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01166 Scoping - Renfrewshire Council - Renfrewshire Local Development Plan 2

Dear Judith,

With reference to the Scoping report you submitted to the SEA Gateway on 23 March 2016.

In accordance with Section 15(2) of the **Environmental Assessment (Scotland) Act 2005** the Consultation Authorities have now considered the Scoping report you submitted. The individual responses from the Consultation Authorities to your report are attached to this letter.

As the Consultation Authorities have now expressed their views on the proposed scope and level of detail of the report, you should refer to the Act to consider what your next step should be. You should of course take into account the opinions offered by the Consultation Authorities.

Note, in accordance with Section 15(3) of the 2005 Act (when agreed) you are required to formally write to advise the Scottish Ministers of the period of consultation you intend to specify, both for the public and the Consultation Authorities.

If you have any queries or would like me to clarify any points, please call me on 0131 244 7650.

Yours sincerely

Johnathan Whittlestone
SEA Gateway Officer



Historic Environment Scotland

Àrainneachd Eachdraidheil Alba

By email: Judith.chalmers@renfrewshire.gov.uk;
SEA Gateway

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Our ref: LDP/REN
Our Case ID: 201508098

06 April 2016

Dear Ms Chalmers

Environmental Assessment (Scotland) Act 2005 **Renfrewshire Council - Renfrewshire Local Development Plan 2** **Scoping Report**

Thank you for consulting Historic Environment Scotland on the scoping report for Renfrewshire Council's Local Development Plan 2, received by the Scottish Government's SEA Gateway on 23 March 2016. This letter contains the views of Historic Environment Scotland on the scope and level of detail of the information to be included in the Environmental Report (part 1), and the duration of the proposed consultation period (part 2). Please note that our view is based on our main area of interest for the historic environment.

1. Scope of assessment and level of detail

1.1 The scoping report provides a clear description of the approach to the assessment and in general I am content with the scope and level of detail proposed for the SEA. However, I do have a few points to raise which can be found in the annex to this response.

2. Consultation period for the Environmental Report

2.1 I note that it is proposed that the Main Issues Report and its environmental report be out for a consultation of 12 weeks. I can confirm that I am content with the consultation period proposed.

Please do not hesitate to contact me should you wish to discuss this response.

Yours sincerely

[REDACTED]
Urszula Szupczynska
Senior Heritage Management Officer

Historic Environment Scotland

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Annex

Table 2 Environmental Baseline Summary

I welcome the identification of relevant environmental problems relating to the historic environment in this section. The assessment should consider how the plan will interact with these issues and how any exacerbation of these issues can be mitigated.

Historic Environment Objective for the SEA

I would recommend adding 'where appropriate' to this objective (after the word enhance) to read 'the Council will aim to protect, maintain and enhance, **where appropriate**, the built and historic environment and promote good quality place making'

Table 3 SEA Issues Scoped In/Out

I note and welcome that the historic environment has been scoped into the assessment.

Appendix 1: Plans, Programmes and Strategies to be used to inform the Local Development Plan 2

The table recording relevant plans, programmes and strategies for the historic environment requires some updating. The following would provide an appropriate framework:

Reference is being made in the Scoping Report to *Passed to the Future (Policy for the Sustainable Management of the Historic Environment, published in 2002)*. It should be noted that SHEP (2011) supersedes the policy elements of *Passed to the Future*.

The Memorandum of Guidance on Listed Buildings and Conservation Areas (1998) has been withdrawn. A series of guidance notes under the name Managing Change in the Historic Environment has replaced the guidance previously provided by the Memorandum in supporting the SHEP and SPP. These guidance notes have been designed to offer clear, consistent advice to professionals, developers and applicants and can be viewed on our webpage at: <http://www.historic-scotland.gov.uk/managingchange>.

Planning Advice Note (PAN) 2/2011: Planning and Archaeology is also relevant as it contains advice for planning authorities on the treatment of archaeological remains.

To note that also relevant here would be *Our Place in Time - The Historic Environment Strategy for Scotland*. This sets out the 10 year vision for Scotland's historic environment and how its cultural, social, environmental and economic value contributes to the nation and its people. The strategy can be found at <http://www.gov.scot/Resource/0044/00445046.pdf>.

Assessing the Effect of the Local Development Plan on the Baseline and Site Assessments

It will be important that the assessment matrix clearly sets out the reasoning behind attributed assessments through the use of commentary, allowing the findings to be clearly reported with accompanying mitigation as required. There should also be a clear read

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across between the assessment (and its mitigation) and the plan in order to aid in clearly setting out the requirements relating to the deliverability of allocations that have predicted significant effects on the historic environment.

