

West Dunbartonshire Local Plan
Strategic Environmental Assessment
Environmental Report

March 2010

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Note:

The West Dunbartonshire Local Plan (WDLP) was adopted by West Dunbartonshire Council on 3 March 2010. This Environmental Report was prepared alongside the Finalised Draft of the Plan and published in May 2008.

The Environmental Report has not been revised, other than to correct factual inaccuracies and errors, however an addendum to the Environmental Report was prepared in September 2009 to update the assessment to take account of proposed modifications. This addendum is included at Appendix 11.

A non-technical summary of this report is also available.

In accordance with Section 18(3) of the Environmental Assessment (Scotland) Act 2005, the Council has produced a Post-Adoption SEA Statement. The statement covers how environmental considerations have been integrated into the plan; how the environmental report and comments received have been taken into account; the reasons for choosing the plan as adopted in the light of the other reasonable alternatives considered; and the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

1 Introduction

1.1 Structure of the Report

1.1.1 This report is split into four parts, these are:

1. Introductory Sections 1-4 set the context of the Local Plan and the SEA;
2. Information about the local environment is presented in Sections 5–7;
3. The SEA context and the environmental assessment process and results are presented in Sections 8–14; and
4. Concluding Sections 15-19 discuss monitoring, the environmental benefit of the SEA, next steps and presents a conclusion.

1.2 Strategic Environmental Assessment and the West Dunbartonshire Local Plan

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

1.2.2 West Dunbartonshire Council published the Notice of Intention to Start Preparation of the West Dunbartonshire Local Plan on 19th October 2004. SEA of the WDLP began as an internal process, with the Forward Planning Section undertaking an initial assessment and producing a Scoping Report that was circulated to Statutory Consultees (Consultation Authorities) for comment in December 2004. Following the scoping stage, Jacobs Babbie was appointed to produce a SEA for the Consultative Draft Local Plan, which was published alongside the WDLP in December 2005. The Forward Planning Section has subsequently revised the SEA in light of consultation responses received and amendments to the WDLP, including the pre-inquiry modifications published as part of the Local Plan process.

1.3 **The Local Plan Process**

1.3.1 West Dunbartonshire Council (WDC) currently has two local plans and is in the process of preparing an area wide Local Plan (the WDLP) to replace and update the current plans. The Consultative Draft WDLP was published in December 2005 and placed on deposit for a period of ten weeks. Comments received from the public consultation have been considered and the draft plan amended accordingly, with the Finalised Draft WDLP published in August 2007. Amendments to the WDLP made following the public consultation on the Consultative and Finalised Drafts have been included in the SEA.

1.3.2 More information on the Local Plan and its purpose can be found in Sections 2 and 10.

1.4 **Purpose of the Strategic Environmental Assessment (SEA)**

1.4.1 SEA was introduced to Scotland by The Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004 and the Environmental Assessment (Scotland) Act 2005 which implement European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment", known as the Strategic Environmental Assessment or SEA Directive. The objective of the SEA Directive is "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development". SEA therefore provides a systematic method of considering the likely effects on the environment of plans and programmes that set a context for future development activity. The purpose of this SEA is to undertake an assessment of the likely environmental impact of the new WDLP. Details of the requirements of the Directive are provided in Appendix 1.

1.4.2 As the first formal preparatory act of the West Dunbartonshire Local Plan was before the date when the 2005 Act became effective on 20th February 2006, this assessment has been undertaken in accordance with the provisions of the 2004 Regulations. In particular, the preparation of this environmental assessment and report has been undertaken in accordance with Part 3 of the Regulations.

- 1.4.3 The term 'Strategic Environmental Assessment' is not actually used in the UK or European Legislation but it is actively used and understood to mean environmental assessment, which complies with the Directive. SEA is the process of appraisal through which strategic aspects of environmental protection may be considered, and factored into all levels of decisions regarding public agency's plans and programmes.
- 1.4.4 In relation to the WDLP, SEA requires the policy maker to justify the choices made in formulating the Local Plan. SEA will contribute to more transparent planning by involving the public and by clearly demonstrating how environmental considerations have been assessed and balanced against other competing factors and subsequently integrated into the planning process.
- 1.4.5 The main objective of the SEA is to incorporate environmental sustainability into strategic decision-making. Through the evaluation of the environmental effects of the WDLP the SEA has improved the plan in a way that promotes effective and sustainable environmental practice.
- 1.4.6 The SEA assesses the environmental impact of reasonable alternatives to the plan, and makes recommendations for the selection of plan alternatives. However, the Environmental Report should be understood to reflect and support the plan. It is not a decision-making document in itself but an aid for decision makers in understanding the Plan and potential environmental impacts.
- 1.4.7 Responsible Authorities are obliged, under regulation 21 of the 2004 Regulations, to monitor the significant environmental effects of the implementation of Local Plans. The monitoring arrangements must identify any unforeseen adverse effects at an early stage and undertake appropriate remedial action. Recommendations for monitoring the effects of implementing the WDLP have been made in Section 16.
- 1.4.8 The SEA ensures that environmental implications have been thoroughly considered at each stage of plan development. Through this process environmental information has been incorporated into the Consultative Draft, Finalised Draft WDLP and the pre-inquiry modifications.
- 1.4.9 The SEA and the Local Plan processes run in parallel and are interwoven. The key decision and output stages of both processes must coincide in order for the SEA to be successful i.e. to successfully influence decisions and to benefit the environment. Figure 1 sets out both processes and indicates the key decision and output stages, where the processes coincide. Both the SEA and the LP processes are iterative and although the diagram may appear linear there is an in-built process of review, which is intended to make the process more robust and to ensure that new information is taken into account as it emerges.

Figure 1 – Local Plan and SEA Stages and Indicative Timetable

Local Plan Process		SEA Process
Notice of intention to prepare the West Dunbartonshire Local Plan	October 2004	SEA screening determination
Survey and Research	Dec 2004 – March 2005	Collate and forecast baseline environmental information Scoping Report: Consult and agree on the scope of the environmental report. Adopt environmental objectives and criteria
Analysis		Asses the Plan's aims and vision Assess alternative policy frameworks and locational strategies Assess the Plan's policies and proposals
Publish Consultative Draft West Dunbartonshire Local Plan (10 week consultation period)	Dec 2005	Publish the Environmental Report (10 week consultation period)
Publish Finalised Draft West Dunbartonshire Local Plan (10 week consultation period)	August 2007	
Publish Pre-Inquiry modifications	May 2008	Revise the Environmental Report
Public Inquiry (to consider unresolved objections)	Nov-Dec 2008	
Post-Public Inquiry modifications and finalisation of Local Plan	September 2009	Post-Public Inquiry modifications and finalisation of Environmental Report
Adoption	March 2010	Adoption Post-Adoption SEA Statement
Monitor and Review	2010 onwards	Monitor and Review

2 West Dunbartonshire Local Plan Context

- 2.1 Schedule 2 of the Regulations requires that the Environmental Report includes “an outline of the contents and main objectives of the plan or programme, and of its relationship (if any) with other relevant plans and programmes”. The purpose of this section is to explain the nature, content and timescale of the Plan.

Table 1 - Key Facts about the West Dunbartonshire Local Plan

Name of Responsible Authority	West Dunbartonshire Council
Title of plan	West Dunbartonshire Local Plan
Legislative Requirement	The Town and County Planning (Scotland) Act 1997
Subject	Land Use Planning and Development Management
Period covered by plan	Five years
Frequency of updates	Minimum of Five-Yearly
Plan area	12,546 Ha – West Dunbartonshire Council area excluding that part within the Loch Lomond and the Trossachs National Park
Plan purpose and/or objectives	See Section 10
Contact	Alan Williamson, Section Head – Forward Planning and Regeneration West Dunbartonshire Council Garshake Road Dumbarton, G82 3PU

- 2.2 Preparation of a Local Plan is a statutory responsibility for a planning authority. The legislative context for the WDLP is the Town and Country Planning (Scotland) Act 1997 and its associated Regulations. The principle purpose of the Local Plan is to set out WDC’s detailed policies and proposals for the use, development, protection and improvement of land. The WDLP sets out a detailed land-use framework for development to 2015 and will replace the existing Clydebank Local Plan (adopted September 2004) and the Dumbarton District, District Wide Local Plan (adopted March 1999).
- 2.3 Scottish Planning Policy (SPP) 1 identifies the key role of local plans in relation to the development plan system. SPP1 states that *‘Local plan policies must conform to the structure plan and be fully justified, demonstrating what is and is not acceptable in land use terms. ...Local plans should be responsive to local needs and promote change in the wider community interest. Policies must be relevant to the circumstances of an area, with enough flexibility to accommodate some of the changes that will inevitably emerge over the lifetime of the plan.’*
- 2.4 The WDLP also supports and enhances key WDC aims and objectives and incorporates the key objectives of the Community Planning process and key features of the Council’s Corporate Plan. The aims and objectives of the WDLP are outlined in Section 10.

2.5 The policies and proposals contained in the local plan have been developed in accordance with current Government guidance, including national planning guidance set out in Scottish Planning Policies (SPPs), National Planning Policy Guidelines (NPPGs) and Planning Advice Notes (PANs) in addition to Structure Plan requirements. They also reflect requirements that have been established in other plans, programmes and strategies that are of relevance to the plan as discussed in Section 4 (see also Appendix 2).

3 **SEA Methodology**

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

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

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

3.3 A sustainability appraisal, incorporating social and economic factors, has not been undertaken for the WDLP. However, the principles of sustainable development have been and will continue to be incorporated into the assessment of the Local Plan and its objectives.

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

3.5 **Establishing an Environmental Baseline**

3.5.1 West Dunbartonshire Council established the environmental baseline using the available information from the WDC GIS database and organisations including SEPA, SNH and Historic Scotland, who store and provided relevant environmental information. The data collected and used in the SEA provides a snapshot of the environment in the plan

area and, used in conjunction with local knowledge, it provides an overview of the plan area and highlights the key environmental issues.

3.6 Scoping

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

3.6.2 West Dunbartonshire went further than the requirements for scoping and published the report for public consultation in February 2005. The consultation was sent to 73 organisations and individuals and placed on the WDC Internet site. A list of the organisations and individuals consulted is provided at Appendix 3. Specific consultation questions were inserted for coordinated responses.

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

3.7 Consultation

3.7.1 Consultation is an integral part of the SEA process and in Scotland there are three 'Consultation Authorities' (statutory consultees) Scottish Ministers (including Historic Scotland), Scottish Environment Protection Agency and Scottish Natural Heritage. Statutory Consultees must be consulted at the Scoping stage and Environmental Report stage. In addition to this the wider public (including Non Governmental Organisations) must be consulted at the Environmental Report stage.

3.7.2 The WDLP is one of the first plans in Scotland to incorporate SEA under the terms of the new legislation. As such, WDC has undertaken informal consultation with Statutory Consultees throughout the development of the SEA. This informal consultation has been of value in determining the methodology for assessment and in documenting the assessment process.

