



Inverclyde
council
**LOCAL
DEVELOPMENT
PLAN**



**STRATEGIC ENVIRONMENTAL
ASSESSMENT
POST-ADOPTION STATEMENT**

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

STRATEGIC ENVIRONMENTAL ASSESSMENT POST-ADOPTION STATEMENT COVER NOTE

PART 1

To: SEA.gateway@scotland.gsi.gov.uk

SEA Gateway
Scottish Government
Area 1 H (Bridge)
Victoria Quay
Edinburgh
EH6 6QQ

PART 2

A post-adoption SEA statement is attached for the PPS entitled:	Inverclyde Local Development Plan 2019
The Responsible Authority is:	Inverclyde Council

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

PART 3

Contact name	Ash Hamilton
Job Title	Planner
Contact address	Planning Policy Team Regeneration and Planning Inverclyde Council Municipal Buildings Clyde Square Greenock PA15 1LY
Contact Telephone no.	01475 712463
Contact email	Ashley.hamilton@inverclyde.gov.uk
DATE	22/01/2020

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

Strategic Environmental Assessment Post

Adoption Statement

Key Facts

This document (referred to here as the SEA Post Adoption Statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

SEA Post Adoption Statement for	Inverclyde Local Development Plan 2019
Plan Adopted	26 August 2019
Responsible Authority	Inverclyde Council
Purpose of the Inverclyde Local Development Plan	<p>The Inverclyde Local Development Plan provides a spatial and policy framework, which will guide new development in line with local, regional and national objectives and priorities.</p> <p>The Plan sets out an overall aim, development strategy, spatial strategy, policy framework and identifies development opportunity sites. Together, these will form the basis for determining planning applications and advising on development proposals, while ensuring that the natural and built environments are protected and, where appropriate, enhanced.</p>
What prompted the PPS	A legislative requirement of the Planning etc. (Scotland) Act 2006
Period Covered by the Plan	2019 - 2024
Area Covered by the Plan	Inverclyde Authority area
Availability	The Inverclyde Local Development Plan, along with the Environmental Report and the SEA Post Adoption Statement are available at the Council Offices, Local Libraries and on the Council's website

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

Office Address	Planning Policy Team Regeneration and Planning Inverclyde Council Municipal Buildings Clyde Square Greenock PA15 1LY
Web Address	https://www.inverclyde.gov.uk/planning-and-the-environment/planning-policy/development-planning/ldp

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

INTRODUCTION

The Local Development Plan was adopted by Inverclyde Council on the 26 August 2019 and made publicly available along with other associated documents, including Supplementary Guidance, Environmental Report and Habitat Regulations Appraisal.

This SEA Post Adoption Statement has been prepared in accordance with Sections 18 and 19 of the Environmental Assessment (Scotland) Act 2005. This Post-Adoption SEA Statement demonstrates how the findings of the Strategic Environmental Assessment have been taken into account in the adopted Local Development Plan. In particular, the following sections:

The following sections review:

1. The Strategic Environmental Assessment Process
2. How Environmental Considerations have been integrated into the Plan
3. How the Environmental Report has been taken into account
4. How opinions expressed during consultation have been taken into account
5. Reasons for choosing the Plan as adopted, in light of other reasonable alternatives
6. Measures that are to be taken to monitor significant environmental effects of the implementation of the Plan.

1: THE STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

The Inverclyde Local Development Plan (LDP) has been subject to Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Scoping Report: The LDP did not require to be screened due to its likely environmental impacts. The SEA process therefore began with the scoping report, which set out the level of detail to be covered in the Environmental Report and the consultation timescales for this. The scoping report was subject to consultation with SEPA, SNH and HES.
- Interim Environmental Report: This assessed the likely significant effects on the environment of the LDP Main Issues Report (MIR), which identified the key issues to be addressed by the next LDP, and set out preferred and alternative options for addressing these issues. This report was consulted on, along with the MIR, from the 31 March – 31 May 2017.
- Environmental Report: Proposed Plan: The preparation of the ER took account of the comments made to the consultation on the Interim ER the MIR. The consultation on the ER was carried out in conjunction with the consultation on the LDP Proposed Plan, from 29 April – 29 June 2018.
- Post Adoption Statement: This concludes sets out the ways in which the findings of the SEA Environmental Report, and the views expressed by consultees, have been taken into account
- A commitment to monitoring the significant environmental effects of the implementation of the LDP. This will also identify any unforeseen adverse significant environmental effects and enable

appropriate remedial action to be taken.

