

Appendix 1

Overview of requirements of Directive 2001/42/EC

Directive 2001/42/EC Article	Directive 2001/42/EC Article Requirement	West Dunbartonshire Local Plan SEA Compliance
Article 1: <u>Objectives</u>	To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to ensuring sustainable development.	This SEA incorporates environmental sustainability into strategic decision making, improving strategic action in a way that promotes effective and sustainable environmental practice.
Article 2: <u>Definitions</u>	Environmental assessment means the carrying out of consultations, the taking into account of the environmental report and the results of consultations in decision-making.	The SEA stages are based on ODPM and Scottish Government guidance.
Article 3: <u>Scope</u>	An environmental assessment shall be carried out for all plans and programmes which are prepared for agriculture, forestry, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent.	The SEA evaluates all the environmental effects of the West Dunbartonshire Local Plan.
Article 4: <u>General Obligations</u>	The environmental assessment will be carried out during the preparation of a plan or programme and before its adoption or submission to the legislative procedure.	The SEA is being carried out in parallel with the preparation of the WDLP, ensuring that Plan development is informed by environmental information.
Article 5: <u>Environmental report</u>	<p>Where an environmental assessment is required, an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme are identified, described and evaluated.</p> <p>The relevant authorities shall be consulted when deciding the scope and level of detail of the information that must be included.</p>	Following discussions between the local authority and statutory consultees, the SEA acknowledges all the likely significant effects on the environment of implementing the plan, and an appropriate level of detail of the information to be included has been established and agreed.
Article 6: <u>Consultations</u>	<p>The relevant authorities and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before its adoption.</p> <p>Member states shall designate the authorities to be consulted, which are likely to be concerned by the</p>	<p>The input of statutory consultees forms an important aspect of the scoping report, and in addition, the environmental report involves consultations with a wide number of non-statutory consultees.</p> <p>The concerned authorities have already been consulted (see Appendix 4).</p>

	<p>environmental effects of implementing plans or programmes.</p> <p>Member states shall identify the public affected or likely to be affected by the decision making subject to the directive, including relevant non-governmental organisations e.g. those promoting environmental protection.</p>	All non-governmental organisations likely to be affected by the decision-making will be consulted. A full list of consultees is included in Appendix 3.
Article 7: <u>Transboundary consultations</u>	Where it is considered that the implementation of a plan is likely to have significant effects on the environment of another Member State, or where otherwise requested, the Member State in whose territory the plan or programme is being prepared shall forward a draft copy prior	Not relevant for West Dunbartonshire Local Plan.
Article 8: <u>Decision making</u>	The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The decision-making process takes into account the opinions of all consultees, and the results of any transboundary consultation, prior to the adoption of the Local Plan.
Article 9: <u>Information on the decision</u>	When a plan or programme is adopted, the public and any Member State consulted in Article 7 are informed.	Not yet relevant.
Article 10: <u>Monitoring</u>	Member states shall monitor the significant environmental effects of the implementation of plans and programmes in order to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.	Monitoring, by means of identifying significant environmental indicators and the setting of targets, forms an integral part of the report, ensuring full compliance with the Directive. The purpose of monitoring the WDLP is: to assess the performance of the plan's policies; to assess the performance of the plan's proposals; to keep track of change and to provide better information.
Article 11: <u>Relationship with other community legislation</u>	An environmental assessment carried out under the Directive shall be without prejudice to any requirements under Directive 85/337/EEC and to any other Community law requirements.	This SEA does not conflict with any other EC law requirements.
Article 12: <u>Information, reporting and review</u>	Member states shall ensure that the environmental reports are of sufficient quality to meet the requirements of the Directive and shall communicate to the Commission any measures they take concerning the quality of these reports.	The environmental report adheres entirely to the Directive 2001/42/EC, and participants will co-operate fully with the Commission regarding concerns over quality.

Appendix 2

Review of relevant Plans/Programmes/Strategies/Polices/Guidance

Title of Document Level of Origin	Summary of Document
International	
EU Birds Directive (Directive 79/409/EEC)	The Birds Directive seeks to protect all naturally occurring wild birds within the European Community and legislates for the establishment of SPA to sustain the habitats of these wild birds.
EU Habitats Directive (Directive 92/43/EEC)	<p>The Habitats Directive is European legislation that aims to protect biodiversity through the conservation of natural habitats and identified species. The directive provided for the establishment of a network of Special Areas of Conservation (SAC) which together with the existing Special Protection Areas (SPA) form a network of protected sites across the European Union called Natura 2000. Authorities are obliged not to permit developments or operations that would damage the integrity of Natura 2000 sites unless there are imperative reasons of overriding public interest.</p> <p>Article 6 of the Habitats Directive requires an appropriate assessment to be carried out where plans may have a significant effect on a Natura 2000 Site.</p>
EU Landfill Directive (Directive 1999/31/EEC)	The overall aim of the Landfill Directive "is to prevent or reduce as far as possible negative effects on the environment...from the landfilling of waste, during the whole life-cycle of the landfill". The Directive sets targets for the reduction of biodegradable waste sent to landfill as 75% of the 1995 level by 2010, 50% by 2013 and 35% by 2020.
EU Water Framework Directive (Directive 2000/60/EC)	The Water Framework Directive requires that the physical characteristics of waterbodies and their quality is protected and, where possible, enhanced to 'at least good' status. It is also intended to tackle flooding and improve aquatic habitats for wildlife.
EU Floods Directive 2007/60/EC	Requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk.
National	
National Planning Framework	A framework to guide the spatial development of Scotland to 2025. Identifies priorities for investment in strategic infrastructure. Is a material consideration in making planning policy.
Scottish Planning Policy (SPP) 1: The Planning System	Scottish Planning Policies (SPPs) provide statements of Scottish Government policy on nationally important land use and other planning matters. This SPP provides an overview of the land use planning system in Scotland under current arrangements. It sets out the key principles and the Government's priorities for the system to guide policy formulation and decision making towards the goal of sustainable development.

Title of Document Level of Origin	Summary of Document
SPP 2: Economic Development	The Scottish Government consider that economic development should raise the quality of life of the Scottish people through increasing economic opportunities for all, on a socially and environmentally sustainable basis. The planning system should provide strong support for economic development, both new and expanding businesses, where it is consistent with other national and local policies, in particular the promotion of social justice and sustainable development.
SPP 3: Planning for Housing	In meeting the requirements of housing markets across Scotland, planning authorities and housing providers should work closely together to create high quality residential environments, where new housing should make a positive contribution to the built and rural environment. New housing developments should be built in the right places which are easily accessible by public transport and well integrated into walking and cycling networks, with an emphasis on previously developed land and buildings.
SPP 6: Renewable Energy	Sets out the planning framework to help ensure the delivery of renewable energy targets as well as supporting the development of a viable renewables industry in Scotland.
SPP 7: Planning and Flooding	SPP 7 seeks to prevent new development that would be at significant risk of flooding from any source or would materially increase the probability of flooding elsewhere. Flood risk and drainage are identified as important material considerations and sustainable drainage will be required whenever practicable.
SPP 8: Town Centres and Retailing	This SPP sets out the Government's policy for town centres and the key uses, particularly retailing, which contribute to their economic growth and enhancement. It re-emphasizes the Executive's support for town centres and acknowledges their role as locations for a broad range of land uses.
SPP 10: Planning for Waste Management	Supports a planned approach to the identification of sites for waste installations and a sustainable approach to waste management planning.
SPP 11: Open Space and Physical Activity	Sets out national policy on planning for open space and facilities for sport and recreation. The key objective of the SPP is to protect and enhance open space and opportunities for sport and recreation. Provides guidance on the quality and accessibility of open space in new developments and on providing for its long-term maintenance and management.
SPP 15: Planning for Rural Development	Sets out the approach, key messages and objectives that should underpin planning policies and decisions affecting rural areas - to enable to countryside to absorb more people content to live and able to work there and maintain the viability of existing communities and bring new life to many places which have seen years of decline.
SPP 17: Planning for Transport	Outlines the land use planning's role in supporting the Scottish Government's transport delivery agenda by assisting in reducing the need to travel; in creating the right conditions for greater use of sustainable transport modes; and in avoiding or mitigating adverse environmental impacts.
SPP 21: Green Belts	This SPP sets out the objectives of green belt policy as one of a range of mechanisms that can help to shape towns and cities in a sustainable way, avoiding unmanaged, unplanned urban expansion. It outlines how green belt policy should be used and enforced and reiterates a strong presumption against inappropriate development in green belts.