The following questions could be used in the individual site assessments to identify impacts on cultural heritage:

- Will the development of the site affect any scheduled monuments or their setting?
- Will the development of the site affect any locally important archaeological site? (www.rcahms.gov.uk/canmore.html)
- Will the development of the site affect any listed buildings and/or their setting?
- Will the development affect any conservation areas?
- Will the development of the site affect any Inventory or Non-Inventory Garden and Designed Landscape?
- Will the development of the site affect any Inventory Historic Battlefield?
- Will the development of the site affect any World heritage Sites?
- To what extent will the development of the site result in the opportunity to enhance or improve access to the historic environment?

Monitoring

I welcome that a monitoring framework will be prepared and in order to check the effectiveness of mitigation and enhancement and look forward to further details on this as the assessment progresses.

Historic Environment Scotland
06 April 2016

Our ref: PCS/145964
SG ref: SEA/01166/SCO

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Planner
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PA1 1JD

If telephoning ask for:
Nicki Dunn

14 April 2016

By email only to: sea.gateway@scotland.gsi.gov.uk

Dear Madam

Environmental Assessment (Scotland) Act 2005 Renfrewshire Local Development Plan 2 - Scoping consultation

Thank you for your Scoping consultation submitted under the above Act in respect of the Renfrewshire Local Development Plan 2. This was received by SEPA via the Scottish Government SEA Gateway on 24 March 2016.

As required under Section 15(2) of the Act, we have considered the document submitted and comment as follows in respect of the scope and level of detail to be included in the Environmental Report (ER). The [Scottish Government SEA Guidance](#) provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA stage; we have also produced [Standing Advice for Responsible Authorities on Strategic Environmental Assessment \(SEA\) Scoping Consultations](#). We have used the guidance to inform our detailed scoping response which is attached as Annex 1.

On completion, the Environmental Report and the plan to which it relates should be submitted to the Scottish Government SEA Gateway (sea.gateway@scotland.gsi.gov.uk) which will forward it to the Consultation Authorities.

Should you wish to discuss this screening consultation please do not hesitate to contact me on 01698 839000 or via our SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely

Nicki Dunn
Senior Planning Officer

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Appendix 1: Comments on the Scoping consultation

1. Relationship with other Plans, Policies and Strategies (PPS)

1.1 The table recording relevant plans, programmes and strategies requires updating.

1.2 The following are the most recent versions and should be referred to:

- The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended);
- SEPA Flood Map;
- SEPA (2009) Groundwater protection Policy for Scotland v3: Environmental Policy;
- Pollution Prevention and Control (Scotland) Regulations 2012;
- Air Quality for England, Scotland, Wales and Northern Ireland: Vol 1 2011.

1.3 The above list is not exhaustive and other amendments may be required.

1.4 Some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the Renfrewshire Local Development Plan 2. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.

2. Baseline information

2.1 SEPA holds significant amounts of environmental data which may be of interest to you in preparing the environmental baseline, identifying environmental problems, and summarising the likely changes to the environment in the absence of the PPS, all of which are required for the assessment. Much of this information is available on our [website](#).

2.2 Additional local information may also be available from our Access to Information unit at our Corporate Office (Telephone 01786 457700 or email dataenquiries@sepa.org.uk).

2.3 Other sources of data for issues that fall within SEPA's remit are referenced in our [Standing Advice for Responsible Authorities on Strategic Environmental Assessment \(SEA\) Scoping Consultations](#).

3. Environmental problems

3.1 We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.

4. Alternatives

4.1 We note that alternatives are still being considered. Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report.

5. Scoping in / out of environmental topics

5.1 We agree that in this instance all environmental topics should be scoped into the assessment.

6. Methodology for assessing environmental effects

- 6.1 Including a commentary section within the matrices in order to state, where necessary, the reasons for the effects cited and the score given helps to fully explain the rationale behind the assessment results. This allows the Responsible Authority to be transparent and also allows the reader to understand the rationale behind the scores given.
- 6.2 Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects this should be clearly set out in the Environmental Report.
- 6.3 We would expect all aspects of the PPS which could have significant effects to be assessed.
- 6.4 We support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.
- 6.5 When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered.
- 6.6 It is helpful if the assessment matrix directly links the assessment result with proposed mitigation measures such as in the example below:

SEA ISSUES - CHECKLIST QUESTION	Yes or No	Effect	COMMENT and OPPORTUNITIES TO MITIGATE OR IMPROVE
Is the allocation at risk from fluvial or coastal flooding?	Y	Negative	Part of site found to be at risk now removed from allocation.
Could the allocation have a physical impact on existing watercourses?	Y	Negative	Site dissected by watercourse. Developer Requirements includes statement " <i>watercourse to be integrated as positive feature of the development. No culverting.</i> "
Can the allocation currently be connected to the public sewerage system?	Y	Positive	Developer Requirement includes statement " <i>connect to public sewer</i> "

Design of the Assessment Matrices

- 6.8 We are content with the proposed detailed assessment matrix and particularly welcome the commentary box to fully explain the rationale behind the assessment results. We also welcome the link between effects and mitigation / enhancement measures in the proposed assessment framework and the consideration of mitigation of impacts.