3.7.3 Consultation on the draft Environmental Report was undertaken in January 2006 alongside the Consultative Draft WDLP. Both documents were placed on deposit for a period of 10 weeks during which comments were sought on all aspects of the assessment. Approximately 100 representations were received and these have been carefully considered by WDC, and where appropriate, the SEA and Finalised Draft Local Plan have incorporated changes and alterations to take account of these representations. A report of the representations received and the Council's response was included in the Statement of Publicity that accompanied the Finalised Draft WDLP and is repeated in Appendix 4.

3.8 **Environmental Assessment.**

3.8.1 See from Section 10.

3.9 **Monitoring Strategy Development**

3.9.1 See Section 16

4 **Links to Other Plans/Programmes/Strategies**

4.1 **Overview**

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

4.2 **International Level**

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

4.2.2 The Habitats Directive requires an appropriate assessment to be carried out where plans may have a significant effect on a protected Natura 2000 site. The Inner Clyde has been designated as a Special Protection Area (SPA, a Natura 2000 site) and as such the WDLP has been subject to an appropriate assessment details of which are provided at Section 14.

4.3 **National Level**

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

- Promoting Brownfield sites for development prior to releasing Greenfield sites;
- Ensuring that town centres are the focus for retail development;
- Protecting and enhancing existing open spaces and providing high quality new spaces; and

- The integration of transport and land use planning, and providing a transport infrastructure.

4.4 **Regional Level**

4.4.1 The plan that has the greatest direct influence on the WDLP is the Glasgow and Clyde Valley Joint Structure Plan (GCVJSP). The Structure Plan sets the strategic context for all Local Plans in the area that it covers. Where the GCVJSP identifies a strategic requirement for additional development land, this requirement is taken on board at a local level where a specific site or sites can then be identified for this purpose. The GCVJSP has undergone an alteration and strategic requirements that have been identified through this process for the West Dunbartonshire area have been taken into account and provided for in the WDLP.

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

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

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

4.5 **Local Level**

4.5.1 At West Dunbartonshire level a number of plans, programmes and strategies are linked to the WDLP. The plans, that are considered to be overarching in terms of their influence on the WDLP, include the Community Plan and the Corporate Plan. West Dunbartonshire Council also has a good working relationship with neighbouring authorities and this extends to consultation on plan development. The neighbouring authorities are: Argyll and Bute, Loch Lomond and Trossachs National Park Authority, Stirling, East Dunbartonshire, Glasgow City, and, south of the River Clyde, Renfrewshire and Inverclyde.

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

- Regeneration and the local economy;
- Health and well-being;
- Safe and strong communities;
- Sustainable environments;
- Education and lifelong learning; and
- An Improving Council.

4.5.3 *Our West Dunbartonshire* - the Community Plan – outlines a vision for 2017, stated as: **“Working in partnership we want to reduce poverty and exclusion, deliver better services and continue to improve the quality of life for everyone living in West Dunbartonshire whilst protecting our natural environment”**. This includes eight key targets:

- Boosting business growth, generating communities and linking people to jobs;
- Improving safety and a sense of security in our communities;
- Promoting health and well-being and challenging health inequalities;
- Maintaining and improving access, to excellent education and lifelong learning;
- Creating sustainable and attractive living environments;
- Developing good quality, sustainable and affordable housing to meet changing demographic needs;
- Enabling young people fulfil their full potential; and
- Valuing, protecting and enhancing the area’s natural and historical resources whilst reducing our impact on the natural environment.

4.5.4 The Community Plan for West Dunbartonshire will identify a series of key targets and the local plan will be expected to take forward the delivery of those targets relevant to development planning.

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

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

4.5.7 The local level plans and programmes have taken account of the previous local plans for West Dunbartonshire; i.e. Clydebank Local Plan and Dumbarton District, District

Wide Local Plan. The WDLP has been built upon the policy framework of previous local plans and it addresses new and emerging issues. As such, it will not present any major directional changes in policy from previous local plans and it is therefore unlikely that it will create conflict with existing plans. However, any areas where conflict may occur between the WDLP and other plans will be identified in this Environmental Report.

5 Environmental Context

5.1 The State of the Environment of the Plan Area

5.1.1 West Dunbartonshire is not undertaking a Sustainability Appraisal for the local plan; therefore social and economic factors are not presented in detail in this Environmental Report. However, in order to understand local needs relating to issues such as housing, transport, retail and open space; socio-economic data has to be considered and this is accommodated through the local plan rather than the SEA.

5.1.2 In order to assess how the policies in the WDLP will affect the environment an environmental baseline has been established. This dataset provides a picture of the current state of the environment.

5.2 Key Facts

5.2.1 Key facts relating to West Dunbartonshire are set out below; there are gaps in the data, these can be filled, but in order to do so, a more intensive environmental study is required. Undertaking such a study was not a feasible option for the WDLP but should be considered for future plans.

5.2.2 **Area Cover:** West Dunbartonshire covers an area of 125 km² (this excludes the area that lies within the Loch Lomond and Trossachs National Park, where West Dunbartonshire Council has no planning control). West Dunbartonshire is not a rural authority, however, c.79% of the land area is classed as rural and c.21% of the area is classed as urban.

5.2.3 **Population:** The total population of West Dunbartonshire is 91,240 (GROS 2006 Population Estimates) and the population is divided into three distinct settlements (Clydebank, Dumbarton, Vale of Leven), Clydebank contains c.50% of the total population and Dumbarton and the Vale of Leven each contain c.25% of the population.

5.2.4 **Unemployment:** The unemployment rate in West Dunbartonshire, based on 2004 figures, is 3.4%; this is significantly above the Scottish average.

- 5.2.5 Areas of Importance to Nature Conservation:** West Dunbartonshire has a high quality environment with 8 Sites of Special Scientific Interest, which are nationally important for nature conservation and geology; one Special Protection Area (Inner Clyde), designated for the conservation of a bird habitat; and one RAMSAR site (Inner Clyde), which is an internationally important bird habitat.
- 5.2.6** West Dunbartonshire has 48 designated Sites of Importance to Nature Conservation (SINCs); these sites are designated locally and are being reviewed as part of the WDLP process.
- 5.2.7 Built Environment:** The built environment in West Dunbartonshire contains 5 conservation areas and 177 listed buildings, including 18 properties with Grade A listed status. There are 9 scheduled ancient monuments including the Antonine Wall Proposed World Heritage Site and the Forth & Clyde Canal, both of which terminate in West Dunbartonshire. There is one site on the Inventory of Gardens and Designed Landscapes.
- 5.2.8 Vacant and Derelict Land:** West Dunbartonshire currently has 121 sites on the vacant and derelict land register, including one site that appears on the contaminated land register.
- 5.2.9** These key facts provide a snapshot of the state of the environment in West Dunbartonshire. A list of the environmental baseline data available for the SEA and the source of the data are presented in Appendix 5.

6 Existing Environmental Issues

- 6.1** The environmental issues that the WDLP addresses are identified below. These issues represent the key areas of concern for the environment and are issues that can be addressed through the plan.
- 6.1.1 Contaminated Land:** West Dunbartonshire has an industrial history, and as such it has many remaining industrial buildings and vacant industrial sites. Several sites in West Dunbartonshire have unknown levels of contamination, which must be dealt with prior to redevelopment. Sites of this nature make up a significant proportion of West Dunbartonshire's Brownfield land. Any contamination (real or perceived) on these sites can be a major barrier to redevelopment. This is a significant issue for West Dunbartonshire, particularly in its promotion of Brownfield land for redevelopment, prior to the release of Greenfield sites.
- 6.1.2 Environmental Vandalism:** Abuse of the environment by residents of West Dunbartonshire is an environmental concern. The majority of this abuse is related to fly tipping, as well as damage to trees and other natural resources. This is not

widespread, however, it has become a significant environmental problem in a number of specific locations throughout the area.

- 6.1.3 Flooding:** Due to the waterfront location of West Dunbartonshire, near the River Leven and the River Clyde, the area is prone to flooding at certain points. Flooding is an important issue, especially in Dumbarton, where the built environment of the town centre is susceptible. Flooding is a significant environmental problem because of the damage it causes to the built environment and also to the natural environment. An additional problem caused by flooding is that any measures that can be taken to mitigate the effects may have a negative impact on the natural environment.
- 6.1.4 Green Space Quality:** Green spaces in the urban environment are generally areas of grass with few trees or shrubs. These spaces are provided for the community and they are intended for recreational purposes, however the quality of many of these spaces is poor. This problem of poor quality environment extends to many open spaces in West Dunbartonshire.
- 6.1.5 Vacant and Derelict Land:** West Dunbartonshire has 121 sites on the vacant and derelict land register. These sites vary in size from 0.1 hectares to 27 hectares with the previous uses of the sites ranging from Oil Depot to Refuse Tip to Housing. A number of these sites may also be contaminated and many of them will be restricted in their development potential for a number of reasons including access.
- 6.1.6 Built Environment:** The built environment suffers from a number of problems, particularly relating to the design of some newer buildings. Design is a particular issue where there is no specific locally focused design guidance. Areas such as Dumbarton and Alexandria town centres and Clydebank and Dumbarton waterfronts (where design guides and action plans are in place) are likely to have a better quality designed environment than other areas. It is important that the built environment is improved in terms of appearance and quality as this will ultimately improve the experience for the public of being in the built environment.
- 6.1.7** There are a number of listed buildings in West Dunbartonshire that are suffering from neglect. Many are vacant and some have been classified as dangerous buildings. This is a serious environmental issue in the built environment.
- 6.1.8 Restricted Access:** Access to West Dunbartonshire's natural resources has previously been restricted due to problems with landowners and path networks, although path network improvements are ongoing. The introduction of the Land Reform Act and the Scottish Outdoor Access Code should help to resolve any remaining access issues relating to the Kilpatrick Hills, West Dunbartonshire's Regional Scenic Area.
- 6.1.9 Traffic:** Traffic congestion is a particular problem in parts of Clydebank and in Dumbarton town centre. Additional traffic problems are evident on the A82 trunk road;

this is the main tourist route to the North and it is often heavily congested, as there is no alternative route.

- 6.1.10 **Noise:** Aircraft noise is a localised problem in areas of Clydebank. The airport is to the south of Clydebank, across the River Clyde, and the aircraft fly low over Clydebank on their approach. This particular type of noise pollution is controlled however, it is still considered as an environmental problem for Clydebank.

7 Evolution of the Environment in the Absence of the WDLP

- 7.1 The West Dunbartonshire Local Plan will provide a framework for all development in West Dunbartonshire over a 5-year period. The plan promotes development in appropriate locations, with due consideration to factors that may be overlooked by market forces.
- 7.2 Without the WDLP, development will still proceed, but the decision-making process will be severely weakened through reliance on out of date and irrelevant information. Response to planning applications will be reactionary and ad hoc and the resulting development is likely to be uncoordinated and inappropriate. In the absence of the WDLP, international, national, regional and local targets may be disregarded. Such targets refer to a variety of topics/issues including air quality, waste management, vacant and derelict land, protection of habitats, and greenbelt management. The effect on the environment of uncoordinated and inappropriate development will be substantially adverse; potentially resulting in the loss of important aspects of the environment in the plan area including Greenfield land, open space, historic buildings and wildlife habitats.
- 7.3 The WDLP will update the two existing local plans (Clydebank Local Plan and Dumbarton District, District Wide Local Plan) taking into account more up to date information than was available during the preparation of these plans. Reliance on the existing local plans for West Dunbartonshire will be of detriment to the environment.

