



INVERCLYDE LOCAL DEVELOPMENT PLAN 2014

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 2014
The Responsible Authority is:	Inverclyde Council

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PART 3

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DATE	28 November 2014

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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 2014
Plan Adopted	29 August 2014
Responsible Authority	Inverclyde Council
Purpose of the Inverclyde Local Development Plan	Sets out where development should take place and identifies areas that should not be developed. Recognises where the main areas of change should be and, along with the Glasgow and the Clyde Valley Strategic Development Plan, provides the framework upon which all planning applications can be determined.
What prompted the PPS	A legislative requirement of the Planning etc. (Scotland) Act 2006
Period Covered by the Plan	2014 - 2019
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 area available at the Council Offices, Local Libraries and on the Council's website

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INTRODUCTION

The Inverclyde Local Development Plan was adopted by Inverclyde Council on the 29 August 2014. The Plan has been made available to the public accompanied by the Environmental Report, the Action Programme, Supplementary Guidance, Habitats Regulations Assessment Report, the Equalities Impact Assessment Report and this SEA post adoption statement.

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,
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 THE 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: Taking into account the views of the Consultation Authorities regarding the scope and level of detail that was appropriate for the Environmental Report. The Local Development Plan did not require to be screened, due to its likely environmental impact, therefore this Strategic Environmental Assessment commenced at the scoping stage.
- The Preparation of an Interim Environmental Report on the likely significant effects on the environment of the LDP Main Issues Report (MIR), including consideration of:
 - Inverclyde baseline data, area profile and the current state of the environment,
 - existing environmental problems and issues affecting the area,
 - relationship between the LDP MIR and other relevant strategies, policies, plans and programmes and the environmental protection objectives therein,
 - the alternative methods considered in the preparation of the LDP MIR and the reasons for selecting the method chosen,
 - the likely significant effects, either positive or negative, of the LDP MIR on the environment,
 - 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 LDP MIR to identify any unforeseen adverse effect.

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- The format of this Interim Report was replicated in the finalised Report.
 - The consultation on the Interim Environmental Report, which was carried out in association with consultation on the LDP Main Issues Report (27 May – 22 July 2011).
 - The responses to the LDP Main Issues Report consultation identified additional potential sites for development which led to further consultation, along with an addendum to the Interim Environmental Report (4 November – 16 December 2011).
 - The preparation of the Environmental Report, taking into account comments made to the consultation on the Interim Environmental Report, and the LDP Main Issues Report, including responses to the addendum and additional suggested sites consultation.
 - The consultation on the Environmental Report, which was carried out in association with the consultation on the LDP Proposed Plan (31 May – 26 July 2013).
 - The preparation of the finalised Environmental Report, taking into account comments made to the consultation on the Environmental Report and the LDP Proposed Plan.
 - 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 LDP has been done in association with the environmental assessment.

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2: HOW ENVIRONMENTAL CONSIDERATIONS 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>Threats to habitats from development of Greenfield sites, particularly where these are also covered by a designation such as a TPO or a SINC or fall within the Green Belt or Countryside</p> <p>Positives from habitat and 'green corridor' creation increased water and air quality</p> <p>SSSI/SPAs at Inner Clyde Estuary and Renfrewshire Heights</p>	Yes	<p>Policy ENV7 sets out a commitment to continue developing habitat and species action plans through the LBAP to manage and enhance biodiversity.</p> <p>Policies SDS5 and SDS7 direct development to previously developed land within the urban settlements and away from the Green Belt and Countryside, while Policy ENV1 protects designated environmental resources from inappropriate development. ENV6 safeguards TPOs and other areas of trees and woodland as well as setting out criteria for woodland creation.</p> <p>Policies ENV3 and SDS4 promote the Green Network, ENV8 promotes improvements to water quality, while SDS1, SDS2, TRA2 and INF2 all promote measures that will lead to better air quality through reduced need to travel and greater opportunity for active travel, greater energy efficiency and reduced carbon and energy use.</p> <p>A Habitats Regulations Screening Assessment was undertaken alongside the Local Development Plan and SEA Environmental Report in consultation with SNH. This concluded that there was no connectivity between the proposed development sites in the Local Development Plan and the SPAs and therefore an Appropriate Assessment was not required.</p>
<p>Population and Human Health</p> <p>Positives from improved access, particularly to green/open spaces as well as new recreation facilities/pitches and associated opportunities for</p>	Yes	<p>The plan protects and promotes the increase and enhancement of walking and cycling routes within the urban area and connecting to the wider countryside through Policy TRA2</p> <p>Policies RES1-7, TCR1- 12 and ECN1-6 aim to provide affordable quality housing, services and facilities and employment opportunities that are easily accessible throughout the area.</p>

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<p>active recreation/travel and to services/facilities and employment opportunities. Improvements to the housing stock and townscape, improved water and air quality and reduced flood risk</p> <p>Particular benefits for those without access to a car, on housing waiting lists and those with respiratory problems.</p>		<p>Policies SDS1, SDS2, TRA2 and INF2 all promote measures that will lead to better air quality through reduced need to travel and greater opportunity for active travel, greater energy efficiency and reduced carbon and energy use. Policy ENV8 promotes improvements in water quality, ENV4 and ENV5 protect open spaces and ENV3 and SDS4 protect and promote the Green Network.</p>
<p>Soil</p> <p>Threats from removal of soil or contamination during development, particularly for Greenfield sites.</p> <p>Positives from tree planting, greening, improved air and water quality and removal of contamination.</p>	Yes	<p>The Plan promotes the remediation of contaminated land as the majority of development sites identified in the plan are brownfield sites that have been developed previously. While it is accepted that not all brownfield sites will be contaminated, a significant number of sites are likely to be contaminated.</p> <p>Policies SDS3 and SDS4 seek to embed Green Network principles in all new development, particularly large-scale renewal and regeneration projects, while ENV6 protects and sets out the conditions for planting of trees and woodland creation. Policies SDS1, SDS2, TRA2 and INF2 all promote measures that will lead to better air quality through reduced need to travel and greater opportunity for active travel, greater energy efficiency and reduced carbon and energy use. Policy ENV8 promotes improvements to water quality.</p> <p>The strategy of the plan directs development toward brownfield, previously developed land ahead of green field sites through Policy SDS5</p>
<p>Water Environment</p> <p>Threats from morphological works required for developments along the waterfront, where the Clyde is already under pressure from such structures.</p>	Yes	<p>Policy ENV8 requires developers to have regard to the impact of proposals on water quality, particularly in relation to the Clyde Area Management Plan.</p> <p>The majority of sites identified in the plan are outwith areas at risk of flooding or are within the developed floodplain. Policy INF4 also directs development away from areas at risk of flooding wherever possible and requires assessment and mitigation of risks where they occur.</p>

