



INVERCLYDE LOCAL DEVELOPMENT PLAN
2014

STRATEGIC ENVIRONMENTAL ASSESSMENT - POST-ADOPTION STATEMENT

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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 2014 – Supplementary Guidance on Renewable Energy

The Responsible Authority is:

Inverclyde Council

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PART 3

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STRATEGIC ENVIRONMENTAL ASSESSMENT – POST-ADOPTION STATEMENT

Strategic Environmental Assessment Post Adoption Statement Key Facts	
<p>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.</p>	
<p> </p>	
SEA Post Adoption Statement for	Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy
Plan Adopted	October 2015
Responsible Authority	Inverclyde Council
Purpose of the Inverclyde Local Development Plan	<p>This document provides guidance to supplement the Local Development Plan Policy INF1 for renewable energy developments. It has been prepared to allow for the assessment of a variety of types of renewable energy development proposals aiming for a balance between promoting renewable technologies and meeting national guidance on other areas such as those relating to the natural environment.</p> <p>It aims to locate renewable energy developments where the technology can operate efficiently and environmental and cumulative impacts can be addressed to produce a satisfactory outcome.</p>
What prompted the PPS	Changes to national policy that required to be reflected in Local Development Plan policy after the plan had been adopted.
Period Covered by the Plan	2014 - 2019
Area Covered by the Plan	Inverclyde Authority area

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Availability	The Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy, 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.
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

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INTRODUCTION

A new requirement to include a Spatial Framework identifying those areas likely to be most appropriate for onshore wind farms as a guide for developers and communities was introduced in Scottish Planning Policy 2014 (SPP). The Inverclyde Local Development Plan (LDP) was at examination when SPP was published along with Supplementary Guidance on Renewable Energy that did not include the Spatial Framework. It was therefore agreed with Scottish Ministers that new Supplementary Guidance would be prepared to incorporate this new requirement into the Plan. This Supplementary Guidance fulfils this obligation.

The SEA post adoption statement has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

The following sections review:

1. THE STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS,
2. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE PLAN, AND HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT,
3. HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT,
4. REASONS FOR CHOOSING THE PLAN AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES,
5. 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 2014 – Supplementary Guidance on Renewable Energy (SG) has been subject to Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Screening Report: where it was agreed after consultation with the Consultation Authorities, that the SG was likely to have significant effects on the environment and therefore an Environmental Assessment should be undertaken.
- Scoping Report: Taking into account the views of the Consultation Authorities regarding the scope and level of detail that was appropriate for the Environmental Report.
- The Environmental Report: on the likely significant effects on the environment of the SG, including consideration of:
 - the relationship between the SG and other relevant strategies, policies, plans and programmes and the environmental protection objectives therein;
 - Inverclyde baseline data, area profile and the current state of the environment;
 - existing environmental problems and issues affecting the area;
 - the SEA objectives;
 - the impact on the environment of not implementing the SG;
 - the alternative methods considered in the preparation of the SG and the reasons for selecting the method chosen;
 - the likely significant effects, either positive or negative, of the SG on the environment;

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- an indication of where mitigation measures would be necessary for the prevention, reduction or offsetting of any significant adverse effects; and
- the need to monitor significant environmental effects arising from the proposals in the SG to identify any unforeseen adverse effects.
- The consultation on the Environmental Report, taking into account comments made to the Scoping Report, which was carried out in association with consultation on the Draft SG (30 January – 27 February 2015). Minor changes were made to the Draft SG following this consultation and the Revised SG was subject to further consultation (5 June – 17 July 2015). The revisions made did not require any changes to the Environmental Report; therefore, it was not resubmitted to the Consultation Authorities, but was subject to public consultation alongside the Revised SG.
- The preparation of the finalised Environmental Report, taking into account comments made to the consultation on the Environmental Report, the Draft SG and the Revised SG.
- The preparation of this SEA post adoption statement.
- 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.

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

2: HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE SG AND HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

Inverclyde context and the need for more detailed assessment

The Spatial Framework applies to onshore wind farms and the SG sets the Spatial Framework in the context of Inverclyde by including all turbine developments of 15 metres to blade tip or greater within this definition. This reflects the predominant wind energy developments applied for in Inverclyde and provides increased environmental protection from the potential impacts, particularly cumulative impacts, of wind turbine development within the area. As the Spatial Framework does not identify sites but rather those areas likely to be most appropriate for onshore wind turbine development, specific impacts and mitigation cannot be determined at this stage. Developers will be required to further investigate likely impacts and ensure relevant mitigation measures are in place as proposals are determined through the development management process.

