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13 April 2020

Our ref: CRC/SEA/001 Scottish

Government
Victoria Quay
Edinburgh
EH6 6QQ

Dear Sir or Madam,

RE: SEA Screening Determination 01560 – Glasgow City Region Adaptation Strategy and Action Plan

Thank you for your letter dated 12 March 2020 outlining the responses from the consultation authorities in relation to the Screening Report which was submitted on 14th February 2020 in relation to the preparation of the Glasgow City Region Climate Adaptation Strategy and Action Plan.

Sniffer agrees with this view and made a determination on 13th April 2020 under section 8(1) of the Environmental Assessment (Scotland) Act 2005 that the Strategy and Action Plan's position for setting the vision and strategic direction for all other regional actions and lower-tiered Plans, Policies, Programmes and Strategies means there is the potential for the SEA process to have a significant positive influence on the Plan through the consideration of a high level assessment and address any potential significant environmental effects. Therefore, the document will be subject to a full Strategic Environmental Assessment in due course and will proceed with Scoping before carrying out a full environmental assessment as part of an Environmental Report.

A copy of the screening determination will be available on the Climate Ready Clyde website at <http://climatereadyclyde.org.uk/our-adaptation-strategy-and-action-plan/>, as well as being placed on the websites our Local Authority partners.

Given the current COVID-19 situation we would also appreciate any further guidance you are able to provide around complying with the publicity requirements. Whilst normally a copy would be placed for inspection at our officers and those of our Local Authority partners, this will not prove possible. Similarly, we will be working with Local Authorities across Glasgow City Region to ensure adverts are placed in local newspapers, but these will have more limited circulation. Once social distancing restrictions are lifted we will ensure physical copies are available, but any further advice you have would be gratefully received.

In accordance with Section 10(1) of the Act, a copy of the screening determination is enclosed and I would be grateful if you could forward this onto the Consultation Authorities. If you have any further queries, please don't hesitate to contact me by emailing kit@sniffer.org.uk.

Yours sincerely,

Kit England
Climate Ready Clyde Manager

SCREENING REPORT

STEP 1 – DETAILS OF THE PLAN

Responsible Authority:

Sniffer, Edinburgh Centre for Carbon Innovation, High School Yards, Edinburgh, EH1 1LZ

Title of the plan:

Glasgow City Region Climate Change Adaptation Strategy and Action Plan.

What prompted the plan:

(e.g. a legislative, regulatory or administrative provision)

Climate Ready Clyde's 15 members, (supported by Scottish Government) voluntarily committed to developing the Strategy and Action Plan as an innovative way to drive Glasgow City Region's adaptation approach, particularly in sectors which work at the regional scale (e.g. infrastructure, housing, transport, economic development, land use planning) which need collective and concerted effort to adapt and need to be done collaboratively not in competition for the broader public benefit.

Plan subject:

(e.g. transport)

Climate change adaptation

Screening is required by the Environmental Assessment (Scotland) Act 2005.

Based on Boxes 3 and 4, our view is that:



An SEA is required, as the environmental effects are likely to be significant: Please indicate below what Section of the 2005 Act this plan falls within

☐

Section 5(3)



Section 5(4)



An SEA is not required, as the environmental effects are unlikely to be significant: Please indicate below what Section of the 2005 Act this plan falls within

☐

Section 5(3)

☐

Section 5(4)

Contact details:

Kit England,
Climate Ready Clyde Manager
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T: 0141 229 7742
E: kit@sniffer.org.uk

Date:

14 February 2020

STEP 2 – CONTEXT AND DESCRIPTION OF THE PLAN

Context of the Plan:

Glasgow City Region's first Climate Adaptation Strategy and Action Plan is intended to set the strategic framework for adaptation in Glasgow City Region to build its resilience to the likely global trajectory of climate change – 4 degrees of warming. It will do this by setting out a broad theory of change for the City Region through to 2030, which includes key strategic actions needed by all actors across the City Region, as well as planned actions by partners in the next five years to achieve them. In doing so, the plan will address the priority areas of climate change risk as set out in [Glasgow City Region's first Climate Risk and Opportunity Assessment](#).

Whilst voluntary, once developed the plan will sit in a hierarchy, underneath the Scottish Climate Change Adaptation Programme (the second version of which is due in Autumn 2019), but at a higher level than the actions and approaches taken by local organisations such as Local Authorities in their approach to adaptation.