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Positives from tree planting/greening/river corridor management, introduction of SUDS, known flooding/contamination issues addressed and culverts opened through development, lowered flood risk through development.		Policy ENV6 protects TPOs and sets out the conditions for planting trees and woodland creation. Policies SDS3 and SDS4 seek to embed Green Network principles in all new development. Policy ENV8 seeks to prevent the deterioration of water quality in all water bodies and open culverts where possible, while INF5 promotes the use of SUDS. Policy INF4 states that development should not increase flood risk.
Climatic Factors and Air Potential threats from cumulative impact of developments being undertaken simultaneously and from increased traffic due to developments, particularly along the A8 where emissions are already breaching limits for certain pollutants. Positives from improved carbon sequestration, reduced need to travel/increased opportunities for active travel and reduced greenhouse gas emissions.	Yes	Policy SDS1 sets out an approach to climate change mitigation and adaptation that is carried throughout the plan, whereby the impact of development on traffic generation and associated carbon emissions is reduced by directing all forms of development to accessible locations and encouraging the use of transport assessments and green travel plans as appropriate for major trip generating uses. Policy INF1 sets out the Council's support for renewable energy developments that meet certain criteria and INF2 states the requirement for new buildings to comply with Scottish Building Standards except in given circumstances. Policy ENV6 sets out the conditions for planting of trees and woodland creation. Policies SDS3 and SDS4 seek to embed Green Network principles in all new development. Policies SDS1, SDS2, TRA2 and INF2 all promote measures that will lead to better air quality through reduced need to travel and greater opportunity for active travel, greater energy efficiency and reduced carbon and energy use.
Material Assets Positive enhancement through policies protecting and seeking enhancement of assets such as the Green Network, roads and path network and council	Yes	Many assets have explicit protection in policy such as the Green Network (ENV3), Transport Network (TRA1), Environmental Resources (ENV1), Open Space (ENV4), and Built Heritage and Archaeology (HER policies). These policies aim to protect and where possible enhance these assets and to mitigate against any unavoidable negative impact on them from development.

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assets such as leisure facilities.		
Cultural Heritage Positives from the restoration and improvement of the setting of listed buildings.	Yes	<p>In general, sites identified in the plan for development do not impinge on cultural or built heritage resources.</p> <p>Policies HER1- 8 set out policy to protect and where possible enhance, conservation areas (HER1-3), listed buildings (HER4 & 5), archaeological sites (HER7) and gardens and designed landscapes (HER8). Where development does go ahead, these policies also set out how any negative impacts should be mitigated.</p>
Landscape Threats from development of prominent Greenfield sites due to topography of area and potential for development within the Green Belt and Countryside. Positives from the improved design of developments, redevelopment of derelict sites, better use of/more open space/greenspace.	Yes	<p>Policy SDS5 states a preference for new development to be directed to brownfield land within the urban settlements, whilst SDS8 sets out a presumption against development in the Green Belt and Countryside.</p> <p>SDS3 seeks high quality place making, having regard to Inverclyde's natural environment, including the setting of the urban areas.</p> <p>Policies ENV1 and ENV2 specifically protect Designated Environmental Resources and the Green Belt and Countryside against inappropriate development, including in terms of landscape character and impact on natural and built heritage.</p> <p>Policies ENV3 and ENV4 support and safeguard the Green Network and Open Space and seeks to enhance them where practicable.</p>
Interrelationships/Cumulative/Synergistic Effects Threats from the cumulative effect of development allocations on multiple environmental receptors.		<p>The Plan is designed to minimise negative environmental impacts and to mitigate them where they do occur, therefore there should be no cumulative negative impacts from the implementation of the plan.</p> <p>The design of the Plan should also maximise positive cumulative and synergistic impacts as development proposals are assessed against all relevant policies.</p> <p>Many of the policies are non-site specific and will be applied to a number of</p>

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<p>Positive cumulative effects of individual policies on multiple environmental receptors.</p> <p>Positive effects on multiple environmental receptors from the synergies and interrelationships formed between policies.</p>		<p>developments across the authority over the lifetime of the plan, meaning that the positive benefits from each individual development will accumulate over time. For example, Policy ENV7, which aims to protect and enhance biodiversity, should be applied in the determination of relevant planning applications and as more applications are brought forward and implemented, the benefits to biodiversity will accumulate. These benefits may be strengthened directly or indirectly by positive impacts on other aspects of the environment brought about by other policies, such as water quality improvements from Policy INF5 (requiring drainage of new development by SUDS) while also benefiting biodiversity in and around new developments.</p> <p>This is particularly the case for the sustainable development strategy policies (SDS1-8), which set out general principles that should be applied to all development. These policies are predicted to have overall positive impacts, with negative impacts only envisaged in specific circumstances and which are mitigated against through other policies in the plan.</p>
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3. HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