Designated areas and policy objectives

There are 2 SPAs, one of which is also a Ramsar site, 7 SSSIs, 3 Gardens and Designed Landscapes and some areas of peat within Inverclyde. All of these areas fall within group 2 of the Spatial Framework for wind energy developments, where wind farms may be appropriate under certain circumstances. Proposals that would have an impact on any of these designations would be assessed against the criteria in the SG, along with the relevant Policies in the Inverclyde Local Development Plan 2014.

The Habitats Regulations Appraisal of the SG identified the need to include a statement within the SG to act as simple mitigation as significant impacts on either of the SPAs within Inverclyde, as well as

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the Black Cart SPA in Renfrewshire, could not be objectively ruled out. This was done through a footnote to the Spatial Framework.

A number of European, National, Strategic and Local policy objectives were considered in the assessment, as set out in Appendix B to the Environmental Report. The European, National and Strategic objectives were already integrated into the criteria for the Spatial Framework as set out in SPP, or for Policy INF1 as set out in the LDP, both of which were subject to SEA during their development. Local objectives, for example relating to the Clyde Muirshiel Regional Park, are included in 'other considerations' section of the SG.

Anticipated impacts

The adverse environmental effects identified in the assessment were on soil quality, from compaction and sealing during development, and on the landscape due to the intrusive nature of wind turbines.

The impacts on soil will be minimised through the application of the SG, which directs turbine development to the least sensitive areas. The SG requires, under other considerations, that once the turbines are no longer required the site be reinstated fully to its former condition, making any impacts that do arise reversible. The criteria accompanying the Spatial Framework also set out the need for conditions relating to site restoration and robust planning obligations to ensure this is achieved.

Impact on the landscape will also be minimised through the application of the SG and is addressed further in the criteria set out alongside the Spatial Framework and INF1, which set out the need to consider the impact, including the visual impact, of proposals on the landscape. The other considerations section also highlights the need to consider the findings of the 2014 Landscape Capacity Study, which should be used to identify any mitigation needed where turbines are proposed in sensitive locations. Diagram 1 and

Appendix 1 in the SG set out the sensitivity of the different areas of landscape character in Inverclyde to different sizes of turbine.

The main cumulative effects are expected to be on the landscape as proposals are developed, particularly where they are within close physical or visual proximity to one another. This is addressed in the SG in both the INF1 and Spatial Framework criteria, as well as under 'other considerations', where the potential for existing and consented development in certain areas to limit capacity for further development is identified. The main indirect impact is an improvement to human health from the positive impact on greenhouse gas emissions, which will lead to improved air quality, particularly benefiting those with respiratory problems.

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

Comments were received to the Draft Environmental Report, accompanying the Draft SG from the Consultation Authorities: Scottish Environment Protection Agency; Scottish Natural Heritage; and Historic Scotland. These comments and the Council’s response are shown in the Finalised Environmental Report published alongside this SEA statement and in **Table 1** below. No comments were received from any other bodies to the public consultations which accompanied the Draft and Revised SG.

TABLE 1		
OPINIONS EXPRESSED DURING ENVIRONMENTAL REPORT CONSULTATION (FEBRUARY 2015) AND HOW THE OPINIONS HAVE BEEN TAKEN INTO ACCOUNT		
	CA COMMENTS AND RECOMMENDATIONS	HOW TAKEN INTO ACCOUNT IN SG AND/OR ENVIRONMENTAL REPORT
LDP Proposed Plan Environmental Report		
SEPA		
1	Satisfied that an adequate assessment of the SG has been carried out and would agree with the overall findings.	Noted.
2	Welcome the inclusion of appendix H summarising the comments on the scoping report and how they have been considered.	Noted.
3	Note that the ER has taken into account the issues raised in our scoping consultation response.	Noted.
4	Appendix F clearly outlines any potential impacts and mitigation required.	Noted.
5	Request our Guidance on Assessing the impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems (GWDTE) is followed to avoid potential impacts to GWDTE.	Where no negative impacts were anticipated no mitigation measures were identified, but the Guidance has been included in the table in Appendix F to be used as an assessment tool where any impacts may occur.
SNH		
1	Broadly, the environmental issues/concerns and key trends have been correctly identified, the assessment of likely significant effects on the environment have been carried out satisfactorily and the measure that could prevent, reduce or offset any significant adverse effects on the environment when implementing the Supplementary Guidance have been clearly identified.	Noted.