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

Throughout this SEA process, the preparation of the LDP has been done in association with the environmental assessment.

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

2: HOW ENVIRONMENTAL CONSIDERATIONS IDENTIFIED IN THE ENVIRONMENTAL REPORT HAVE BEEN INTEGRATED INTO THE PLAN

TABLE 1		
Environmental Considerations	Integrated into the Local Development Plan (Yes/No)	How Considerations Taken Into Account or Reasons for not Taking into Account
<p>Biodiversity Flora and Fauna</p> <p>Development can, potentially, have significant adverse effects on natural heritage assets. In light of this, there is a need to avoid/minimise:</p> <ul style="list-style-type: none"> • disturbance to protected species • loss or fragmentation of designated habitats, green linkages and wildlife corridors. • Increases of invasive non-native species <p>There are also opportunities for development to deliver:</p> <ul style="list-style-type: none"> • Enhancements to biodiversity, e.g. through improvements to habitats linked to new development sites, or the expansion of woodland cover. 	<p>Yes</p>	<p>The ‘Our Natural and Open Spaces’ component of the Spatial Development Strategy supports the protection and enhancement of important habitats and species, wider biodiversity and trees and woodland.</p> <p>The potential adverse impacts of greenfield development, particularly in the green belt and countryside, are addressed in the Plan through the land allocations and the Spatial Development Strategy, which together direct the majority of new development to built up urban areas. While accepting that Policies 14 and 19 supports, in principle, development in the green belt and countryside, this is restricted to a limited number of development types and circumstances.</p> <p>Policy 1, which promotes the creation of successful places, requires consideration to be given to a series of factors which are likely to reduce significant impacts on biodiversity and, in some cases, enhance it. These factors include the retention of locally distinct built or natural features; the use of native species in landscaping and the creation of habitats for native wildlife; making use of existing buildings and brownfield land and the incorporation of green infrastructure and provide links to the green network.</p>

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

	<p>Policy 33 safeguards European, National and local conservation sites and protected species, unless strict criteria are met. The policy also addresses impacts on non-designated habitats and species by requiring all new development to seek to minimize adverse impacts on wildlife, take account of connectivity between habitats areas and, where possible, be designed to conserve and enhance biodiversity.</p> <p>Policy 34 seeks to safeguard ancient and semi-natural woodland, TPOs and trees and hedgerows with significant value. Also, but also setting out the circumstances in which the removal of woodland, trees and hedgerows could be supported.</p> <p>Policy 36 will contribute to biodiversity enhancements and habitat connectivity by requiring green infrastructure provision in new development.</p> <p>Policies 4, 8 and 10, which address energy development, flood risk and sustainable travel respectively, require that regard is given to the impact which proposals could have on the Green Network (defined in the Plan as ‘an interconnected system or linked network of open spaces, often alongside river, sea and water courses, with walking and cycling routes, which bring the ‘green’ of the countryside into the urban areas, to create a continuous ‘network’).</p> <p>Policies 7 and 27, which address Waste Management and Tourism development, require that proposals avoid significant adverse impacts on the Green Network.</p>
--	--

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Population and Human Health</p> <p>Inverclyde’s declining and ageing population presents a significant challenge to economic regeneration, area renewal and service provision. In light of this, a key issue is the provision of an appropriate range of housing and employment opportunities and an adequate level of service provision.</p> <p>There is a need to improve Inverclyde’s health prospects through:</p> <ul style="list-style-type: none"> a) Adequate provision of open space, recreational facilities, access routes and green networks b) reduction of transport emissions and associated effects on air quality. 	<p>Yes</p>	<p>The Plan’s Spatial Development Strategy, land allocations, and policies 17—27, aim to support delivery of an appropriate quantity and mix of housing and employment opportunities and an adequate level of service provision.</p> <p>Policy 35 safeguards existing open space and supports proposals for new or enhanced open space provision.</p> <p>Policy 38 safeguards the existing path network and, where applicable, requires development proposals to provide new paths in order to encourage active travel and/or connectivity to the green network.</p> <p>With regard to reducing effects on air quality, the Plan seeks to reduce transport related emissions through the land allocations and Spatial Development Strategy, which focus development within well connected urban areas. Also through Policies 10 and 38, which support sustainable and active travel modes. Policy 12 also requires development proposals that could have a detrimental impact on air quality to identify likely impacts and set out appropriate mitigation measures.</p> <p>Policy 1 promotes the creation of successful places by requiring proposals to give consideration to a series of factors, including the need to be well connected, with good path links to the wider path network and public transport nodes.</p> <p>Policies 4, 8 and 10 require that regard is given to the impact which proposals could have on the Green Network, while policies 7 and 27 require that proposals avoid significant adverse impacts on the Green Network.</p>
---	------------	---