TABLE 2		
Findings from the Environmental Report	Integrated into the Local Development Plan (Yes/No)	How Findings Taken Into Account or Reasons for not Taking into Account
<p>Biodiversity Flora and Fauna</p> <p>Negative impacts from greenfield development</p> <p>Negative impacts from development in the Green Belt or Countryside</p> <p>Negative impacts where sites include an environmental designation such as a TPO, SPA or SINC etc.</p>	Yes	<p>Following a screening assessment for the HRA it has been agreed with SNH that, due to a lack of connectivity between the proposed development sites in the LDP and the SPAs in Inverclyde, an appropriate assessment is not required. Any proposals for development that may impact on the SPAs will be assessed against Policy ENV1, which states such development will only be permitted where an appropriate assessment has demonstrated there will be no adverse impact on the integrity of the site or where there are no alternatives and the development is of overriding public interest.</p> <p>Policy ENV1 protects Strategic and Local designations from development apart from in exceptional circumstances, including where the impact on the environment, including biodiversity, is minimised and any loss can be compensated by appropriate habitat creation/enhancement elsewhere.</p> <p>Policy ENV2 protects the Green Belt against development other than in exceptional or mitigating circumstances and the Countryside against development only where it does not adversely impact on natural heritage and environmental resources.</p> <p>Policy ENV3 states that where development proposals would encroach upon or undermine the green network, alternative routes and green space is expected to be provided or enabled.</p> <p>Policy ENV5 seeks alternative provision of formal, active open space or other recreational facilities where these are lost through development.</p> <p>Policy ENV7 makes the protection and enhancement of biodiversity a</p>

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		consideration in the determination of planning applications and states that development likely to adversely affect protected species will not be granted permission unless it can be justified in terms of the relevant legislation
<p>Population and Human Health</p> <p>There are no anticipated negative impacts on Population or Human Health from the implementation of the LDP, which has growing the population and improving the quality of life for all sections of society as its main objective.</p> <p>There are potential indirect negative impacts on human health from e.g. loss of greenspace, air pollution or increased flood risk but these are dealt with in the relevant sections where they have direct implications.</p>		
<p>Soil</p> <p>Negative impact where development leads to the removal or contamination of soil.</p>	Yes	Policy ENV2 protects prime quality agricultural land and peat land with value as a carbon store from development within the Countryside, where the vast majority of such sites are located. The majority of the sites identified for development in the Plan are brownfield sites where development can improve soil quality by removing existing contamination.
<p>Water Environment</p> <p>The built up areas of Inverclyde, where the majority of development sites are located, lies adjacent to the River Clyde, which is under pressure both in terms of water quality and flood risk. Some of the proposals include works within the River that would add to existing morphological pressures and</p>	Yes	<p>Policy ENV8 states all proposals for development should have regard to their potential impact on the water environment, particularly in terms of the Clyde Area Management Plan, not lead to deterioration and bring about sustainable improvements where possible.</p> <p>Policy INV4 states that development will not be acceptable where it is at risk of flooding or increases flood risk elsewhere except in exceptional circumstances, which are set out. It also directs all proposals for development at risk of flooding to be accompanied by a Flood Risk</p>

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potentially lead to increased marine traffic. Some proposals are within areas at risk of flooding and could lead to an increase in the number of buildings at risk of flood if adequate defences are not in place.		<p>Assessment to demonstrate the level of risk and how it will be mitigated.</p> <p>Policy INF5 states all new development should be drained by SUDS with details of long term maintenance provided.</p>
<p>Climatic Factors</p> <p>There are potential negative impacts from emissions during construction, particularly if a number of sites in close proximity to each other are being developed at the same time.</p> <p>Other potential negative impacts are due to increased traffic either from new residential sites or to new employment sites, particularly in the area of the A8 that is currently experiencing high emissions levels.</p>	Yes	<p>Emissions during construction and operation are regulated through the IPPC regulations which will apply in all cases.</p> <p>Policy SDS1 seeks to reduce greenhouse gas emissions through a range of means, while SDS2 seeks to promote the integration of land use and sustainable transport.</p> <p>Policy TRA2 directs major trip-generating development to locations accessible by sustainable transport modes and requires transport assessments and travel plans to be submitted where appropriate. Policy TRA4 states that the council will seek appropriate contributions toward improved transport infrastructure from developers where this is identified as required in the transport assessment.</p>
<p>Material Assets</p> <p>There are no identified negative impacts on the Council's material assets from the implementation of the LDP. Many of the measures in the Plan will lead to enhancements by requiring improvements to open space and the Core Path Network for example.</p>		
<p>Cultural Heritage</p> <p>There are no identified negative impacts to the Cultural Heritage of Inverclyde from the implementation of</p>		

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<p>the LDP. The policies of the Plan aim to protect and enhance cultural heritage wherever possible and protect designated resources from development that would negatively impact upon them.</p>		
<p>Landscape Negative impacts from Greenfield development, particularly in the Green Belt and Countryside and due to Inverclyde's topography, which means that many such sites are highly visible and negative impacts, are therefore likely to be greater.</p> <p>There are also potential negative impacts from renewable energy infrastructure development due to the requirement for e.g. wind turbines to be located on high ground within the Green Belt and Countryside.</p>	<p>Yes</p>	<p>Policy SDS3 promotes good place making, including having regard to Inverclyde's setting and Scottish Government place making policies 'Designing Places' and 'Designing Streets'. Policy SDS5 states the preference for all new development to be located on previously used brownfield land within the urban settlements, while SDS8 states there is a presumption against the spread of the built up area into the Green Belt and careful management of development within the Countryside.</p> <p>Policy RES1 safeguards and enhances the character and amenity of residential areas, with proposals assessed against criteria including details of proposals for landscaping.</p> <p>Policy ENV2 states that development in the Green Belt will only be considered favourably under exceptional or mitigating circumstances and also sets out the conditions development in the Countryside requires to meet to be considered favourably, including not adversely impacting on landscape character.</p> <p>Proposals for renewable energy development will be considered against Policy ENV1 which states that such development will be supported subject to a number of criteria, including not having a significant adverse effect upon the landscape and wider environment.</p> <p>INF1 states that the Council will support development required for renewable energy generation unless any economic, environmental and social benefits are outweighed by significant adverse effects upon a number of criteria, including the landscape and wider environment.</p>

