



# Post Adoption Strategic Environmental Assessment Statement for the Renfrewshire Local Development Plan

November 2014

**Part 1**

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**Part 2****A post Adoption SEA Statement is attached for the PPS entitled:**

Renfrewshire Local Development Plan

**The Responsible Authority is:**

Renfrewshire Council

**Part 3**

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## **INTRODUCTION**

This is the Post Adoption Strategic Environmental Assessment (SEA) for the Renfrewshire Local Development Plan which was adopted by Renfrewshire Council on the 28 August 2014. This Post Adoption Statement considers all the results and responses of the consultation process, the effects of these responses on the decision-making process and highlights the ongoing monitoring and review procedures.

## **SEA PROCESS**

The Renfrewshire Local Development Plan has been subject to a process of SEA as required under the Environmental Assessment (Scotland) Act 2005. In twin-tracking the SEA process with the Local Development Plan (LDP) process, the Renfrewshire LDP has a framework to deliver sustainable economic growth in locations that are economically, socially and environmentally sustainable.

At each stage of the LDP process, consideration of the environmental factors associated with preferred and alternative options, strategies, policies and proposals, meant that the SEA positively contributed towards the blueprint that has become the adopted Renfrewshire LDP.

The preparation of the Renfrewshire LDP through to adoption has incorporated the aims of SEA by undertaking the following:

### **Early Dialogue**

An important starting point was taking into account the views of the Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH) and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the SEA of development plans.

### **Integration of Environmental Information into Plan Preparation**

In preparing the Environmental Report to support the development of the LDP, Renfrewshire Council prepared a State of Environment Report providing an up to date baseline on the current state of Renfrewshire's environment.

The baseline data provided identification of existing environmental issues that the LDP would require to consider when developing the framework. This snapshot of the environmental conditions allows the Council to monitor the implementation of the LDP and the impact of the strategies, policies and proposals. The Renfrewshire State of Environment Report is updated every two years and the indicators as well as the direction of the environmental trends recorded will be fed into the preparation of the next LDP. Any unforeseen environmental effects that are identified through the monitoring of the LDP require to have the appropriate remedial action and these were set out in the Environmental Report accompanying the LDP.

An important part of the process when integrating environmental information was the identification and evaluation of the links between the LDP and other relevant strategies, policies, plans, programmes and the environmental protection objectives. This part of the process was embedded into the Renfrewshire LDP Main Issues Environmental Report.

### **Best Environmental Options**

Through the preparation of the Main Issues Report (MIR) the SEA was central to selecting preferred options and reasonable alternatives, providing in many cases the reasons for selecting particular options. The Environmental Report submitted as part of the development plan process identified the likely impacts/effects that the strategies, policies and proposals would have on Renfrewshire's Environment, whether they are positive, negative or have no impact. Measures set out to prevent, reduce or offset any significant adverse effects were also outlined.

### **Transparency of decision-making**

Continuous consultation and engagement with key agencies, stakeholders as well as the wider public is central to the LDP/SEA process and that was carried out at every stage in the preparation process as well as in-between each of the key preparation stages.

Taking into account the comments received on the Environmental Report and the outcome of both the consultation at the MIR stage as well as the Proposed LDP stage helped in making the final decisions regarding the adopted LDP.

## RENFREWSHIRE'S KEY SEA STAGES

Figure 1 summarises these key stages of the Strategic Environmental Assessment process that was carried out by Renfrewshire Council.

**Figure 1 – Key SEA Stages**

<b>Key Stage</b>	<b>Description</b>
<b>Screening</b>	Determined whether the plan, programme or strategy was likely to have significant environmental effect and whether a SEA was required
<b>Scoping</b>	Involved the completion of a Scoping Report setting out assessment methodology, assessment criteria and outlined consultation procedures. The Scoping Report was submitted to the statutory Consultation Authorities for a 5 week consultation period seeking the views of the experts regarding the report
<b>Environmental Report carried out alongside the Main Issues Report</b>	Assessment of the main issues for Renfrewshire, preferred and alternatives options, assessment of potential development sites to identify any significant environmental impacts and highlighting the best environmental options. Highlighted cumulative and synergistic environmental impacts. The Environment Report was published for consultation alongside the LDP. The consultation for the Environmental Report involved the statutory Consultation Authorities, stakeholders and the general public. The consultation period was carried out over a 12 week period
<b>Analysis of Responses to the Environmental Report</b>	An analysis was undertaken of the responses to the Environmental Report
<b>Updated Environmental Report</b>	An update of Environmental Report was produced for the consultation on the Proposed LDP. It was considered that given the Proposed LDP sets out detailed land use policies and specific proposals a full SEA of the strategies, policy and proposals was required. This then enabled a full assessment of any environmental impacts and the potential remedial measures required to prevent, reduce or offset any impact. The consultation for the updated Environmental Report involved the statutory Consultation Authorities, stakeholders and the general public for a consultation period of 6 weeks.
<b>Post Adoption Statement and Monitoring</b>	This Post-Adoption Statement considers all the results and responses of the consultation process, the effects of these responses on the decision-making process and highlights the ongoing monitoring and review procedures

## ENVIRONMENTAL CONSIDERATIONS IN THE ADOPTED LDP

The following section outlines how the environmental considerations have been integrated into the Renfrewshire LDP. Figure 2 sets out the significant environmental issues identified in the Environmental Report and explains how these were considered, and where appropriate, incorporated within the Renfrewshire LDP.

**Figure 2 – Renfrewshire’s Environmental Report**

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
<b>Biodiversity, Flora and Fauna</b>	Development pressure on designated sites/protected species which could result in the disturbance of the resource	Yes	Through promoting good quality development in sustainable locations the Renfrewshire LDP aims to protect and enhance natural heritage, green spaces, landscape character, biodiversity as well as recreational and access resources. Specifically the protection of designated sites / protected species is through Policy ENV 2 – Natural Heritage
	Reduction in site area due to development		A Habitats Regulation Appraisal was undertaken of the Renfrewshire Local Development Plan to determine its likely effects on Renfrewshire’s international protected sites and the findings were taking into account in the LDP and the Environmental Report
	Fragmentation of designated sites or green corridors restricting species migration		To provide a range and choice of housing sites across Renfrewshire to meet the housing need and demand, Renfrewshire Council had to identify greenfield sites for new housing development. The most sustainable sites were identified through a planning and SEA assessment of each site. To protect the identity of Renfrewshire’s settlements along with protecting and enhancing landscapes, Policy ENV1 – Green Belt was central to the Environment section of the LDP to support planned growth in the most appropriate locations
	Requirement for Council to improve and expand the Central Scotland/Glasgow and Clyde Valley Green Network		
	Development pressure on protected trees and limited resources for management of existing woodlands		The green network is a key asset for Renfrewshire and the Council see great opportunities to strengthen this asset. Policy P7 – Green Network was a key policy in the LDP which aims to safeguard existing green networks and the LDP Spatial Strategy shows the potential for greater integration in the network and the joining up of green and blue spaces and corridors

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
	<p>Sea level rise and climate change may have long term impact on the extent and quality of habitats and occurrence of species</p> <p>Development pressure on open space/parks and reduced resources for their management</p>		<p>Policy ENV 2 – Natural Heritage has highlighted that all proposals will require to be assessed in relation to the impact on Trees</p> <p>Policy EN4 – The Water Environment specifically encourages protection of the existing water environment as well as improvement to the control and management of water along with the enhancement of biodiversity, flora and fauna surrounding blue corridors. Comments from SEPA helped provided the wording for this policy and in particular SEPA were keen to see the significance of other strategies and plans specifically mentioned in this Policy such as the River Basin Management Plan and the Clyde Area Management Plan. The Policy was altered accordingly</p> <p>In relation to any threat to open space and parks from development pressures, Renfrewshire Council in responding to comments from SNH provided Policy P8 – Open Space to protect open space, recreational provision and amenity space from development. SNH also helped Renfrewshire Council with appropriate wording for the New Development Supplementary Guidance in relation to open space</p> <p>Additional mitigation and guidance is set out within the New Development Supplementary Guidance which covers the Green Belt, Natural Heritage, Trees, Woodland and Forestry, Biodiversity and International, National and Local Designations</p>
<b>Historic and Cultural Environment</b>	<p>Development pressure on sensitive sites or listed buildings could result in an adverse impact to buildings, sites or their settings</p> <p>New development may detract from neighbouring historic buildings</p>	Yes	<p>Renfrewshire LDP Spatial Strategy aims to protect many of the valuable assets and resources within Renfrewshire. It does this by having policies and proposals which provides the balance between the need to protect and enhance the environment and quality of life within Renfrewshire. Placemaking is central to Renfrewshire’s Spatial Strategy and the historic and cultural built environment makes Renfrewshire’s places. These buildings and areas are therefore afforded protection through the LDP</p> <p>Policy P1 – Renfrewshire Places promotes a presumption in favour of a continuance of the built form and any new developments should be complementary to existing buildings</p>