8 SEA Difficulties and Limitations

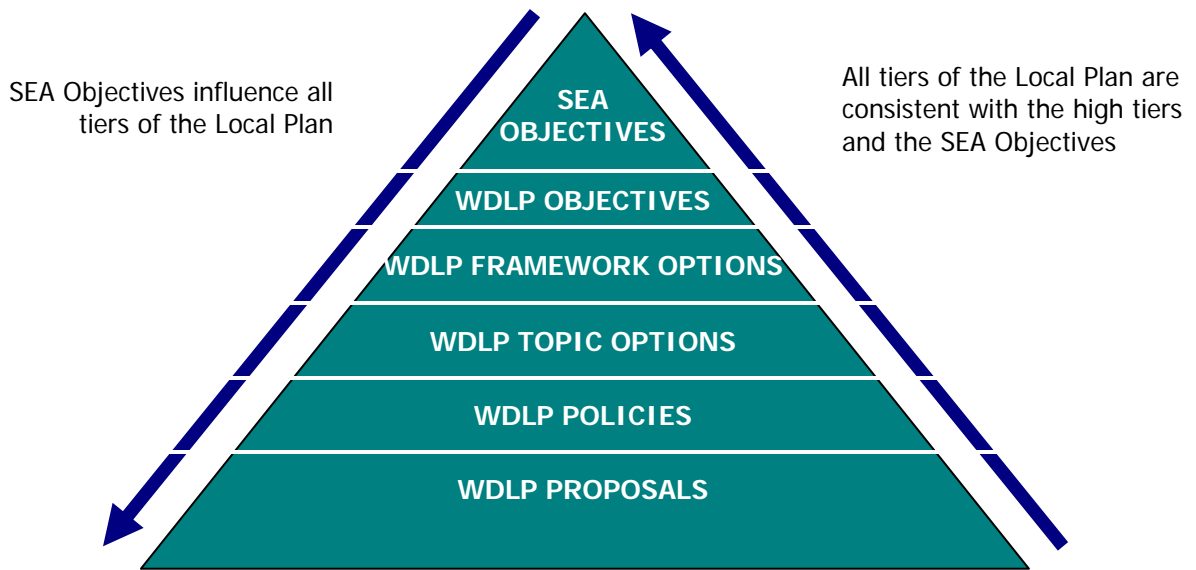
- 8.1 Establishing the environmental baseline is an important aspect of SEA, it sets the context for the plan and it provides data for use in monitoring the plan and how the environment has benefited over the plan period. This SEA has not benefited from the preparation/availability of a state of the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

- 8.2 One solution to the environmental baseline requirements of SEA is to have a detailed state of the environment report produced that is consistent with data held by neighbouring local authorities. This would assist in the identification of environmental problems that are cross-boundary issues and it would also provide the opportunity to undertake cumulative impact analysis over time.
- 8.3 One of the key difficulties encountered whilst undertaking the SEA work for the WDLP was the absence of best practice as a reference point at the beginning of the process. In the early stages of the SEA development it may have been beneficial to have access to a range of professionals to input to the development of environmental objectives and the initial assessment exercises. Latter stages of the SEA did benefit from additional input from a larger team and examples of best practice. However, the outcome of the early stages is no less valid, having been undertaken by planning professionals, than it would have been had there been a range of specialists involved. The SEA team for the WDLP considers that it has been preferable to have consistency and rigor applied to the assessment, and this may have been difficult to achieve with a large team of specialists involved.

9 SEA Objectives

- 9.1 SEA objectives establish environmental markers, which will be used as a benchmark for all aspects of the plan. These objectives are overarching in terms of their influence on the plan and they set the context for plan development.
- 9.2 The SEA objectives, targets and indicators are set out in Appendix 6. The environmental objectives that have been adopted for the WDLP are those identified in Appendix B of the Interim Planning Guidance and each of the 18 objectives has been retained. The criteria linked to the objectives in Appendix B of the Guidance have also been adopted, although they have been modified to form specific questions of relevance to the WDLP.
- 9.3 The SEA objectives ensure that the key environmental factors, identified in the Directive are priorities in the SEA and in the development of the WDLP. These factors are: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape, inter-relationship between these factors.
- 9.4 The SEA objectives have been used throughout the development of the WDLP to ensure that the plan aims and objectives, which provide the context for the development of plan policies and proposals, are consistent with the environmental objectives of the SEA. This approach is top-down, it ensures consistency at the highest tier of the plan, which in turn ensures consistency at all subsequent levels of the plan (see [Figure 2](#)).

Figure 2 – Hierarchy



Environmental Assessment

10 West Dunbartonshire Local Plan Objectives

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

10.2 The WDLP will replace and consolidate the two existing Local Plans – the Clydebank Local Plan (adopted September 2004) and the Dumbarton District, District Wide Local Plan (adopted March 1999). The aims and objectives of the WDLP correlate with those of the Glasgow and the Clyde Valley Joint Structure Plan and focus on the key areas i.e. environmental, social, commercial, economic and sustainability.

10.3 The WDLP objectives have been assessed against the SEA objectives to determine if the WDLP objectives are consistent, unknown or inconsistent with the SEA objectives. The original WDLP objectives were:

- To promote sustainable development and communities;
- To create a competitive place and economic well-being through the development of strategic locations;
- To maintain and enhance the environment.
- Develop key strategic locations;
- Secure economic and environmental regeneration;
- Ensure an adequate supply of land for development;
- Conserve environmental resources;
- Identify future areas of change;
- Promote environmental quality; and
- Ensure sustainable transport and infrastructure provision.

10.4 The initial assessment indicated that the consistency of a significant number of the WDLP objectives was unknown – meaning that their consistency depends on the implementation of the objective, through plan policy. Achieving consistency with the SEA objectives is the first critical stage in the local plan/SEA process and as such the SEA team did not consider this outcome to be favourable. A subsequent revision of the WDLP objectives was undertaken to actively ensure consistency with the SEA objectives. The process of amending the objectives has, where necessary, focused the intent and clarity of the objective. The changes to the plan objectives do not alter their intent, rather they have resulted in objectives that have a narrower field of interpretation, they are more focused on achieving environmental benefit and they now reflect more explicitly the way in which the local plan will actually be implemented.

10.5 The revised set of plan objectives are:

- To promote sustainable development and communities;
- To create economic well-being *and a sustainable* and competitive place through the development of strategic locations;
- To maintain and enhance *the natural and built* environment;
- *Identify sustainable locations* for key strategic developments;
- Enable *sustainable* economic and environmental regeneration;
- Ensure that sufficient land is available *in appropriate locations* to meet development requirements;
- Conserve environmental resources;
- Identify future areas of *land use* change;
- Promote *and support improvements in* environmental quality; and
- Ensure sustainable *and integrated* transport and infrastructure provision.

10.6 The amended objectives are not significantly different from the original set, with changes italicised in the above list. However, the changes that have been made are intended to make a significant contribution to the environment in the plan area. Appendix 7 presents the assessment of the initial and revised WDLP objectives. The assessment indicates that the majority of the WDLP objectives are now consistent with the SEA objectives with only a small number depending on implementation. This is an improved set of objectives, which ensures that the WDLP policies and proposals are consistent with the SEA objectives and the changes will result in a benefit for the environment in the plan area.

11 Alternatives/Options

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

11.2 The WDLP Scoping Report identified three options for the development plan framework, but on further consideration of these options it was determined that they do not represent realistic and/or reasonable options for the plan and that new options should be developed. The original options were:

1. Constraint – restricting the amount of development land that is made available;
2. Supply – Provision of sufficient land for development; and
3. Expansion – Provide more development land.

11.2.1 Constraint is a potential scenario for the framework but it is not an option that will be considered as a potential framework for the plan, the main reason for this is that it does not comply with the structure plan requirements.

11.2.2 Supply and Expansion are also both realistic and reasonable options for the plan. However, they do not represent the full spectrum of options available for the plan framework.

11.3 **Framework and Topic Options**

11.3.1 The development of new options has resulted in the identification of Framework and Topic options. This separation provides a distinction between the options for the broad local plan framework and the specific issue related options. The framework and topic options and associated assessment are provided below. The framework options provide the strategic choices for policy formulation and the topic options provide more subject specific choices for policy formulation.

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

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

11.3.4 The preferred framework option has been tested for consistency with the SEA objectives. Each of the topic options is consistent with the preferred framework option; therefore it is not necessary to test the topic options for consistency with the SEA objectives (see Figure 2). This approach is in proportion with the scale of Strategic Environmental Assessment and it also avoids repetition in the assessment, which would have no tangible benefit to the SEA.

Framework Options

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
A	Growth	Providing development additional to the structure plan requirements to accord with need identified through local development pressure. Support will be given to development proposals outwith the identified urban area and greenfield release and expansion sites will be identified.	Relative containment of development pressure.	Pressure on natural systems.	Expansionist policy puts pressure on the environment. Development outwith identified areas will be a permanent environmental change.		
B	Minimum Growth	Providing only for essential development, as identified in the structure plan or relevant SPP, and not taking local needs into consideration. Development will be promoted on brownfield sites and in other sustainable locations, with a focus on urban renewal and conservation of environmental resources.	Protection of environmental resources.	Short term environmental gain.	Protectionist policy will ensure environmental gain in the short term but it is likely to have negative impacts on the environment elsewhere.		
C	Business as Usual	Continuation of the existing plan (consisting of the Clydebank Local Plan and the Dumbarton District, District Wide Local Plan), not taking account of changing circumstances in the plan area and basing development decisions on past trends and policies.	Environmental monitoring.	Exacerbation of environmental problems.	Emerging environmental problems will be unmanaged and will worsen through neglect.		

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
D	Most Environmentally Beneficial	Providing for development in line with structure plan requirements and taking local development need into consideration. Development will be directed only to sustainable locations within the existing urban area and emphasis will be placed on conservation and enhancement of built and natural environmental resources.	Development of sustainable sites only.	Transfer of development pressure.	Other areas will experience increased development pressure, therefore, problems will be moved rather than addressed.		
E	Sustained Growth	Providing land for development to meet the requirements of the structure plan and local development needs. Development will be promoted on brownfield sites and in other sustainable locations, with a focus on urban renewal and conservation of environmental resources.	Promotion of sustainable development and regeneration.	Pressure on natural systems.	Pressure will be managed through sustainable development.	✓	✓
Commentary: Consistent with Structure Plan.							