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Soil</p> <p>The re-development of vacant and derelict land is a key issue for the LDP, as it has potential to remediate contaminated land and deliver environmental improvements. It will also support economic regeneration and area renewal.</p> <p>Development can, potentially, also have significant adverse effects on soil quality. In light of this, there is a need to avoid/minimise:</p> <ul style="list-style-type: none"> • loss or degradation of carbon rich soils and prime agricultural land • impacts on all soils through: <ul style="list-style-type: none"> a) contamination or erosion caused by surface water run-off b) contamination from substances used in construction, cleaning and redevelopment 	<p>Yes</p>	<p>The Sustainable Development Strategy and the land allocations support the redevelopment of vacant and derelict land by directing most new development to brownfield site within built up urban areas. Policy 1 also requires consideration be given to the reuse of existing buildings and brownfield land in order to create successful places.</p> <p>While accepting that Policies 14 and 19 provide in principle support for greenfield development in the green belt and countryside, which will adversely affect soil this is restricted to a limited number of development types and circumstances.</p> <p>The loss or degradation of carbon rich soils or prime agricultural land is addressed by Policy 15. While the policy would only support development on this resource if strict criteria are met, it is accepted that it could lead to adverse impacts on the resources, albeit impacts that are limited.</p> <p>With the Plan directing the majority of development to brownfield sites in urban areas, many of which are potentially contaminated, Policy 16, which requires proposals to identify the nature of any contamination and identify a programme of remediation, is likely to have significant positive effects on soil quality.</p> <p>Contamination or erosion caused by surface water run-off is addressed by Policy 9, which requires the use of SuDS in development, with few exceptions.</p> <p>Emissions during construction and operation are regulated through the IPPC regulations which will apply in all cases.</p>
---	------------	---

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Water Environment</p> <p>Development can, potentially, have significant adverse effects on water quality. In light of this, there is a need to avoid/minimise:</p> <ul style="list-style-type: none"> • diffuse pollution, i.e. from surface water run-off • point source pollution, i.e. from sewage disposal • morphological alterations to water bodies • direct and indirect impacts on the Inner Clyde Estuary SPA/SSSI. • Increased flood risk on individual development sites and/or the wider area <p>There are also opportunities to:</p> <ul style="list-style-type: none"> • Enhance water quality/ecological status, e.g. through de-culverting and Suds etc. • Reduce existing flooding issues, e.g. through flood prevention schemes and natural flood management measures 	<p>Yes</p>	<p>Diffuse and point source pollution are addressed by Policy 9, which requires new development to utilise SuDS and connect to a public sewerage system in the vast majority of cases.</p> <p>Policy 39 requires that development proposals affecting the water environment safeguard and improve water quality and the enjoyment of the water environment. The Policy addresses issues such as impacts on the ecological status of RBMP waterbodies, morphological alterations and the removal of existing culverts.</p> <p>Policy 8 addresses flood risk by requiring development proposals to demonstrate that they will not be at significant risk of flooding or increase flood risk elsewhere, and by supporting flood prevention schemes in the areas local Flood Risk Plan.</p>
---	------------	---

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Climatic Factors and Air</p> <p>Climate change is expected to have significant impacts on the use and management of land (e.g. flooding – see Water topic), through rising sea levels and increases in extreme rainfall events.</p> <p>To mitigate climate change, there is a need to continue to support:</p> <ul style="list-style-type: none"> • renewable energy development (e.g. wind and hydro) • energy efficiency in new development • settlement strategies and land allocations which minimise the need to travel through good public transport connections and active travel routes. <p>To adapt to the effects of climate change, there is a need to:</p> <ul style="list-style-type: none"> • avoid development in flood risk areas or mitigate flood risk, where appropriate • future proof new development identify any other suitable adaptation measures 	<p>Yes</p>	<p>The Sustainable Development Strategy supports the sustainable production and distribution of energy, sustainable waste management, and flood risk management.</p> <p>Policy 1 promotes the creation of successful places by requiring proposals to give consideration to a series of factors, including the incorporation of low and zero carbon generation technologies.</p> <p>The Plan seeks to reduce transport related emissions through the land allocations and Spatial Development Strategy, which focus development within well connected urban areas. Also through Policies 10 and 38, which support sustainable and active travel modes.</p> <p>Policies 4-6 support energy related development proposals that contribute to a reduction in greenhouse gases, including renewable generation, energy storage, and heat networks etc.</p> <p>Policy 6, by supporting proposals for waste management facilities that promote the Zero Waste Plan and the waste hierarchy, is likely to contribute to a reduction of greenhouse gases, specifically methane.</p> <p>With regard to climate change adaptation, Policy 8 requires development proposals to demonstrate that they will not be at significant risk of flooding or increase flood risk elsewhere.</p>
---	------------	---