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
	<p>Neglect and vandalism of buildings, structures or their settings putting them at risk and a loss of amenity in surrounding area</p> <p>Loss of archaeological resources through development</p>		<p>and uses and cause no significant harm</p> <p>Policy ENV3 - Built Heritage and the New Development Supplementary Guidance provide the policy protection for the Built Heritage including listed buildings, conservation areas, scheduled monuments, sites of know archaeological sites and the inventory of gardens and designed landscapes. In relation to the wording of this policy we worked with Historic Scotland to ensure the wording afforded the appropriate protection</p>
<b>Material Assets</b>	<p>Development pressures on assets, including Council owned resources and land</p> <p>Development pressure for green field locations</p> <p>Lack of integration between active travel routes, transport infrastructure, services and development sites</p>	Yes	<p>The main focus for the LDP Spatial Strategy is development of previously used sites, concentrating on existing built-up areas and key redevelopment sites. By implementing this strategy this takes development pressure off many assets including green field land</p> <p>The New Development Supplementary Guidance ensures that there is the required investment in material assets to support new development through ensuring that proposals demonstrate that adequate provision has been made for all services including water, sewerage, power, communications, education, health and social facilities</p> <p>Policy P4 – Housing Action Programme Sites identifies Council owned land across Renfrewshire to ensure that there is identification of the right sites in the right locations to try and decrease the development pressures elsewhere</p> <p>Policy ENV1 and the related provisions in the New Development Supplementary Guidance including the Environment Development Criteria and Green Belt Development Criteria provide the protection and allow enhancement of the natural and built environment</p> <p>Policies P1 – Renfrewshire’s Places, I1 – Connecting Places and P7 – Green Network and the New Development Supplementary Guidance ensure new development is well connected to and well served by walking, cycling and public transport provision. Support is also given to the green network in its roll in active travel corridors</p>

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
Air	A lack of integration between transport and land uses can result in unsustainable development leading to an increase in traffic and a resultant reduction in air quality	Yes	The Renfrewshire LDP Spatial Strategy aims to ensure that high quality new development is in the right locations. The proposals maps that accompany the LDP outline all of the new development sites in location well served by walking, cycling and public transport routes, aiming to encourage use of existing infrastructure as well as encourage a step change to more sustainable travel and transport modes
	Some land uses can be associated with poor air quality, odour, dust or cause pollution		Through numerous Local Development Plan policies including P1 – Renfrewshire’s Places, I1 – Connecting Places, I2 – Freight, I3 – Potential Transport Improvements and I6 and the New Development Supplementary Guidance the policies ensure integration of land uses with good connections and links to active travel and public transport networks. This ensures that there should not be a reduction in air quality and an increase in pollution
	Air quality may be influenced by activities/ development in neighbouring authorities		In discussions with SEPA through the preparation of the LDP, a new policy emerged between the preparation of the Proposed LDP and the final adopted LDP. Policy ENV5 – Air Quality was considered important for the Renfrewshire LDP considering the existence of an Air Quality Management Area within Paisley Town Centre. This policy therefore aims to ensure that development, whether individually or cumulatively have an adverse impact on air quality
Water	Although improving, the quality of the water environment is poor in rivers and open standing water	Yes	The Local Development Plan acknowledges the Council’s duty as a responsible authority under the Water Framework directive to protect and, where possible improve the water environment within and following out of Renfrewshire and to promote sustainable flood management. Policy ENV4 – The Water Environment was strengthened to ensure that the River Basin Management Plan and the Clyde Area Management Plan was considered
	Increased flood risk will have an adverse impact on human		

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
	<p>health, the environment, cultural heritage and the economy</p> <p>Climate Change predictions require to be incorporated in the assessment and management of flood risk</p> <p>Poor water quality continues to compromise biodiversity</p> <p>Water environments can be the subject of cross boundary influences</p>		<p>when assessing proposals for development or change</p> <p>Renfrewshire Council worked with SEPA in ensuring Policy I5 – Flooding and Drainage was appropriate and complied with the Flood Risk Management (Scotland) Act 2009. Furthermore the flooding and drainage policy also aims to ensure that new flooding and drainage measures have a positive effect on the water environment as well as the natural heritage interests of the site or land surrounding the site</p> <p>In the New Development Supplementary Guidance, detailed information is provided on flooding and drainage. In terms of what is required for drainage and flood risk assessments it is specifically listed that climate change predictions require to be incorporated</p> <p>Policy ENV4 – The Water Environment state that support will be given to proposals that enhance biodiversity, flora and fauna in blue corridors. As well as this Policy ENV2 – Natural Heritage also aims to ensure that developments protect and enhance biodiversity and geodiversity of the area</p> <p>Renfrewshire Council along with surrounding local authorities work together to produce the Clyde Area Management Plan, which highlights cross boundary influences and relationships. Policy ENV4 – The Water Environment specifies that the Clyde Area Management Plan requires to be taken into consideration when assessing proposals. This then allows proposals in Renfrewshire to take into account issues outside the Council boundary</p>
<b>Climatic Factors</b>	Increased energy consumption from new developments	Yes	Policy I6 – Renewable and Low Carbon Energy Developments, Policy I7 – Low Carbon Development and detailed guidance in the New Development Supplementary Guidance provides the framework to try and reduce energy consumption in new developments

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
	<p>Lack of renewable energy and resource efficiency of new developments</p> <p>Continuing car dependence with associated emissions</p> <p>Sea level rise with the possibility of more severe rainfall and extreme weather events</p>		<p>There is also a Places Checklist in the Places section of the New Development Supplementary Guidance which aims to encourage innovative design and building techniques. This approach has already encouraged the submission of planning applications for low carbon sustainable designed houses</p> <p>Policy I1 – Connecting Place and Policy I3 – Potential Transport Improvements aims to encourage development in places where active travel and good public transport networks and hubs exist. This aims to reduce emissions associated with vehicles</p> <p>Renfrewshire has many issues associated with drainage and flooding. Given the significance of some of the issues Renfrewshire council undertook and Strategic Flood Risk Assessment (SFRA). The SFRA help to inform the policies, the details set out in the New Development Supplementary Guidance and helped with the identification of sites not at significant risk from flooding</p>
<b>Landscape</b>	<p>Development pressure on land within the greenbelt</p> <p>Loss of woodlands due to development or poor management</p> <p>Development in areas where there may be ground conditions or stability issues due to former mineral working</p>	Yes	<p>Through all of the policies in the adopted LDP, proposed developments are directed to appropriate locations. Specifically Policy ENV1 – Green Belt, ENV2 - Natural Heritage and the New Development Supplementary Guidance ensure that the Green Belt is used to direct planned growth to suitable locations, safeguarding the openness of areas and retaining green spaces linking to green networks.</p> <p>The natural environment within Renfrewshire is considered a valuable resource. The protection and enhancement of wildlife and their habitats as well as other natural features is a consideration in assessing development proposals. Trees and woodlands, along with their management are safeguarded through Policy ENV 2 – Natural Heritage and the detailed guidance in the New Development Supplementary Guidance</p> <p>The New Development Supplementary Guidance provides specific details in relation to mineral extraction and sites on or in the vicinity of mineral sites. Renfrewshire Council worked with the Coal Authority to ensure that appropriate wording and details were provided in the SG to ensure any potential developer had sufficient information in relation to mineral working or sites in close proximity to mineral working</p>

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
<b>Population and Human Health</b>	Population decline and working age population decline	Yes	Through Local Development Plan policies the aim is to provide a range of housing, services and facilities to retain and attract people to the area. Policy P2 – Housing Land Supply, Policy P3 – Additional Housing Sites, Policy P4 – Housing Action Programme Sites and Policy P6 – Paisley South Expansion Area all aim to ensure a range and choice of housing across Renfrewshire
	Increasing number of pensionable persons		
	Reduced life expectancy and health related deaths		A range and choice of housing should also help ensure that people are able to live independently in suitable housing with appropriate community facilities and services close to hand
	Concentrated areas of deprivation		Policy P4 – Housing Action Programme Sites and Policy P1 – Renfrewshire Places is aimed at ensuring the areas where there is the greatest concentration of deprivation within Renfrewshire that these areas are tackled as a priority and support is given to getting a good mix of housing, services and facilities which allow areas of deprivation to also be good Renfrewshire Places
	Unemployment and changing structure of the economy		
	High crime rates		<p>Sustainability as the core element of the spatial strategy helps promote developments which improve the health and well being of communities. By promoting good access to green networks helps support healthier and active lifestyles as well as social interaction</p> <p>The LDP identifies a good quality supply of employment land. Policy E1 – Renfrewshire’s Economic Investment Locations, Policy E2 – Glasgow Airport Investment Zone and Policy E4 - Tourism ensure that there is a framework to deliver sustainable economic growth in the economic locations identified in the Renfrewshire LDP.</p> <p>Policy I1 – Connecting Places, Policy I2 – Freight and Policy I3 – Potential Transport Improvements are also considered important as these ensure that people and places are well connected. This is also important in delivering regeneration outcomes and sustainable communities within Renfrewshire. Connection to travel and transport networks is a key enabler for increasing access to employment, opening up new markets,</p>