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

Comments were received to the Interim Environmental Report, accompanying the Main Issues Report, and the Environment Report accompanying the Proposed Plan from the Consultation Authorities: Scottish Environment Protection Agency; Scottish Natural Heritage; and Historic Scotland. Comments were also received from Inverclyde Council's Environment and Safety Service and Mr & Mrs Crighton to the Interim Environmental Report. These comments and the Council's response are shown in the Finalised Environmental Report published alongside this SEA statement. Further comments were received from the Consultation Authorities in response to the Environmental Report published alongside the Proposed Plan in May 2013. These comments and the Council's responses are shown in Table 3 below.

TABLE 3 OPINIONS EXPRESSED DURING ENVIRONMENTAL REPORT CONSULTATION (31 MAY TO 26 JULY 2013) 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		
HS		
General	Overall, we welcome the thorough approach taken to the preparation of the ER. We consider it is well structured, clear and concise. We note that the ER contains an assessment of the LDP policies and proposed land allocations against the SEA's objectives.	Noted
Non-Technical Summary	We consider the information provided within this section appropriately summarises the context and findings within the ER.	Noted
Background	We found the introductory chapters useful in setting the scene of the SEA, particularly in terms of detailing the process and steps taken to date.	Noted
State of the Environment / Environmental Baseline	Overall, we are content with the Environmental Baseline presented within the ER. We would note, however, that although the baseline summary in Table 2 focuses on designated asset types, such as scheduled monuments, reference could also be made here to Inverclyde's resource of undesignated assets. We welcome the inclusion of the Constraints Map in Appendix J. Consideration should still be given to how the existence of listed	Inverclyde's undesignated historic assets are now included in the baseline information in Table 2. The sheer number and close proximity of many listed buildings makes them impractical to show on a large scale map such as the constraints map or proposals maps that accompany the LDP. The Council's online interactive mapping system is currently being developed and opportunities to identify listed

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	buildings can be depicted graphically.	buildings will be investigated.
<i>SEA Environmental Objectives</i>	We are content with the SEA objectives for cultural heritage. We note the inclusion of the questions for assessing effects, which have been included along with the SEA objectives. This shall assist with reviewing the proposed policies and proposals.	Noted
<i>Assessment of LDP Policies</i>	<p>Overall, we welcome the approach taken in the assessment of LDP policies against the SEA objectives. We note the commentary which has been provided to explain the reasoning behind the predicted effects. We can provide the following comments:</p> <ul style="list-style-type: none"> We note the predicted '<i>potentially negative</i>' effect on cultural heritage resulting from certain of the Natural Heritage and Environmental Resources policies, for example, Policies ENV2 and ENV3. We would suggest that the effect of these policies could be potentially positive or negative, for example, safeguarding Green Belt and Green Networks may offer additional protection to the setting of cultural heritage assets. Policies HER3 and HER5 have '<i>no significant impacts</i>' predicted on cultural heritage. We would suggest that these policies may have '<i>potentially positive</i>' effects on cultural heritage, for example, taking into account the protection afforded by Conservation Areas. There is a predicted '<i>significant positive</i>' effect on cultural heritage resulting from Policy HER7. We consider this policy could also result in a potential negative effect, for example, in a case where enabling development is permitted as the only way of retaining a listed building, this may also result in a negative effect on the site or setting of the GDL. 	Policies ENV2 and 3 along with HER3, 5, 6 and 8 have been reassessed following the comments received from the Consultation Authorities to the Environmental Report that accompanied the Proposed Plan, and following the LDP Examination Report. See the response to SNH below.
<i>Spatial Strategy</i>	<p>We welcome the thorough approach taken in the assessment of land allocations against the environmental topics, including cultural heritage. Historic Scotland can provide the following comments:</p> <p><i>(a) Fort Matilda Industrial Estate (Site 30)</i> We note the recognition under Policy ECN1 for the '<i>potentially negative</i>' effect on the listed building as a result of this allocation.</p> <p><i>(b) Site 41 – Ravenscraig Hospital, Greenock: proposed development for housing.</i> We note the '<i>potentially positive</i>' effect on cultural heritage under</p>	<p>Noted</p> <p>(a) Noted</p> <p>(b) Noted, the assessment of Site 41 has been changed to reflect this comment</p>

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	Policy RES3 of the ER. We would suggest the effect is potentially both positive and negative, which is dependent upon the specific development brought forward.	
Mitigation	We note that some mitigation measures have been referred to in Appendix H of the ER. Having a separate text box or comments section for ' <i>mitigation measures</i> ' would assist with identifying where mitigation measures are proposed or have been taken into account.	The mitigation measures have now been moved into a separate box.
Monitoring	In terms of monitoring, we welcome the acknowledgement of the requirement to monitor the significant effects of the Plan. However, it is unclear from Section 6.3 how this is to be achieved. Currently, the Monitoring Table within the ER states that Historic Scotland maintains the record of scheduled monuments, listed buildings etc. This merely represents the baseline of the historic environment and is not representative of the effects of the LDP. It would be more beneficial to consider the use of indicators that better reflect the outcomes of the plan on the historic environment. For example, these could include indicators such as 'the number and outcome of planning applications affecting listed buildings' or 'the number and outcome of EIA applications where significant effects on the historic environment have been identified'. As you are aware, the Environmental Assessment Act 2005 requires Responsible Authorities to supply information on 'the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan' in their Post- Adoption Statement. We would therefore advise that consideration is given to this issue and we would be happy to discuss this with you.	Monitoring has been revisited and revised and the proposed framework is shown in Table 5 below. Information on the monitoring for the LDP is also shown in the Action Programme.