Topic Options

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
	Topic - Housing						
A	Capped Growth	Housing sites identified in the housing land supply will be promoted for development. Additional sites (i.e. windfall sites) will not be developed for housing during the plan period.	Management of development.	Potentially restricting brownfield development.	Housing development pressure will be managed but potentially at the expense of brownfield redevelopment.		
B	Windfall Growth	All suitable brownfield sites that become available during the plan period will be promoted for housing development additional to the sites identified in the housing land supply, if not required for other uses.	Development pressure is contained.	Development attention may be diverted from urban renewal.	Interest in urban renewal may decline as a result of an open housing development policy.	✓	✓
<p>Commentary: Restrictions on brownfield redevelopment is in conflict with the objectives of the local plan. Allowing suitable windfall sites to be promoted for development during the plan period will strengthen the local plan. Urban renewal efforts are ongoing and are actively promoted and pursued by WDC.</p>							
	Economic Development						
A	Sustainable Economic Development	Identifying sites for traffic generating development in close proximity (15 minutes walk) to public transport facilities and identifying sites for freight generating activities near trunk roads, rail links and port locations and promoting these sites only for the specified type of development.	Reducing the need for travel.	Potential development of open space or greenbelt.	Promotion of development in locations that support sustainable transport may result in loss of open space.	✓	

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
B	Enterprise Directed Economic Development	Identifying sites in accordance with market led demand in potentially unsustainable locations mitigated by measures to improve public transport accessibility.	Improvement in public transport.	Potential loss of important nature conservation sites.	Market-led development may result in loss of environmental quality.		
C	Improving Marketable Industrial Land Supply	Continue to promote and enhance existing industrial sites whilst reducing the supply of non-marketable industrial sites.	Brownfield redevelopment.	Potential loss of important nature conservation sites.	Focusing on redevelopment of marketable brownfield sites may result in some loss of nature conservation value.		✓
<p>Commentary: Implementation of Option A would achieve integrated development and highlight the commitment of WDC to sustainable development. Any loss of open space/greenbelt as a result of this approach would be compensated by the steps towards sustainable and integrated development. WDC has decided to proceed with Option C because it is considered that providing a portfolio of high quality industrial development sites is currently more feasible than siting traffic generating development in locations that may not be designated for industrial use and that may be contributing to the greenbelt or open space provision.</p>							
<p>Green Belt</p>							
A	Greenbelt Protection	Protecting and enhancing the greenbelt as an area where development, not specified as an appropriate use for Greenbelt land, is strictly prohibited.	Greenbelt protection.	Transfer of development pressure	Protecting the greenbelt but potentially creating development pressure elsewhere.	✓	✓
B	Greenbelt Development	Supporting any high quality development on specified greenbelt sites.	Development pressure is contained.	Greenbelt erosion.	Releasing and developing greenfield land to ease development pressure		
<p>Commentary: The key objectives of green belt policy are to direct planned growth to the most appropriate locations and support regeneration; to protect and enhance the character, landscape setting and identity of urban areas; and to protect and give access to open space within and around towns and cities. It is therefore important that the green belt remains robust and defensible in the long term in order to support sustainable development and regeneration priorities.</p>							

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
	Nature Conservation						
A	Protect Nature Conservation Sites	Identifying all nature conservation sites as areas where development is restricted.	Protection of nature conservation assets.	Restricting development on potential key sites.	Prioritising nature conservation may restrict development of suitable locations.	✓	✓
B	Sensitive Development	Promoting sensitive development in areas that have been identified for their nature conservation value.	Promotion of environmentally sensitive development.	Loss of nature conservation value or greenbelt.	Releasing land with nature conservation value for sensitive development will result in loss of conservation value.		
C	Nature Conservation Strategy	Develop a Nature Conservation Strategy that will provide detailed information about the nature conservation of designated sites.	Protection of nature conservation assets.	May lead to development of sites with relatively poor nature conservation value.	Protecting high quality conservation assets may result in development of sites with low conservation value.		✓
<p>Commentary: Nature conservation sites, whether Local, National, European, International are identified because they have particular values, some of which may be unique. Restricting development on nature conservation sites is the only way to ensure that the reasons for their designation remain protected.</p> <p>It is important that the reasons for site designation and details of the nature conservation value are identified and acknowledged. A Nature Conservation Strategy will provide this information and will prove to be of particular importance when considering how a particular development may affect a designated site.</p>							
	Built Environment						
A	Design Quality	Requiring that development applications be supported by a design statement; this requirement will be based on the criteria outlined in PAN 68.	Securing high quality design in development.	Cumulative impact of small developments is unchecked.	Adopting a threshold approach to design may result in poor design of small developments with significant visual impact.	✓	✓

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
B	Enhancement	Promoting the enhancement of conservation areas and the redevelopment of listed buildings.	Restoration and reuse of the built heritage.	Aspects of the built heritage will continue to deteriorate.	Focusing on enhancement of key heritage assets may result in degradation of the less important built environment.		✓
<p>Commentary: Design is an important environmental consideration and one that must get priority. West Dunbartonshire, similar to other areas, has inherited a legacy of poor quality design and this is something that the Council is committed to and will change through the application of criteria and standards to planning applications.</p> <p>Built heritage assets are very important to the visual appearance and history of West Dunbartonshire. The Council is committed to enhancing these assets and by adopting this approach progress is made.</p>							
Contamination							
	Decontaminate	Allocating existing resources (provided by the Scottish Executive) to particular sites for decontamination work whilst continuing to lobby for increased national resources for site decontamination.	Increasing the availability of brownfield land for development.	Potential loss of conservation value.	Providing more feasible brownfield development land may result in loss of conservation value.	✓	✓
	Regenerate	Preparation of master plans for contaminated sites to stimulate regeneration.	Comprehensive regeneration.	Potential loss of conservation value.	A Masterplan will kickstart the regeneration process but site development may result in loss of conservation value.		✓
<p>Commentary: Decontaminating sites is a very important environmental improvement that the local plan can achieve that will also carve the way for regeneration of contaminated sites.</p> <p>Decontamination of sites alone will not achieve site regeneration. Preparation of masterplans for decontaminated sites will kick start regeneration and identify these sites as feasible redevelopment opportunities.</p>							

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
	Commercial Development						
A	Continuation of Existing Policy	Emphasising the primacy of town centres for the siting of new retail development.	Reducing the need for travel.	Potential damage to the natural and built environment.	Improving town centres will encourage use of public transport but may damage the built environment.	✓	✓
B	Town centre uses	Supporting the development of non-retail uses on the upper floors in town centres whilst retaining the ground floor solely for retail use.	Preventing neglect and deterioration of the built environment.	Loss of town centre vitality and viability and neglect of built environment.	Restricting the development of town centres may result in fewer services being provided in this key location.		
Commentary: Focusing retail development in town centres ensures that the majority of services are located in the same geographic area. This will reduce the need for residents to travel and will help to create a critical mass in town centres that will ultimately contribute to urban renewal.							
	Transportation						
A	Sustainable Transport	Maximising use of public and sustainable modes of transport by introducing traffic demand management in town centres and at office locations.	Potential reduction in air and noise pollution.	Potential conflict with town centre renewal.	Managing traffic will result in a reduction in air pollution but may restrict urban renewal efforts.	✓	
B	Sustainable Growth	Improving and increasing use of public and sustainable modes of transport whilst not restricting traffic growth.	Improving public transport use and services.	Increase in noise and air pollution.	Public transport services will improve but traffic will continue to increase with associated environmental problems.		✓
C	Continuation of Existing Policy	Sustaining the current level of improvements to public and sustainable modes of transport.	Improvement of public transport.	Traffic growth puts pressure on the environment.	Public transport services will improve but traffic will continue to increase with associated environmental problems.		

	Options	Description	Key Benefit	Key Detriment	Environmental Assessment	Preferred Approach	Local Plan Approach
<p>Commentary: WDC has decided to adopt this approach because it is the most realistic in light of the current circumstances in the council area. Restricting traffic in town centres and office locations may reduce the attractiveness of West Dunbartonshire for business development. However, by focusing on public transport and improving the existing facilities and services, in the longer term it will be more feasible to implement traffic restrictions.</p>							
<p>Open Space, Access and Recreation</p>							
A	Open Space Protection	Ensure high quality open space through the application of specific standards and targets and protect all open space areas from development.	Improving the quality of open space.	Restricting development on potential key sites.	Open space is of high quality but it may restrict development on otherwise suitable sites.		
B	Open Space Development	Allocating resources for and concentrating improvements on the most functionally appropriate and sustainable sites.	Securing some high quality open space.	Deterioration of many areas of open space.	Open space is of mixed quality with much of the environment degrading rather than being improved.		
C	Continuation	Maintaining and enhancing current open space provision whilst releasing, for development, sites considered surplus.	Development pressure is contained.	Loss of open space.	Development pressure will be alleviated and open space provision reduced and enhanced.		
D	High Quality Open Spaces	Maintain and enhance open space provision whilst applying standards and targets to protect quality open space based on an assessment of use, quality, function and value.	Improving the quality of open space.	Loss of open space.	Assessment of open space (develop an Open Space Strategy) to ensure a high standard of provision.	✓	✓
<p>Commentary: Through the development of an Open Space Strategy WDC can identify and protect open space and ensure that all areas of open space are assessed for their quality and maintained at the same level.</p>							

12 Policies

12.1 Many WDLP policies are based on the existing policies in the Clydebank Local Plan and the Dumbarton District, District Wide Local Plan where the existing policies remain relevant to current circumstances. Neither of the existing local plans has been assessed using SEA, therefore, all the WDLP policies have been assessed for this SEA.

12.2 The policy assessment has been undertaken on the assumption that all policies, having been prepared to conform to the plan objectives, are consistent with the SEA objectives. The assessment identifies the likely impact that the policy will have on the environmental parameters established in the Directive, set out in Paragraph 9.3 of this Environmental Report.

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

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

12.5 The assumptions made in the policy assessment are:

- The assessment considers only significant impacts.
- The definition of the environmental parameters is that which is established in the Interim Planning Guidance.
- Where the impact of a policy is dependent on implementation this is identified as an unknown impact e.g. Policy GB1 - Greenbelt may protect a large area of forest, which will have a positive impact on air quality, but this is an unknown factor in the assessment and therefore the assessment cannot determine whether or not the impact will be positive, negative or neutral.
- Where a policy states 'no significant undesirable environmental impact' (or similar) it is assumed that this applies to all environmental parameters and that the environmental impact (without additional information) will be neutral.
- Only where a site has a significant negative environmental impact will mitigation measures will be identified.
- Where a proposal includes the criteria 'will not conflict with other Local Plan policies' (or similar) it is assumed that the inter-relationship between the environmental factors will be positive.