SEA Topic	Environmental Issues identified in the Environmental Report	Integrated into Plan (Yes or No)	How integrated/taken into account or reason for not being taken into account
			particularly to Glasgow Airport and for encouraging people to live, work and spend time in Renfrewshire
<b>Soil</b>	<p>Development pressure on green field land and prime or good quality agricultural land</p> <p>Vacant and derelict land may potentially be contaminated and be difficult to develop. It can also reduce the amenity of an area</p> <p>Development can result in increased areas of hard standing or soil compaction and greater risk of flooding</p> <p>Loss of peat to other land uses or a reduction in its quality can have implications for its effectiveness as a habitat and carbon sink</p>	Yes	<p>The spatial strategy directs development and the use of land to locations that support sustainable growth, development and regeneration. Policy ENV 1 – Green Belt and the New Development Supplementary Guidance provide the criteria that development proposals on Green Belt sites must meet. This includes no loss of prime quality agricultural land</p> <p>If contaminated land is present in land associated with new development then the New Development Supplementary Guidance sets out an assessment framework. This ensures that the necessary site investigations and risk assessments are undertaken to prevent unacceptable risks to human health or the environment</p> <p>Policy I5 – Flooding and Drainage requires new development to avoid areas susceptible to flooding and any proposed development is required to demonstrate promotion of sustainable flood risk management measures by implementing suitable drainage infrastructure. There is a promotion of sustainable drainage techniques that are not hard engineering solutions but more natural solutions to encourage an increase in biodiversity, flora and fauna.</p> <p>The natural environment within Renfrewshire is considered a valuable resource. Policy ENV2- Natural Heritage provides the general protection and integrity of sites protected for their natural conservation interest or which have the potential to protect and enhance designated sites and the wider biodiversity and geodiversity of the area. The New Development Supplementary Guidance specifically states that development should avoid the unnecessary disturbance of peat and carbon-rich soils. Where peat and other carbon rich soils are present, the Council seeks to protect these areas and will require the submission of information sufficient to assess the likely effects associated with any proposed development work.</p>

## How opinions expressed in the consultation have been taken into account in the preparation of the Local Development Plan and updated Environmental Report

The following table provides a summary of the responses received in relation to the consultation on the Environmental Report and identifies the ways in which the responses have been taken into account in the preparation of the Renfrewshire Local Development Plan and in the SEA process.

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
Scottish Natural Heritage	SNH welcomed the approach that has been adopted in relation to the SEA of the Renfrewshire LDP including the assessment of strategic options at MIR stage followed by the assessment of specific proposed allocations (mainly for housing) and the assessment of particular policies	Noted
Scottish Natural Heritage	<p>Biodiversity, Flora &amp; Fauna</p> <p>SNH noted that the baseline condition of biodiversity, flora and fauna in Renfrewshire continues to be assessed as being particularly good. SNH therefore restated the view that if a realistic assessment of the condition of Renfrewshire’s biodiversity was made using the status and trends of Local Biodiversity Action Plan priority habitats and species as the main indicator (although they accept that this would be very challenging), or the even the percentage of designated site features considered to be in favourable condition, it is highly unlikely that this conclusion could be defended</p>	Noted – the Council utilises the data that is available
Scottish Natural	<p>Climatic Factors</p> <p>In the assessment of climatic factors the table and graphics appear to</p>	Once explained, SNH accepted that there had been a change in the way the date was collected. This was accepted by SNH

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
Heritage	show that there has been a substantial improvement in Renfrewshire's greenhouse gas emissions and carbon footprint between 2011 and 2012. Yet at the same time, the tables state that the most recent data on which Renfrewshire's contribution to climatic factors was assessed are from 2010. If that is the case, it is not clear what the conclusion of such a dramatic improvement over the last year is based on	
Scottish Natural Heritage	Soil  SNH welcomed the reference to the extensive areas of blanket peat in Renfrewshire within the Clyde Muirshiel Regional Park as peat soils are considered to be of value as both a natural heritage resource and a carbon sink	Noted
Scottish Natural Heritage	Data Gaps  SNH reiterated their advice that whilst undertaking a review of Renfrewshire's locally important nature conservation designations and the development of associated management guidelines, they hope that any such review in Renfrewshire could include consideration of locally important geological sites as well as the areas of locally important wildlife habitat that would be identified by the proposed Phase 1 Habitat Survey	The LDP Action Programme states the commitment of updating the LBAP in line with current legislation. This has now been undertaken.  As part of the process of undertaking a Green Network Strategy which includes access, renewable, green belt, along with biodiversity, flora and fauna, it is proposed to commission a Phase One Habitat survey and as part of this process further investigation into the consideration of locally important geological sites will be considered
Scottish Natural	Appendix 2 – Plans, Programmes & Strategies Used to Inform the LDP  State that in the discussion of Renfrewshire's landscape in the	Reference to this document should have been included in Appendix 2 as the document has been referred to in the Environmental

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
Heritage	<p>Environmental Baseline section of the Report a list is given in section 2.37 of the landscape character types found in Renfrewshire. These appear to have been derived from the Glasgow and the Clyde Valley Landscape Assessment (Land Use Consultants for SNH, 1999) – a document which also includes valuable guidance for ensuring that development is appropriate to the area of landscape character within which it is sited. However there is no reference to this work in the list of Regional Level Guidance used to inform the LDP</p>	<p>Report. It will be added to the list in future documents</p>
Scottish Natural Heritage	<p>Appendix 3 – LDP Policies &amp; Proposals Assessment</p> <p>Policy E1 - Renfrewshire’s Economic Investment Locations</p> <p>SNH generally agrees with the conclusions of the assessments outlined for this policy. However in the assessment of this policy against SEA Biodiversity, Flora &amp; Fauna topic it is initially stated that the policy may affect the Black Cart SPA but then later that it has been framed in such a way as to ensure no adverse effects on the integrity of this or any other Natura site. It may be worth taking care to clarify this using appropriate Natura terminology and to replace “The Black Cart SPA and SSSI may be affected by this policy, along with SINCs such as...” with “This policy as originally written was identified as being likely to result in significant effects on the Black Cart SPA and SSSI. It may also affect SINCs such as...”</p> <p>We would also once again draw your attention to the dubious value of using the Rolls Royce development at Inchinnan as an example of how</p>	<p>It was agreed with SNH that there would be additional wording in Policy E1 – Renfrewshire’s Economic Investment Locations, Policy E3 – Transition Areas and also impact on Natura sites would be an integral part of the Spatial Strategy. There is also specific wording been added to the New Development Supplementary Guidance to provide adequate protection of Natura 2000 site</p> <p>The points raised regarding the development at Rolls Royce as good practice has been noted. As a Council we aim to improve on how we handle planning applications for development in sensitive areas. The new LDP and New Development Supplementary Guidance aim to help support this aim</p>

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
	<p>development in this area has been possible in the past with minimal environmental impact. The particular planning condition applied to the consent for this development which would have ensured minimal environmental impact – and indeed, it was hoped, some environmental benefits – has never been adequately discharged by the landowner and was ultimately deemed unenforceable by the planning authority</p>	
<p>Scottish Natural Heritage</p>	<p>Policy E2 – Glasgow Airport Zone</p> <p>The assessments presented for this policy seem sound, however all of the comments made in relation to the assessment of Policy E1 apply equally to the assessment of this policy. SNH therefore suggested a similar change of wording in the consideration of the impacts in relation to Biodiversity, Flora and Fauna; as well as again noting the problems with holding up Rolls Royce, Inchinnan as an example of development claimed to have had minimal environmental impact</p>	<p>This suggestion was discussed with SNH and because the Glasgow Airport Investment Zones sits within Renfrewshire’s Economic Investment Locations then the wording in Policy E1 equally applies to consideration of any proposed development within E2. This was considered acceptable to SNH once explained</p>
<p>Scottish Natural Heritage</p>	<p>Policy E5 – Glasgow Airport</p> <p>SNH agrees with the assessments presented in relation to this policy but would again advise some minor wording amendments as also noted in relation to Policies E1 and E2 – i.e.</p> <p>“This policy as originally written was identified as having the potential for significant effects on the Black Cart SPA and SSSI. It may also affect</p>	<p>This again was discussed with SNH and Policy E5 – Glasgow Airport Operational Land was altered to take on board SNH comments</p>