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Material Assets</p> <p>To ensure the sustainable use/re-use of resources, there is a need to continue to:</p> <ul style="list-style-type: none"> • promote renewable energy (e.g. wind and hydro) • minimise waste during the construction and operational phases of new development • re-develop vacant and derelict land 	<p>Yes</p>	<p>The Sustainable Development Strategy and the development allocations identified in the Plan support the redevelopment of vacant and derelict land by directing most new development to brownfield sites within built up areas.</p> <p>To promote the creation of successful places, Policy 1 requires proposals to give consideration to a series of factors identified under 6 headings, one of which is ‘Resource Efficient’.</p> <p>Policy 4 supports renewable energy development proposals in principle.</p> <p>Policy 7 aims to reduce waste arising by promoting the National Waste Plan and the waste hierarchy.</p>
---	------------	---

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Cultural Heritage</p> <p>There continues to be development interest on a number of sites with designated cultural heritage assets, e.g. Duchal Estate and Ardgowan Estate.</p> <p>In addition, the development pressure around the fringes of settlements, and in the wider countryside, has potential to impact on cultural heritage assets in these areas.</p> <p>In light of the above, there is a need to avoid/minimize:</p> <ul style="list-style-type: none"> • adverse impacts on cultural heritage sites, including those sites which are not subject to statutory protection. • adverse impacts on the setting of cultural heritage sites <p>There are also opportunities to secure the long term future of historic buildings through appropriate re-use, e.g. restoration or conversion.</p>	<p>Yes</p>	<p>The Spatial Development Strategy supports the preservation of, and development sympathetic to the historic environment.</p> <p>Prior to their inclusion in the Plan, all land allocations were assessed for potential impacts on the historic environment. Where an adverse impact was identified, appropriate mitigation were identified in the ER and will be picked up at the development management stage.</p> <p>To promote the creation of successful places, Policy 1 requires proposals to give consideration to a series of factors, including the need to contribute positively contribute to historic buildings and places.</p> <p>Policies 28, 29, 31 and 32 require that development proposals affecting conservation areas, listed buildings, scheduled monuments, archaeological sites and Gardens and Designed Landscapes are to preserve, and in some cases, enhance these assets. Policy 30 also supports the restoration of listed buildings by supporting, in principle, enabling development in certain circumstances.</p>
--	------------	--

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Landscape</p> <p>The urban fringes of settlements, particularly Kilmacolm and Quarriers, continue to be subject to development pressure, mostly for housing. In addition, there is also pressure for housing in the wider countryside.</p> <p>In light of the above, there is a need to avoid/minimise:</p> <ul style="list-style-type: none"> • adverse impacts on the landscape setting of settlements • impacts on landscape designations • impacts on Clyde Muirshiel Regional Park • incremental erosion of landscape character through the cumulative effect of small scale developments in the countryside • adverse impacts on significant landscape features 	<p>Yes</p>	<p>The Sustainable Development Strategy and the development allocations identified in the Plan support the redevelopment of vacant and derelict land by directing most new development to brownfield site within built up areas.</p> <p>Policy 1 promotes the creation of successful places by requiring proposals to give consideration to a series of factors, including the need to make use of existing buildings and previously developed land and reflect local architecture and urban form.</p> <p>Policies 14 and 19 limit landscape impacts on settlements, particularly the villages, by only supporting greenbelt and countryside development in a very limited number of circumstances.</p> <p>Policy 4 requires development proposals to have regard to impacts on landscape.</p> <p>Policy 20 assesses development proposals within residential areas with regard to a number of impacts, including on the character and appearance of the area.</p> <p>Policy 33 requires development proposals affecting the West Renfrew Hills Local Landscape Area to protect and, where possible, enhance its special features. The policy also requires proposals should take account of local landscape character outwith designated areas.</p> <p>Policy 34 supports the retention of woodland and trees which have significant landscape value.</p>
--	------------	--

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Air</p> <p>In order to maintain good air quality in Inverclyde, there is a need for the settlement strategy and land allocations to minimise the need to travel by locating development close to good public transport connections and active travel routes.</p>	<p>Yes</p>	<p>The Plan seeks to reduce transport related emissions through the land allocations and Spatial Development Strategy, which focus development within well connected urban areas. Also through Policies 10 and 38, which support sustainable and active travel modes.</p> <p>Policy 12 requires development proposals that could have a detrimental impact on air quality to identify likely impacts and sets out appropriate mitigation measures.</p>
--	------------	--

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

4: HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

Comments were received from the Consultation Authorities (SEPA, SNH and HES) to the Interim Environmental Report, which accompanied the Main Issues Report, and the Environmental Report, which accompanied the Proposed Plan. These comments and the Council’s responses, including changes to the final environmental report, are shown in Table 2 below.