Title of Document Level of Origin	Summary of Document
National Planning Policy Guidance (NPPG) 5: Archaeology and Planning	This National Planning Policy Guideline (NPPG) sets out the Government's planning policy on how archaeological remains and discoveries should be handled under the development plan and development control systems, including the weight to be given to them in planning decisions and the use of planning conditions.
NPPG 14: Natural Heritage	Gives guidance on how the Government's policies for the conservation and enhancement of Scotland's natural heritage should be reflected in land use planning. In this context, Scotland's natural heritage includes its plants and animals, its landforms and geology, and its natural beauty and amenity.
NPPG 18: Planning and the Historic Environment	This NPPG sets out the Government's planning policies in relation to the historic environment with a view to its protection, conservation and enhancement. Central to the Government's approach is the need to secure preservation whilst accommodating and remaining responsive to present day needs.
Circulars (various)	Circulars which also provide statements of Scottish Government policy, contain guidance on policy implementation through legislative or procedural change.
Planning Advice Notes (various)	Planning Advice Notes (PANs) provide advice on good practice and other relevant information relating to a range of topics, including design, archaeology, noise, open space, waste, natural heritage and sustainable urban drainage.
National Waste Strategy & Plan	The National Waste Strategy sets out a framework within which Scotland can reduce the amount of waste it produces and deal with the waste that is produced in a more sustainable way, including reducing waste sent to landfill. The National Waste Plan is the keystone to implementing the National Waste Strategy.
Nature Conservation (Scotland) Act 2004	The Nature Conservation (Scotland) Act 2004 imposes a wide-ranging duty on Local Authorities to conserve biodiversity and protect the nation's precious natural heritage. Implementation is linked to the national biodiversity strategy that is endorsed by the Scottish Government.
The Scottish Biodiversity Strategy	Scotland's response to its obligations under the Convention on Biological Diversity and to the UK Biodiversity Action Plan. It aims to conserve biodiversity for the health, enjoyment and wellbeing of the people of Scotland now and in the future.
Air Quality Strategy for Scotland	Sets out a way forward on air quality issues. Gives details of the air quality objectives and identifies potential new national policy measures to help achieve significant health benefits and move us closer towards meeting these objectives.
Water Environment and Water Services (Scotland) Act 2003	The Act seeks to make provision for the protection of the water environment including ground water, surface water and wetlands, for or in connection with implementing the Water Framework Directive. The main objectives of the Act are to: prevent the deterioration and enhance the status of aquatic ecosystems, including groundwater; promote sustainable water use; reduce pollution; and contribute to the mitigation of floods and droughts.
Regional	

Title of Document Level of Origin	Summary of Document
Glasgow & Clyde Valley Joint Structure Plan (2000)	The Structure Plan sets out a common strategy for the long term planning and development of Glasgow and the Clyde Valley. It seeks to enhance the well-being and quality of life of the people who live in, work in or visit the region through balanced and sustainable development communities encompassing a greater emphasis upon urban renewal and regeneration and the protection of environmental heritage. The aims of the Plan are to increase economic competitiveness; to promote greater social inclusion and integration; to sustain and enhance the natural and built environment; to integrate land uses and transportation.
Glasgow & Clyde Valley Area Waste Plan	The Area Waste Plan seeks to contribute to the sustainable development of Glasgow and Clyde Valley by developing waste management systems that will control waste generation, reduce its environmental impact, improve resource efficiency, stimulate investment and maximise the economic opportunities arising from waste.
Regional Transport Strategy for West of Scotland 2007-2021	Sets out an integrated strategy for transport development and investment in the West of Scotland for the next 20 years. Identifies strategic requirements for transport management and investment required to support economic competitiveness, regeneration and strategic development locations.
Joint Economic Development Strategy	Sets out the key issues facing the area in terms of economic performance and a framework for action.
Local	
<i>Our West Dunbartonshire</i> Community Plan 2007-2017	Outlines strategic vision for West Dunbartonshire: working in partnership to reduce poverty and exclusion, deliver better services and continue to improve the quality of life for everyone living in West Dunbartonshire whilst protecting our natural environment.
West Dunbartonshire Council Corporate Plan 2005-2009	Sets the priorities and objectives of the Council over a four-year period, guiding the work of services and employees. The Council's priorities are: regenerate and develop the local economy; promote health and well-being; promote lifelong learning; create a better environment; develop our children and young people; and provide high quality, best value services.
Local Housing Strategy	Undertakes a comprehensive assessment of housing needs and conditions within the Council area, and outlines a strategy to tackle identified housing problems. The fundamental aim of the strategy to ensure that households in West Dunbartonshire have access to housing that is affordable, in good repair and meets their needs. The Strategic Objectives include building sustainable communities; community regeneration; and enabling better choice.
Nature Conservation Strategy	Assesses the nature conservation value of previously identified Sites of Importance to Nature Conservations, proposes new sites and identifies actions for improving identified local nature conservation sites.
Greenspace Strategy	Seeks to promote the conservation, enhancement, management and repair of the physical and natural environment and landscape of the area of West Dunbartonshire by means of environmental initiatives.
Countryside Access Strategy	Provides a framework for the planning and management of paths for walking, cycling and horse riding in West Dunbartonshire. Area Access Action Plans have been prepared for the Vale of Leven and Clydebank to Bowling.

Title of Document Level of Origin	Summary of Document
Local Transport Strategy	Sets out an integrated strategy for West Dunbartonshire that works towards economic, environmental and social sustainability by providing an accessible and integrated transport framework. Informs the Council's transport investment.
Local Air Quality Strategy	The aim of this strategy is to highlight the ways in which West Dunbartonshire Council can strive to achieve the best possible air quality within the council area. Its objectives include: to incorporate air quality as a consideration in all relevant Council operations; to lead by example in the pursuit of air quality improvement, and; to work with local businesses, industry and residents of West Dunbartonshire to encourage sustainable improvements to ambient air quality
Local Waste Strategy	West Dunbartonshire Council has developed a Strategic Waste Implementation Plan which sets out measures the Council will undertake in a bid to meet targets established in the EU Directive on the landfill of waste.
Alexandria 'Heart of the Vale' Town Centre Action Plan	Strategic vision and Action Plan for the wider Alexandria town centre area with the primary aim of improving economic vitality, competitiveness and sustainability of the town centre.
Clydebank Framework for Development and Clydebank Design Guide	The Guidelines aim to encourage inspirational design ambitions. Although not prescriptive they are intended to stimulate innovative and creative responses from developers. The Guidelines play an important part in the appraisal of all sizeable developments in Clydebank. The long term objective is for Clydebank to be recognised as a centre for leading design and quality
Re-discovering Dumbarton Town Centre Action Plan	An implementable Action plan, incorporating a strategic vision, covering a 10-year period that will lead to the revitalisation of the town centre.
Dumbarton Waterfront Design Framework: A Vision for Dumbarton Waterfront	An urban design framework presenting a series of initiatives drawing together future proposals for the town centre.