It will complement, incorporate and influence the adaptation work done by organisations that operate at a similar scale, such as Clydeplan through the Regional Spatial Strategy, the Clyde Marine Planning Partnership through the Regional Marine Plan, the Regional Transport Partnership (through the Regional Transport Plan), the Glasgow and Clyde Valley Green Network partnership and the Metropolitan Glasgow Strategic Drainage Partnership.

Within this hierarchy It is intended that the strategy and action plan will influence both national and UK policy on climate adaptation (such as the Scottish Climate Change Adaptation Programme, Infrastructure Investment Plan, the Strategic Transport Projects Review, or Flood Risk Management policy) as well as providing context for more local activities (e.g. Local Authority Adaptation Strategies, Local Development Plans) in relation to climate change adaptation.

However, given that climate change will have effects across all sectors of Glasgow City Region's economy, society and environment the strategy is also intended to influence wider policies, plans and actions to ensure they adequately account for the need for resilience to future climate change. For example, this could include infrastructure investment plans from Infrastructure Operators.

Description of the Plan:

Vision, aims and objectives of the plan – The strategy will seek to ensure Glasgow City Region's economy, society and environment is not only prepared, but continues to flourish in the face of the impacts arising from the climate crisis. In this context, the plan has a number of aims and objectives:

- To outline the strategic process of change needed for Glasgow City Region to adapt and build resilience to climate change into the 2030s
- To position Glasgow City Region to be ready to address the range of possible climate futures, including up to 4 degrees of warming
- To take the early steps needed to manage long-term risks where highlighted as necessary by the Climate Risk and Opportunity Assessment

To ensure the City Region meets these objectives, Climate Ready Clyde has designed a draft vision, outcomes framework and principles to guide activity. The overarching draft vision is:

“Glasgow City Region’s people and nature flourish in its future climate”

The three main outcomes are as follows:

- People & communities shape their lives and places to be resilient to climate change
- Institutions use resources, services and assets to make Glasgow City Region climate ready
- The City Region’s governing systems enable adaptation

These will be supported by three principles which cut across the outcomes in the framework:

- **Equality, fairness and justice:** - with both the process and outcomes, being fair, equitable, and inclusive
- **Supporting transitions:** Our adaptation approach will support broader societal transitions to net zero, a circular economy, and digital transformation and an aging population
- **Supporting City Region ambitions:** Our approach will support the City Region’s economic, social and environmental objectives

The plan is expected to improve the current approach by providing a framework for regional, coordinated action which enhances effectiveness and increases influence with other organisations in support of regional adaptation efforts. The regional plan should also play a supporting role in accelerating adaptation efforts from all organisations within Glasgow City Region.

The focus and direction of the plan – Whilst it will not bring any new formal powers, the Adaptation Strategy and Action Plan will be a significant policy document, setting strategic direction for the City Region.

A key focus of the plan will be on building Glasgow City Region’s capability to adapt to a range of climate futures, given the uncertain climate trajectories associated with the ability to cut global CO2e emissions in line with the Paris Agreement.

The plan itself will not set targets, but will set a contextual framework of where the City Region needs to be planning to adapt to a 2-4 degree temperature rise by 2030. Where relevant it will reference appropriate thresholds for climate extremes in systems to manage risks (e.g. for high temperatures in the railways, which ScotRail have already called for a review of)

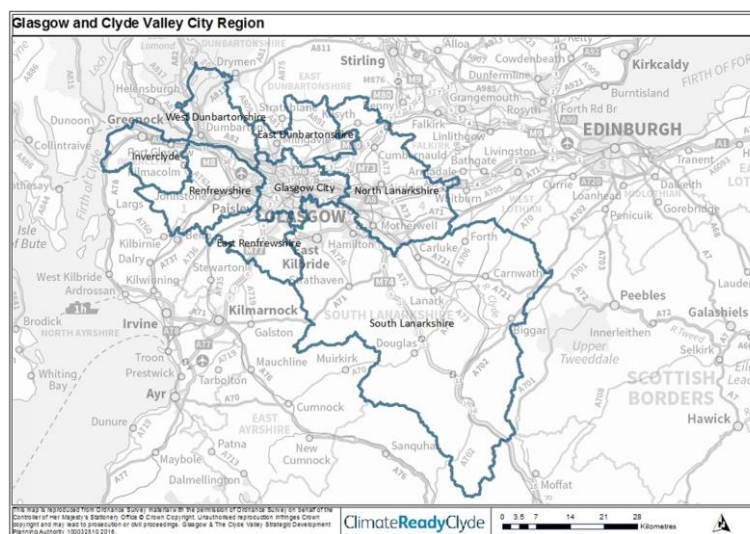
Who it is aimed at – The strategy and action plan is being written to be relevant to all individuals and organisations that are based in on operate within Glasgow City Region. Whilst the detailed action plan will contain actions developed with, and collated from a wide range of organisations, the strategy is intended to provide the framework for organisations beyond those that Climate Ready Clyde is able to engage with directly, setting out what must happen.