TABLE 2		
OPINIONS EXPRESSED DURING ENVIRONMENTAL REPORT CONSULTATION (30 April–29 June 2018) AND HOW THE OPINIONS HAVE BEEN TAKEN INTO ACCOUNT		
CA COMMENTS AND RECOMMENDATIONS	HOW TAKEN INTO ACCOUNT IN LOCAL DEVELOPMENT PLAN AND/OR ENVIRONMENTAL REPORT	
LDP Proposed Plan Environmental Report		
HES		
Mitigation of Cultural Heritage Impacts	As a general point in the assessment of impacts on cultural heritage, we note that the cultural heritage policies are identified as mitigation in some instances. We are content that this is appropriate, as the policies outlined in the plan are likely to provide protection against significant impacts. The exception to this is Policy 31-Scheduled Monuments and Archaeological Sites. As this is currently worded, it is possible that it will not effectively mitigate against impacts on cultural heritage in some instances where there is an impact on setting of a scheduled monument. However, if alterations are made to this policy (as suggested above) this would be likely to increase the level of mitigation offered in this context.	Noted. Policy 31 was modified by the Reporter at examination to align with the wording suggested by HES. This modification was subsequently included in the adopted Plan.
Site Assessment	We welcome the detailed level of assessment provided for sites in the Proposed Plan Sites Assessment, and the inclusion of sites which have identified as unsuitable development opportunity sites within the Plan. This is useful in providing a comparative assessment of reasonable alternatives. It has been very helpful to have had the early opportunity to comment on allocations at previous stages, prior to the publication of the Proposed Plan.	Noted.
SEPA		

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

General Comments	We welcome the amendments that have been made to the report following our previous response dated 12 May 2017.	Noted
Detailed Comments	We note that the soil objective has been amended to consider disturbance to organic rich soils.	Noted
Detailed Comments	We also note that the assessment tables are much clearer than previously.	Noted
Appendix F	We note that R6 Dubbs Road does not include the requirement for an FRA despite SEPA requesting this information in both our response to the legacy sites (e23) and the call for sites (023).	The ER has been updated to note that an FRA will be required for R6.
	We commented on site E13 Scott Street as part of legacy site e8 and noted the requirement for an FRA to be carried out, this requirement is not included.	The ER has been updated to note that an FRA will be required for E13.
	R2 Broadfield Hospital is mentioned in Table 4 as not being assessed but appears in Appendix F as one of the residential development opportunities.	Noted. The site assessment of R2 has been removed from the ER.
	There are a number of sites that SEPA have not had the opportunity to comment on as part of the LDP2 process at this time. We are therefore unable to comment on whether the assumptions regarding the potential requirements for flood risk assessments and other mitigation are in line with our requirements.	While a small number of the land allocations in the Proposed Plan were not identified at the pre-MIR and MIR stages, the consultation on the Proposed Plan provided the opportunity for the SEA consultees to comment on all the allocations in the Proposed Plan.
SNH		
<p>Priority Places</p> <ul style="list-style-type: none"> • R33 The Harbours, Greenock (page 70); and • R15/R16 James Watt Dock/Garvel Island, Greenock (page 72). <p>Business and Industrial Opportunities</p> <ul style="list-style-type: none"> • E7 Inchgreen (page 122) 	We note that some sites have been identified as being in close proximity to the Inner Clyde Special Protection Area (SPA), however, the Council considers that the developments are not likely to have a significant environmental effect. The Environmental Report outlines that this should be confirmed through an updated EIA, however, we suggest updating this to reflect the assessment of the sites as set out in the Habitats Regulations Appraisal (HRA) of the Plan which provides a more detailed assessment.	Noted. The assessment of the sites R33, R15/16 and E7 has been updated to reflect the site assessments in the HRA.