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
	SINCs such as...” instead of “The Black Cart SPA and SSSI may be affected by this policy, along with SINCs such as...”	
Scottish Natural Heritage	<p>Policy C1 – Renfrewshire Network of Centres</p> <p>The wording relating to the possibility of Natura impacts arising from development in the Erskine Town Centre area is appropriate here</p>	Noted
Scottish Natural Heritage	<p>Policy I1 – Connecting Places</p> <p>SNH agrees that this policy will have largely positive impacts in terms of the SEA topics for which they have a responsibility</p>	Noted
Scottish Natural Heritage	<p>Policy I6 – Renewable and Low Carbon Energy Developments</p> <p>SNH noted that the assessment of this policy’s impact on Soils is considered to be positive</p> <p>From the text it appears that this is at least partly based on the statement that “Peat should... be protected”, however SNH have noted that neither the LDP itself nor its Supplementary Guidance appear to contain any policy to protect peat soils. We have therefore suggested the inclusion within the Delivering the Environment Strategy section of the Supplementary Guidance of a requirement for developers to assess the impact of any proposal on peat soils</p>	The New Development Supplementary Guidance now contains a specific reference to peat and it states that ‘the Development should avoid the unnecessary disturbance of peat and carbon-rich soils. Where peat and other carbon rich soils are present, the Council will seek to protect these areas and will require the submission of information sufficient to assess the likely effects associated with any development work.’
Scottish Natural	<p>Policy I8 – Waste Management</p> <p>In the assessment of this policy in terms of Biodiversity, Flora &amp; Fauna</p>	This caveat has been retained as the exact potential impact on biodiversity, flora and fauna from waste management infrastructure

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
Heritage	<p>it is stated that the policy ensures that there will be no adverse impacts on the integrity of any Natura 2000 site. SNH does not understand the need for such a caveat in relation to this particular policy as it is not clear to us how the policy might give rise to the likelihood of significant impacts on any particular Natura site</p>	<p>is uncertain as the potential specific location is unknown. This was discussed with SNH and agreed</p>
Scottish Natural Heritage	<p>Policy P3 – Additional Housing Sites &amp; Additional Housing Sites - Greenfield</p> <p>SNH agrees with the assessment of likely negative impacts arising from these policies with respect to Biodiversity, Flora &amp; Fauna and Climatic Factors. However query the conclusion that the policy will have “no significant impact” on Landscape. The commentary given for landscape impacts seems reasonable – i.e. that sympathetic design will be required to minimise landscape impacts and that there may be opportunities for place making / landscaping. However the surrender of green belt sites for housing development must surely risk a degree of negative landscape impacts that in some locations may be difficult to mitigate. We would therefore suggest that an assessment conclusion of “unknown impacts” (at this stage) or even minor “negative impacts” would be more appropriate</p>	<p>The decision to determine no significant impact on landscape from this policy was due to the potential to offset any negative impact with sensitive design. All of the new additional housing sites that are in green belt locations were all independently assessed by landscape architects who provided detailed comments on which sites would and would not have a significant impact on landscape. Therefore this is why we could be quite direct in our assessment. Furthermore the detailed guidance contained in the New Development Supplementary Guidance provides criteria to ensure any potential development will not have a significant impact on landscape. It should also be noted that all new sites identified by Renfrewshire Council were accepted a good sustainable sites by the Scottish Government Reporters</p>
Historic Scotland	<p>Historic Scotland states the Environmental Report provides a clear and comprehensive assessment of the significant environmental effects of the Proposed LDP on the historic environment and we are content with the level of information provided within the document.</p>	<p>Noted</p>

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
Historic Scotland	<p>Historic Scotland notes that the archaeological resource has been improving since 2011. This is on the basis that in 2011 there was limited data available on the subject and in 2012 the status of archaeological resource was good. Historic Scotland felt it would be helpful to explain whether the condition of archaeological sites was taken into consideration in forming judgement on this issue or the overall knowledge about the sites is deemed to have improved. The inclusion of a commentary box would address this uncertainty.</p>	<p>Although limited data was available it was considered in 2011 that the trend direction was improving, the decision was taken to assess the archaeological resource as fair</p>
Historic Scotland	<p>Historic Scotland are content that relevant environmental issues which can impact on the historic environment (such as development pressures on listed buildings) have been correctly identified on page 34. They note that the Council intend to prepare Heritage Strategy for the Renfrewshire area and they would be happy to assist with this work.</p>	<p>Noted</p>
Historic Scotland	<p>Figure 11 and 12 of the Environment Report presents an assessment of compatibility of the Proposed Plan's topics and objectives with the SEA objectives. Overall, Historic Scotland is content with this and agrees that none of the Proposed Plan Objectives are significantly incompatible with the SEA objectives relating to the historic environment.</p> <p>However, an element of uncertainty is expressed with regard to SEA Objective 8 (population and human health) and its compatibility with the objectives relating to, among others, the historic environment. We consider that there is a positive relationship between protecting,</p>	<p>As Historic Scotland consider a direct compatibility between the population and human health and the historic environment objectives future Environment Reports will reflect this</p>

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
	<p>maintaining and enhancing the historic environment, which gives people a sense of identity and place, and protecting and enhancing quality of life. We feel that a well maintained and protected built and historic environment contributes to people’s well-being and would therefore put a positive score in the compatibility box. Historic Scotland also suggest the inclusion of a commentary box under Figures 11 and 12 as it would be useful to explain the reasoning behind the different scoring predictions.</p>	
Historic Scotland	<p>Appendix 2 – Plans, Programmes and Strategies (PPS) Used to Inform the LDP - overall, they are content that relevant PPS for their interests have been adequately covered here.</p>	Noted
Historic Scotland	<p>Appendix 3 - Assessment of LDP Policies – Historic Scotland are largely content with the assessment of implications that each policy within LDP could have on the historic environment. It is recognized in the commentary boxes for several policies that some of the proposed development sites have the potential for direct or indirect impacts on heritage assets. Historic Scotland agrees that robust application of national and appropriate local policies should be able to mitigate any adverse impacts. However, we emphasize that early engagement with Historic Scotland on proposals which raise complex or significant issues could be key to avoiding adverse impacts and optimising positive outcomes for the historic environment.</p>	<p>Renfrewshire Council agree that early engagement with Historic Scotland on proposals which raise complex or significant issues could be key to avoiding adverse impacts and optimising positive outcomes for the historic environment</p>
Historic	<p>Appendix 4 Supplementary Guidance Criteria Assessment- Historic Scotland suggest the inclusion of a commentary box in here as it</p>	<p>A commentary box was not included within this section as it was considered it would repeat much of the information contained</p>

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
Scotland	<p>would be useful to explain the reasoning behind the different scoring predictions. We note that a ‘negative impact’ score has been assigned in relation to industrial transition areas and their potential impact on the historic environment. We consider that through the use of a masterplan approach and application of relevant development criteria within SG, any potential negative impacts should be mitigated.</p>	<p>within Appendix 3.</p> <p>Renfrewshire Council agree that through the use of a masterplan approach and application of relevant development criteria within SG, any potential negative impacts should be mitigated</p>
SEPA	<p>Overall SEPA were satisfied that an adequate assessment of the plan policies and proposals had been undertaken.</p>	<p>Noted</p>
SEPA	<p>Flood risk has been identified as an issue for a number of sites. It should be noted that in line with our Interim Position Statement on Planning and Flooding and SPP the starting point for development plans should be the avoidance of flood risk.</p> <p>For a number of the proposals the ER states that there will be an opportunity through SUDs to mitigate flooding. SUDs can help to minimise the volume and rate of surface run-off from development sites however as set out in the Scottish Government’s new Surface Water Management Planning Guidance the high level objectives for surface water flooding should be set around the principles of avoid, protect and prepare. In the first instance an increase in surface water flood risk to people, economy and environment should be avoided.</p> <p>The ER also states that the flooding concerns can be reduced or avoided through various mitigation measures. We would have expected the ER to have provided further details of mitigation</p>	<p>In discussion with SEPA, Renfrewshire Council altered Policy I5 – Flooding and Drainage to ensure the first line of the policy stated that new development should avoid areas susceptible to flooding. The New Development Supplementary Guidance also states avoidance of areas that flood is the first principle.</p> <p>The Strategic Flood Risk Assessment produced by Renfrewshire Council identified this information. It should be noted that Renfrewshire’s Strategic flood Risk Assessment is used as a best practice example by SEPA</p>

Consultee	Summary of Comment	How the comment was taken into account in the process of adopting the Renfrewshire Local Development Plan
	measures. For example, the avoidance of development in areas within the functional flood plain, policies and SPG on flood risk	
SEPA	A number of the policy assessments have referred to negative impacts on air being controlled through legislation, but does not explicitly explore the planning impacts. When considering development sites it is important to consider the acceptability of the development itself as a land use taking into account the sensitivity of the receiving environment	SEPA requested an additional policy on Air Quality and Renfrewshire Council worked with SEPA on suitable wording for Policy ENV5 - Air Quality which was included as part of the adopted Renfrewshire LDP
SEPA	Policy I8 Waste Management – SEPA consider the commentary for this policy refers to the role of regulation and legislative requirements. It is important that the assessment is in line with SPP and focuses on the acceptability in planning terms of waste management infrastructure and facilities rather than on control of the processes or waste streams involved	Again the Council worked with SEPA and additional wording was added to Policy I8 Waste Management as well as particular sections of the New Development Supplementary Guidance. All of SEPA's comments were addressed in the adopted Renfrewshire LDP and the finalised SG
SEPA	Appendix 4: Supplementary Guidance Criteria Assessment - SEPA consider that It would have been useful if the assessment matrix for the SPG included some written justification as per the assessment matrix for the proposals and policies.	A written commentary was not included within this section as it was considered it would repeat a lot of the information contained within Appendix 3 as the Supplementary Guidance does not introduced any new policies

## **REASONS FOR CHOOSING THE RENFREWSHIRE LOCAL DEVELOPMENT PLAN (LDP) AS ADOPTED**

The production of the Local Development Plan (LDP) is a legislative requirement of the Planning Etc (Scotland) Act 2006 and there is therefore no alternative to producing the plan. The Renfrewshire LDP sets out the spatial strategy that facilitates investment and guides the future of land use in Renfrewshire. The Renfrewshire LDP will have an overall positive impact on the environment as it contains policies and proposals requiring environmental considerations to be taken into account, when making decisions on planning applications.