Appendix 3

Consultees

	Organisation	Department	Category
Statutory Consultees			
1	Scottish Environmental Protection Agency (SEPA)		Statutory Consultee
2	Scottish Natural Heritage (SNH)		Statutory Consultee
3	Historic Scotland		Statutory Consultee
Non-statutory Consultees			
4	Architectural Heritage Society for Scotland		Special Interest Group
5	Strathclyde Fire Brigade		Special Interest Group
6	Saltire Society		Special Interest Group
7	Scottish Water Solutions		Public Utility
8	SportScotland		Statutory Consultee
9	Homes for Scotland		Special Interest Group
10	National Trust For Scotland		Special Interest Group
11	Renewable Devices		Private Company
12	The Architectural Heritage Society		Special Interest Group
13	Royal Commission on Ancient & Historic Monuments		Government Department
14	Scottish Hydro		Statutory Undertaker
15	Sustrans		Special Interest Group
16	VisitScotland		Statutory Consultee
17	Health & Safety Executive	Chemical & Hazardous Installations Division	Government Department
18	Transco		Public Utility
19	British Gas Properties	Head of Planning	Private Company
20	Scottish Landowners Federation		Special Interest Group
21	Friends of the Earth Scotland		Special Interest Group
22	Scottish Executive Environment Dept.	Planning Services	Government Department
23	Scotways		Special Interest Group
24	Royal Society for the Protection of Birds		Special Interest Group
25	Royal Fine Arts Commission for Scotland		Special Interest Group
26	Stirling Council	Environmental Services	Adjacent Authority
27	Argyll, the Isles, Loch Lomond, Stirling and the Trossachs Tourist Board		Special Interest Group
28	Scottish Civic Trust		Special Interest Group

29	Glasgow City Council	Development & Regeneration Services,	Adjacent Authority
30	Strathclyde Passenger Transport		Special Interest Group
31	Glasgow & the Clyde Valley Joint Structure Plan Committee		Special Interest Group
32	West of Scotland Archaeology Service		Special Interest Group
33	Scottish Renewables		Special Interest Group
34	Scottish Enterprise		Government Department
35	Scottish Water	Asset & Investment Planning	Public Utility
36	Scottish Wildlife Trust		Special Interest Group
37	Scottish Power		Public Utility
38	Greater Glasgow Health Board		Special Interest Group
39	Railtrack		Statutory Undertaker
40	British Waterways		Private Company
41	British Gas plc (Scotland)	Transco W. Scotland	Statutory Undertaker
42	Forth & Clyde Canal Society		Special Interest Group
43	East Dunbartonshire Council	Department of Development & Environment	Adjacent Authority
44	Central Scotland Water Development Board		Government Department
45	Health and Safety Executive		Government Department
46	Scottish Enterprise Dunbartonshire		Government Department
47	Clydebank Rebuilt		Special Interest Group
48	West Dunbartonshire Greenspace		Special Interest Group
49	Forestry Commission		Government Department
50	West Dunbartonshire Heritage Ltd		Special Interest Group
51	Town Centres Initiative Ltd		Special Interest Group
52	West Dunbartonshire Environment Trust		Special Interest Group
53	West Dunbartonshire Partnership		Special Interest Group
54	Strathclyde Police		Special Interest Group
55	West Dunbartonshire Council	Director of Education & Cultural Services	Council Department
56	West Dunbartonshire Council	Director of Social Work	Council Department
57	West Dunbartonshire Council	Director of Housing & Technical Services	Council Department
58	West Dunbartonshire Council	Director of Corporate Services	Council Department
59	West Dunbartonshire Council	Chief Executive	Council Department
60	West Dunbartonshire Forum on Disability		Special Interest Group
61	Loch Lomond & Trossachs National Park Authority		Adjacent Authority
62	Ramblers Association		Special Interest Group

63	Network Rail		Private Company
64	British Wind Energy Association		Special Interest Group
65	Renfrewshire Council	Dept of Planning and Transport,	Adjacent Authority
66	Inverclyde Council	Head of Planning & Building Control	Adjacent Authority
67	Scottish Power PLC	Clyde District	Public Utility
68	Argyll & Clyde Health Board		Special Interest Group
69	Communities Scotland		Government Department
70	Scottish Airports Ltd		Private Company
71	Clydebelt		Special Interest Group
72	Argyll & Bute Council	Department of Planning & Environmental Services	Adjacent Authority
73	World Wide Fund for Nature		Special Interest Group
74	Woodland Trust Scotland		Special Interest Group
75	BAA PLC	Group Airport Planning & Environment	Statutory Undertaker
76	Department of Transport, Airports Policy Division		Government Department

Appendix 4

Consultation Comments

	Consultee	Comment	WDC Response
1	Historic Scotland	The options considered for the built environment topic are focussed on the architectural and townscape components of the historic environment. Were any options considered for the archaeological resource?	No options were considered for the archaeological resource specifically
2	Historic Scotland	The number of scheduled ancient monuments (SAMs) may not be a robust indicator for monitoring the effects of the plan on SAMs, as the number of monuments may change regardless of the effects of the plan. A better indicator might be related to the effects of the plan on SAMs e.g. through monitoring planning application statistics you may be able to determine how many developments have an adverse effect on the site and setting of scheduled ancient monuments	Noted
3	Historic Scotland	It is noted from the discussion of the assumptions that mitigation is only considered where a policy is identified to have a significant adverse environmental impact. Have you considered opportunities for enhancement.	Opportunities for enhancement should emerge from further planning studies currently being undertaken.
4	Historic Scotland	I am content with the assessment of the plan objectives, and note that the objectives were modified after the initial environmental assessment to improve their clarity and intent.	Noted
5	Historic Scotland	The historic environment is not explicitly included in a number of the key and general Local Plan policies and the assessment considers that these policies will have positive effects on cultural heritage. I accept that there may be positive effects on the historic environment if these policies are applied along with policies BE1-9. Has this been taken into account in the assessment, or does the assessment consider the individual policy rather than the package of policies?	The Assessment considers the affect of individual policies, however the topic options set out in Appendix 10 considers a package of policies.
6	Historic Scotland	Policy RET1 Retail Developments within Town Centres this is assessed to have positive effects on cultural heritage, however the impact may be better assessed as uncertain.	Noted
7	Historic Scotland	You will note that there are a number of amendments suggested to policies BE1-9 in Historic Scotland's separate response to the Consultative draft Local Plan. These suggestions are intended to strengthen the policies. Please note that I do not disagree with the assessment of the policies in the Environmental Report.	Noted
8	Historic Scotland	I am pleased to note that you have undertaken an assessment of the broad strategic framework for the Local Plan, and have also assessed the strategic options for each policy topic area.	Noted

	Consultee	Comment	WDC Response
9	Historic Scotland	It is noted that the environmentally preferred option is greenbelt development. Is this correct?	Will amend commentary to fully and better explain option
10	Historic Scotland	H4(1) Clydebank, 354-394 Dumbarton Road The site is adjacent to the scheduled ancient monument known as Forth and Clyde Canal: Old Kilpatrick - Linnvale	Noted
11	Historic Scotland	I note that one of the indicators in Appendix 14 relies on Historic Scotland providing information on the number of restoration projects in urban areas.	The Council is currently considering its monitoring programme, and to date there has been no discussion with other external organisations.
12	Historic Scotland	It is not clear how the proposals for monitoring set out in Appendix 14 are related to the indicators listed in Appendix 7.	The Council is currently considering the monitoring programme for the Local Plan and Strategic Environmental Assessment It is intended that the environmental indicators listed will be consistent with environmental objectives.
13	Historic Scotland	As you are likely aware, certain environmental issues do not lend themselves to quantification and, indeed, should not be considered in these terms e.g. designed landscapes and gardens	Noted
14	Historic Scotland	There should be an indicator and target related to the effects of the WDLP on designed gardens and landscapes e.g. through monitoring planning applications where designed landscapes and gardens may be affected.	Noted
15	Historic Scotland	I think that the influence of SEA objectives on the plan may somewhat be overstated. It is important to recognise that there may be conflict between the proposed allocations and the SEA objectives. The purpose of SEA is, indeed, to identify such environmental impacts and present this information to the decision maker.	Accepted, appendices to SEA indicate potential impacts of the Local plan. The figure is intended to demonstrate the consistency between the SEA and the Local Plan.
16	Historic Scotland	I note that the potential cumulative effects of the proposed Local Plan land allocations have been identified using clusters of proposal sites (Appendix 13). I would have found it easier to consider this assessment if more detail had been provided, it would also have been useful to include an indication of the nature of likely effects.	Noted, will be considered as part of the Finalised SEA
17	Historic Scotland	I note that listed building and archaeological surveys are proposed as mitigation measures for sites with potentially adverse effects on the historic environment. I welcome this approach, but would be grateful for further detail of how they will be used.	Surveys will be required as part of planning process, and actions emerging will be considered as part of any planning consent.