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>Priority Places/Residential Development Opportunities Priority Places</p> <ul style="list-style-type: none"> • R15/R16 James Watt Dock/Garvel Island, Greenock (page 72); • R63 Inverkip Power Station (page 73) <p>Residential Development Opportunities</p> <ul style="list-style-type: none"> • R23 Luss Avenue/Renton Road (page 95) • R40 Kilochend Drive (page 103) • R58 Kirn Drive (page 112) (see more detailed comments below) • R59 Cowal View (page 113) • R60 Levan Farm (Phase 3) (page 114) • R68 Former Balrossie School (page 117) • E8 Sinclair Street – tree survey but could have development brief • E12 Ingleston Street • E13 Scott Street 	<p>There are a number of development sites which contain areas of semi-natural woodland within the site boundary (see opposite) which should be included in the assessment of the site. Mitigation/enhancement measures should be detailed, for example in a Development Brief to identify developable areas, avoiding adverse effects on woodland areas.”</p> <p>In relation to Sinclair Street (E8), a tree survey has been identified as a mitigation/enhancement measure as “Development likely to adversely affect the significant area of semi-natural woodland within the site”. We consider that, if required, a Development Brief should identify developable areas, avoiding effects on woodland areas. We have provided more detailed comments on the Kirn Drive (R58) site below.</p>	<p>R15/16 – site assessment has been updated to reflect the presence of small areas of semi-natural woodland and to require consideration be given to this in the review of the existing masterplan, as required by the SG on Priority Places.</p> <p>R63 – site assessment acknowledges that there ‘significant areas of semi-natural woodland within the site’ and requires the existing EIA to be updated.</p> <p>R23 – site assessment has been updated to reflect the consultees comment, but also to note that a pre- MIR site visit by officers found this site to be largely shrubland rather than semi-natural woodland. The site remains as a development site in the Plan on the basis that the site is shrubland.</p> <p>R40 – site assessment has been updated to reflect the presence of small areas of semi-natural woodland and to require a Development Brief.</p> <p>Comments on the R58 site are addressed in more detail below.</p> <p>While there was previously an area of semi-natural woodland on site R59, this was removed prior to a planning application for residential development being submitted in Feb 2017.</p> <p>The assessment of R60 has been updated to reflect the presence of semi-natural woodland within the northern boundary. A Development Brief is already required for this site.</p> <p>R68 - as noted in Table 4 of the ER, this site was not individually assessed as there is an active planning permission for the site and therefore no scope for the Plan to influence layout and design.</p> <p>E8 - it is considered that a Tree Survey is sufficient to inform the design and layout of future development on this site.</p>
---	---	--

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

		<p>E12 – the site assessment acknowledges that development would result in the loss of immature trees/shrubs, but notes that these are unstable due to ground conditions, and not considered of high value. The site assessment has been updated to require a Tree Survey to evidence this. As the Tree Survey is likely to be provided by the developer as part of or just before submission of a planning permission, it is not possible to determine if a Development Brief is required at this point. However, if the woodland area is found to be of greater value and ground conditions are suitable, the design and layout of the development will be required to take account of the woodland area.</p> <p>E13 – site assessment has been updated to reflect presence of semi-natural woodland and to require a Tree Survey. A Development Brief is not appropriate for a site of this size.</p>
--	--	--

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

<p>R58 Kirn Drive (page 112)</p>	<p>SNH are pleased to note that, following our advice at MIR stage in response to the overestimation of the likely significant effects on Biodiversity, Landscape, and Population and Human Health, the site has been reassessed.</p> <p>We welcome the requirement for development proposals to carry out an Extended Phase 1 Habitat Survey and to prepare a Development Brief.</p> <p>Our comments at Main Issues Report (MIR) stage highlighted that Habitat Survey and Landscape Capacity studies should be carried out before determining the geographic scope to inform the Environmental Report and the Development Brief. We note that these studies have not been provided at this stage and therefore have not informed the Environmental Report, however, they will be required to inform the Development Brief.</p> <p>We note that the boundary of this site has been revised to reduce the area of the Burneven Site of Importance for Nature Conservation (SINC) and semi-natural woodland within the site boundary. The Development Brief should identify developable areas of the site, avoiding adverse impacts on Burneven SINC and the semi-natural woodland.</p> <p>The boundary of the site is immediately adjacent to an area of ancient woodland which could be directly and/or indirectly affected by the development, for example in hydrological terms. Development proposals must include appropriate information to understand the extent of any direct and/or indirect impacts on the woodland habitat network, SINC and ancient woodland along with appropriate mitigation measures.</p> <p>In relation to Population and Human Health, the Development Brief should ensure that access enhancements include active travel provision. We would be happy to input</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>The site assessment has been updated to make it clear that the development brief will identify developable areas of the site, minimize adverse impacts on the areas of native woodland and Burneven LNCS. The development brief will also highlight the need for future development proposals to include sufficient information to understand the extent of any impacts on the woodland habitat network, LNCS and ancient woodland, along with appropriate mitigation measures.</p> <p>The development brief will address access enhancements, including active travel. The latter is also a requirement under Policy 10.</p>
----------------------------------	--	---

