of Superfast Broadband for New Developments	✓				General policy statement/vision not likely to have a significant effect on a European site.
CON 5	Communications Infrastructure	✓				General policy statement/vision not likely to have a significant effect on a European site.
CON 6	Sustainable Waste Management	✓				General policy statement/vision not likely to have a significant effect on a European site.
Low Carbon: Renewable Energy						
RE1	Renewable Energy Developments	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE2	Spatial Framework for Wind Energy	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE3	Wind Energy Proposals outwith the Spatial Framework	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE4	Heat Generation	→		→	✓	E: Effects on any particular European site cannot be identified, because the policy is too general: not possible to identify where, when or how the policy might be implemented or where the effects may occur, or which sites, if any, may be affected.
RE5	Low and Zero Carbon Buildings	✓				General policy statement/vision not likely to have a significant effect on a European site.
Low Carbon: Achieving Zero Waste						
ZW1	Sustainable Waste Management	✓				General policy statement/vision not likely to have a significant effect on a European site.
Low Carbon: Minerals, Aggregates and Coal						
MIN1	Minerals and Aggregates Extraction	✓				General policy statement/vision not likely to have a significant effect on a European site. NB: Sites listed in Schedule 9 are existing permissions.
MIN2	Financial Guarantees	✓				General policy statement/vision not likely to have a significant effect on a European site.
MIN3	Coal	✓				General policy statement/vision not likely to have a significant effect on a European site.
Proposals						
Dumbarton Proposal 1	Dumbarton Football Club	→		→	✓	D: For which effects on any particular European site cannot be identified, because the proposal is too general.
Clydebank Proposal 1	Co-operative Building, Clydebank	→		→	✓	A: Intended to protect the natural/built environment
Bowling Basin Proposal 1	Bowling Harbour Path	→		→	✓	D: For which effects on any particular European site cannot be identified, because the proposal is too general.

Proposed Plan Section Policy Proposal		Stage 1 General Statements	Policy	Stage 2 Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
Value of Leven Industrial Estate Proposal 1	Trees	→		→	✓	A: Intended to protect the natural/built environment

Table b) Scoped into the Appropriate Assessment

Proposed Plan Section Policy Proposal		Stage 1 General Statements	Policy	Stage 2 Projects referred to in, but not proposed by, the plan	Stage 3 No likely significant effects on any European site	Commentary
Delivering Our Places						
	Queens Quay	→		→	→ AA	Scope into Appropriate Assessment: The majority of the site falls within 150m metres of the adjoining Inner Clyde SPA. Although Redshank may not use the north side of the Clyde here, the zone of potential disturbance is likely to include their roosts on the south side. Disturbance to redshank on Inner Clyde could be caused during construction and through increased human activity.
	Esso Bowling & Scott's Yard	→		→	→ AA	Scope into Appropriate Assessment: The majority of the site falls within 150 metres of the adjoining Inner Clyde SPA. Disturbance to redshank on Inner Clyde could be caused during construction and through increased human activity. NB: extension of the site westwards, the MIR preferred option, is no longer proposed. SNH noted land raising/flood defences would prevent coastal marsh habitats (notified feature of SSSI) migrating inland where otherwise they might be lost due to sea-level rise, with implication for redshank.
	Carless	→		→	→ AA	Scope into Appropriate Assessment: The majority of the site falls within 150 metres of the adjoining Inner Clyde SPA. Although Redshank may not use the north side of the Clyde here, the zone of potential disturbance is likely to include their roosts on the south side. Disturbance to redshank on Inner Clyde could be caused during construction and through increased human activity.
	Dumbarton town centre & waterfront	→		→	→ AA	Scope into Appropriate Assessment: The area south of the tidal basin is within 150 metres of the Inner Clyde SPA. Construction and increasing access to the waterfront could cause disturbance to redshank on the Inner Clyde. The town centre is beyond 300m. (Individual development sites within Dumbarton town centre and waterfront are assessed below).
	Bowling Basin	→		→	→ AA	Scope into Appropriate Assessment: The whole of the site falls within 150 metres of the adjoining Inner Clyde SPA. Construction and increasing access to the waterfront could cause disturbance to redshank on the Inner Clyde.
Policy WD1	<i>Waterfront Development</i>	→		→	→ AA	Scope into Appropriate Assessment: Policy has implications for the Inner Clyde SPA and the Endrick Water SAC by encouraging recreational access on these watercourses but also indicating that new development should front onto these watercourses which may lead to disturbance to the qualifying interests.
Policy E3	<i>Golden Jubilee National Hospital</i>	→		→	→ AA	Scope into Appropriate Assessment: The whole of the site falls within 150 metres of the adjoining Inner Clyde SPA. Although Redshank may not use the north side of the Clyde here, the zone of potential disturbance is likely to include their roosts on the south side. Disturbance to redshank on Inner Clyde could be caused during construction and through increased human activity.
E1 (6)	<i>Clydebank Industrial Estate</i>	→		→	→ AA	Scope into Appropriate Assessment: The whole of the site falls within 150 metres of the adjoining Inner Clyde SPA. Although Redshank may not use the north side of the Clyde here, the zone of potential disturbance is likely to include their roosts on the south side. Disturbance to redshank on Inner Clyde could be caused during construction and through increased human activity.
E1 (7)	<i>Cable Depot Road, Clydebank</i>	→		→	→ AA	Scope into Appropriate Assessment: The whole of the site falls within 150 metres of the adjoining Inner Clyde SPA. Although Redshank may not use the north side of the Clyde here, the zone of potential disturbance is likely to include their roosts on the south side. Disturbance to redshank on Inner Clyde could be caused during construction and through increased human activity.