	Consultee	Comment	WDC Response
18	Historic Scotland	RET3(4) Queens Quays, Clydebank The site is in the vicinity of the following listed buildings: Municipal Buildings, Dumbarton Road Category B Hall Street former fire station tenement Category B Clydebank, former John Brown shipbuilding yard, Titan cantilever crane Category A	Noted
19	Historic Scotland	Conservation Area Appraisals is included as an indicator for SEA objective 5 and this might be better included as an indicator for SEA objective 9, which concerns the protection of building character and townscape	Noted
20	Historic Scotland	LE1(6), LE1(17) Vale of Leven IE, Dumbarton In addition to the constraints identified in the environmental assessment, the site is in the vicinity of a group of listed buildings.	Noted
21	Historic Scotland	Policy R7 Dumbarton Football Site has not been assessed. This site is in close proximity to Dumbarton Castle, which is a scheduled ancient monument and a property in care of the Scottish Ministers. If the site were to be developed for non-stadium uses there may be adverse effects on the historic environment.	The impact of any non-stadium uses on this site would be assessed as part of any planning application on the site, however Policy R7 will be assessed as part of Finalised Strategic Environmental Assessment.
22	Historic Scotland	H2(19) Duntocher, Carleith Site is in the vicinity of the scheduled ancient monument known as, Antonine Wall, SW of Carleith to Carleith Primary School, and is shown on the proposals map as being in the vicinity of the Antonine Wall amenity zone.	Noted
23	Historic Scotland	H2(17) and (18) Duntocher, Burnbrae and William Street Sites are in the vicinity of the scheduled ancient monument known as Antonine Wall, Golden Hill Park, Roman fort, annexe and bathhouse	Noted
24	Historic Scotland	H2(6) Clydebank, Cart Street The site is adjacent to Riverside Station, Clydebank Category B listed	Noted
25	Historic Scotland	H2(25) Old Kilpatrick, Carless Oil Depot The site is adjacent to the scheduled ancient monument know as Forth and Clyde Canal: Old Kilpatrick- Linnvale	Site has been identified as being within consultation area for scheduled ancient monument.
26	Historic Scotland	H2(22) Milton, Milton Brae In addition to the constraints identified in the environmental assessment, there may also be effects on the setting of scheduled ancient monument known as Sheep Hill, fort, Milton House Category B listed, and Old Mill in ground of Milton House Category B listed	It is considered that the there is sufficient distance between these environmental resources and the development site, so as not to affect either the setting of listed buildings or the scheduled ancient monument.
27	Historic Scotland	GD2(11) Bank Street, Alexandria. The site is in the vicinity of a number of listed buildings:	Noted, site will be re-categorised as part of assessment

	Consultee	Comment	WDC Response
28	Historic Scotland	The setting of Alexandria, Smollett Fountain Category B listed may be affected.	It is considered that there is sufficient distance from the Smollett Fountain to the development site, so as not to affect setting of listed building
29	Historic Scotland	Many of the sites identified in Table 1 are either adjacent or close to proposed development areas, and the potential impacts are mainly related to effects on the setting of the feature, rather than more direct impacts. In particular, effects on the setting of scheduled monuments and listed buildings are unlikely to be captured.	Noted
30	Historic Scotland	I am not clear why some of the assessments consider that a particular policy will have a positive effect on the historic environment, when the intention of the policy is to protect the resource from development. I consider that this will have a neutral effect on the historic environment rather than a positive effect, as the existing resource will simply be maintained.	Noted.
31	Historic Scotland	RET3(3) Argyle Road/Chalmers Street, Clydebank The site is adjacent to the following: Scheduled ancient monument known as Forth and Clyde Canal: Old Kilpatrick - Linnvale, 2 Sylvania Way/Chalmers Street, central warehouse (co-op department store) Category B, 11 Hume Street, former co-op administrative office building Category B	Noted
32	Historic Scotland	I should point out that the Ancient Monuments and Archaeological Areas Act 1979 requires the prior written consent for any proposals that directly affect scheduled ancient monuments. It is therefore unlikely that the absence of a Local Plan would result in the loss of scheduled ancient monuments without prior written consent from the Scottish Ministers. A similar statutory consent mechanism applies to listed buildings.	Reference to listed buildings and scheduled ancient monuments will be deleted from paragraph 7.2.
33	Historic Scotland	Content with the review of relevant of plans, programmes and strategies included in Appendix 2.	Noted
34	Historic Scotland	Note at paragraph 3.6.3 that you have provided an overview of the comments received at the scoping stage, and welcome this approach and consider that the framework set out in Appendix 4 clearly demonstrates how comments have been taken into account.	Noted
35	Historic Scotland	As well as including information on listed buildings and conservation areas, key facts for the historic environment should include details of the number of scheduled ancient monuments and designed gardens and landscapes.	Information is included in Appendix 6, the status of the Antonine Wall being nominated for World Heritage Status, is reflected in Finalised Draft of Local Plan.
36	Historic Scotland	It is clearer if the same terminology is used when describing SEA objectives. Paragraphs 9.2, 9.3 and 9.4 refer to environmental objectives.	Noted

	Consultee	Comment	WDC Response
37	Homes for Scotland	Greenfield release should have been considered as an option as part of SEA process, suggests this omissions undermines Plan and SEA	SEA sets out alternative Framework and Topic options, and these are included in Appendix to Strategic Environmental Assessment No change proposed to Strategic Environmental Assessment
38	Taylor Woodrow	Table 2 of Appendix 12 does not include an assessment of reasonable alternatives	SEA sets out alternative Framework and Topic options, and these are included in Appendix to Strategic Environmental Assessment No change proposed to Strategic Environmental Assessment
39	Taylor Woodrow	Consider alternatives/options in SEA should have tested greenfield scenarios as part of the process	SEA sets out alternative Framework and Topic options, and these are included in Appendix to Strategic Environmental Assessment No change proposed to Strategic Environmental Assessment
40	Barratt West Scotland	Alternative Greenfield sites should be assessed as alternatives within SEA	SEA sets out alternative Framework and Topic options, and these are included in Appendix to Strategic Environmental Assessment No change proposed to Strategic Environmental Assessment
41	British Waterways Scotland	Categorisation of Bowling Basin as a category A site in SEA should be revisited to ensure this does not prejudice development of site.	Reflects environmental constraints that exist in this location, however does not preclude development.
42	Scottish Environmental Protection Agency	Nature Conservation - Nature Conservation Strategy SEPA support this position.	Noted
43	Scottish Environmental Protection Agency	SEPA would have preferred to see a commentary column as was included in Appendix 10. This would have given an opportunity to provide context and justification for the impact recorded	Appendix 9 seeks to demonstrate consistency between WDLP objectives and objectives of Strategic Environmental Assessment It is not considered appropriate to provide justification within this matrix
44	Scottish Environmental Protection Agency	SEPA would support Housing Windfall Growth option as it would encourage the re-use of existing sites and should reduce pressure on the greenbelt.	Noted