Who the plan will apply to – The plan will be designed to set the direction for all public, private and voluntary organisations working in Glasgow City Region. As a voluntary plan, it will not directly apply to any organisations. However, in the first instance, it will likely be more highly regarded by institutions covered by the Public Sector Reporting Duties under the Climate Change (Scotland) Act 2009, and financial institutions (e.g. banks, building societies and insurers) and large asset owners in the private sector expected to report the physical risks of climate change under the proposed commitments in the UK Government’s Green Finance Strategy.

Spatial Scope – the spatial scope of the plan will primarily be Glasgow City Region – consisting of the eight Local Authorities:

- East Dunbartonshire Council,
- East Renfrewshire Council
- Glasgow City Council,
- Inverclyde Council,
- North Lanarkshire
- Renfrewshire Council,
- South Lanarkshire Council and
- West Dunbartonshire Council.

This boundary is specifically outlined below.



However, there may be actions included in the action plan which are regionally significant but at a local level (e.g. which have the potential to be scaled or are catalytic of wider systemic change in the City Region). Similarly, it may be possible the plan will include actions outside of the City Region if deemed as having a material impact in managing Glasgow City Region’s climate risks (e.g. rail connectivity or supply chains).

Temporal scope – The strategy will be designed around outcomes designed to achieve a positive flourishing City Region. It will set the broad direction of Glasgow City Region’s adaptation approach to the 2030s (e.g. wider mobilisation of financial resources). The action plan will then focus on the near-term concrete

	<p>commitments between 2020 and 2025. Within this some of the actions may be needed now to ensure the City Region manages the City Region’s climate risks well to the end of the century (e.g. in new infrastructure where there is the potential to lock in future risk). Whilst the action plan will cover 5 years, it will likely be updated and refreshed after two or three years to account for new developments and changes in City Region activity.</p> <p>Individual components of the strategy and action plan – The plan will aim to be comprehensive in its scope, covering the strategy for infrastructure (gas and electricity distribution, rail, road and subway transport, and communications), the built environment, people and communities, business and industry, land use and also the ‘enabling environment’ for adaptation – focusing on governance, decision making, skills and capacity, evidence, and finance and resourcing.</p> <p>New powers from the plan – the plan will not give new powers to organisations. However, under current legislation Scotland’s first regional adaptation plan will not have any statutory force, which could limit its effectiveness. As a result Climate Ready Clyde is planning to facilitate discussion between partner organisations and Scottish Government over the lifetime of the plan development on what new powers legislation or frameworks (amendments to the SCCAP2) might be needed to ensure the plan achieves its outcomes and is adequately considered and enforced in wider policy-making at UK, national, regional and local levels.</p>
<p>What are the key components of the plan?</p>	<p>The components of the plan are a high level vision for 2050 which at present is:</p> <p>“Glasgow City Region’s people and nature flourish in its future climate”.</p> <p>Underneath, there will be three high level goals:</p> <ol style="list-style-type: none"> 1) People & communities are shaping their own lives and places in a way that means they are resilient in the face of climate change – This will focus on making sure there are processes which allow people to engage in shaping place, as well as inspiring 2) We are shaping Glasgow City Region as a climate ready place through our use of resources, services & assets 3) The City Region’s systems has developed capability to adapt to climate change <p>Each of these goals will be supported by a Theory of Change, setting out the key changes we need in the City Region to prosper in the future climate both now and in the future. The vision, goals and pathways of change will be a living document further refined through ongoing work with stakeholders.</p> <p>Alongside, the strategy will set out the high level case for action include a policy context (EU, UK, National and Regional) focusing on both climate ambitions and broader regional economic, social and environmental ambitions, a summary of emissions and climate projections and risks for Glasgow City Region, as well as case studies of successful projects already underway.</p>