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
44	Policy E3A – Local Nature Conservation Sites	+	o	+	+	+	+	+	o	o	o	o	+	+
45	Policy E3B – Local Nature Reserves	+	+	+	+	+	o	o	o	o	o	o	+	o
46	Policy E4 – Tree Preservation Orders	+	o	+	+	+	o	o	o	o	o	+	+	o
47	Policy E5 – Development Affecting Trees	+	+	+	+	+	o	o	o	o	o	+	+	o
48	Policy E6 – Woodland Strategy	+	+	+	+	+	o	o	?	?	?	o	+	o

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors	
49	Policy E7 – Woodland and Parkland Retention	+	+	+	+	+	o	?	?	?	o	?	+	+	
50	Policy E8 – Environmental Improvement Opportunities	+	See Proposal Assessments (E8 (1-5)) Appendix 9									+	o	+	+
51	Policy E9 – Landscape Character	+	+	+	+	+	o	o	o	o	o	+	+	+	
52	Policy BE1 – Conservation Areas and Article 4 Directions	o	+	+	o	o	o	o	o	o	+	+	+	o	
53	Policy BE2 - Listed Buildings	o	+	+	o	o	o	o	o	o	+	+	+	o	

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
54	Policy BE3 – Derelict/Vacant Buildings	o	+	+	o	o	o	o	o	o	+	+	o	o
55	Policy BE4 – Listed Building Opportunities See also Proposal Assessment	o	+	+	o	o	o	o	o	o	+	+	+	+
56	Policy BE5 – Scheduled Ancient Monuments and Other Archaeological Sites	+	+	+	o	o	o	o	o	o	+	+	+	o
57	Policy BE6A – Antonine Wall	+	o	o	o	o	o	o	o	o	+	+	+	o
58	Policy BE6B – Antonine Wall Buffer Zones	+	+	+	o	o	o	o	o	o	+	+	+	+

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
59	Policy BE6C – Antonine Wall SPG	?	?	?	?	?	?	?	?	?	?	?	?	?
60	Policy BE7 – Gardens and Designed Landscapes	+	+	+	+	+	o	o	o	o	+	+	+	o
	Open Space, Access and Recreation													
61	Policy R1 – Retention of Open Space	+	+	+	+	+	?	?	?	?	+	o	+	o
62	Policy R2 – Open Space Provision	+	+	+	+	+	?	?	?	?	+	o	+	o
63	Policy R3 – Enhancement of Open Space and Sports Facilities	o	+	+	o	o	o	o	o	o	+	o	+	o

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
64	Policy R4(A) – Forth and Clyde Canal	+	+	+	+	+	o	+	o	o	+	+	+	+
65	Policy R4(B) – Forth and Clyde Canal	+	+	+	+	+	o	+	o	o	+	+	+	+
66	Policy R4(C) – Forth and Clyde Canal	o	+	+	o	o	o	?	o	o	+	+	o	o
67	Policy R4(D) – Forth and Clyde Canal	+	+	+	+	+	o	+	o	o	+	+	+	+
68	Policy R4(E) – Forth and Clyde Canal	+	+	+	+	+	o	+	o	o	+	+	+	+
69	Policy R4(F) – Forth and Clyde Canal	o	+	+	o	o	o	+	o	o	+	+	+	+
70	Policy R4(G) – Forth and Clyde Canal	o	+	+	o	o	o	o	o	o	o	+	+	o

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
71	Policy R4(H) – Forth and Clyde Canal	0	0	0	0	0	0	0	0	0	0	0	0	0
72	Policy R4(I) – Forth and Clyde Canal	0	0	0	0	0	0	0	0	0	0	0	0	0
73	Policy R4(J) – Forth and Clyde Canal	0	+	+	0	0	0	0	0	0	0	0	0	0
74	Policy R5 – Access Opportunities	+	+	+	0	0	0	0	0	0	+	+	+	+
75	Policy R6 – Golf Courses	+	+	+	+	+	?	?	0	0	+	0	+	+
76	Policy R7 – Dumbarton Football Stadium Site	0	+	+	0	0	0	+	0	0	+	?	0	0

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
	Public Services													
77	Policy PS1 – Public Service Provision	+	+	+	+	+	?	?	?	0	+	?	+	+
78	Policy PS2 – Community Learning Campuses	See Proposal Assessment (Reference PS2 (1-10)) Appendix 9												
79	Policy PS3 – Public Service Opportunities	?	+	+	?	?	?	?	?	?	?	?	?	+
80	Policy PS4 – Waste Management	?	+	+	?	?	?	?	?	?	?	?	?	+
	Development Control													
81	Policy DC1 – Advertisements	0	+	+	0	0	0	0	0	0	+	+	+	0

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
82	Policy DC2 – Shop Front Design and Security	o	+	+	o	o	o	o	o	o	+	+	+	+
83	Policy DC3 – Aircraft Noise and Safeguarding Zone	o	+	+	o	o	o	o	o	o	o	o	o	+
84	Policy DC4 – Telecommunications	+	+	+	+	+	?	?	?	?	+	o	+	+
85	Policy DC5 – Notification Zones	?	+	+	?	?	?	?	?	?	?	?	?	?
86	Policy DC6 – Renewable Energy	+	+	+	+	+	?	?	+	+	+	o	+	+

	WDLP Chapter WDLP Policy	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships between these factors
87	Policy DC7 – Micro-renewable Energy in New Development	+	+	+	+	+	?	?	+	+	+	o	+	+
88	Policy DC8 – Minerals	+	+	+	+	+	+	o	o	o	o	o	+	o
	Flooding and Sustainable Urban Drainage													
89	Policy F1 – Flood Prevention	+	+	+	+	+	o	+	o	o	+	o	+	+
90	Policy F2 – Waste Water, Sustainable Urban Drainage Impact Assessment and Culverts	+	+	+	o	o	+	+	o	o	o	o	+	+

13 Proposals

13.1 As part of the SEA process, development proposals were assessed for their positive and negative environmental impacts; this assessment does not assess consistency with the SEA objectives. The WDLP has **129** proposal sites. Six further sites included in the Consultative Draft have also been assessed. Assessing the environmental implications of this number of sites has been a significant task. Therefore, a filtering process was developed to determine which sites required a more detailed assessment through the SEA process. The filtering also served to omit from further assessment proposals that are unlikely to have a significant environmental effect.

13.2 The following assessment methodology has been applied.

13.3 Proposal Assessment

Purpose: To identify the local plan proposals which require detailed consideration through the SEA process and to omit from further assessment proposals that are unlikely to have a significant environmental effect.

13.4 Proposal Assessment Methodology

1. **Tag** all proposals as site-specific or non site-specific.
 - a. Identify all site-specific proposals on GIS and overlay all available environmental data identified in the Scoping Report
 - b. All non site-specific proposals must be considered further and the determination of likely significant environmental effect will be based on professional judgement rather than GIS analysis.
2. **Categorise** all proposals, using professional judgement and the information available on GIS, into the following categories:
 - A** – likely to have a significant environmental effect
 - B** – may have a significant environmental effect
 - C** – unlikely to have a significant environmental effect [this category will include sites where the environmental effect is likely to be positive]
3. **Document** the reasons for allocating proposals into category C – the proposals in this category will not be considered further in the SEA.
4. **Filter** the proposals in Categories A and B.
 - a. Proposals in category A cannot be filtered further; professional judgement and environmental information has been used to determine that they are likely to have a significant environmental effect and as such all of these

proposals should be assessed further to produce a more robust determination.

- b. Proposals in category B can be filtered further, but only with reference to additional information including specialist knowledge, local context provided by the Planning team, the Consultation Authorities and, where appropriate, non-statutory consultees.
5. **Redefine** proposals in Category B.
 - a. Based on the additional information for sites in Category B reallocate the proposals to category A, B or C.
 6. **Assess**
 - a. All proposals allocated to category A will be assessed further.
 - b. Proposals in category B will be assessed for precautionary principle reasons.
 - c. Proposals in category C will be omitted from further consideration in the SEA but reasons for omission will be documented.

13.5 The assessment is based on GIS analysis of all proposal sites, with sites being categorised based on proximity to the following environmental assets:

- Ancient Monuments
- Ancient Woodlands
- Archaeological Trigger Maps
- Historic Gardens
- Listed Buildings (with a 2m buffer)
- Natural Nature Reserves
- National Parks
- Raised Bogs (with 20m buffer)
- RAMSAR Sites
- Regional Scenic Areas
- Rights of Way (1m buffer)
- RSPB Reserves
- Sites of Importance to Nature Conservation
- Special Areas of Conservation
- Special Protection Areas
- Sites of Special Scientific Interest
- Tree Preservation Orders (9m buffer – British Standard)

13.6 The WDLP proposal sites represent development opportunities for a variety of land uses including, housing, industry, retail and office and business. A summary of the assessment results is presented in Table 2 with full details provided at page 53.

Table 2 – Proposal Assessment (Summary)

Site Type	Initial site categorisation	Redefined site categorisation	Final site categorisation*
A	17	55	70
B	44	0	0
C	74	80	63
<i>Total</i>	<i>135</i>	<i>135</i>	<i>133</i>

* adjusted to reflect sites added/deleted following consultation on Consultative and Finalised Drafts.

Detailed Assessment

13.7 Category A Sites

13.7.1 One of the outputs of the GIS filtering process was a set of results, which gave a percentage of the site impinging on the environmental assets. Where this percentage was 100% the sites were categorised as category A. Consultation on the draft Environmental Report has resulted in a number of sites being reclassified as Category A. The detail of the proposals is not known, so the precautionary principle was implemented assuming that for each site the proposal is to develop the entire site thus having a detrimental effect on the environmental assets.

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

13.8 Category B Sites

13.8.1 These sites were identified as those with >0% and <100% constraint and 44 of the original 135 proposal sites were placed in this category. The percentage of category B sites impacting on environmental assets ranges from 0.045% to 32.782%. At the lower end of this scale the impact may be as a result of a digitising error, however, it is recognised that certain datasets are points or linear only i.e. the sensitivity criteria or assets are very small and would not produce a large percentage impact/constraint, examples of these include rights of way and listed buildings. It is therefore possible that category B sites impinging on these environmental assets may have a significant impact.

13.8.2 These sites have been further assessed to determine whether or not there is a significant constraint. Following further assessment only 6 of these sites were unconstrained, meaning that 38 sites were added to Category A.

13.9 **Category C Sites**

- 13.9.1 The 63 sites in this category do not conflict with any of the environmental assets in any way. These sites have therefore been scoped out from detailed assessment. However, when the nature and scale of proposals are determined they may necessitate further environmental assessment at planning application stage

Proposal Assessment

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
1	C	GD 2 (1)	Clydebank, Park Road	No constraints	N/A
2	C	GD 2 (2) H2 (7)	Clydebank, Clydebank College	No constraints	N/A
3	C	GD 2 (3)	Clydebank, 193-197 Dumbarton Rd.	No constraints	N/A
4	A	GD 2 (4)	Clydebank, Braidfield School	Archaeology – site is contained within a WoSAS consultation area. Tree Preservation – trees adjacent to eastern boundary covered by TPO.	Archaeology – Archaeological Survey. Tree Preservation – Tree survey and protection measures/site planning.
5	C	GD 2 (5)	Clydebank, St. Andrews High School	No constraints	N/A
6	A	GD 2 (6)	Clydebank, St. Eunan's Primary School	Archaeology – site is contained within a WoSAS consultation area.	Archaeology – Archaeological Survey.
7	A	GD 2 (7)	Old Kilpatrick, Erskine Ferry Road	Archaeology – site extends into a WoSAS and HS consultation area. Heritage Conservation – site is adjacent to Forth & Clyde Canal: old Kilpatrick – Linnvale SAM. Nature Conservation – Disused railway line identified as a SINC.	Archaeology and Heritage Conservation – Archaeological Survey. Nature Conservation – Habitat and Species survey/Environmental Statement.
8	A	GD 2 (8)	Old Kilpatrick, Gavinburn Bus Depot	Archaeology – site extends into a WoSAS and HS consultation area. Heritage Conservation – site extends into the Antonine Wall Proposed WHS and Gavinburn Bus Depot, Old Kilpatrick SAM.	Archaeology and Heritage Conservation – Archaeological Survey. Nature Conservation – Habitat and Species survey, Environmental Statement.