	Consultee	Comment	WDC Response
45	Scottish Environmental Protection Agency	SEPA would have reservations if the Improving Marketable Industrial Land Supply option would result in loss of nature conservation sites	The SEA makes clear that in terms of nature conservation sites, the preferred option is the protection of nature conservation sites.
46	Scottish Environmental Protection Agency	Nature Conservation Protect Nature Conservation Sites SEPA support this position.	Noted
47	Scottish Environmental Protection Agency	SEPA would suggest that some plan policies may cause an increase in car travel/traffic congestion and hence result in a reduction in air quality in certain areas.	The Local Plan has sought to ensure development locations have access to public transport and the road network, and it is accepted that a consequence of this could result in a reduction in air quality in certain locations.
48	Scottish Environmental Protection Agency	The commentary would appear to suggest that the protection of the greenbelt is justification for the Greenbelt Development option however the option would cause a reduction in the greenbelt which would not be the most sustainable option	Commentary will be amended to indicate that this option is considered to be the most appropriate for the WDLP
49	Scottish Environmental Protection Agency	While SEPA recognises the intent behind the approach to assess the Plan objectives against the SEA objectives, is this beneficial? Given the Local Plan sets the framework for land-use, surely there is always going to be an element of conflict between new development and the natural environment.	Noted will delete Appendix 8
50	Scottish Environmental Protection Agency	SEPA would also comment that there may be benefit in re-considering the 'Environmental capacity and the precautionary principle' objectives.	Noted. Will form 2 separate objectives with associated indicators and targets
51	Scottish Environmental Protection Agency	Built Environment Design Quality No comment as this is generally outwith SEPA's area of expertise.	Noted
52	Scottish Environmental Protection Agency	It is recognised that the objectives are taken directly from the Interim Planning Advice (Environmental Assessment of Development Plans, Aug 2003) however further guidance has been published by the Office of the Deputy Prime Minister (Sept 2005) and SEPA recommends that the most recent guidance is followed where possible.	Noted, the Finalised SEA will reflect up to date advice tailored to the WD area
53	Scottish Environmental Protection Agency	In terms of the choice of Sustained Growth, there is no reference or link to the proposed approach in the draft finalised Alteration to the Glasgow & Clyde Valley Structure Plan.	Will make reference that this is in conformity and is consistent with Alteration to the Structure Plan
54	Scottish Environmental Protection Agency	Whilst water quality in the WDC area is good to excellent and there are no immediate environmental issues it should be recognised that there are developments which could potentially downgrade water quality.	Noted

	Consultee	Comment	WDC Response
55	Scottish Environmental Protection Agency	Appendix 2 appears to have omitted the Glasgow & Clyde Valley Area Waste Plan	The Glasgow & Clyde Valley Area Waste Plan will be added to Appendix 2
56	Scottish Environmental Protection Agency	This section rightly highlights the importance of the Glasgow & Clyde Valley Structure Plan. Paragraph 4.3.3 refers to the SEA which has been undertaken on the Structure Plan draft finalised alteration, however this does not elaborate on the links between the two assessments which would be helpful.	With the Structure Plan being a higher level Plan the WDLP SEA has had regard to and has links with the assessment undertaken for the Structure Plan Alteration. The Assessment of the Structure Plan 2006 has considered only those parts of the Structure Plan that are the subject of alteration. The WDLP SEA was published in advance of the Structure Plan assessment, however the WDLP has considered the main issues set out in Section 2 of the Assessment of the Structure Plan 2006 insofar as it impacts on West Dunbartonshire.
57	Scottish Environmental Protection Agency	1.4.8 & Figure 1 This clearly sets out the linkages between the Local Plan and SEA process.	Noted
58	Scottish Environmental Protection Agency	SEPA would comment that monitoring is a key element of SEA and is a requirement of the Regulations	1.4.6 will be revised to reflect that monitoring is a key element of SEA
59	Scottish Environmental Protection Agency	Paragraph 1.4.1 implies that the aim of the SEA process is to mitigate environmental impacts resulting from the implementation of the plan.	The SEA process is intended primarily to improve consideration of environmental factors during plan preparation with a view, ultimately, to better plans. Will revise 1.4.1 to better reflect purpose of SEA
60	Scottish Environmental Protection Agency	SEPA would highlight that it is important that objectives set are measurable.	The WDLP SEA sets a series of targets that are considered appropriate to the area.
61	Scottish Environmental Protection Agency	The policies shown in Appendix 11 of the ER do not correspond with the DC Policies in the draft local plan.	Will amend appendix accordingly

	Consultee	Comment	WDC Response
62	Scottish Environmental Protection Agency	The monitoring programme proposed in Appendix 14 is limited and does not appear to relate to the range of indicators identified in Appendix 7: Environmental Objectives, Criteria and Indicators.	The monitoring regime of the Plan and SEA is being developed to assess to environmental impact of the Plan. A monitoring programme will be established that relates to the details outlined in Appendix 7.
63	Scottish Environmental Protection Agency	In terms of the matrix in appendix 8 & 9 showing the assessment of the WDLP objectives is misleading and gives the impression that all issues have been addressed or assessed.	Key indicates that symbol 'o' refers to unknown
64	Scottish Environmental Protection Agency	Built Environment Enhancement No comment as this is generally outwith SEPA's area of expertise.	Noted
65	Scottish Environmental Protection Agency	SEPA would recommend a target that all new or re-developments should include a SUDS scheme, in accordance with PAN 61 and the SUDS manual.	Noted and accepted, the Council require the drainage of development proposals to satisfy the principles of SUDS and comply with current guidance.
66	Scottish Environmental Protection Agency	It may be worth linking this assessment into the SEA objectives if possible, as it stands this is a different assessment method from the policies and from the plan objectives.	Appendix 12 seeks to show environmental constraints and the proposed mitigation measures
67	Scottish Environmental Protection Agency	It is appreciated that assessing such effects can be difficult. Neither the Scoping Report nor the Environmental Report give any detail on how the Council intends to assess non direct effects such as cumulative, indirect, secondary and synergistic effects.	Agreed that assessing non-direct effects is extremely difficult . The Environmental Report will be revised to outline the process of identifying the cumulative impacts.
68	Scottish Environmental Protection Agency	SEPA would question why Policy PS5 Waste Minimisation Facility has not been subject to SEA since in SEPA's opinion it is likely that this would have a significant environmental impact.	Policy PS5 will be assessed as part of Finalised SEA
69	Scottish Environmental Protection Agency	In Appendix 4 where it was stated in the response to the scoping that West Dunbartonshire does not have a LBAP, therefore LBAP objectives cannot be considered in the Strategic Environmental Assessment	Since scoping the SEA the Council have commissioned a review of nature conservation sites and are committed to preparing an LBAP. It is considered that the targets set will meet this objective of the Strategic Environmental Assessment
70	Scottish Environmental Protection Agency	Development Control Policy DC7 Minerals: This should read Policy DC8 Minerals	Will amend appendix accordingly

	Consultee	Comment	WDC Response
71	Scottish Environmental Protection Agency	Open Space & Recreation Policy R7 Golf Courses: This should read Policy R6	Will amend appendix accordingly
72	Scottish Environmental Protection Agency	There appears to have been no assessment of Policy BE4 (Derelict/Vacant Buildings) which is included in the draft local plan and in SEPA's opinion should be assessed under SEA. In addition there are errors in the numbering and the section should read Policies BE1 - BE9.	Will amend appendix accordingly
73	Scottish Environmental Protection Agency	Whilst SEPA understand the approach being taken, we would question why the option, High Quality Open Spaces, which may reduce areas of open space, is preferred.	Preferred approach seeks to focus on improving quality of open space and applying standards developed through the open space strategy
74	Scottish Environmental Protection Agency	Contamination Regenerate SEPA support this position and the proposal to develop and hence remediate contaminated sites.	Noted
75	Scottish Environmental Protection Agency	Contamination Decontamination SEPA support this position.	Noted
76	Scottish Environmental Protection Agency	The Sustainable Growth option for Transport may result is a possible reduction in air quality due to increase in traffic and has the potential to result in a negative environmental impact, however this is not reflected in the ER.	Noted, will confirm that this option has the potential to reduce air quality in certain locations
77	Scottish Environmental Protection Agency	Commercial Development Continuation of Existing Policy No comment as this is generally out with SEPA's area of expertise.	Noted
78	Scottish Environmental Protection Agency	SEPA welcomes the use of the matrix assessment method, though again, it would have been helpful to include a commentary column as was included in Appendix 10 which would have given an opportunity to provide the context and justification for the impact recorded.	Noted, will complete key to matrix
79	Scottish Environmental Protection Agency	It should be recognised that that new development can still have an environmental impact despite the plan's approach, be it through cumulative impacts from the generation of additional traffic, increase in surface water run-off or domestic waste,.	Noted
80	Scottish Environmental Protection Agency	SEPA would comment that a more robust approach would be that each local plan policy should have been assessed against the SEA objectives. The suite of SEA objectives, which have been shown in Appendix 11, could have been designed in a way which will assess the impact of all the individual issues.	Will consider this for the Finalised SEA