SEPA		
	We welcome the table in Appendix D summarising comments from the consultation authorities and others on the interim ER and addendum and how these were taken into consideration. We are satisfied that in general our comments at the scoping stage have been taken into account and that an adequate assessment of the strategy has been carried out.	Noted
	One of the assessment criteria is positive and negative effects balance out; we would not agree that positive effects will necessarily	The assessment of positive and negative impacts balancing out was removed from the assessment of policies and

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	balance out negative effects. Where a potential negative impact has been identified mitigation measures should be put forward. There are some sites where potential negative impacts have been identified but no mitigation has been suggested such as site 15, Parkhill Farm and site 22, Douglie Hill Road.	proposals in the Proposed Plan (Appendix H of the ER). Mitigation measures for site 15, Parkhill Farm are identified in Appendix H and Dougliehill Road is not included in the Plan.
SNH		
The Hierarchy of Plans, Programmes & Strategies (informed by reference to Appendix F)	The Glasgow & the Clyde Valley Landscape Assessment (Land Use Consultants for SNH, 1997) is not listed in the regional level strategy documents used to develop the LDP, and indeed does not appear to have been referred to. However the Inverclyde landscape character areas identified in this work may have been useful in terms of establishing the landscape resource baseline to inform the SEA.	The Landscape Assessment informed the production of the Proposed Plan and is referred to in paragraph 8.13 of the Plan. In assessing the sites for the Proposed Plan, none were felt to be of a scale or location to require the Landscape Assessment to be consulted.
Table 2: The Environment & Environmental Problems & Objectives for the SEA	SNH notes the inclusion of obviously natural heritage related “SEA Issues” in relation to the objectives against which the proposed Local Development Plan is to be assessed; such as Biodiversity, Flora & Fauna and Landscape. We also note and welcome the fact that, as well as recreational areas such as parks and sports pitches, the Material Assets issue/objective includes Inverclyde’s Core Paths network in its baseline. However we believe that it would have been of value to have also included Inverclyde’s existing Green Network in this Material Assets baseline, and to have included the Network’s protection and enhancement as an objective against which policies and proposals could be assessed.	While the Green Network is not included in Table 2, impacts on the Green Network were considered during the assessment of the policies and proposals. Table 2 has now been amended to include the Green Network as a Material Asset and an objective included to highlight and make clear the role the Green Network played in the assessment of the policies in Appendix H of the ER.
Assessment Methodology	SNH welcomes the inclusion of a protected network of open spaces and of a policy with proposals to enhance Inverclyde’s Green Network, as is stated within this methodology. While we may have wished to see this process go a step further and for the existing Green Network to have been specifically identified, mapped and named as such; this should go some way to facilitating the Inverclyde’s contribution to the Central Scotland Green Network (CSGN) of which it is a part.	The existing, proposed and potential links in the Green Network are mapped in Figure 8.2 of the Proposed Plan (mislabelled in the key).
Alternatives (informed by reference to	To demonstrate the required consideration of alternatives, Appendix G again sets out the environmental assessment of broad “issues, options and sites” which was presented in the SEA at Main Issues	Out of the 18 issues included in the Main Issues Report and assessed in Appendix G, only 2 of the options taken forward

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<p>Appendix G)</p>	<p>Report (MIR) stage, only this time identifying the options which have been adopted by the planning authority and taken forward into the proposed Plan. Given some of the conclusions reached, SNH would query whether all of the alternatives considered have in fact been genuinely 'reasonable' (as is required by the SEA process).</p> <p>As all of the alternatives considered within the SEA should, by definition, be realistic options, SNH would hope that in general – i.e. unless there are specific socioeconomic or other overriding reasons for rejecting them – it will be the alternatives assessed as having the fewest negative and most positive environmental impacts that are ultimately adopted within the Plan.</p> <p>In cases where the Council chooses to reject a genuinely viable alternative for one with more negative / fewer positive environmental impacts, the means by which any such negative impacts will be mitigated should be clear within the LDP. This should in fact also be the case for any adopted alternative where some degree of negative impacts is identified through the SEA process. At present however, the proposed Plan does not appear to have been clearly informed by the SEA of the Main Issues, in that such mitigation – i.e. associated with alternatives identified as having negative environmental impacts - does not appear to be clearly expressed in the Plan.</p>	<p>to the Proposed Plan did not have the fewest negative and most positive environmental impacts.</p> <p>The first was at Port Glasgow Industrial Estate (Main Issue 3) where the option taken forward was assessed as having no environmental impacts, SNHs comments on this and the Council's response are given below.</p> <p>The other was for the re-designation of sites on the edge of settlements either for affordable housing or as part of the Green Belt (Main Issue 15). The preferred option was to designate them for affordable housing provision, although re-designation within the Green Belt was assessed as having the most environmental benefit. It was felt that these sites may not have been required to provide affordable housing if other sites had been identified for this through the plan process, meaning a Green Belt designation would be feasible. As this was not the case, the social benefit of increased affordable housing provision, and the lack of assessed significant negative impacts from such a use, led to a decision to retain these sites for affordable housing.</p>
<p>MIR Chapter 4 – Economy – Issue 3 Port Glasgow Industrial Estate</p>	<p>The Council had stated that its preference in this case was either to change the allocation of this area from industrial use to housing/community use or to return it to the Green Belt. SNH were supportive of the latter option, which is clearly shown by the assessment to have the greatest number of positive environmental impacts among the range of options considered.</p> <p>However, on the basis of "further internal discussions" the Council has adopted neither of these 'preferred' options, instead choosing to retain the present industrial use allocation. This option is however assessed as having no impacts, positive or negative – presumably on the basis that there will be no change – so no specific mitigation requirements are identified.</p>	<p>As the option taken forward is to retain the designation in the adopted Local Plan, there are no environmental impacts anticipated. Any proposal for development at this site would need to meet the requirements of Policy ECN3, which includes environmental considerations, including the Green Network.</p> <p>Although the option with the most positive environmental impacts was to re-designate the site as within the Green Belt, it was felt that the social and economic benefits of retaining the site for employment merited it being retained for this use.</p>