Comments on wording of proposed SEA objectives

- 6.9 We are content with the proposed SEA objectives to be used in the assessment.

Assessment of land allocations

- 6.10 When it comes to assessment of the effects of allocations or sites we advocate a rigorous methodology which clearly assesses potential effects on all environmental topics. Our experience in relation to assessment of allocations is that it can be a much easier and useful exercise for the plan-maker if the assessment is made against a range of related questions, rather than directly against the environmental topics. This allows a very practical assessment to take place which clearly highlights the environmental benefits and costs of each individual allocation. As an example, assessing the allocation against the question “*Can the allocation connect to public sewage infrastructure?*” gives a clear practical view on how this allocation is likely to affect the water environment.
- 6.11 We would draw your attention to the joint [SEA and development plan site assessment proforma](#) which sets out the issues which we require to be addressed in more detail.

7. Mitigation and enhancement

- 7.1 We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option; hence we support proposals for enhancement of positive effects as well as mitigation of negative effects.
- 7.2 It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.
- 7.3 We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).
- 7.4 One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA.
- 7.5 Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. The inclusion of a summary table in the Environmental Report such as that presented below will help to track progress on mitigation through the monitoring process.

Issue / Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale
Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate
etc	etc	etc	etc

8. Monitoring

- 8.1 Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators. It would be helpful if the Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan.

9. Consultation period

- 9.1 We are satisfied with the proposal for a 12 week consultation period for the Environmental Report.

10. Outcomes of the Scoping exercise

- 10.1 We would find it helpful if the Environmental Report included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account.



Scottish Natural Heritage
Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Judith Chalmers
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PA1 1JD

13 April 2016

SG ref: SEA01166

Dear Ms Chalmers

ENVIRONMENTAL ASSESSMENT (SCOTLAND) ACT 2005
RENFREWSHIRE LOCAL DEVELOPMENT PLAN - SCOPING REPORT

Thank you for your scoping report sent to the Scottish Government SEA Gateway on 23rd March 2016. In accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, I have reviewed the report on behalf of Scottish Natural Heritage (SNH) in our role as a Consultation Authority. Our comments on the scope and level of detail to be included in the Environmental Report and on the duration of the proposed consultation are set out below.

Subject to the specific comments set out below, we are content with the scope and level of detail proposed in the environmental report. We note that all of the SEA topics/receptors are scoped into the assessment at this stage (Table 3).

The approach to assessment that is proposed, using a two stage process to focus on assessing changes and emerging or changing issues from the existing Local Development plan is welcomed and this means that a focussed assessment can be undertaken.

We note the use of a matrix approach to undertake the assessment of policies, which has been tried and tested widely.

For the site assessments we welcome the use of a template. This looks to be a good opportunity to streamline the Local Development Plan site assessment and SEA assessment processes. However, we recommend a couple of amendments are made to the template to make it more effective and easier to identify issues. We recommend that within each topic specific site assessment questions/objectives are asked. We also recommend an additional column(s) is inserted into the table to provide more explicit commentary on the findings together with any proposed mitigation and opportunities for enhancement. We believe this more detailed assessment will provide information which can then be directly incorporated into the development plan as part of any site requirements or can inform design tools such as development frameworks. An example of a template which we hope you will find useful can be found here www.snh.gov.uk/docs/A1636437.pdf.

Within Appendix 1 which lists the plan's programmes and strategies that are to be used to inform the Local Development Plan we note there is a reference to Scotland's Biodiversity: It's in Your Hands. This biodiversity strategy is now supplemented by 2020 challenge for biodiversity – A strategy for the conservation and enhancement of biodiversity in Scotland <http://www.gov.scot/Publications/2013/06/5538>. We recommend that this strategy is also included in Appendix 1.

I hope that this response is helpful. If you would like to discuss any of the points made in this scoping report response, please do not hesitate to contact Derek Manson on 0141 951 0855 or via SNH's SEA Gateway at sea.gateway@snh.gov.uk .

Yours sincerely

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By e-mail only to: sea.gateway@scotland.gsi.gov.uk