The Main Issues Report was prepared in 2011 after a period of engagement and consultation with members of the public and other stakeholders. As part of this early engagement process a “Suggestions for Land Use Change” exercise was undertaken providing an early opportunity to identify potential sites for development as part of the new LDP. Identifying development sites early in the process enabled the Council to consider these as it prepared the LDP. Each site was subject to both a planning and an environmental assessment and all of the sites were consulted on alongside the Renfrewshire Main Issues Report.

Renfrewshire’s Main Issues Report (MIR) was subject to a 12 week consultation period which commenced in January 2012. The MIR set out a series of options including the preferred option and a number of alternative options and was supported by two key documents: The Monitoring Statement and the Environmental Report. The Monitoring Statement reviewed the performance of the Renfrewshire Local Plan of 2006 and the significant demographic, economic and social changes within Renfrewshire since then. The Environmental Report considered the environmental consequences of the strategies, proposals and options presented in the MIR.

The Proposed Renfrewshire Local Development Plan (the Proposed Plan) was published in January 2013 with a consultation period of 6 weeks. The Proposed Plan incorporated the findings from the consultation into the MIR and its accompanying Environmental Report. Renfrewshire Council considered it necessary to provide an updated Environmental Report to take account of the potential environmental consequences of the spatial Strategy, policies and proposals set out in the Proposed Plan as well as the detailed guidance set out in the New Development Supplementary Guidance (SG) that sits alongside the Proposed Plan.

The Proposed Plan contains two sections. The LDP document sets out the overall spatial strategy with key policies and proposals structured around five themes:

Economy;

Centres;

Infrastructure;

Places; and the,

Environment.

Proposal maps are also an integral part of the LDP outlining specific areas of land to which the policies listed in the LDP apply. The second part of the LDP is the New Development SG which provides more detailed criteria and guidance for assessing new development. The New Development SG outlines what developers are required to consider when in designing, delivering and implementing development, with an emphasis on place making and sustainable development. The format of the SG is similar to the LDP as it is structured around the same five themes. Together these documents constitute the Renfrewshire LDP.

The consultation period for the Proposed Renfrewshire LDP concluded in 2013 and the representations were received from 1780 parties were compiled into 46 emerging issues. No significant modifications to the LDP were proposed so the LDP and the objections received to it were submitted to Scottish Ministers for their consideration. The examination was completed in June 2014. The conclusions and recommendations of the Reporters appointed by Scottish Ministers largely support the strategy, policies and proposals.

Appendix 2 summaries the Scottish Governments Reporters Modifications to the LDP and how they have been taken into account in the Environmental Report. There were two areas where the Reporters recommended significant modifications to the LDP at Braehead and land for housing. The Reporter concluded that Braehead should not be identified as a town centre stating that it does not have a diverse mix of uses and attributes and that there are other aspects to a successful town centre that are not found at Braehead. This conclusion represented a significant change to the spatial strategy of the Plan which would have had adverse consequences for delivering sustainable economic growth. Renfrewshire Council declined the Reporters recommendations in relation to Braehead on the grounds that they were based on conclusions that could not reasonably have been reached based on the evidence considered at the Examination. Renfrewshire Council did accept all other changes and recommendations to the LDP.

In relation to land for housing, the Scottish Government Reporter identified 3 additional sites in the Green Belt for new housing to reduce an identified housing land supply shortfall, these being: Station Road, Bishopton (50 units), Lawmarnock Road, Bridge of Weir (9 units) and Northbar, Florish Road, Erskine (200 units). These three sites were submitted as part of the "Suggestions for Land Use Change" exercise and were therefore subject to an environmental assessment as well as consultation through the MIR and the Proposed Plan stages. It was considered that since these additional housing sites had been considered throughout the plan preparation process, that both individually and cumulatively all sites had been assessed in terms of the environmental impact, there was therefore no requirement to change the conclusion of the policy assessment in the Environmental Report.

In relation to other changes that may have environmental consequences, the inclusion of an additional policy - POLICY ENV5 – Air Quality was agreed with SEPA during the Proposed Plan stage and Renfrewshire Council had suggested to the Scottish Government Reporter that this addition would be a positive addition to the LDP. This policy seeks to ensure that development proposals shall not individually or cumulatively have an adverse affect on air quality. Appendix 1 provides an assessment of Policy ENV 5 as was undertaken for each Policy in the updated Environmental Report for the Proposed Plan. This assessment illustrates that this Policy will have a significant positive impact on Renfrewshire’s environment.

Overall it is considered that the approach selected in the Adopted Renfrewshire LDP balances the environmental, social and economic pressures and the final Renfrewshire Local Development Plan was formally adopted by Renfrewshire Council on 28<sup>th</sup> August 2014.

### **Monitoring Measures**

Renfrewshire Council is required to monitor the significant environmental effects when the plan is implemented. The Council propose to do this on a bi-annual basis through the review of Renfrewshire’s State of Environment Report. This monitoring will include the provision of information on the measures that are to be taken to monitor for any unforeseen environmental effects.

The Council is also required to prepare a Monitoring Statement which informs the plan making process, provides evidence to support the plan’s content and provides a benchmark for continuous monitoring. The Monitoring Statement sets the context within which LDP 2 will emerge along with the trends leading to the identification of key issues. The next Monitoring Statement will be prepared in 2015 and will report on the impact of the Renfrewshire LDP (2014) as well as the principal changes in economic, environmental and social characteristics since the preparation of the current adopted LDP.

### **Conclusion**

The SEA process has had a positive effect on the production of the Renfrewshire LDP. The process of identifying both significant and negative environmental effects has enabled mitigation measures to be built in to both the policies within the Adopted Renfrewshire LDP and the New Development Supplementary Guidance. It is important to monitor the effects of implementing the Adopted Renfrewshire LDP as this will provide the mechanism to identify potential unforeseen adverse environmental effects and this will provide a sound base for LDP 2.

**Key To Symbols**



**Appendix 1: Assessment of Policy ENV 5 Air Quality**

	SEA Topics									Effect			Commentary, assumptions, measures envisaged for the prevention, reduction and offsetting of adverse effects etc
	1. Biodiversity, Flora and Fauna	2. Historic Environment	3. Material Assets	4. Air	5. Water	6. Climatic Factors	7. Landscape	8. Population and Human Health	9. Soil	Long (L), Medium (M) or Short (S) Term	Permanent (P) or Temporary (T)	Secondary/Cumulative/Synergistic	
<b>Environment</b>													
<b>Policy ENV 5 Air Quality</b>	++	~	+	++	++	++	~	++	+	S/M/L	P	Yes	
Commentary	The protection and improvement of air quality will help improve biodiversity, flora and fauna across Renfrewshire	A policy on air quality would have no significant impact on the historic environment, in fact it could be the case that improving air quality would be beneficial for the overall fabric of buildings and structures	Policy ENV 5 would indirectly help improve the environmental assets of Renfrewshire through protection of natural and built heritage	The additional policy will specifically help protect air quality	The water environment is part of a wider ecosystem and improvements to air quality could lead to improvements in the water environment	Improvements to air quality will have a direct positive impact on climate change, as where appropriate, applications should be accompanied by an air quality assessment which demonstrates the likely impact on air quality and how such impacts will be avoided and/or mitigated	A policy on air quality would have no significant impact on the landscape	Policy ENV 5 has a direct significant positive impact on human health in Renfrewshire as improvements in air quality improve the population's health and well being	An improvement in air quality contributes directly to soil quality	Protecting air quality will happen throughout the lifetime of the plan	Protection and improvement of air quality through development proposals should lead to a permanent improvement in air quality	Positive cumulative effect by ensuring that development proposals do not have an adverse effect on air quality	The policy protects air quality throughout Renfrewshire. The Supplementary Guidance sets out the specific criteria that proposed developments will be tested against

**Appendix 2: Scottish Government Reporters Modifications to the Local Development Plan and how they have been taken into account in the Environmental Report**