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HS		
1	Welcome that our comments at the scoping stage have been taken into account.	Noted.
2	Welcome the concise nature of the assessment, however consider the ER would have benefitted from being more explicit regarding the specific assessment methodology utilised in Section 4. Assume the SEA objectives and assessment questions in Appendix E were used to test the spatial framework and criteria of the guidance.	Noted. Correct that the SEA objectives and questions were used to test the spatial framework and criteria. Section 4 has been updated to clarify this.
3	In the absence of a single spatial framework map in the guidance depicting Group 3 areas, also assume the assessment has been carried out on a principle basis.	<p>A single spatial framework map has now been included in the SG. Figure 1 shows the Group 2 areas within Inverclyde (there are no Group 1 areas) as set out on page 8 of the SG.</p> <p>As development may occur in Group 2 or Group 3 areas, the assessment was done on an in principle basis assuming proposals could come forward in either area, but would only be acceptable where they met the criteria in both the SG and the LDP (and where appropriate, the SDP).</p>
4	Understand we consider the guidance is unlikely to have a significant environmental effect on the historic environment. However, as the criteria aim to mitigate the effect of the spatial framework in relation to such assets as scheduled monuments and listed buildings we consider that for the purposes of the report the guidance should be scored as having a negative effect. This only becomes a residual neutral effect upon appropriate application of the spatial framework and its accompanying mitigating criteria (in conjunction with the application of development plan policies for the historic environment).	<p>It was decided to use a consistent approach to assessing the areas of the environment scoped in. Where there are mitigating measures within the criteria in the SG it was assessed as neutral, but where the mitigating criteria are in other LDP policies, it was assessed as negative and the LDP policies are identified as the required mitigation measures.</p> <p>We have added to the commentary on the assessment of cultural heritage setting this out and recognising that there is potential for negative impacts on listed buildings and scheduled monuments due to their inclusion in Group 3, which is identified in the Spatial Framework as areas where development is more likely to be acceptable.</p>

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

The Strategic Environmental Assessment (Scotland) Act 2005 requires that, when preparing a plan or programme, other reasonable alternatives are considered. The SG introduces the Spatial Framework set out in SPP into the Inverclyde LDP, as described in the LDP para. 10.5 and agreed by Scottish Ministers. As LDPs require to accord with the broad principles identified in SPP, it would not be reasonable not to produce the SG. The environmental designations the SG seeks to protect have been set at a higher level by other bodies or were introduced through the LDP, which the SG must accord with, therefore there is no alternative but to take these into account as they are designated. These limitations on the scope and content of the SG mean that no reasonable alternatives were identified.

The criteria for the assessment of proposals, both from the Spatial Framework and Policy INF1, were subject to SEA as part of SPP and the LDP. This means that, while there is little scope to change them based on the outcome of the Environmental Assessment, they already address the significant impacts that the Spatial Framework presents to the environment and set out mitigation measures where required. The negative impacts anticipated on soil and the landscape should therefore be limited by the use of the SG, with development only taking place on sites where they can be minimised or mitigated.

5: 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.

For some SEA issues, although no negative impacts are anticipated, an indication of how any unforeseen impacts will be managed is given. For example, SEPA's guidance on the Management of Forestry Waste, Developments of Peatland and Assessing the impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems will be used where waste is generated from tree-felling, peat is disturbed or excavated or there are potential impacts on groundwater from development.

Applications for wind turbines are monitored quarterly by the Council and this will assist with identifying cumulative impacts. **Table 2** below shows the indicators and data sources that will be used to monitor the impact of the SG on each SEA objective. This, along with the Action Programme that accompanies the LDP, constitutes the monitoring regime that will be undertaken as part of the ongoing development plan process.

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

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TABLE 2: MONITORING FRAMEWORK			
SEA Objective	Indicator	Data Source	Frequency of updating
Biodiversity, Flora and Fauna	Adverse impacts on National and/or International natural heritage designations	SNH http://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' (published December 2014)	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'.	Every 5 years
		Inverclyde Housing Land Supply	Annually
	Inverclyde Council 'Housing Land Survey'	Annually	
	Impact on Open Space Provision	Inverclyde Open Space Strategy (currently being developed)	To be determined
Soil	Loss of deep peat and prime agricultural soils	GIS data on distribution of deep peat soils (James Hutton Institute)	Annually
	Remediation of contaminated land	GIS data on distribution of prime agricultural land (James Hutton Institute) Inverclyde Council - Contaminated Land Officer Inverclyde Council - Monitoring of planning applications for wind turbines and development in the greenbelt.	Annually Annually

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SEA Objective	Indicator	Data Source	Frequency of updating
Water Environment	Impact on the number of flood events	Inverclyde Council-Roads monitoring	Annually
	Impact on water quality	SEPA - Clyde Area Catchment Management Plan	Every 6 years
	Impact on morphology of watercourses		
Climatic Factors	Number of Air Quality Management Areas	Inverclyde Council – ‘Local Air Quality Monitoring Progress Reports’	Annually
	Increase in Greenhouse Gas Emissions	Inverclyde Council – ‘Carbon Management Plan’ Department of Energy and Climate Change ‘UK Greenhouse Gas Emissions Statistics’	Annually Annually
Material Assets	Impact on Council assets	Inverclyde Council – Property Monitoring	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 Green Belt/Countryside	Every 5 years

Inverclyde
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