	<p>Action Plan – The action plan will contain a more detailed approach, including setting out the concrete actions being taken by partners between 2020 and 2025 that are in line with achieving our Theory of Change. This will consist of an aggregate of actions pledged by key institutions which will be collated in early 2020.</p>
<p>Have any of the components of the plan been considered in previous SEA work?</p>	<p>As a new, voluntary strategy and action plan, the strategy itself will not have been considered in previous SEA work. However, since Climate Ready Clyde will aggregate and develop existing and new commitments of partner organisations for the action plan, it is likely that some of these will have been considered in previous SEA plan work.</p> <p>A full review of actions/activities and projects will be undertaken and where actions haven't been assessed through an SEA of a strategic action by one of the partner organisations, then they will be assessed as part of the SEA for the Strategy and Action Plan to ensure that all environmental impacts of the Strategy have been captured.</p> <p>In doing so, we may also identify synergies or cumulative impacts that are not possible or evidence in an SEA on a Thematic PPS – and these could be positive or negative.</p> <p>As part of the development of the action plan, we plan to capture whether proposed plans are included in other plans and strategies and be clear that this is the responsibilities of other organisations to consider whether their activities require an SEA in line with statutory requirements.</p>
<p>In terms of your response to Boxes 7 and 8 above, set out those components of the plan that are likely to require screening:</p>	<p>Error! Reference source not found. In light of the above information, Sniffer would be of the view that that a Strategic Environmental assessment and screening will be required for the Strategy, its vision and outcomes and for the individual actions contained in the action plan.</p> <p>A number of actions will already have been agreed by partners organisations within other strategic actions as committed projects. Therefore it isn't appropriate for the CRC Strategy and Action Plan to re-assess such actions and provide alternatives at this stage. However, all actions will be included within the Cumulative Assessment and where new actions are proposed through the Strategy, these will be assessed, where relevant.</p>

**STEP 3 – IDENTIFYING INTERACTIONS OF THE PLAN WITH THE ENVIRONMENT AND
CONSIDERING THE LIKELY SIGNIFICANCE OF ANY INTERACTIONS (Error! Reference source not found.)**

Plan Components	Environmental Topic Areas										Explanation of Potential Environmental Effects	Explanation of Significance
	Biodiversity, flora and fauna	Population and human health	Soil	Water	Air	Climatic factors	Material assets	Cultural heritage	Landscape	Inter-relationship issues		
VISION: Glasgow City Region's people and nature flourish in its future climate	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	There are overall potential for minor and significant positive effects to all environmental topic areas as the Regional Adaptation Strategy will directly influence and guide action to be taken and delivered to benefit communities throughout Glasgow City Region.	The strategy is part of a guiding vision for Glasgow City Region and will guide other strategic actions within other organisations, including CRC members. The proposed vision and associated impacts with other strategic actions have the potential to result in significant environmental positive impacts.
2030 Outcomes												
1. People & communities shape their lives and places to be resilient to climate change	✓	✓	✓	✗	✗	✗	✓	✓	✓	✗	This outcome is likely to create positive environmental effects for the City Region's population by ensuring that there is both the mechanisms and the desire for communities to be able to shape their own places.	The 2030 Outcomes do not detail planned actions but will contain examples of proposed areas of activity. Climate Ready Clyde and Glasgow City Region intend to rely on lower-tier Plans, policies and strategies (PPS) to deliver and take action to realise the

2. Institutions use resources, services and assets to make Glasgow City Region climate ready	✓	✗	✓	✓	✓	✓	✓	✓	✓	✓	<p>The outcome has the potential to create significant positive environmental effects by focusing use of resources, services and assets of institutions in support of addressing a range of climate risks, including those to sensitive habitats such as the Inner Clyde SPA and culturally significant places (e.g. UNESCO world heritage sites of the Antonine Wall and New Lanark.</p>	<p>Strategy outcomes. This will ensure that SEA has been integrated into the production of PPS at the most effective development stage.</p> <p>However, a full review of actions/committed projects will be carried out to ensure that all have been assessed and impacts integrated into the Environmental Report.</p>
3. The City Region's governing systems enable adaptation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	<p>This outcome has the potential for significant positive effects by improving the adaptive capacity of the City Region, including Facilitating adaptive measures, and improving governance, skills, evidence and funding/financing approaches in relation to adaptation.</p>	
Adaptation Action Plan	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	<p>As a partnership initiative, at this stage in the process Climate Ready Clyde does not have any draft action plan to assess. Instead, the action plan will collate new and existing actions which will be solely owned and delivered by individual partners. As part of this, we will ensure that individual partners are aware of the need for compliance with SEA legislation, and will document whether it is included in an existing or forthcoming plan that will be subject to SEA.</p>	