Issue	Reporter's Recommendation	Effect of modification on the conclusions of assessment of the modified Proposed Plan
<p><b>1. Spatial Strategy</b></p>	<p>That the second and third criteria in the shaded box on page 6 of the proposed plan be replaced by:</p> <ul style="list-style-type: none"> <li>The design of new development is demonstrated to benefit the area by following the principles of 'Designing Places'.</li> </ul>	<p>Reference to Designing Places and Designing Streets was set out in two separate bullet points in the Proposed LDP. The change recommended by the Reporter simply combines two bullet points into one.</p> <p>Overall, there is no change to the original assessment</p>
<p><b>2. Economic Strategy, Policy E1 - Renfrewshire's Economic Investment Locations and Figure 6</b></p>	<p>That the proposed plan be modified as follows</p> <ol style="list-style-type: none"> <li>Add to the end of the first paragraph of the Renfrewshire Economic Infrastructure Location's section on Pg 8: <i>Opportunities to improve existing key infrastructure will be supported where appropriate.</i></li> <li>Under the heading Role and Function for Hillington change the text to read: <i>Key strategic business park adjacent to M8.</i></li> </ol> <p>Under the heading Challenges/Opportunities for Hillington add: <i>The park provides a range of opportunities to provide premises at differing scales and for a wide range of businesses.</i></p>	<ol style="list-style-type: none"> <li>Recognising that infrastructure improvements can assist in promoting economic development helps strengthen Renfrewshire's Economic Locations as well as aims to reduce emissions through the encouragement of active travel and public transport infrastructure</li> <li>Changes to the role and function and the challenges/opportunities at Hillington simply provided a more accurate description of the business park and the opportunities available</li> </ol> <p>These changes have resulted in no change to the original assessment</p>
<p><b>3. Policy E2 – Glasgow Airport Zone and Figure 5 – Renfrewshire's Economic Investment Locations</b></p>	<p>That policy E2 of the proposed plan be modified by removing the words <i>Hillington / Renfrew North</i> after <i>Linwood</i> and by adding the word <i>and</i> before <i>Linwood</i>.</p>	<p>The reference to Renfrew North and Hillington SEIL was added to the text in error. This proposed modification reflects the Strategic Development Plan. This deletion results in no change to the original assessment</p>

<p><b>4.</b> <b>Policy E3 and Figure 9</b></p>	<p>I recommend that the following modifications be made:</p> <ol style="list-style-type: none"> <li>1. Add the words “waste management” between the words “business” and “and” in the column headed “Acceptable uses within Transition Area” in relation to Meadowside Street/Blythswood Area/Normandy Hotel, Renfrew on page 13 of the plan.</li> <li>2. Delete the words “(retail uses would not be acceptable)” in the column headed “Acceptable uses within Transition Area” in relation to Old Glasgow Road, Braehead on page 13 of the plan.</li> </ol>	<ol style="list-style-type: none"> <li>1. The addition recommended by the Reporter allows Policy E3 to comply with the objectives of the zero waste plan. This additional wording was the result of discussions with SEPA regarding each policy within the LDP. Given the nature of many of the sites within Transition Areas, i.e. old industrial areas, the additional wording is likely to have no significant impact on the area. It may have the potential to have significant positive environmental effects reducing the amount of municipal waste going to landfill</li> <li>2. Since the production of the Proposed LDP a retail application was granted at a site off Old Glasgow Road. The planning application was assessed for its impact during consideration of the planning proposal. The change simply reflects the most up to date land use situation in this area</li> </ol> <p>These change therefore result in no change to the original assessment</p>
<p><b>5.</b> <b>Alternative Renfrewshire Economic Investment Locations (REIL’s)</b></p>	<p>No modifications.</p>	<p>/</p>
<p><b>6.</b> <b>Policy C1 – Renfrewshire’s Network of Centres, Figure 11 and Proposed Retail Sites in Bridge of Weir</b></p>	<ol style="list-style-type: none"> <li>1. The boundary of Paisley East End Local Service Centre on Proposals Map E should be changed to include the Tesco Store and associated car park in East Lane and this area should be included within the area covered by Policy C1 (LSC).</li> <li>2. The first bullet point of the Programme of Delivery on page 21 should be replaced with the following bullet point: “Work in partnership to develop a Centre Strategy for each centre to strengthen the role, function and diversification of uses within</li> </ol>	<ol style="list-style-type: none"> <li>1. This change was the result of an error made by Renfrewshire Council in not including a principle retail unit within the Local Service Centre boundary. This change is a minor alteration which would have no environmental consequences</li> <li>2. Renfrewshire Council considered that it was important to set out the importance of producing a Centre Strategy for each centre in Renfrewshire to ensure that it fully complied with</li> </ol>

	<p>Renfrewshire’s Network of Centres”.</p> <p>3. All reference to “Retail Warehouse Parks” as a designation within the Network of Centres in the proposed local development plan, including on the Proposals Maps, should be replaced with the term “Commercial Centres”.</p> <p>4. On Figure 11 on page 18, under the Bridge of Weir Local Service Centre, the paragraph under “Challenges and Opportunities” should be replaced with the following paragraph:</p> <p>“Improvements in public realm as well as development of gap sites with appropriate uses to strengthen the quality of the centre’s environment. Opportunity to strengthen local convenience retail offer within the village.”</p>	<p>Scottish Planning Policy (SPP) along with the main aim of helping to improve the physical environment and aid in positive place making</p> <p>3. This change reflects the terminology within the SPP and ensures a consistent approach. This has no impact on the original assessment.</p> <p>4. The lack of convenience provision within Bridge of Weir results in unsustainable travels patterns as residents have to travel to purchase goods. Inclusion of the statement to strengthen local convenience retail offer in the village will have a positive significant environmental impact due to reduced travel patterns thus reducing emissions and a positive impact on population and human health</p>
<p><b>7</b> <b>Policy C2 – Development Out with the Network of Centres</b></p>	<p>No modifications.</p>	<p>/</p>
<p><b>8.</b> <b>Braehead</b></p>	<p>The plan should be modified as follows:</p> <p>1. In the narrative on page 16:</p> <p>(a) under Strategic Centres, on the second line delete “Town”</p> <p>(b) under Clyde Riverside – Braehead, Renfrew, Erskine, Bishopton, replace the first paragraph with the following: “Braehead is identified in both the SDP and the LDP as a Strategic Centre. The SDP seeks the development of a masterplan for the regeneration of the centre and wider area as Braehead is central to the Clyde Waterfront regeneration initiative and the emerging community of</p>	<p>No changes made as Renfrewshire Council declined the modification</p>

Renfrew North. The council may allow further retail development at Braehead but the LDP will only support such expansion where it furthers the development of a town centre character at Braehead, where there is evidence of a qualitative or quantitative need and if there are no suitable sites in Glasgow City Centre or Paisley town centre. There is a need for Braehead as a place to develop a town centre rather than shopping mall character and this must have a bearing on all proposals that emerge in the future.”

- (c) under Clyde Riverside – Braehead, Renfrew, Erskine, Bishopton, in the fourth paragraph replace the final sentence with the following:  
“There is a need for Braehead to develop the character of a town centre.”
  
- 2. In the narrative on page 17, under Retail Warehouse Parks (to be changed to Commercial Centres) – Linwood, Phoenix, Abbotsinch Retail Park, Braehead Retail Park, in the second paragraph, second line, insert “Centres” after “Strategic”.
  
- 3. In Figure 11 – Renfrewshire Network of Centres Role & Function:
  - (a) under “Strategic Centres” after “Braehead”, delete “Town Centre”
  - (b) under “Strategic Centres” in the third column “Challenges/Opportunities”, against “Braehead” replace the existing paragraph with the following:  
“To develop a town centre character, creating a sense of place and increasing connectivity between Braehead and Renfrew while developing a hub for public transport. Significant opportunity for development of town centre

uses that will continue to stimulate and complete the wider Clyde Waterfront regeneration, subject to the sequential approach and acceptable retail impact in relation to Glasgow City Centre and Paisley Town Centre.”

- (c) under “Retail Warehouse Parks” (to be changed to “Commercial Centres”) in the third column “Challenges/Opportunities” against “Braehead Retail Park”, in the first line delete “Town” and replace with “Strategic”.

4. In Figure 12 – Braehead, in the Key:

- (a) in Proposed Town Centre Expansion, Long Term Town Centre Expansion and Town Centre Boundary, delete “Town” and replace with “Strategic”.
- (b) against both Proposed Strategic Centre Expansion, Long Term Strategic Centre Expansion insert and asterisk.
- (c) at the foot of the Key insert an asterisk against which add “subject to the sequential approach and satisfactory retail impact in relation to Glasgow City Centre and Paisley Town Centre”.

5. In Figure 12 – Braehead:

- (a) in the location of the Travel Lodge, replace the purple “Business/Commercial Use” shading with a different colour to indicate the existing hotel use and add this colour and the appropriate label to the Key.