	Consultee	Comment	WDC Response
81	Scottish Environmental Protection Agency	The Local Plan Framework & Topic Options identify that it is accepted that the Local Plan's approach may result in a reduction in air quality at certain sites, however there is no adverse impact shown on the assessment of local plan polices.	The SEA undertakes a strtaegic assessment of policies in the West Dunbartonshire Local Plan. It may be that individual sites will have an adverse impact on air quality and that this will be considered as part of any planning application.
82	Scottish Environmental Protection Agency	The consultative draft local plan shows RET1 - RET5. Policies R1 - R5, as shown in the consultative draft local plan, relate to Open Space & Recreation.	Will amend appendix accordingly
83	Scottish Environmental Protection Agency	The consultative draft local plan shows only Policy E8.	Will amend appendix accordingly
84	Scottish Executive Development Department	The SEA does not clearly indicate cumulative impact as part of SEA process	Accept, cumulative impact maps will be reconsidered and accompanying text will be included.
85	Scottish Executive Development Department	The SEA methodology does not indicate if the categories are negative or positive, which undermines the clarity of the assessment and the purpose of the exercise.	Noted, will be clarified for Finalised version of Environment Report
86	Scottish Natural Heritage	H1(27) Renton, Dalquhurn Estate adjacent to River Leven SINC	Noted
87	Scottish Natural Heritage	H2(24, 25) Old Kilpatrick, Erskine Ferry Rd and Carless Oil Depot sites both straddle disused railway which SNH consider could be designated as a Wildlife Corridor subject to results of the ongoing Nature Conservation Survey	Noted
88	Scottish Natural Heritage	LE1(18) Kilmalid (North), Dumbarton appears to overlap with Murroch Burn Wildlife Corridor	Noted
89	Scottish Natural Heritage	LE1(3) Clydebank Business Park adjoining Wildlife Corridor	Noted
90	Scottish Natural Heritage	Potential significant environmental constraints - therefore should be reassigned to a higher Category H2(14, 15, 16) Dalmuir, Whiteinch Demolition and Old St and former Transfer Station	Noted, will consider
91	Scottish Natural Heritage	Potential significant environmental constraints - therefore should be reassigned to a higher Category LE1(8) Carless, Old Kilpatrick	Noted will consider
92	Scottish Natural Heritage	SNH does not have a programme for monitoring loss of natural features or landscape change at the Local Plan level. Therefore, this monitoring would have to be carried out by the local authority, although SNH could provide support to the authority to set up such a system.	The Council is currently considering its monitoring programme, and to date there has been no discussion with other external organisations.

	Consultee	Comment	WDC Response
93	Scottish Natural Heritage	Potential significant environmental constraints - therefore should be reassigned to a higher Category Policy LE5(A)Kilmalid	Noted, will consider
94	Scottish Natural Heritage	H1(20) Dumbarton, Leven Shipyard site is close to intertidal areas within Inner Clyde SPA and SSSI	Noted
95	Scottish Natural Heritage	H1(15) Dumbarton, Keil School within non-Inventory Historic Garden and Designed Landscape	Noted
96	Scottish Natural Heritage	H1(14)Dumbarton, Notre Dame Convent overlaps with (rather than adjacent to) SINC	Noted
97	Scottish Natural Heritage	GD2(2) Beardmore Place, Clydebank adjoining Wildlife Corridors	Noted
98	Scottish Natural Heritage	DC7 windfarm area of search (Kilpatrick Hills) windfarm could adversely affect integrity of Black Cart SPA (migrating swans), landscape character and values of Regional Scenic Area, protected bird species, and locally valuable upland habitat	This policy has been deleted from the Finalised Plan
99	Scottish Natural Heritage	The assessment mainly refers to a series of surveys as measures to mitigate these impacts for each proposal. These surveys will not in themselves mitigate the impact of the proposal. Therefore, we would suggest that the relevant policies in the Local Plan which would be applied to mitigate impacts should be listed against each relevant proposal.	The exact environmental impacts of certain development are unknown. Therefore it is being suggested that when development proposals come forward for particular sites a series of surveys are undertaken to clearly identify impacts in order that where planning permission is to be granted appropriate planning conditions are attached.
100	Scottish Natural Heritage	The analysis of impacts of each respective policy appears to be made in comparison with the lack of each policy. Therefore, for the most part, the impacts of the policies are identified as being positive. This is correct in itself, but it does not consider the relative strength of each policy.	The assessment undertaken for each of the policies within the Local Plan reflect the Council's view as to the strength or weakness of each policy and indicates whether this has a positive or negative impact. It is accepted that some policies will have a detriment on the environment, however in order to pursue particular Council priorities it is accepted there may be certain consequences. The SEA has attempted to identify these and suggest mitigating measures.

	Consultee	Comment	WDC Response
101	Scottish Natural Heritage	Alternatives/Options: The analysis in Appendix 10 provides a transparent rationale to the direction which the Local Plan has taken, identifying the best environmental options, and the preferred options, and explaining why the Council has chosen the preferred options.	Noted
102	Scottish Natural Heritage	Local Plan Objectives: we note the set of objectives as set out in 10.5, and note the process that lead to their refinement as set out in Appendix 9.	Noted
103	Scottish Natural Heritage	Cumulative Impacts: it is unclear which policies and proposals each of these maps refers to, what cumulative impacts are identified as arising, and what action is being proposed to mitigate or avoid these impacts.	Agreed that assessing non-direct effects is extremely difficult . The Environmental Report will be revised to outline the process of identifying the cumulative impacts.
104	Scottish Natural Heritage	We note that Section 6 does not consider the pressure of urban expansion on the natural heritage. This should be one of the main issues which the Local Plan should consider, and the Environment Report should assess how well this has been achieved	Urban expansion is not an existing environmental issue in West Dunbartonshire. New developments sites primarily recycled brownfield land, or sites that have been assessed for development through the Local Plan and SEA process. A Review of the Green Belt has outlined those areas that could be considered for removal from the Green Belt and these will be assessed within the revised environmental Report
105	Scottish Natural Heritage	The Consultative Local Plan has actually identified a quite low level of protection for local sites. Therefore, the options considered in this analysis should describe those actually available to the Local Plan, and, we would conclude, the option selected in the Local Plan is not the environmentally preferred option.	The WDLP SEA options is one that seeks to protect nature conservation sites, and lists a series of local nature sites where habitats, species and natural features are to be protected. It is therefore considered that the SEA has identified the most environmentally preferred option in this regard.
106	West Dunbartonshire Council HRES	Reference to Gruggies and Knowle burn should be referred to at 6.13	Will make reference to both water courses at 6.13 and that flooding on River Leven is caused by fluvial and tidal flows

Appendix 5

Baseline Environmental Information Sources

Environmental Information	Source
Conservation Areas	West Dunbartonshire Council
Listed Buildings	Historic Scotland/West Dunbartonshire Council
Gardens and Designed Landscapes	Historic Scotland/Scottish Natural Heritage
Sites of Special Scientific Interest	Scottish Natural Heritage
Special Protection Areas	Scottish Natural Heritage
RAMSAR sites	Scottish Natural Heritage
Sites of Importance to Nature Conservation	West Dunbartonshire Council (Nature Conservation Strategy)
Species in West Dunbartonshire protected by law	Red Data Book, Nature Conservation Strategy
Habitats in West Dunbartonshire protected by law	Red Data Book, Nature Conservation Strategy
Vacant and Derelict Land	Vacant and Derelict Land Register
Contaminated Land	Contaminated Land Register
Tree Preservation Orders	West Dunbartonshire Council Records
Landscape Character	Landscape Character Assessment
Other Landscape Designations	West Dunbartonshire Council Records
Open Space	West Dunbartonshire Council Local Plans
Air Quality	West Dunbartonshire Council
Other Potential Sources of Pollution	Environmental Health Records
Areas of Fluvial or Coastal Flood Risk	Flooding Studies/Scottish Environmental Protection Agency (SEPA)
Green Network	Glasgow and the Clyde Valley Joint Structure Plan
Green Belt	West Dunbartonshire Local Plan, Landscape Assessment of Green Belt
Archaeological Consultation Trigger Map Areas	West of Scotland Archaeology Service
Scheduled Ancient Monuments	Historic Scotland (Pastmap)
Water Quality	SEPA
Water Features	Ordnance Survey Maps
Ancient Woodland Inventory	Scottish Natural Heritage
Waterbody Classification	SEPA