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	<p>While SNH is disappointed that our preferred option has not been taken forward in this case, we have previously stated that we have no in-principle objections to an industrial use allocation in this area (provided master planning is used to protect and enhance the local Green Network).</p>	
<p>MIR Chapter 6 – Environment – Issue 8 Open Spaces in the Urban Area</p>	<p>The Council had again stated its preference for two options in relation to urban open space – both to protect all areas of urban open space to ensure maximum provision and to consider other uses for urban open space that does not contribute to recreational or visual amenity. The SEA states that both of these options have been taken forward to the proposed LDP.</p> <p>SNH finds it difficult to envisage how the Council will be able to “protect all areas of open space irrespective of size” while at the same time considering other development uses for some of them. The adoption of both ‘alternatives’ in this case is another issue which raises questions about the extent to which the SEA process has in fact had any real influence on the development of the proposed Plan.</p> <p>As suggested in our consultation response to the Main Issues Report, it is also SNH’s view that the environmental assessment of the option to consider other uses for open space could result in a less negative outcome if those ‘other uses’ included alternative types of open space of greater value to the local community. However given the negative impacts that have actually been identified, it might be expected that the proposed Plan would identify the mitigation requirements should this option be taken forward (see below).</p>	<p>The reference to ‘protecting all areas of open space irrespective of size’ relates to the fact that not all open spaces are identified on the Proposals Map, but that they should all be protected in principle. The development of some areas of open space will only be on the basis that there will be provision of open space of greater benefit than the existing space. An error was made in the negative impact identified and this has been corrected.</p> <p>The approach taken in the MIR and in taking options forward to the Proposed Plan reflected a lack of information at that time about the quality of open space throughout Inverclyde. A qualitative assessment of open space is intended to be carried out, and this will help determine where areas may be developed for other uses without compromising the provision of open space.</p>
<p>MIR Chapter 7 – Housing – Issue 15 Undeveloped Housing Sites on the Settlement Edge</p>	<p>The Council have in this case adopted their preferred option, which is to utilise such sites mainly for affordable housing. This alternative is assessed as having mainly neutral impacts, but is considered positive in terms of its impacts on Population/Human/Health through facilitating house ownership for people who would otherwise not be able to achieve this. SNH do not disagree with this assessment, although this effect is not an environmental impact of itself. We would again point out though that the option to remove the housing allocation from some of these sites and return those appropriate to the Green Belt is in fact assessed as having the greatest number of</p>	<p>The alternative option was realistic, as demonstrated by the fact that some of the sites identified in the MIR under this issue were returned to the Green Belt. The other sites may have also been re-designated within the Green Belt if acceptable alternative sites had been identified through the LDP process.</p>

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	positive environmental impacts of those considered. If, for reasons unrelated to the environment, returning some of these sites to the Green Belt was not a realistic option for the Council, it perhaps should not have been considered as an alternative to be assessed under SEA.	
MIR Chapter 8 – Assessment of Development Sites	In our advice to the Council in relation to both the interim SEA at MIR stage and its subsequent addendum SNH noted that a number of the housing proposals assessed had the potential to result in negative impacts to the areas of locally important habitat recognised by Inverclyde Council as Sites of Importance for Nature Conservation (SINCs). As such, we agreed with the assessment that in all such cases there would be negative impacts in terms of Biodiversity/Flora/Fauna. Consequently, we are pleased to note that none of these proposals have been taken forward to the proposed Plan.	Noted.
Assessment of the Policies & Sites (informed by reference to Appendix H) APC1 – Areas of Potential Change – Central East Greenock	This policy is assessed as having potential negative impacts in terms of Biodiversity/Flora/Fauna, as part of a SINC is included within the allocation which includes proposals for residential development (RES3r24 Wellington Park). SNH would argue that this policy certainly will result in negative biodiversity impacts due to the partial loss of the SINC unless the LDP contained policy or mitigation measures which ensured that the integrity of the designation was maintained throughout any development, or that adequate compensatory habitat management was required. At present, any requirement for mitigation is deferred to the development management process.	<p>Policy ENV1 in the Proposed Plan aims to protect designated environmental resources, including SINCS from development unless there are exceptional circumstances in which case criteria are set out to minimise and mitigate against negative impacts, including the compensation of any lost habitat through appropriate creation or enhancement elsewhere.</p> <p>The Supplementary Guidance for Local Development Frameworks also shows the part of APC1 that is covered by the SINC as being an area for a new/reinstated park and open space. Any proposal for development would be expected to comply with this framework, and would also be subject to Policy ENV1 in respect of the part of the site that falls within the SINC.</p>
ECN1(b) – Local Business & Industrial Areas – Faulds Park, Gourrock	The allocation at Faulds Park is one of a series of zonings for local business/industrial development which are assessed as having no environmental impacts, positive or negative. SNH notes however that this allocation does have a partial overlap with the large SINC covering the adjacent hillside. In keeping with the assessment of other allocations overlapping SINC designations, we would suggest that the Biodiversity/Flora/Fauna impacts should be assessed as negative in	As above for Policy APC1, development of this site would also have to comply with Policy ENV1 for the part of the site included in the SINC. The likely environmental impact for biodiversity, flora and fauna has therefore been changed to potentially negative to reflect this.