6. In Policy C1 add at the end of the policy:

“and bearing in mind the pre-eminence of Glasgow City

	<p>Centre as identified in the Glasgow and Clyde Valley Strategic Development Plan Strategy Support Measure 11”.</p> <p>7. In Policy C2:</p> <p>(a) replace the first bullet point with the following: “Provide clear justification as to why sites within the network of centre and Glasgow City Centre have been discounted, demonstrating a sequential approach has been undertaken to site selection”.</p> <p>(b) add at the end of the second bullet point: “and Glasgow City Centre”.</p> <p>(c) add at the end of the fourth bullet point: “or Glasgow City Centre”.</p>	
<p><b>9.</b> <b>Policy I1 - Connecting Places</b></p>	<p>No modifications</p>	<p>/</p>
<p><b>10.</b> <b>Policy I1 Potential Transport Improvements</b></p>	<p>1. On page 12 of the proposed plan, in the key at the bottom right hand corner of Figure 8, add after “3 Indicative road link between Inchinnan Road and Renfrew Road” the following in brackets:</p> <p>(subject to a Strategic Transport Appraisal Guidance (STAG) assessment).</p> <p>2. The possibility of the reinstatement of the line from Elderslie to Paisley Canal and its identification as a project in the in the text of the 2009 Strategic Transport Projects Review should be mentioned in the text of the Infrastructure</p>	<p>1. In adding STAG assessment to Figure 8 this will ensure any negative environmental impacts are avoided, reduced or mitigated against. This is a positive addition to the LDP</p> <p>2. Adding text to the LDP will have no significant environmental consequences at this stage given that this is a long term aspiration to convert an existing walking/cycle route to a public transport link. The likelihood of this proposal proceeding is slim but this will be taken into consideration at the preparation of each new LDP. There is no change to Environmental Assessment</p>

	<p>section of the proposed plan on pages 22 or 23.</p> <p>3. An additional bullet point should be added to Policy 13 to read: Surface access enhancements at Glasgow Airport.</p>	<p>3. Improved surface access at Glasgow Airport will help airport passengers and staff get to/from the airport more sustainably. This has a positive impact on the policy as it improves sustainable transport and travel at the airport. Policy 11 had a positive impact on material assets, air, population and human health no changes are therefore required to the Environmental Assessment</p>
<p><b>11.</b> <b>Policy 14 - Fastlink</b></p>	<p>The airport surface access enhancements shown in Figure 7 should be widened to take account of possible Fastlink access or connection to the Fastlink route to/from the airport and Figure 7 should be altered accordingly.</p>	<p>Not Applicable</p>
<p><b>12.</b> <b>Policy 15 - Flooding and Drainage</b></p>	<p>I recommend that the following modifications be made:</p> <p>Amend Policy 15 by (1) deleting the words “will require to demonstrate that it will promote” and substituting the words “should avoid areas susceptible to flooding and is required to demonstrate promotion of” and (2) adding the words “and be supported by an assessment of flood risk when deemed necessary” after the words “New Development SG”.</p>	<p>Modification of the policy ensures potential developments avoid areas susceptible to flooding. Policy 15 had significant positive impacts on biodiversity, flora and fauna, water, climatic factors and population and human health. The modifications to the policy strengthen this assessment</p>
<p><b>13.</b> <b>Policy 16 - Renewable and Low Carbon Energy Developments</b></p>	<p>I recommend that the following modifications to Policy 16 be made:</p> <p>1. Delete the last line of the wording of Policy 16 and substitute “Any development will require to comply with the above criteria as well as the criteria set out in the council’s New Development SG.”</p>	<p>1. The modifications proposed address any inconsistency in the wording</p> <p>No change is required to the environmental assessment</p> <p>2. Following the modifications proposed Renewable and Low Carbon Energy Developments have to have regard to the</p>

	<p>2. Add new criterion to Policy I6 as undernoted: “outdoor sport and recreation interests”.</p>	<p>individual and cumulative effects on outdoor sport and recreational issues helps ensure that there is a positive environmental effect</p> <p>No changes are required to original assessment</p>
<p><b>14.</b> <b>Policy I7 Low Carbon Developments</b></p>	<p>I recommend that the following modification to Policy I7 be made:</p> <p>Add the words “or setting out the reasons why it is neither practical nor viable to meet the requirement in part or in full” after the word “met” at the end of Policy I7.</p>	<p>The modifications were made to ensure the Policy is flexible to developers in circumstances where they are able to demonstrate significant technical constraints to using on site low and zero carbon generating technologies</p> <p>The modifications do not impact on the original environmental assessment as developer still need to considered using low and zero carbon generating technologies</p> <p>No change is required to the policy assessment</p>
<p><b>15.</b> <b>Policy I8 - Waste Management</b></p>	<p>The fourth bullet point of Policy I8 – Waste Management should be replaced with the following:</p> <p>Be located on or adjacent to land previously licensed for waste management processes without impact upon amenity or operation of other uses or on land designated for Renfrewshire's Economic Investment Locations or Transition Areas, subject to site specific considerations;</p>	<p>The modifications to the policy do not change the original policy assessment as even though the wording allows waste management facilities in a range of locations across Renfrewshire, the Policy still requires the impact upon amenity or operation of other uses or land to be considered no matter where it is, so therefore the protection is still central to this Policy</p> <p>No change is required to the policy assessment</p>
<p><b>16.</b> <b>Policy P1 – Renfrewshire’s Places</b></p>	<p>Modify Policy P1 by removing the words ‘impact on’ and replacing them with the words ‘harm to’</p>	<p>The modification to Policy P1 ensures that the policy does not discourage development which has a significant positive effect.</p> <p>This change does not impact on the original environmental assessment</p>

**17.  
Policy P2 – Housing Land  
Supply**

1. On page 26, under the heading ‘Additional Housing Sites’, remove the first sentence of the second paragraph (which begins ‘By identifying...’).
2. On page 27 under the heading ‘Housing Land Requirement’, replace the second paragraph with the following:  
  
‘The council recognises that a five year effective supply of land for housing, as set out in Scottish Planning Policy, will not be provided at the start of the plan period. The council will investigate the potential for further release of land and prepare supplementary guidance to ensure an effective and generous supply. The land supply will be monitored through annual housing land audits and where the 5-year supply is not being maintained, further land release will be considered against the detailed criteria set out in that supplementary guidance.’
3. Include the affordable housing targets as a separate column in table 1 on page 27.
4. Provide up to date figures for table 3 on page 27 as supplied to the examination.
5. Adjust the figures in table 4 (on page 27) and Schedule 2 (on page 30) to include allocations recommended in issues relating to specific sites and to delete the contribution estimated for the Paisley South Expansion Area.
6. Modify Policy P2 – Housing Land Supply by adding the following:

The changes requested under Policy P2 ensure that with an optimistic outlook for the economy it was appropriate to modify the policy as a means of identifying appropriate additional sites to meet demand

The original environmental assessment of Policy P2 is still appropriate and relevant as the potential development sites are likely to be located within or on the edge of urban areas

No change is required to the policy assessment

The Supplementary Guidance on Housing Land Supply will be prepared and a separate SEA will be undertaken to assess the individual and cumulative impact of the additional houses that are required to meet the housing land supply shortfall

	<p>‘The council will prepare supplementary guidance within 1 year of adoption of this plan to include a detailed framework to guide the release of additional housing land where a 5- year supply of effective housing land is not being maintained. This guidance should be subject to annual monitoring and review. The council will grant planning permission in accordance with the detailed guidance, provided that:</p> <ul style="list-style-type: none"> <li>• the site is shown to be effective and can be delivered to address the identified shortfall;</li> <li>• it will not undermine the spatial strategy of the plan; and its design would comply with the criteria for implementing the spatial strategy on page 6 of this plan and the council’s New Development SG.’</li> </ul>	
<p><b>18. Policy P3 – Additional Housing Sites</b></p>	<ol style="list-style-type: none"> <li>1. Delete Proposal 3 – Additional Housing Sites - Greenfield from the proposed plan.</li> <li>2. Under Additional Housing sites on page 26 of the proposed plan, replace the text of the fourth paragraph with:   <p>”At present there is great financial uncertainty and house building is seen as a method to kick- start the economy. The council is not in favour of the additional greenfield sites that have been identified in this LDP being left undeveloped. Therefore, any of the additional sites with no planning permission for housing by the adoption of the next LDP may be replaced by other effective sites and returned to the green belt.”</p> </li> </ol>	<p>The removal of Proposal P3 was undertaken by strengthening the supporting text which clearly states that the additional Greenfield sites that have been identified will be returned to the Green Belt if they do not have planning permission by the adoption of the next Local Development Plan. Therefore the text has not been lost from the LDP, this is still the procedure that the Council will carry out if sites identified for proposed housing are not built on.</p> <p>No change is required to the policy assessment</p>

<b>19. Merchiston Hospital, Brookfield</b>	No modifications.	Not applicable
<b>20. Abbey Road, Elderslie</b>	No modifications.	Not applicable
<b>21. Midton Road, Howwood</b>	No modifications.	Not applicable
<b>22. Shillingworth, Bridge of Weir</b>	<p>I recommend the following modification be made:</p> <p>In Schedule 2 – Additional Housing Sites – Greenfield, in the section relating to Shillingworth, off Earl Place, Bridge of Weir, after the words “Green belt release” add the words “The precise western boundary of the site shall be defined by a masterplan approved by the council”.</p>	<p>Undertaking a master plan approach approved by the Council will allow the most suitable western boundary to the site to be developed. The Council want to encourage additional planting at this site and consider that this addition to the LDP is positive</p> <p>No changes are required to the environmental assessment</p>
<b>23. East of Fleming Road, Houston</b>	No modifications.	Not applicable
<b>24. Houston Road Houston</b>	No modifications.	Not applicable
<b>25. Bishopton – Alternative Suggested</b>	Add the site at Station Road, Bishopton to Schedule 2 of the proposed plan as a green belt release and with an indicative capacity of 50 units.	<p>The addition of the site at Station Road, Bishopton is required to meet the overall shortfall in Renfrewshire’s Housing Land Supply</p> <p>It is a discrete site, which is technically brownfield given that it has had a number of previous uses on the site. There was no recording of significant amounts of flora and fauna and it was likely that biodiversity was low. It is a sustainable site adjacent to walking, cycling and public transport routes and is located in the middle of</p>