Appendix 6

SEA Objectives, Criteria and Indicators

	Objective	Criteria Question(s)	Indicator	Targets
1	Respect land form, natural processes and systems	<p>a) Does the aim/policy/proposal influence the landform, geology and geomorphology?</p> <p>b) Does the aim/policy/proposal influence natural systems?</p>	<ul style="list-style-type: none"> • Loss of natural environmental features • SINC's, designation based on geology • Aerial photography to indicate areas of erosion 	<ul style="list-style-type: none"> • Undertake Nature Conservation Strategy • Undertake appropriate management of SINC's
2	Protect and use soils in a sustainable way	<p>a) Is the aim/policy/proposal likely to protect or to have adverse effects on soils?</p>	<ul style="list-style-type: none"> • Contaminated land register • McAuley Institute soil maps • Greenland/Brownland development • Vacant and Derelict Land Register 	<ul style="list-style-type: none"> • Reduce number of sites on vacant and derelict land register • Reduce area of land on vacant and derelict land register
3	Protect and enhance the water environment including coastal and river systems	<p>a) Is the aim/policy/proposal likely to protect the water environment (e.g. by encouraging SUDS, reducing flood risk), or is it likely to have significant adverse effects on the water environment</p>	<ul style="list-style-type: none"> • Quality of rivers, canals and freshwater bodies • Flooding Studies • SEPA food warning/flood maps • Number of SUDS in West Dunbartonshire • SEPA run-off data • Effluent discharge data 	<ul style="list-style-type: none"> • Increase number of SUDS • All development proposals to satisfy the principles of SUDS. • Undertake appropriate flooding studies

	Objective	Criteria Question(s)	Indicator	Targets
4	Protect, enhance and where necessary restore (specified) species and habitats	<p>a) Is the aim/policy/proposal likely to protect species especially protected by law or species identified in national or local BAPs?</p> <p>b) Is the aim/policy/proposal likely to protect, enhance or restore designated nature conservation sites and/or habitats, which are identified in national or local BAPs?</p> <p>c) Is the aim/policy/proposal likely to have significant adverse effects on species and habitats?</p>	<ul style="list-style-type: none"> • Levels of damage to designated sites reported to SNH • Number of designated sites • Achievement of National BAP targets • SINC target notes • Nature Conservation Act sets requirements for monitoring species • Wildlife corridors 	<ul style="list-style-type: none"> • Undertake review of nature conservation sites • Identify target notes for SINCS • Undertake appropriate
5	Protect, enhance and where necessary restore landscape character, local distinctiveness and scenic value	<p>a) Is the aim/policy/proposal likely to protect or damage the character, local distinctiveness or scenic value of the landscape?</p>	<ul style="list-style-type: none"> • Number of SINCS • Landscape Character Assessment • Greenbelt Review 	<ul style="list-style-type: none"> • Undertake survey of Nature Conservation Strategy • Undertake review of green belt • Undertake landscape assessment of urban fringe areas
6	Protect enhance and create green spaces important for recreation and biodiversity	<p>a) Is the aim/policy/proposal likely to protect or damage green spaces important for recreation and biodiversity?</p>	<ul style="list-style-type: none"> • Net change in open space • Nature Conservation Strategy • Greenspace Strategy • Urban II funding – Environmental Improvement Key Fund 	<ul style="list-style-type: none"> • Undertake OS Strategy • Undertake audit of areas of open space • Continue to fund Greenspace • Use Urban II funding to undertake environmental improvement in Clydebank South
7	Regenerate degraded environments	<p>a) Is the aim/policy/proposal likely to contribute to the regeneration/ restoration of degraded environments or is it likely to increase the area or the degradation of such land?</p>	<ul style="list-style-type: none"> • Area or number of sites on the vacant and derelict land register • Area of contaminated land (not necessarily Scottish Government definition) 	<ul style="list-style-type: none"> • Reduce number of sites on vacant and derelict land register • Reduce area of land contained in vacant and derelict land register

	Objective	Criteria Question(s)	Indicator	Targets
8	Respect urban form, settlement pattern and identity	a) Does the aim/policy/proposal respect aspects of urban form, settlement pattern and identity in ways that contribute to, or depart/detract from sustainable development?	<ul style="list-style-type: none"> • Greenbelt Review • % of West Dunbartonshire covered by Design Guides • Number of applications in areas covered by Design Guides • Number of Appeals in areas covered by Design Guides • Town Centre Action Plans (TCAP) 	<ul style="list-style-type: none"> • Undertake Green Belt Review • Take forward series of measures in TCAP • Monitor applications in conservation areas • Undertake landscape impact of pressured urban fringe areas
9	Protect, enhance and where necessary restore building character and townscape	a) Is the aim/policy/proposal likely to protect or damage building character or townscape?	<ul style="list-style-type: none"> • Restoration projects in the urban area • % of West Dunbartonshire covered by Design Guides • Number of listed buildings and conservation areas/Article 4 directions • Conservation Area Appraisals • Gardens and Designed Landscapes 	<ul style="list-style-type: none"> • Undertake evaluation studies of key listed buildings • Take forward series of measures in TCAP • Monitor planning applications in conservation areas and affecting G&DL
10	Protect, enhance and conserve the historic environment	a) Is the aim/policy/proposal likely to protect or damage the historic environment?	<ul style="list-style-type: none"> • Number of listed buildings and conservation areas • Archaeological Trigger Maps • Planning applications affecting the site and setting of scheduled ancient monuments • Important buildings – identified in action plans 	<ul style="list-style-type: none"> • Monitor applications for listed building consent and affecting the site and setting of scheduled ancient monuments • Undertake evaluation studies of key listed building restoration • Undertake appraisal for townscape heritage scheme
11	Improve design quality in new development	a) Is the aim/policy/proposal likely to improve or reduce the quality of design in new development?	<ul style="list-style-type: none"> • Number of design guides and design briefs produced • % of West Dunbartonshire covered by Design Guides • Development Control figures (see Objective 8) • % of applications refused on design grounds • Roads Development Guidelines 	<ul style="list-style-type: none"> • Monitor planning applications in Conservation Areas and for Listed Building Consent • Adopt design guides for Clydebank Riverside and Dumbarton Waterfront • Investigate designation of Townscape Heritage Initiative for Dumbarton town centre

	Objective	Criteria Question(s)	Indicator	Targets
12	Reduce energy consumption	a) Is the aim/policy/proposal likely to reduce energy consumption or increase it?	<ul style="list-style-type: none"> • HECA report (2 year review) • Energy Action Grants Agency – administer grants • Distance from transport links • Travel to work distance • Commercial and private consumption data 	<ul style="list-style-type: none"> • Ensure all development opportunities identified in the WDLP are accessible by public transport • Promote high density design ay key transport nodes
13	Facilitate renewable energy	a) Is the aim/policy/proposal likely to facilitate renewable energy in appropriate locations or deter its development?	<ul style="list-style-type: none"> • Number of renewable energy applications over 20 MW out with Structure Plan preferred areas • Number of renewable energy applications • Measure of integration into new build/refurbishment of renewable energy technologies • Measure of the number of properties generating renewable energy 	<ul style="list-style-type: none"> • Promote sites for renewable energy in WDLP
14	Reduce the need for travel and journey length	a) Is the aim/policy/proposal likely to reduce the need to travel or reduce journey length or is it likely to significantly increase travel?	<ul style="list-style-type: none"> • Travel to work times and distances • % of population working and living in West Dunbartonshire • Distance of housing from public transport • Scottish Government transport indicators 	<ul style="list-style-type: none"> • Ensure all development opportunities identified in the WDLP are accessible by public transport • Promote high density design ay key transport nodes
15	Encourage walking, cycling and use of public transport	a) Is the aim/policy/proposal likely to encourage walking, cycling or the use of public transport or is it likely to deter them?	<ul style="list-style-type: none"> • Number of cycle paths • Improved access routes • Traffic growth levels (Scottish Government) • Number of Green Travel Plans • Length of paths • Number of cyclists using paths 	<ul style="list-style-type: none"> • Improve key access routes • Encourage green routes in WDLP • Identify opportunities to enhance access network