CROSS CUTTING PRINCIPLES												
Equality, fairness and justice: - with both the process and outcomes, being fair, equitable, and inclusive	x	✓	x	x	x	x	✓	✓	✓	✓	<p>This outcome has the potential to improve the distributional impacts of climate change (e.g. by encouraging decisions which put the most vulnerable at the heart of decision making, ensuring they are not disproportionately impacted by climate change), as well as to ensure some of the more challenging societal impacts (e.g. from Sea Level Rise)</p>	<p>At present, social equity and fairness is not very well considered as part of adaptation planning. Incorporating this as a cross cutting principle will likely result in minor positive effects by encouraging institutions to explicitly consider distributional impacts and effects on vulnerable groups.</p>
Supporting transitions: Our adaptation approach will support broader societal transitions to net zero, a circular economy, and digital transformation and an aging population	x	x	✓	✓	✓	✓	✓	x	x	✓	<p>There are a range of other long-term sustainability trends which the City Region is also pursuing, where adaptation action has the potential to enhance activities. Examples include health, circular economy and supporting delivery of a net zero greenhouse gas emissions target. In relation to net zero, more detailed policies could include climate proofing low carbon infrastructure, using solutions with co-benefits (e.g. passive ventilation of buildings) and adopting low carbon adaptation solutions (e.g. green infrastructure vs air conditioning, or timber construction vs. concrete).</p>	<p>By supporting and working with other big environmental transitions such as in water, air and climatic factors, there is the potential to achieve major positive effects.</p>

Supporting City Region ambitions: Our approach will support the City Region's economic, social and environmental objectives	✓	✓	✓	✓	✓	✓	✓	✓	✗	✗	✓	Aligning the adaptation strategy and action plan with these as they emerge will likely create minor positive effects across the topic areas.	Glasgow City Region's broader ambitions around Economy, Society and Environment are in the early stages of development, with a range of new plans and strategies under development, including the new indicative Regional Spatial Strategy, a revised Regional Economic Strategy, Regional Transport Plan and Regional Marine Plan. Working to align and support these will likely create minor positive effects.
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STEP 4 – STATEMENT OF THE FINDINGS OF THE SCREENING

Summary of interactions with the environment and statement of the findings of the Screening:
(Including an outline of the likely significance of any interactions, positive or negative, and explanation of conclusion of the screening exercise.)

Sniffer concludes from the screening exercise that the strategy has the potential to achieve significant positive environmental effects, considering the cumulative potential across all areas of the strategy and action plan. Proactively adapting to climate change through new actions, as well as by influencing other national, regional and local plans and strategies, and influencing allocation of resources, and activities, is likely to reduce or reverse significant deterioration of , and impact on the environment as well as the region's economy and society.

The strategy and action plan will also act as a critical practical mechanism for delivery of the second Scottish Climate Adaptation Programme. Whilst all public bodies have a legal duty to act in a way best calculated to deliver the programme under s44 of the Climate Change (Scotland) Act 2009, the level of integration and collaboration needed to manage risks, not just with public bodies but also private and third sector requires a collaborative approach, whilst the spatial scale of certain sectors (e.g. economic development, land use planning, transport) mandates a regional approach.

The plan is also a critical part of achieving sustainable development. At present climate risks present the possibility of compromising the ability of future generations to meet their own needs. It is not a case of if

climate impacts will happen, but *when*, and increasingly climate impacts are already being felt in Glasgow City Region.

As such, Sniffer is proposing to undertake an SEA of both the strategy and the action plan. A full review of actions/activities and projects will be undertaken and where actions haven't been assessed through an SEA of a strategic action by one of the partner organisations, then they will be assessed as part of the SEA for the Strategy and Action Plan to ensure that all environmental impacts of the Strategy have been captured. In doing so, we may also identify synergies or cumulative impacts that are not possible or evidence in an SEA on a Thematic PPS – and these could be positive or negative.

When completed send to: SEA.gateway@scotland.gsi.gov.uk or to the SEA Gateway, Scottish Government, Area 2H (South), Victoria Quay, Edinburgh, EH6 6QQ.

Our ref: PCS/170114
SG ref: SEA01560/SCR

If telephoning ask for:
Julie Gerc

10 March 2020

Kit England
Climate Ready Clyde
City Chambers East
Floor 2, Room 29
Glasgow
G1 1JL

By email only to: SEA_Gateway@gov.scot

Dear Sir

Environmental Assessment (Scotland) Act 2005
SNIFFER - Glasgow City Region Adaptation Strategy and Action Plan - Screening Report

Thank you for your Screening Report consultation which SEPA received via the Scottish Government SEA Gateway on 14 February 2020.