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	<p>this case. Mitigation would therefore be required to ensure that the integrity of the SINC was maintained throughout any subsequent development.</p>	
ECN1(c)e10 – Economic Mixed Use Areas – Inverkip Power Station	<p>The assessment of this allocation notes that there are potential adverse Biodiversity/Flora/Fauna impacts "<i>if open spaces (are) developed</i>". SNH would note that the Inverkip Major Area of Change (MAC) proposal, of which this allocation forms a part, includes the whole of a SINC designation. The Biodiversity/Flora/Fauna impacts of the wider MAC proposal are accordingly assessed as being negative. We would therefore suggest that the biodiversity impacts of proposal ECN(c)e10 are even more likely to be negative if it was also to involve this SINC being developed in addition to the site's open spaces.</p>	<p>The Local Development Framework for the Power Station area shows the business area as being adjacent to, but not impinging on the SINC. Again the development of the site would be expected to follow this framework and proposals would be assessed against Policy ENV1 where relevant.</p>
Policy TRA2 – Sustainable Access	<p>This policy, which includes a restatement of the Council's long-held commitment to the provision/enhancement of a complete Inverclyde Coastal Route for cyclists and walkers, is assessed as having neutral impacts in terms of most Environmental Issues including Biodiversity/Flora/Fauna. This proposed pathway includes a stretch running adjacent to the length of foreshore which has been classified as the Inner Clyde European Special Protection Area (SPA) in order to protect the internationally important population of migratory redshank that overwinter there. The path is also included in the Inverclyde Core Paths Plan, which states a commitment to using signage to encourage responsible access. SNH have previously advised the Council that the provision of such signage, undertaken in consultation with ourselves, should be adequate to keep the number of dogs walked off the lead in sensitive areas during the winter months at an acceptable level. As such, we are content to agree with this assessment.</p>	<p>Noted.</p>
RES3r1 – Residential Development Opportunities – former Broadfield Hospital	<p>The assessment of this proposal seems reasonable. However, the fact that the site is largely contiguous with an area covered by a TPO should probably be covered in the discussion of Biodiversity/Flora/Fauna impacts, for consistency with the assessments of other housing proposals where this is the case.</p>	<p>The assessment has been changed to reflect the TPO designation.</p>

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RES3r2 – Residential Development Opportunities – Arran Avenue, Park Farm	The housing proposals assessed are not numbered in the SEA, making it difficult to cross-reference them with the LDP. However it does not appear that any assessment of the Arran Avenue proposal has been presented. This allocation lies entirely within the Midhill/Castle Hill SINC. As such its Biodiversity impacts are almost certain to be adverse. Given the elevated terrain, there may also be notable landscape impacts on additional housing development in this area, though this is difficult to determine with any certainty from the information available.	This site is included as 'Parkhill' and is assessed along with Levan Farm as having negative biodiversity, flora and fauna and landscape impacts and positive population and human health impacts.
RES3r52 – Residential Development Opportunities – Levan Farm (Phase 3)	SNH would agree that this long-established housing proposal will have negative Biodiversity and Landscape impacts. However, in a manner identical to that for the adjacent Faulds Park business development allocation, this housing allocation too has a partial overlap with the adjacent SINC. For consistency with other development allocations where this is the case, this should really have been covered in the discussion of the Biodiversity/Flora/Fauna impacts.	Assessment has been changed to reflect the SINC designation.
RES3r57 – Residential Development Opportunities – former Inverkip Power Station	As with the associated business/economic development proposal (see above) the assessment of this allocation notes that there are potential adverse Biodiversity/Flora/Fauna impacts, though this time attributing this to the development of a "Greenfield" site. SNH would therefore again note that the Inverkip Major Area of Change (MAC) proposal, of which this allocation forms a part, includes the whole of a SINC designation. The Biodiversity/Flora/Fauna impacts of the wider MAC proposal are accordingly assessed as being negative. We would therefore suggest that the biodiversity impacts of proposal RES3r57 would be even more likely to be negative if it was also to involve this SINC being developed.	The Local Development Framework for the Power Station shows part of the site covered by the TPO/SINC is included for development. The report of handling for the Planning Permission in Principle application which is yet to be determined states that any intrusion into the TPO/SINC site will be considered further and assessed at the detailed application stage, where it will be assessed against ENV1.
TCR6tc12 – Town Centre / Retail Development Opportunities – former Inverkip Power Station	SNH would first draw the Council's attention to the fact that this proposal has been misnumbered in the SEA as TCRtc14 (with the James Watt Dock / Garval Island town centre allocation misnumbered as TCRtc12). However in terms of the assessment, we note that the impacts are considered to be neutral for all environmental issues. SNH would argue that, in common with the other proposals coming under the Inverkip Major Area of Change policy, this proposal should be assessed as having at least potentially negative Biodiversity/Flora/Fauna impacts due to the Wemyss	<p>The Council would like to thank SNH for bringing this to our attention and the numbering in the SEA has now been amended.</p> <p>As above, the Local Development Framework shows the proposed retail element of the development as not impinging on the TPO or SINC.</p>

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	Plantation SINC and TPO area that may be affected by the associated development.	
ENV1 – Designated Environmental Resources	<p>Rather than being taken as a whole, an attempt is made to assess this policy in terms of its potential impacts on various types of natural heritage designation. For some of these designations, potential negative impacts are predicted in terms of issues such as Biodiversity/Flora/Fauna and Landscape – the thinking apparently being that if development were to happen within such designations, then this would be the result. This appears to be a somewhat wrong-headed approach to the assessment of this policy however. The policy as written in the proposed plan clearly sets out the means by which these designations will be protected – it does not facilitate development on them. Therefore while development on international, national, regional or local natural heritage designations may indeed result in the negative impacts predicted, policy ENV1 will not.</p> <p>Even at that there is inconsistency in the way the assessment conclusions are presented. For example, in terms of Inverclyde's European Special Protection Areas no impacts are predicted - presumably because the policy largely states that development will only proceed where it will not result in adverse impacts to any SPA. However when considering impacts on the Clyde Muirshiel Regional Park designation, it is concluded that there is potential for negative impacts "particularly if development proposals fall within the Renfrewshire Heights SPA" – despite the fact that the Council has assessed SPA impacts as being neutral immediately above.</p> <p>SNH would suggest that a more realistic assessment of the impacts of this policy as a whole would be that it has positive effects in terms of Biodiversity/Flora/Fauna and Landscape because it prevents potentially damaging development on the sites involved that might take place if the policy was absent.</p>	The assessment was undertaken on the assumption that development would take place, leading to negative outcomes. Agree that the assessment approaches this policy wrongly and it has been amended to show positive impacts of preventing harmful development where possible, and minimising and mitigating where it is not possible.
ENV2 – Greenbelt & the Countryside	Similarly to policy ENV1 this policy appears to have been assessed as if it were facilitating development on the Greenbelt rather than protecting it. SNH would suggest that as this is a policy explicitly intended to protect an environmental resource, its environmental impacts will in fact be far more positive.	As above