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

	on the preparation of the Development Brief in relation to our areas of interest.	
R42 Papermill Road (page 104)	<p>We note that this site is identified as “brownfield” sited on an area of “Partial tarmac covering” with “Low ecological value”. However, the proposals map shows a greenfield site which is currently a playing field and play area.</p> <p>We understand that the Council has issued a clarification statement in relation to this site setting out the error.</p> <p>We recommend that this site is removed from the Proposed Plan and that the revised Environmental Report reflects this.</p>	R42 has been removed from the Plan and the Environmental Report.
R45 Upper Bow (page 106)	<p>We understand that the Council has issued a clarification statement in relation to this site, highlighting that the boundary includes an area of established housing rather than the “northernmost former housing site” which has now been cleared. We note that “These two sites should not have been included as housing development opportunities in the proposed plan” although we understand that they are include in the Strategic Housing Investment Plan (SHIP) and that the Council will “follow statutory procedures at a later date in the process with the intention of correcting this”. We recommend ensuring that the revised Environmental Report reflects this.</p>	The Environmental Report has been updated to reflect the boundary amendment to R45.
E3 Newark Street (page 119-120)	<p>The assessment of this site includes contradictory statements with regards to the current status of the land with the site being identified as brownfield, however, it has been identified as greenfield under Material Assets. We recommend updating this to ensure it is accurate.</p>	The material assets element of the site assessment has been updated to clarify that the site is brownfield.
E12 Ingleston Street (page 126)	<p>The majority of this site is within an area of semi-natural woodland. We note that the Council considers that these are immature trees/shrubs which are unstable due to ground conditions. However, a tree survey should be carried out to provide evidence of this and, if required, a Development Framework/Development Brief should identify developable areas, avoiding adverse effects on trees of importance.</p>	The site assessment has been updated to require a Tree Survey to evidence this. As the Tree Survey is likely to be provided by the developer as part of or just before submission of a planning permission, it is not possible to determine if a Development Brief is required at this point. However, if the woodland area is found to be of greater value and ground conditions are suitable, the design and layout of the development will be required to take account of

STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

		the woodland area.
Appendix G Sustainable Development Strategy (page 133)	This policy has three aspects: ‘Creating Successful Places’, ‘Tackling Climate Change’ and ‘Connecting People and Places’. We consider that this policy should have a positive effect on all SEA objectives, however, we note that Landscape and Material Assets have been assessed as neutral. The Council have themselves highlighted that the policy is likely to have a positive effect on Landscape. We consider that both pre-mitigation and post-mitigation/enhancement scores should be updated.	Noted. The assessment has been updated to show a positive effect on all SEA objectives.
Appendix G Sustainable Spatial Strategy (page 134)	We note that Soil, Landscape and Material Assets have been scored +/- pre-mitigation, however, have been scored + post-mitigation/enhancement despite no mitigation measures being set out. This should be updated to ensure that it is accurate.	Noted. The post mitigation score has been updated to align with the pre-mitigation score.
Appendix G Policy 33 – Biodiversity and Geodiversity (page 152)	We note that this policy has a pre- and post-mitigation/enhancement scoring of +/- in relation to Biodiversity, Flora and Fauna. We consider that this policy should have a +/0. Where development proposals affect a Natura 2000 site, and meet the required criteria, compensatory measures must be put in place to ensure there are no negative effects on the integrity of the site.	Noted. The scoring for biodiversity, flora and fauna has been updated to have a +/0 score.
Appendix G Policy 36 – Delivering Green Infrastructure Through New Development (page 153)	The Council have scored this policy as having a neutral effect on Landscape. Green infrastructure can reinforce the local landscape character, provide improvements to the landscape setting and can help create an attractive landscape framework. This should be reflected in the assessment by scoring Landscape as + for both pre- and post-mitigation/enhancement.	Noted. The pre and post mitigation scores for landscape have been updated to + for the reasons stated.