In accordance with Section 9(3) of the Environmental Assessment (Scotland) Act 2005 we have considered your screening report using the criteria set out in Schedule 2 for determining the likely significance of effects on the environment. Having reviewed the Screening Report, we consider that in respect of our main areas of interest (air, water, soil, human health, material assets (of which we have a specific interest in waste) and climatic factors) the Plan is likely to have significant environmental effects. Based on the information available to date we consider that significant effects are most likely with respect to human health, water, air, soil and climatic factors.

Although we are of the view that significant environmental effects are likely, it is for the Responsible Authority to make a formal determination taking into account the consultation responses received. If it is formally determined that SEA is required, you will be aware that the next stage requires the Responsible Authority to consult the Consultation Authorities on the proposed scope and level of detail to be included within the Environmental Report. This can be undertaken through preparation of a concise Scoping Report; further information on which can be found in the [Scottish Government SEA Guidance](#) (sections 3.4. to 3.8 in particular).

We would encourage you to use the scoping process to focus the assessment on those SEA issues upon which there are likely to be significant environmental effects, to outline the baseline information you consider as most relevant and explain your proposed method of assessment. To assist with this process we have produced [SEA topic guidance](#) on those issues which fall within our remit.

We are committed to providing early and focused advice and supporting continuous engagement and would therefore welcome the opportunity to meet with you and discuss these issues prior to the formal consultation.

Should you wish to discuss this screening consultation, please do not hesitate to contact me on 01698 839337 or via our SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely

Julie Gerc

Senior Planning Officer

Ecopy: sea.gateway@hes.scot; SEA_GATEWAY@nature.scot



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: sea.gateway@gov.scot

Mr Kit England
Climate Ready Clyde Manager
c/o Glasgow and Clyde Valley Green Network
Partner
125 West Regent Street
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G2 2SA

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
Switchboard: 0131 668 8600
HMConsultations@hes.scot

Our case ID: 300043358
Your ref: 01560 Screening
09 March 2020

Dear Mr England

01560 Screening - SNIFFER - Glasgow City Region Adaptation Strategy and Action Plan

Screening Report

Thank you for your consultation which we received on 14 February about the above screening report. We have reviewed this report in our role as a Consultation Authority under the above Act, in accordance with the requirements of Section 9(3). In doing so we have used the criteria set out in Schedule 2 for determining the likely significance of the effects on the environment.

Historic Environment Scotland's view

In light of the information and reasoning set out within the screening report, we are content to agree with your view that there are **likely to be significant environmental effects** for the historic environment.

Next steps

The Environmental Assessment (Scotland) Act 2005 requires you as the Responsible Authority to determine within 28 days whether an environmental assessment is required and to inform the Consultation Authorities accordingly. This may be done via the SEA Gateway (sea.gateway@gov.scot).

We hope our advice is helpful to you in making this determination. Please feel welcome to contact us if you have any questions about this response. The officer managing this case is Virginia Sharp who can be contacted by phone on 0131 668 8704 or by email on Virginia.Sharp@hes.scot.

Yours sincerely

Historic Environment Scotland

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. SC045925

VAT No. GB 221 8680 15



Scottish Natural Heritage
Dualchas Nàdair na h-Alba
nature.scot

Kit England
Climate Ready Clyde
Room 29
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Glasgow
G1 1JL

By email via: SEA_gateway@gov.scot

Date: 10 March 2020

Dear Kit,

Environmental Assessment (Scotland) Act 2005 – Climate Ready Clyde – Glasgow City Region Climate Change Adaptation Strategy and Action Plan - Screening Report

Thank you for consulting us on the above screening report which we received on 17 February 2020. In accordance with Section 9(3) of the Environmental Assessment (Scotland) Act 2005, we have reviewed it for significant environmental effects in line with our remit.

We note that the Strategy and Action Plan aim to set a strategic framework for climate adaptation in the Glasgow City Region and have the potential to "*achieve significant positive environmental effects*", including positive or negative cumulative effects (p. 11-12).

Based on the above, we agree that environmental effects are likely to be significant and that an SEA is required.

We hope you find these comments useful. Should you wish to discuss any aspect of our response please do not hesitate to contact Katie Bain at katie.bain@nature.scot or on 0131 314 6797.

Yours sincerely,

Katie Bain
Planning Adviser
Strathclyde & Ayrshire

cc.

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