APPENDIX 2 – SCREENING: in combination effects (Section 3.5)

	B			C											
	RLDP – Policy E1 Economic Investment Locations	RLDP – Policy E3 Transition Areas	RLDP – Policy C1 Core Town Centre				Bowling Basin	Carless, Old Kilpatrick	Cable Depot Road, Clydebank	Clydebank Industrial Estate	Dumbarton Waterfront	Esso Bowling & Scott's Yard	Queens Quay	Policy WD1: Waterfront Development	Policy E 3: Golden Jubilee National Hospital
RLDP – Policy E1 Economic Investment Locations															
RLDP – Policy E3 Transition Areas															
RLDP – Policy C1 Core Town Centre															
Bowling Basin															
Carless, Old Kilpatrick															
Cable Depot Road, Clydebank															
Clydebank Industrial Estate															
Dumbarton Waterfront															
Esso Bowling & Scott's Yard															
Queens Quay															
Policy WD1: Waterfront Development															
Policy E 3: Golden Jubilee National Hospital															

B: Other Plans and Projects.

C: Proposals and projects which have been screened out of the appraisal because they have planning permission (and have therefore undergone project-level HRA) or are not included in the WDLDP because they have planning permission or construction has commenced. A review of these sites has identified four for which a significant effect cannot be ruled out.

D: Sites included within the Appropriate Assessment (listed at paragraph 3.4 and shown in Map 2) post-mitigation.

Key

	No in-combination effects identified by RLDP HRA
	No in-combination effects
	Likely in-combination effects

APPENDIX 2 – SCREENING: in combination effects (Section 3.5)

Discussion

A number of sites have been identified where, in-combination, the effects of development are likely to be significant. The reason for this relates to the cumulative impact of disturbance upon redshank within the Inner Clyde SPA.

In general terms, disturbance of redshank in small numbers is not likely to significantly alter redshank distribution or their population as a component of the SPA, particularly when relocation distances are not significantly further than the zone of likely disturbance (c. 150m) and regular disturbance can be accommodated by the dynamics of the SPA population.

However, cumulative effects may arise where two developments are progressing concurrently, which limit the opportunity for redshank to be relocated without significant effect.

Such scenarios can be mitigated through restrictions on activities (both during construction and operational phases) which cause visual and acoustic disturbance, either in their entirety during the winter months when redshank are present, or out with certain noise levels or times during the day. Furthermore, phasing plans can ensure works which cause disturbance are planned for appropriate times in relation to both the presence of redshank within the Inner Clyde and other works that may be happening at the same time. These mitigation measures have already been identified as mitigation in the Plan.

It is therefore assessed that any potential for in-combination effects arising from the West Dunbartonshire Local Development Plan2: Proposed Plan would not adversely affect the integrity of the Inner Clyde SPA or any other Natura 2000 site.

CONTACT DETAILS

Planning and Building Standards
Council Offices
16 Church Street
Dumbarton
G82 1QL
Telephone: 0141 951 7948
Email: ldp@west-dunbarton.gov.uk

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.