5: REASONS FOR CHOOSING THE PLAN AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES

The Strategic Environmental Assessment Act requires that, when preparing a plan or programme, other “reasonable alternatives” are considered. The preparation of a Local Development Plan is a statutory requirement under the Planning etc (Scotland) Act 2006 and therefore the only reasonable alternatives were in terms of the sites and policies to include in the LDP.

The Planning Act requires that for each issue raised in the Main Issues Report, the Council set out its preferred option and reasonable alternatives for consideration through the consultation process. These alternative options were the subject of the Interim ER where each was environmentally assessed. For each of these options, a decision based on this assessment and the consultation responses received was made, and one selected to be included in the Proposed LDP. A table showing the options considered and giving the reason for which was selected are shown in Appendix H of the Environmental Report.

The Proposed Plan was then subject to examination by Reporters, who recommended a number of modifications be made to the plan, which are set out in Appendix 1 and reflected in the updated Environmental Report. While modifications were made to a number of natural and cultural heritage related policies, it is considered that they have the effect of either clarifying or strengthening the policies. The modification to re-designate a greenbelt site adjacent to the eastern boundary of Port Glasgow to a housing allocation (R2 Arran Avenue) will have an adverse impact on a number of SEA topics due to its elevated location and impact on environmental designations. While acknowledging the adverse effects of the R2 allocation, the Council has accepted all the Reporter’s modifications and have adopted the Plan, as modified.

6: MEASURES THAT ARE TO BE TAKEN TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE PLAN

Under Section 18(3)(f) of the Environmental Assessment (Scotland) Act 2005, Inverclyde Council is required to monitor the significant environmental effects that result from the implementation of the plan. This monitoring includes the provision of information on the measures that are to be taken to monitor for any unforeseen environmental effects so that appropriate remedial action may be taken. The monitoring framework provided in Table 4 sets out the indicators and data sources that will be used to monitor the impacts of the Plan on each SEA objective. This framework is part of the monitoring regime set out in the Environmental Report. This regime has been established to ensure that any unforeseen adverse environmental effects can be readily identified and addressed appropriately.

The environmental baseline information will be updated every 5 years as part of the process of updating the LDP

TABLE 4 MONITORING FRAMEWORK

SEA Topic	Indicator	Data Source	Frequency of updating
Biodiversity, Flora and Fauna	Adverse impacts on the status of National and/or International natural heritage designations	SNH https://gateway.snh.gov.uk/sitelink/	Annually
	Impact on local natural heritage designations Impact on the wider biodiversity, flora and fauna	Inverclyde Council 'Biodiversity Duty Report'	Every 3 years.
Population and Human Health	Changes in population, household size and tenure	Glasgow and the Clyde Valley Housing Market Partnership 'Housing Need and Demand Assessment'. Inverclyde Council 'Housing Land Audit'	Every 5 years Annually
	Impact on Open Space Provision	Inverclyde Open Space Strategy (to be developed)	To be determined
Soil	Loss of deep peat and prime agricultural soils	GIS data on distribution of deep peat soils (James Hutton Institute) GIS data on distribution of prime agricultural land (James Hutton Institute)	Annually Annually
	Remediation of contaminated land	Inverclyde Council - Contaminated Land Officer	Annually
Water Environment	Impact on the number of flood events	Inverclyde Council-Roads monitoring	Annually
	Impact on water quality Impact on morphology of watercourses	SEPA - Clyde Area Catchment Management Plan	Every 6 years
Climatic Factors	Number of Air Quality Management Areas	Inverclyde Council – 'Local Air Quality Monitoring Progress Reports'	Annually
	Increase/decrease in Greenhouse Gas Emissions	Inverclyde Council – Submission to Scottish Public Bodies Climate Change Reporting	Annually Annually
Material Assets	Take-up of vacant and derelict land	Vacant and Derelict Land Survey	Annually
	Planning permissions for renewable energy development	Monitoring of planning applications for renewable energy.	Annually
Cultural Heritage	Impact of new development on Listed Buildings, Conservation Areas, Gardens and Designed Landscapes and Archaeological sites	Inverclyde Council - Monitoring of planning applications related to listed buildings, Conservation Areas, Gardens and Designed Landscapes and Archaeological sites.	Annually
Landscape	Impact of development on the Green Belt/Countryside	Glasgow and Clyde Valley Strategic Development Plan – Monitoring of	Every 5 years

		Green Belt/Countryside	
--	--	------------------------	--

Inverclyde
council



Regeneration and Planning

Inverclyde Council
Municipal Buildings
Clyde Square
Greenock
PA15 1LY

Tel: 01475 712491

E-mail: ldp@inverclyde.gov.uk

Web: www.inverclyde.gov.uk/ldp