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
9	A	GD 2 (9) H2 (23) LE1 (16)	Old Kilpatrick, Carless Oil Depot	Archaeology – site extends into a WoSAS and HS consultation area. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick – Linnvale SAM. Nature Conservation – site extends into Inner Clyde SSSI, Ramsar and SPA. Disused railway identified as SINC.	Archaeology and Heritage Conservation – Archaeological Survey. Nature Conservation – Habitat and Species survey, Environmental Statement.
10	A	GD 2 (10)	Bowling, Bowling Basin	Archaeology – site extends into two WoSAS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Bowling – Old Kilpatrick SAM. Six listed buildings/structures. Nature Conservation – site adjacent to the Inner Clyde SPA, RAMSAR and SSSI.	Archaeology and Heritage Conservation – Archaeological Survey, Build Heritage – Listed Building Survey. Nature Conservation – Habitat and Species survey, Environmental Statement.
11	A	GD 2 (11)	Bowling, Scotts Yard	Archaeology – site extends into a WoSAS consultation area. Nature Conservation – site adjacent to the Inner Clyde SPA, RAMSAR and SSSI.	Archaeology – Archaeological Survey. Nature Conservation – Habitat and Species survey, Environmental Statement.
12	A	GD 2 (12)	Dumbarton, Dennyston Forge	Access – claimed right of way. Nature Conservation – site adjacent to River Leven and Leven swamp and pond SINC.	Access – Layout Plan. Nature Conservation – Habitat and Species survey, Environmental Statement.
13	A	GD 2 (13)	Dumbarton, Dumbuck Warehouses	Nature Conservation – site adjacent to Inner Clyde SPA, RAMSAR and SSSI	Nature Conservation – Habitat and Species survey, Environmental Statement.
14	A	GD 2 (14)	Dumbarton, Castle Street	Archaeology – site is contained within a WoSAS consultation area. Nature Conservation – site adjacent to the River Leven SINC. Tree Preservation – site lies within the buffer zone for a TPO	Archaeology – Archaeological Survey. Nature Conservation – Habitat and Species survey, Environmental Statement. Tree Preservation – Tree survey and protection measures.

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
15	A	GD 2 (15)	Dumbarton, Aitkenbar Primary School	Nature Conservation – site adjacent to Bellsmyre Grasslands SINC	Nature Conservation – Habitat and Species survey, Environmental Statement.
16	C	GD 2 (16)	Dumbarton, Braehead Primary School	No constraints	N/A
17	A	GD 2 (17)	Dumbarton, Dalreoch Primary School	Built Heritage – school is a category B Listed Building	Built Heritage – Listed Building survey.
18	A	GD 2 (18)	Alexandria, Bank Street	Built Heritage – this site is in the vicinity of a number of Listed Buildings	Built Heritage – Listed Building survey.
19	C	GD 2 (19)	Alexandria, North Street	No constraints	N/A
20	A	GD 2 (20)	Livingston Street, Clydebank	Archaeology – site extends into a WoSAS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick - Linnavle SAM.	Archaeology and Heritage Conservation – Archaeological Survey.
21	C	LE 1 (1)	Clydebank Industrial Estate	No constraints	N/A
22	A	LE 1 (2)	Riverside Industrial Estate	Nature Conservation – site extends into Inner Clyde SPA, RAMSAR and SSSI	Nature Conservation – Habitat and Species survey, Environmental Statement.
23	A	LE 1 (3)	Clydebank Business Park	Archaeology – site extends into a WoSAS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick - Linnavle SAM.	Archaeology and Heritage Conservation – Archaeological Survey.
24	C	LE 1 (4)	Vale of Leven Industrial Estate	No constraints	N/A
25	A	LE 1 (5)	Vale of Leven Industrial Estate	Built Heritage – site in close proximity to Category A Listed Strathleven House and Dovecot and Category B Listed Coach house and stable yard.	Built Heritage – Listed Building survey

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
26	A	LE 1 (6)	Vale of Leven Industrial Estate	Built Heritage – category B Listed Building (Strathleven Coach house and stable yard) is wholly contained within the site. Close proximity to Category A Listed Strathleven House and Dovecot.	Built Heritage – Listed Building survey
27	A	LE 1 (7)	Cart Street (Queen's Quay), Clydebank	Nature Conservation – site extends into Inner Clyde SPA, RAMSAR and SSSI	Nature Conservation – Habitat and Species survey, Environmental Statement.
28	A	LE 1 (8)	Rothsay Dock	Archaeology – part of site within a WoSAS consultation area.	Archaeology – Archaeological Survey.
29	C	LE 1 (9)	John Knox Street	No constraints	N/A
30	C	LE 1 (10)	Main Street, Jamestown	No constraints	N/A
31	C	LE 1 (11)	Bowie Road, Lomond Industrial Estate	No constraints	N/A
32	C	LE 1 (12)	Vale of Leven Industrial Estate	No constraints	N/A
33	A	LE 1 (13)	Vale of Leven Industrial Estate	Nature Conservation – site extends into the Nursery Woodlands and Ballantine Grasslands SINC.	Nature Conservation – Habitat and Species survey, Environmental Statement.
34	A	LE 1 (14)	North Kilmalid	Nature Conservation – site is adjacent to the Nursery Woodlands and Ballantine Grasslands SINC and Murroch Burn Wildlife corridor.	Nature Conservation – Habitat and Species survey, Environmental Statement.
35	C	LE 1 (15)	Adj. Hucheson's, Bankend Road	No constraints	N/A
36	C	LE 1 (17)	Wilson Street, Alexandria	No constraints	N/A
37	A	LE 1 (18)	Lomond Industrial Estate, Alexandria	Nature Conservation – site is adjacent to the Fishers Wood and River Leven SINC.	Nature Conservation – Habitat and Species survey, Environmental Statement.
38	C	LE 1 (19)	Birch Road, Broadmeadows Industrial Estate	No constraints	N/A

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
39	A	LE 4	Former ESSO Terminal, Bowling	Archaeology – site extends into two WoSAS consultation areas. Built Heritage – two category B Listed Buildings are wholly contained within the site. Nature Conservation – site extends into Inner Clyde Ramsar, SPA, SSSI.	Archaeology – archaeological survey. Built Heritage – Listed Building survey. Nature Conservation – Habitat and Species survey/Environmental Statement
40	A	LE 5A	Kilmalid	Nature Conservation – site is adjacent to the Murroch Burn Wildlife corridor.	Nature Conservation – Habitat and Species survey, Environmental Statement.
41	C	H1 (1) PS3 (9)	Alexandria, Kippen Dairy	No constraints	N/A
42	C	H1 (2)	Alexandria, Wilson Street	No constraints	N/A
43	C	H1 (3)	Alexandria, Heather Avenue	No constraints	N/A
44	C	H1 (4)	Bonhill, 311 Main Street	No constraints	N/A
45	A	H1 (5)	Bonhill, Bonhill Quarry	Nature Conservation – site extends into the Pappert Wood and Bonhill Quarry SINC	Nature Conservation – Habitat and Species survey/Environmental Statement
46	C	H1 (6)	Bonhill, Croft Street	No constraints	N/A
47	C	H1 (7)	Dumbarton, Pinetrees	No constraints	N/A
48	C	H1 (8)	Dumbarton, Castlehill	No constraints	N/A
49	A	H1 (9)	Dumbarton, Notre Dame Convent	Built Heritage – category C(S) Listed Building is wholly contained within the site. Nature Conservation – site is adjacent to the Brucehill Cliffs SINC. Tree Preservation – Avenue of trees into site covered by TPO	Built Heritage – Listed Building survey. Nature Conservation – Habitat and Species survey/Environmental Statement. Tree Preservation - tree survey and protection measures.

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
50	A	H1 (10) H3 (9)	Dumbarton, Allied Distillers Site	Nature Conservation – site lies within the River Leven SINC. Archaeology – site falls within a WoSAS consultation area	Nature Conservation – Habitat and Species survey/Environmental Statement. Archaeology – archaeological survey.
51	C	H1 (11)	Dumbarton, Gooseholm	No constraints	N/A
52	A	H1 (12)	Dumbarton, Crosslet House	Nature Conservation – site extends into Overtoun Estate, overtoun Burn and Barwood Hill SINC. Woodland – site extends into an area of ancient woodland.	Nature Conservation - Habitat and Species survey/Environmental Statement. Woodland – Tree survey and protection measures.
53	A	H1 (13) BE4 (1)	Dumbarton, Levenford House/ Helenslee Nursery	Built Heritage – Within Kirktonhill Conservation Area, Category A Listed Building, B Listed garden walls, gateway and stables. On Interim List of Non-Inventory Gardens and Designed Landscapes. Tree Preservation – site is bounded to east by TPO.	Built Heritage – Listed Building surveys, character appraisal. Tree Preservation – tree survey and protection measures.
54	A	H1 (14)	Dumbarton, Shed 7, Castle Road	Archaeology – site extends into HS and WoSAS consultation areas. Heritage Conservation – site is adjacent to Dumbarton Castle (SAM)	Archaeology and Heritage Conservation – Archaeological Survey.
55	C	H1 (15) H3 (8)	Dumbarton, Dumbarton Joint Hospital	No constraints	N/A
56	C	H1 (16)	Dumbarton, Mary Fisher Cres/Diamond Power/Castlegreen Street	No constraints	N/A
57	C	H1 (17)	Jamestown, Levenbank Terrace	No constraints	N/A
58	A	H1 (18)	Renton, Leven Street	Archaeology – site is contained within a WoSAS consultation area.	Archaeology – Archaeological Survey.