		<p>the village. It will round off the residential development on this side of Bishopton and leave a logical and clearly defined position green belt boundary. The environmental assessment of Policy P3 generally covers the additional housing sites. A specific planning and environmental assessment of the site was undertaken as part of the Suggestions for land use change exercise”</p> <p>No changes are required to the environmental assessment</p>
<p><b>26 Bridge of Weir – Alternative Suggested Housing Sites</b></p>	<p>Add the site at Lawmarnock Road, Bridge of Weir to Schedule 2 of the proposed plan as a green belt release and with an indicative capacity of 9 units.</p>	<p>The addition of the site at Lawmarnock Road, Bridge of Weir is required to meet the overall shortfall in Renfrewshire’s Housing Land Supply.</p> <p>A development of 9 dwellings on this site could be satisfactorily accommodated without wider adverse landscape or visual impact and with no significant harm to the green belt</p> <p>The environmental assessment of Policy P3 generally covers the additional housing sites</p> <p>A specific assessment of the site was undertaken as part of the Suggestions for land use change exercise”</p> <p>No changes are required to the environmental assessment</p>
<p><b>27 Elderslie - Alternative Suggested Housing Site</b></p>	<p>No modifications.</p>	<p>Not applicable</p>
<p><b>28. Erskine – Alternative Suggested Housing</b></p>	<p>Add the site at Florish Road, Northbar, Erskine to Schedule 2 of the proposed plan as a green belt release and with an indicative capacity of 200 units.</p>	<p>The addition of the site at Florish Road, Northbar, Erskine is required to meet the overall shortfall in Renfrewshire’s Housing Land Supply</p> <p>Development at this location would round off development on the west of the residential area. The surrounding woodlands and</p>

		<p>grounds of Northbar House would protect the setting of the Listed Building</p> <p>The environmental assessment of Policy P3 generally covers the additional housing sites</p> <p>A specific assessment of the site was undertaken as part of the “Suggestions for land use change exercise”</p> <p>No changes are required to the environmental assessment</p>
<b>29. Alternative Site, Houston</b>	No modifications.	Not applicable
<b>30. Howwood – Alternative Suggested Housing</b>	No modifications.	Not applicable
<b>31. Johnstone – Alternative Suggested</b>	No modifications.	Not applicable
<b>32. Kilbarchan - Alternative Suggested</b>	No modifications.	Not applicable
<b>33. Alternative Site – Langbank</b>	No modifications.	Not applicable

<b>34. Linwood – Alternative Suggested Housing</b>	No modifications.	Not applicable
<b>35. Lochwinnoch – Alternative Suggested Housing Site</b>	No modifications.	Not applicable
<b>36. Alternative Sites – Paisley</b>	No modifications.	Not applicable
<b>37. Policy P4 – Housing Action Programme</b>	1. Replace Schedule 4 in the proposed plan with the version of the table set out in core document CD53.	This modification is the substitution of a table with the correct figures  No change to the environmental assessment is required
<b>38. Policy P5 - Community Growth Areas</b>	No modification.	Not applicable
<b>39. Paisley South Expansion Area</b>	No modification.	Not applicable
<b>40. Policy P7 – Green Network</b>	No modification.	Not applicable
<b>41. Policy P8 – Open Space</b>	No modification.	Not applicable
<b>42. Policy ENV1 – Green belt</b>	No modification.	Not applicable

<p><b>43.</b> <b>Policy ENV2 - Natural Heritage</b></p>	<p>1. The first sentence of policy ENV2 – Natural heritage should be replaced with the following sentence:</p> <p>To accord with the local development plan, developments must not have an adverse effect on the integrity of sites protected for their natural conservation interest or which have the potential to protect and enhance designation sites and the wider biodiversity and geodiversity of the area. Where appropriate, the council will seek to improve these resources.</p>	<p>Modifications were made to Policy ENV 2 to provide more of a focus on development not having an adverse effect on the natural heritage and to clarify that natural heritage designations can include geological interests</p> <p>Policy ENV2 was assessed as having a significant positive effect on all SEA topics but the historic environment where it would have a positive effect. Strengthening the policy to clarify that geological interests are natural heritage features and providing an additional focus on development not having an adverse effect on the natural heritage further intensifies the positive environmental effect that this policy has on all SEA topics</p> <p>No changes are required to the assessment</p>
<p><b>44.</b> <b>Policy ENV4 - The Water Environment</b></p>	<p>Alter Policy ENV4 so that it reads as follows:</p> <p>In line with the Water Framework Directive, River Basin Management Plan and the Clyde Area Management Plan, there will be support for proposals which encourage protection of the existing water environment as well as improvement to the control and management of water along with the enhancement of biodiversity, flora and fauna surrounding blue corridors. The inclusion of green infrastructure which promotes the integration of blue and green networks in and around developments will be encouraged to ensure that the water environment is central to the fabric of places, contributing to sustainable flood management and not having an adverse effect on the integrity of any Natura 2000 sites. Proposals for development will require to be assessed against the criteria set out in the New Development Supplementary Guidance</p>	<p>Policy ENV 4 - The Water Environment was assessed as having a significant positive environmental effect on all SEA topics. The modifications to the Policy link to the Water Framework Directive, the River Basin Management Plan and the Clyde Area Management Plan and highlight the important links between river basin management planning and land use planning regimes. These changes strengthen the Policy further</p> <p>No changes are required to the assessment</p>

**45.  
New Policy**

1. Include a new policy in the environment section worded as follows:

“POLICY ENV5 – Air Quality

The council will seek to ensure that development proposals shall not individually or cumulatively have an adverse affect on air quality. Where required, planning applications should be accompanied by an air quality assessment which demonstrates the likely impact on air quality and how such impacts will be mitigated. All development proposals will require to be in accordance with the provisions set out in the New Development SG.”

2. Add two sentences to the text on page 32, at the end of the second paragraph under the heading Built Heritage, to read:

“The use of enabling development will be considered where it is essential to the preservation of built heritage and where the benefits outweigh any conflict with other parts of the development plan. The New Development SG sets out the criteria to be met by enabling development.”

3. Modify the second sentence of Policy ENV3 to read:

“Development proposals, including enabling development, within or in the vicinity of built heritage assets will be required to demonstrate that there is no negative impact to their site or setting and that they are in accordance with the provisions set out in the New Development SG.”

1. A full assessment of this new Policy has been undertaken and is illustrated in Appendix 1 of this Post Adoption SEA
2. The modifications to the supporting text and to Policy ENV3 address the difficulties associated with the desirable aim of preserving and re-using Listed Building through a policy approach to enabling development

This will have a significant positive environmental effect on the historic environment

3. Although Policy ENV3 has been altered to include support for enabling development, the Scottish Government Reporter has correctly suggested that each proposal would require to be assessed on its merits and therefore the impact of particular developments would be assessed at the planning application stage

No change is required to the environmental assessment



5. The final sentence of Policy E5 should be altered to read:  
  
Any development proposals in or around the airport should not have a significant adverse impact on the infrastructure of the airport or surrounding environment and demonstrate that it does not have an adverse effect on the integrity of any Natura 2000 sites.
6. The fourth bullet point of Policy I6 should be altered to read:  
The safe and efficient use of the airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.
7. The following definition should be included in the Glossary:  
  
A habitat network is a set of separate areas of habitat which are sufficiently connected for a particular species to move between the individual areas.
8. The boundary of Clyde Muirshiel Regional Park should be added to the proposals maps.
9. On the proposals maps, the entire site of the former Greenhead Nursery, Inchinnan should be included within the policy P1 area and removed from the greenbelt.

5. The addition of the word adverse to Policy E5 – Glasgow Airport is a minor modification and helps strengthen that any proposed development should not impact on the infrastructure of the airport.

No change is required to the environmental assessment

6. Policy I6 – Renewable and Low Carbon Energy Developments was modified to ensure that any proposed renewable energy development did not have an individual or cumulative significant effect on the airport, flight activity, navigation, flight paths and the Ministry of Defence surveillance.

No change is required to the environmental assessment as the impact the policy has on the SEA topics has not altered

7. Not Applicable

8. Not Applicable

9. The entire site of Greenhead Nursery is a previously developed site and it is an anomaly where ½ the site was within Green Belt and ½ covered by the Policy P1 zoning. Making this modification means the entire site is covered by Policy P1. As the green belt did not follow any clearly identifiable feature on the ground allows the site to be redeveloped in a consistent manner.

No change is required to the environmental assessment