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ENV3 – Safeguarding & Enhancing the Green Network	Once again this environmentally positive policy appears to have been assessed in a very negative way. It is, for example, rather hard to understand (and it is not explained) how improvements to the Green Network would result in potential negative Biodiversity/Flora/Fauna and Landscape impacts – particularly as none of the following assessments of the individual proposals which come under this policy predict negative Landscape impacts.	ENV3 has been reassessed as one policy following changes to the assessment method as for ENV1. This found the policy to have positive impacts on biodiversity, flora and fauna, population and human health and material assets and potential positive impacts on the water environment and cultural heritage. The SEA has been amended to show this.
ENV5 – Securing Open Space by Planning Agreements	Once more, it is very difficult indeed to understand, nor is it explained, how such a policy would result in potentially negative Landscape impacts in particular. Biodiversity/Flora/Fauna impacts are also deemed potentially negative, but will surely be no worse for this policy than if it were not in place.	ENV5 has been reassessed as ENV3 above and found to have no significant environmental impacts. The SEA has been amended to show this.
HER7 – Gardens & Designed Landscapes	This policy – which restricts (it does not encourage) development on Inverclyde's Gardens & Designed Landscapes Inventory sites - is assessed as having particularly negative impacts in terms of Biodiversity/Flora/Fauna, Landscapes and Soils " <i>due to development</i> ". In fact, it is deemed far more negative in terms of environmental impacts than nearly any other policy in the proposed Plan. Like many others, the environmental impacts of this policy need reassessed in the light of an understanding of what it is intended to achieve.	Policy is now HER8 following changes made by the Reporter through the Examination. The policy has been reassessed and its overall positive impacts identified and highlighted.
Mitigation	Where negative environmental impacts are identified by the SEA, the need for mitigation is regularly stated. However SNH is very disappointed to note that in all cases this is deferred to the development management process, with statements along the lines of " <i>detailed planning applications will be required to set out mitigation proposals</i> ". SNH would normally expect that where the SEA process has identified negative impacts arising from alternatives or policies that are adopted into the LDP, then the LDP itself will set out in some way how these impacts will be mitigated – rather than leaving it to development management where a developer could argue that there is no requirement for such mitigation measures in the LDP and	Many of the policies within the Plan contain criteria that act as mitigation in the way suggested e.g. RES1 states proposals for new residential development will have to satisfy a number of criteria, including proposals for the retention of existing landscape or townscape features of value on the site, or are themselves mitigation that would be considered in deciding any development proposals e.g. ENV2 sets out criteria for the assessment of development proposals in the Green Belt and Countryside which includes the impact on landscape character. As the Plan is designed to be read as a whole, development proposals are assessed against all appropriate policies. The relevant mitigating policies are identified in the assessments of development

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	<p>that it is therefore not needed. This is, in fact, one of the principle values of identifying the negative impacts of policies/proposals that are ultimately adopted in the Plan.</p> <p>Potential mitigation would include revisions to the policies. For example if particular housing proposals were identified as having negative landscape impacts, then the LDP's housing policy could be revised to include a requirement that housing development applications in the areas concerned must be accompanied by landscape assessments and mitigation proposals.</p>	opportunities and policies in the ER.
Appendix 1 Cumulative Impacts by Geographical Area	<p>Given the unreasonably negative assessment of many policies outlined above (apparently based on a substantial misconception of their intention), the results of the cumulative impact assessment are somewhat confused. Even so, it is not clear how this assessment of cumulative environmental impacts has had any significant impact on the actual content of the proposed Plan.</p>	<p>Where appropriate, cumulative impacts were identified in the assessment of each policy and development site, as set out in Appendix G. As such, cumulative impacts fed into the consideration of all preferred and alternative options and the need for mitigation measures.</p>

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. These include the removal of redesignating housing site r39 Former Holy Cross School as open space, changes to the wording of several policies, the removal of reference to Enabling Development from the Gardens and Designed Landscapes Policy (HER7) and the creation of a new policy on this subject, applying to all listed buildings. None of these modifications result in a change to the environmental assessment of the policies in question, with the new Enabling Development policy having already been assessed as part of HER7, resulting in no changes to the Environmental Report.

The main negative impacts anticipated are on biodiversity, flora and fauna and the landscape, as well as the water environment and soil in certain locations and for certain types of development. Proposals for such development would be assessed against all the relevant policies in the plan. This would include the environmental protection policies which

require further investigation to identify specific impacts and the imposition of mitigation measures where necessary.

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 5 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 5			
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' (to be 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'. Inverclyde Housing Land Supply Inverclyde Council 'Housing Land Survey'	Every 5 years Annually 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)	Annually
	Remediation of contaminated land	GIS data on distribution of prime agricultural land (James Hutton Institute) Inverclyde Council - Contaminated Land Officer	Annually

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		Inverclyde Council - Monitoring of planning applications for wind turbines and development in the greenbelt.	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 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

Where required, remedial action may be taken to mitigate or remove adverse negative environmental effects when the LDP is reviewed, including changes to land allocations, plan policies and Supplementary Planning Guidance. Other remedial actions will also be considered where necessary and appropriate.



Regeneration and Planning

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