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
59	A	H1 (19) H3 (17)	Renton, Dalquhurn	Archaeology – site extends into a WoSAS consultation area. Tree Preservation – TPO wholly contained within site. Nature Conservation – site extends into Tontine Grassland SINCS and is adjacent to the River Leven.	Archaeology – Archaeological Survey. Tree Preservation – Tree survey and protection measures. Nature Conservation – Habitat and Species survey/Environmental Statement.
60	C	H1 (20) H3 (18)	Renton, Former Roads Depot	No constraints	N/A
61	C	H1 (21)	Renton, 245-251 Main Street	No constraints	N/A
62	A	H2 (1)	Bowling, Littlemill Distillery	Built Heritage – Category B Listed Building wholly contained within site	Built Heritage – Listed Building survey.
63	A	H2 (2) H4 (3) RET3 (3)	Clydebank, Queens Quay	Built Heritage – Category A Listed Structure (Titan crane) on site, close to Municipal Buildings, Dumbarton Road and Hall Street former fire station tenement (both Category B Listed) Nature Conservation – site extends into Inner Clyde SSSI, SPA and Ramsar.	Nature Conservation – Habitat and Species survey/Environmental Statement.
64	A	H2 (3)	Clydebank, Queens Quay LCHO	Built Heritage – Category A Listed Structure (Titan crane) on site. close to Municipal Buildings, Dumbarton Road and Hall Street former fire station tenement (both Category B Listed) Nature Conservation – site extends into Inner Clyde SSSI, SPA and Ramsar.	Built Heritage – Listed Building surveys. Nature Conservation – Habitat and Species survey/Environmental Statement.
65	C	H2 (4)	Clydebank, Former Union Church	No constraints	N/A
66	A	H2 (5)	Clydebank, Dunclutha	Tree Preservation – Entire site covered by TPO.	Tree Preservation – Tree survey and protection measures

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
67	A	H2 (6)	Clydebank, Thor Ceramics	Archaeology – site is within WoSAS and HS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick – Linnvale SAM	Archaeology and Heritage Conservation – Archaeological Survey.
68	C	H2 (8)	Clydebank, Granville Street	No constraints	N/A
69	A	H2 (9)	Clydebank, Cable Depot Road South	Nature Conservation – site extends into Inner Clyde SSSI, SPA and Ramsar.	Nature Conservation – Habitat and Species survey/Environmental Statement.
70	C	H2 (10)	Clydebank, Cable Depot Road North	No constraints	N/A
71	C	H2 (11)	Clydebank, Cochno Street	No constraints	N/A
72	C	H2 (13)	Clydebank, Kilbowie Retail Park	No constraints	N/A
73	A	H2 (14)	Clydebank, Milton Mains Road	Tree Preservation – Three protected trees at north of site	Tree Preservation – Tree survey and protection measures
74	A	H2 (15)	Dalmuir, Whiteinch Demolition	Nature Conservation – Disused railway line within site identified as SINC	Nature Conservation – Habitat and Species survey/Environmental Statement.
75	A	H2 (16)	Dalmuir, Auld Street	Nature Conservation – Site adjoins SINC.	Nature Conservation – Habitat and Species survey/Environmental Statement.
76	A	H2 (17)	Dalmuir, Former Transfer Station	Nature Conservation – Site adjoins SINC.	Nature Conservation – Habitat and Species survey/Environmental Statement.

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
77	A	H2 (18) H4 (5)	Dalmuir, Beardmore Place	Archaeology – site is within WoSAS and HS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick – Linnvale SAM. Nature Conservation - Site adjoins SINC/wildlife corridor (disused railway line, Forth & Clyde Canal)	Archaeology and Heritage Conservation – Archaeological Survey. Nature Conservation – Habitat and Species survey, Environmental Statement.
78	A	H2 (19)	Duntocher, William Street	Archaeology – Site in the proximity of the Antonine Wall Heritage site and Buffer Zone.	Archaeology – Archaeological Survey & Landscape Assessment
79	A	H2 (20)	Duntocher, Carleith	Archaeology – Site in the proximity of the Antonine Wall Heritage site and Buffer Zone.	Archaeology – Archaeological Survey & Landscape Assessment
80	A	H2 (21)	Milton, Milton Brae	Tree Preservation – Part of site covered by TPO. Woodland – site extends into an area of ancient woodland.	Tree Preservation and Woodland – Tree survey and protection measures.
81	A	H2 (22)	Old Kilpatrick, Lusset Glen	Archaeology – Site adjoins WoSAS and HS consultation areas.	Archaeology – Archaeological Survey
82	C	H2 (x)	Yards North of Cable Depot Road, Clydebank	No constraints	N/A
83	C	H3 (1)	Alexandria, Leven Street	No constraints	N/A
84	C	H3 (2)	Alexandria, Leven Cottage	No constraints	N/A
85	C	H3 (3)	Bonhill, Croft Street	No constraints	N/A
86	C	H3 (4)	Bonhill, Raglan Street	No constraints	N/A
87	C	H3 (5)	Bonhill, Bonhill Primary School	No constraints	N/A

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
88	C	H3 (6)	Dumbarton, Stoneyflat Road	No constraints	N/A
89	C	H3 (7)	Dumbarton, Townend Road	No constraints	N/A
90	C	H3 (10)	Dumbarton, Valeview Terrace	No constraints	N/A
91	C	H3 (11)	Haldane, Shearer Quadrant	No constraints	N/A
92	C	H3 (12)	Haldane, Miller Road	No constraints	N/A
93	C	H3 (13)	Haldane, Brown Street	No constraints	N/A
94	A	H3 (14)	Renton, John Street Depot	Archaeology – site falls within a WoSAS consultation area.	Archaeology – archaeological survey.
95	C	H3 (15)	Renton, Main Street/King Street	No constraints	N/A
96	C	H3 (16)	Renton, Village Square	No constraints	N/A
97	A	H3 (x)	Dalreoch Quarry, Dumbarton	Nature Conservation – site overlaps Dalreoch Quarry SINC.	Nature Conservation – Habitat and Species survey/Environmental Statement.
98	A	H4 (1)	Clydebank, 354-394 Dumbarton Road	Archaeology – site extends into a WoSAS and HS consultation area. Built Heritage – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick – Linnvale SAM	Archaeology and Heritage Conservation – Archaeological Survey.
99	C	H4 (2)	Clydebank, South Douglas Street	No constraints	N/A
100	A	H4 (4)	Clydebank, Cart Street	Built Heritage – site adjacent to Riverside Station, Category B listed	Built Heritage – listed building survey
101	C	H4 (6)	Dalmuir, Caledonia Street	No constraints	N/A

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
102	A	H4 (7)	Dalmuir, French Street etc.	Archaeology – part of site is within WoSAS and HS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick – Linnvale SAM	Archaeology and Heritage Conservation – Archaeological Survey.
103	A	H4 (x)	Dalmuir, Beardmore Place East	Archaeology – site is within WoSAS and HS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick – Linnvale SAM. Nature Conservation - Site adjoins SINC/wildlife corridor (disused railway line, Forth & Clyde Canal)	Archaeology and Heritage Conservation – Archaeological Survey. Nature Conservation – Habitat and Species survey, Environmental Statement.
	C	RET 3(1)	St James Retail Park, Glasgow Road, Dumbarton	No constraints	N/A
104	A	RET 3(2)	Argyll Road/Chalmers Street, Clydebank	Archaeology – northern part of site is within WoSAS and HS consultation areas. Heritage Conservation – site is adjacent to the Forth and Clyde Canal: Old Kilpatrick – Linnvale SAM. Built Heritage - 2 Sylvania Way South/Chalmers Street, Central Warehouse (Co-op Department Store) Category B listed building.	Archaeology and Heritage Conservation – Archaeological Survey. Built Heritage – listed building survey.
105	C	RET 3(4)	Clyde Retail Park, Livingstone Street, Clydebank	No constraints	N/A
106	A	RET 3(5)	Lomond Galleries, Alexandria	Built Heritage - Category A listed building.	Built Heritage – listed building survey.
107	A	E 8(1)	Former Garshake Waterworks, Dumbarton	Nature Conservation – site is adjacent to the Overtoun Estate, Overtoun Burn & Barwood Hill SINC.	Nature Conservation – Habitat and Species survey/Environmental Statement.

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
108	C	E 8(2)	Cochno Waterworks, Clydebank	No constraints	N/A
109	C	E 8(3)	The Boulevard, Clydebank	No constraints	N/A
110	C	E 8(4)	Former Dalmonach Works, Alexandria	No constraints	N/A
111	A	E 8(5)	Dalreoch Quarry, Dumbarton	Nature Conservation – site is defined as a SINC.	Nature Conservation – Habitat and Species survey/Environmental Statement.
112	A	BE 4(2)	Academy Buildings	Built Heritage – Buildings are Category A Listed. Archaeology – site is within a WoSAS consultation area.	Archaeology – Archaeological Survey. Built Heritage – Listed Building survey.
113	A	BE 4(3)	Titan Cantilever Crane	Built Heritage – Crane is Category A Listed.	Built Heritage – Listed Building survey.
114	A	BE 4(4)	Cochno House and Stables	Built Heritage – House and stables are Category B Listed. Tree Preservation – trees on Cochno Estate are protected by TPO.	Built Heritage – Listed Building survey. Tree Preservation – tree survey and protection measures.
115	A	BE 4(5)	Dunglass Castle	Built Heritage – Site is Category B Listed. Archaeology – site is within a WoSAS consultation area.	Archaeology – Archaeological Survey. Built Heritage – Listed Building survey.
116	A	BE 4(6)	Notre Dame Convent/Church	Built Heritage – Church and Convent is a Category C(S) Listed Building.	Built Heritage – Listed Building survey.
117	A	BE 4(7)	Dalmoak House Stables	Built Heritage – Stables, courtyard and walled garden are Category B Listed.	Built Heritage – Listed Building survey.
118	A	BE 4(8)	Millburn Free Church	Built Heritage – Church is a Category A Listed Building.	Built Heritage – Listed Building survey
119	A	BE 4(9)	Dalreoch Primary School	Built Heritage – school is a Category B Listed Building	Built Heritage – Listed Building survey.
120	C	PS 2 (1)	Clydebank High School	No constraints	N/A
121	C	PS 2 (2)	St. Columba's High School	No constraints	N/A
122	C	PS 2 (3)	Dumbarton Academy	No constraints	N/A
123	C	PS 2 (4)	Vale of Leven Academy	No constraints	N/A

	Site Category	Local Plan Site ID	Site Location	Environmental Assets/Constraints	Proposed Mitigation
124	C	PS 3 (1)	Site North of Dalmoak Farm, Renton	No constraints	N/A
125	A	PS 3 (2)	Dennystoun Forge Caravan Park, Dalreoch	Nature Conservation – site is adjacent to the Leven swamp and pond and River Leven SINCS.	Nature Conservation – Habitat and Species survey/Environmental Statement.
126	C	PS 3 (3)	Leven Valley Enterprise Centre, Dumbarton	No constraints	N/A
127	C	PS 3 (4)	Garshake Road, Dumbarton	No constraints	N/A
128	A	PS 3 (5)	Queens Quay, Clydebank	Built Heritage – Category A Listed Structure (Titan crane) on site. Close to Municipal Buildings, Dumbarton Road and Hall Street former fire station tenement (both Category B Listed) Nature Conservation – site extends into Inner Clyde SSSI, SPA and Ramsar.	Nature Conservation – Habitat and Species survey/Environmental Statement. Built Heritage – Listed Building surveys.
129	A	PS 3 (6)	Main Street, Bonhill	No constraints	N/A
130	A	PS 3 (7)	Auchentoshan Estate, Clydebank	Tree Preservation – site subject to TPO Nature Conservation – site adjacent to Duntocher Burn and Wood SINC.	Tree Preservation – tree survey and protection measures. Nature Conservation – Habitat and Species survey/Environmental Statement.
131	C	PS 3 (8)	Levenbank Road, Jamestown	No constraints	N/A
132	A	PS 3 (10)	North Main Street, Alexandria	Tree Preservation – Part of site subject to TPO Nature Conservation – site adjacent to Alexandria Woods SINC.	Tree Preservation – tree survey and protection measures. Nature Conservation – Habitat and Species survey/Environmental Statement.
133	C	PS 3 (11)	Land off Great Western Road, Clydebank (Davie Cooper Centre)	No constraints	No constraints

13.10 Summary

- 13.10.1 The environmental assessment of proposals for this SEA is by no means conclusive in terms of defining the detailed environmental impacts of the Local Plan proposals. It does however provide a strategic level assessment of potential environmental conflicts. Where proposals are likely to have a significant environmental impact on one or more environmental asset, mitigation for that proposal has been provided in the final column of the table. The assessment identifies where a significant impact is likely to occur and the environmental asset that may be affected. The assessment does not suggest what that impact is likely to be as this is straying out with the strategic level and there is insufficient detail of the nature of the proposal to make an accurate assessment.
- 13.10.2 The assessment provides information for the local plan policy and decision makers to consider when formulating and implementing the plan. The information provided in the SEA will also be taken into account in future SEAs and when the plan is being modified changes can then be made to further benefit the environment.

13.11 Cumulative, Synergistic and Secondary Effects

- 13.11.1 Schedule 2, paragraph 6 of the Regulations requires that the assessment must include an analysis of the following:
- short, medium and long-term effects;
 - permanent and temporary effects;
 - positive and negative effects; and
 - secondary, cumulative and synergistic effects.
- 13.11.2 This is widely acknowledged to be a complex task and for the purposes of this SEA has been restricted to an analysis of the potential impacts of proposals using GIS analysis as per the above approach for individual proposal sites. Appendix 8 illustrates key allocations in the local plan where cumulative impacts may arise if all identified sites in the area were developed. These are indicative diagrams designed to highlight general areas where cumulative impact may occur, based on clusters of major proposal sites and environmental assets/constraints. The following areas have been identified by the assessment:

Table 3 – Indicative Cumulative Impact Areas

Area	Proposals	Environmental Asset/Constraints	Proposed Mitigation
Strathleven	LE1 (4, 5, 6, 12, 13, 14) LE5A H1 (11, 19) H3 (10, 14, 17)	Nature Conservation – number of SINC: Nursery Woodlands and Ballantine Grasslands, Fishers Wood, River Leven, Tontine Grassland; Murroch Glen wildlife corridor. Built Heritage – Listed Buildings within Strathleven Estate, non-Inventory garden and designed landscape.	Nature Conservation – Habitat and Species survey/Environmental Statement. Built Heritage – Listed Building survey, design statement
Dumbarton Waterfront	GD2 (13, 14) H1 (10, 14, 16) H3 (9) RET3 (1)	Nature Conservation – adjacent to Inner Clyde SPA, RAMSAR and SSSI site, River Leven SINC, Dumbarton Rock and Foreshore SSSI. Archaeology – Dumbarton Castle scheduled ancient monument, WoSAS and HS consultation zones.	Nature Conservation – Appropriate Assessment, Habitat and Species survey/Environmental Statement Archaeology – Archaeological Survey & Landscape Assessment
Bowling	LE4 GD2 (10, 11) BE4 (5) H2 (1)	Nature Conservation – adjacent to Inner Clyde SPA, RAMSAR and SSSI Built Heritage – nine Listed buildings and structures including Dunglass Castle, Bowling Basin. Heritage Conservation – Forth & Clyde scheduled ancient monument	Nature Conservation – Appropriate Assessment, Habitat and Species survey/Environmental Statement. Built Heritage – Listed Building survey, design statement
Carless	LE1 (16) GD2 (7, 9) H2 (23)	Nature Conservation – adjacent to Inner Clyde SPA, RAMSAR and SSSI, Disused railway identified as SINC. Heritage Conservation – Forth & Clyde scheduled ancient monument.	Nature Conservation – Appropriate Assessment, Habitat and Species survey/Environmental Statement. Built Heritage – Listed Building survey, design statement

Queen's Quay, Clydebank	LE1 (2, 7, 8) GD2 (3, 5) H2 (2, 3, 9, 10) H4 (3, 4) BE4 (3) RET3 (2, 3) PS3 (5)	<p>Nature Conservation – adjacent to Inner Clyde SPA, RAMSAR and SSSI</p> <p>Built Heritage – nine Listed buildings within or adjacent to development sites.</p> <p>Heritage Conservation – Forth & Clyde scheduled ancient monument</p>	<p>Nature Conservation – Appropriate Assessment, Habitat and Species survey/Environmental Statement.</p> <p>Built Heritage – Listed Building survey, design statement</p>
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14 **Appropriate Assessment**

- 14.1 In 2005 the European Court of Justice ruled that the UK is not compliant with the Habitats Directive because the transposition of the Directive to the UK Habitat Regulations does not specifically require land use plans to be considered under Articles 6(3) and 6(4) of the Directive. As a result of the ruling, WDC has followed the Scottish Government Interim Guidance 'Assessing Development Plans in Terms of the Need for Appropriate Assessment' and with the assistance of Scottish Natural Heritage has established the need for an appropriate assessment and prepared a report to assess the effects of the WDLP may have on European Sites.
- 14.2 The full report is presented at Appendix 9. It concludes that subject to the safeguards introduced in the Finalised Plan, plus additional safeguards identified in the report, the WDLP will not adversely affect the integrity of the Inner Clyde Natura 2000 site.

15 **SEA Indicators and Targets**

- 15.1 The 18 environmental objectives that have been adopted for the WDLP are set out in Appendix 6, with associated targets and indicators.
- 15.2 The indicators will form the basis of monitoring information for use in the next review of the local plan and in future SEAs. They are closely linked to local plan monitoring and to the environmental baseline.
- 15.3 Targets, linked to the indicators, have been established and these will also be incorporated into the monitoring of the plan, where the WDLP has control over the target.
- 15.4 The use of indicators and targets is essential to provide quantifiable information that can be used to determine the success or otherwise of the plan policies and proposals. However, it is not always possible to develop indicators and targets that relate to the objectives and are quantifiable. Therefore, in a number of cases it has been necessary to develop qualitative indicators and targets. Additionally, it is not always possible to identify indicators and targets that can be controlled via the local plan.

16 **Proposals for Monitoring**

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

- 16.2 Environmental monitoring is also important to future plan implementation. Monitoring enables decision-makers to answer such questions as:
- Were the assessment's predictions of environmental effects accurate?
 - Is the plan benefiting the environment?
 - Is the plan contributing to the achievement of desired environmental objectives and targets?
 - Has implementation changed the environmental focus of the plan?
 - Are mitigation measures performing as well as expected?
 - Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?
- 16.3 A proposed monitoring programme is presented in Appendix 10.

17 **Environmental benefit of the SEA**

- 17.1 Whilst environmental factors have always been a consideration for planning policy and decisions, social and economic factors have been paramount in the policy and decision making process. West Dunbartonshire especially, due to its high level of socio-economic deprivation, has consistently maintained its strong focus on socio-economic factors.
- 17.2 However, with the known human health and living environment impacts associated with environmental degradation, it has now become crucial for environmental sustainability to be at the forefront of plan and policy maker's minds. This is not at the expense of social and economic factors, which are still key considerations in plan development.
- 17.3 The SEA process has raised the profile of the environment with policy makers and politicians; through the development of formalised, critical assessments, and the consideration of potential proposals, the SEA has effectively facilitated decision makers in their environmental awareness and understanding.
- 17.4 Throughout the local plan preparation process, the SEA has been influencing policy making and the direction of the plan. Information relating to the specific changes and improvements that have been made to the plan as a result of SEA information are provided in each section of this Environmental Report.
- 17.5 Perhaps the most significant change in local plan direction is the overarching plan objectives (See Section 10). The objectives were tested for consistency with the SEA objectives and were subsequently amended to have a more environmental focus. These changes are significant because the plan objectives provide the context for the entire local plan and all policies and proposals are written to achieve these goals.

- 17.6 The SEA and the WDLP processes have been integrated from the local plan inception through to the preparation of this Environmental Report. This integration has ensured that all aspects of the local plan have an environmental focus, which will benefit many areas of the environment through the decision making process.
- 17.7 The SEA does not have a direct influence over plan implementation, however as a result of the SEA the plan has been written with an environmental focus. When the plan is being implemented it starts out with a positive environmental focus, which can only be enhanced by implementation.

18 **Next Steps**

- 18.1 This Environmental Report accompanies the Finalised Draft Local Plan, which was placed on deposit for 10 weeks to 16 November 2007. Representations and objections to the Finalised Draft are currently being considered with a view to making modifications to the Plan, which will be consulted upon in March/April 2008. Where there are outstanding objections, these will be considered by a Reporter in October/November 2008. The Adopted Local Plan is expected to be published in Summer 2009.
- 18.2 The SEA process will continue alongside the WDLP. If any significant changes are made to the WDLP at the pre- or post-Inquiry modification stages these will be assessed through the SEA process and incorporated into the Final Environmental Report. On adoption of the Local Plan, the Environmental Report will also be published alongside a statement detailing how environmental considerations have been integrated into the plan, as required by Regulation 20(2)(b).
- 18.3 Consultation comments relating to the Environmental Report that refer to the methodology used and the assessment outcome will be logged and considered in the development of future SEAs.

19 **Conclusions**

19.1 **The West Dunbartonshire Local Plan**

- 19.1.1 As a land use development framework, the WDLP will have an impact on the environment. This SEA has identified where and why this impact is likely to occur and this information has been incorporated into the local plan and will inform plan implementation.
- 19.1.2 The SEA has had a beneficial influence on the WDLP, however, a number of areas remain where changes would result in improved environmental benefit, such as those

identified in the topic option assessment. The SEA cannot force changes on the local plan, therefore it is unlikely that it will ever result in a plan where all recommendations for environmental improvement are adopted. This SEA has achieved important plan changes in key areas that will be permanent, carried forward from this local plan to successive plans.

19.2 The Strategic Environmental Assessment

- 19.2.1** The SEA process has raised the profile of the environment with policy makers, politicians and those involved in the local plan process. Mechanisms for considering environmental factors have been formalised and all aspects of the plan are critically assessed.
- 19.2.2** Throughout the local plan preparation, the SEA has been influencing policy making and the direction of the plan. Information relating to the specific changes and improvements that have been made to the plan as a result of SEA information are provided in each section of this Environmental Report.
- 19.2.3** The SEA is not a process with a beginning and end; it is a process that will always be operating alongside the local plan process. This continual process will ensure that policy development and decision-making processes incorporate the available environmental information and consider the likely environmental impacts.
- 19.2.4** The strength of SEA is that over time environmental benefit in a plan area and plan policy success will become apparent through trends in environmental data and planning application monitoring. Monitoring is a key aspect of SEA and one that will help to determine the success of the plan and the SEA. Monitoring will also provide essential information on which to base future SEA development.