	Objective	Criteria Question(s)	Indicator	Targets
16	Reduce waste	a) Is the aim/policy/proposal likely to reduce waste including by re-using existing buildings or is it likely to increase waste arising?	<ul style="list-style-type: none"> • Amount of waste disposed of in landfill • Recycling rates • Greenlight Business Plan 	<ul style="list-style-type: none"> • Promote reuse of land and buildings • Identify opportunities for recycling facilities
17	Protect the environment from pollution	a) Is the aim/policy/proposal likely to protect the environment from pollution, including by avoiding potentially polluting developments in sensitive locations, or is it likely to increase the risk of pollution?	<ul style="list-style-type: none"> • Air quality monitoring • Contaminated land register • Quality of water courses • Noise pollution 	<ul style="list-style-type: none"> • Monitor air quality • Ensure protection of watercourses in any development scheme • Ensure schemes are implemented as appropriate in and development schemes • Secure funding and decontaminate appropriate sites
18	Develop within environmental capacity, applying precautionary principle where relevant	<p>a) Is the aim/policy/proposal likely to identify, and contain development within, the limits of acceptable change?</p> <p>b) Would the precautionary principle be applied?</p>	<ul style="list-style-type: none"> • Number of Article 18 applications • Greenbelt review • Landscape Character Assessment • Species census (including common/nuisance species) 	<ul style="list-style-type: none"> • Monitor Article 18 developments • Undertake landscape assessment for urban fringe sites

Appendix 8

Cumulative Impact Assessment

Cumulative Impact Indicative Mapping

- 1) Strathleven
- 2) Dumbarton Waterfront
- 3) Bowling
- 4) Carless
- 5) Queens Quay

(Mapping attached separately)

Appendix 9

Appropriate Assessment

Introduction

The European Court has confirmed that Article 6(3) and 6(4) of the Habitats Directive applies to development plans.

As a result of this ruling, West Dunbartonshire Council has followed the Scottish Executive Interim Guidance 'Assessing Development Plans in Terms of the Need for Appropriate Assessment' (May 2006) and with the assistance of Scottish Natural Heritage has prepared this report to assess the effects of the West Dunbartonshire Local Plan may have on European sites.

A European site is an area classified under the Habitats and Birds Directives as forming a network of protected areas, known as Natura 2000. This network includes Special Protection Areas (SPAs) classified under the Birds Directive and Special Areas of Conservation (SACs) introduced by the Habitats Directive. The Local Plan area has one Natura 2000 site, the Inner Clyde SPA, which extends for 20 km along the shores of the River Clyde including most of the shore line in the Plan area and contains extensive intertidal flats that support large numbers of wintering wildfowl. The site is also a Ramsar Site under the Ramsar Convention on Wetlands of International Importance to which the Scottish Executive have chosen to apply the same considerations to their protection as SPAs.

This report concludes that subject to the safeguards introduced in the Finalised Plan plus additional safeguards identified here, the West Dunbartonshire Local Plan will not adversely affect the integrity of any Natura 2000 site.

1. The Geographical Scope of the Plan

- 1.1 The West Dunbartonshire Local Plan covers the whole area of the West Dunbartonshire Council excluding the part within the Loch Lomond and the Trossachs National Park.

2. European Sites That May be Affected

- 2.1 One European site is affected by the Local Plan this being the Inner Clyde Special Protection Area (SPA) and Ramsar Site. There are several development sites on the north bank of the River Clyde which potentially could impact on the European site.

- 2.2 An appraisal of how the development areas may affect this Natura 2000 site has been undertaken considering the qualifying interests and conservation objectives of the site in the context of the Local Plan's aims, objectives, policies and proposals. Following consultation with SNH no Natura 2000 sites outwith the Local Plan area were considered to be significantly effected by the policies and allocations in the Local Plan.

3. The Local Plan's Aims and Objectives

- 3.1 The Local Plan is the statutory document which sets out the land use planning framework for all of West Dunbartonshire with the exception of the part of the Council area within the Loch Lomond and the Trossachs National Park. The Plan indicates the Council planning policies and development opportunities including recent projects which have received planning consent for the period until 2012. The Plan complies with the Glasgow and the Clyde Valley Joint Structure Plan 2000 (and the 2006 Structure Plan Alteration) which provides the strategic development plan for the long term planning of the wider Glasgow conurbation. The Local and Structure Plans together comprise the Development Plan for West Dunbartonshire.
- 3.2 The 2006 Structure Plan Alteration was subject to an Alternative Assessment and it was concluded that the majority of the changes to the 2000 Structure Plan are unlikely to have a significant effect on a European site either directly or indirectly. Following the appropriate assessment of the SPAs and SACs it was concluded that no adverse effect will arise from the Structure Plan policy on their integrity.
- 3.3 The aims and objectives of the Local Plan are:

The aims of the Local Plan are as follows:

- To promote sustainable development and communities,
- To create economic well-being and a sustainable and competitive place through the development of strategic locations,
- To maintain and enhance the natural and built environment.

The identified key objectives are:

- To identify sustainable locations for key strategic developments,
- To enable sustainable economic and environmental regeneration,
- To ensure that sufficient land is available in appropriate locations to meet development requirements,
- To conserve environmental resources,

- To identify future areas of land use change,
- To promote and support improvements in environmental quality, and
- To ensure sustainable and integrated transport and infrastructure provision.

3.4 The main policies in relation to the natural environment include:

- Policy SUS 1 on sustainable development which seeks to maintain and enhance the quality of the environment within the Plan area.
- Policy E1 on the conservation of biodiversity.
- Policy E2A and E2B which seek to enhance wildlife habitats and protect and conserve wildlife and natural resources by safeguarding the environmental interest of the national and international nature conservation sites.
- Policy E3A and E3B on local nature conservation sites, local Nature reserves and the maintenance and enhancement of the environmental resources of the Plan area by the protection of habitats etc. which are vulnerable or specifically protected.
- Further policies on the retention of trees and woodland and their protection from development.
- Reference to the Water Framework Directive and River Basin Management Plans.

3.5 The Plan also has Key Policies relating to urban renewal and regeneration priorities which follows from the Structure Plan in directing development to previously developed sites in the urban area in order to continue the process of urban renewal. In addition specific policies on housing, economic development and transport put forward opportunities for the potential development of sites and infrastructure.

3.6

4 How the Plan Might Effect the Natura 2000 Site

4.1 The Plan has Key Policies, subject related policies, proposals and opportunities listed in schedules under each of the subject headings. The policies not only support development on opportunity sites but will also allow development in certain specified circumstances on unallocated sites or alternative development on allocated sites. The following analysis considers the impact of these policies on the Natura site. This includes general policies that would apply for developments along the foreshore and alternative proposals on designated sites as well as more site specific proposals and opportunities.

4.2 UR1 Urban Renewal promotes the re-use of land and buildings in the urban area that become vacant, derelict or underused. This policy covers the urban area north of the Clyde adjacent to the Natura site. Whilst this policy

encourages redevelopment the detailed consideration of any development proposal would be subject to other Local Plan policies therefore there is little direct impact in the Natura site from the UR1 Policy.

- 4.3 RP1 Regeneration priorities identifies three areas north of the Clyde where redevelopment of underused, vacant or derelict land is supported in order that development opportunities are brought forward. The policy refers to designations of sites on the proposals map and conformity to other Local Plan policies therefore Policy RP1 would have little direct impact on the Natura site.
- 4.4 GB1 Greenbelt has a general presumption against development unless certain criteria are met including the following that may be relevant to the Greenbelt area near the Clyde:
- Agriculture and forestry;
 - a recreation, leisure or tourist proposal that is not contrary to other Local Plan policies;
 - there is a specific location requirement for development and it cannot be accommodated on an alternative site; and
 - there is an necessity for additional land for development having regard to the Structure Plan

The policy could impact on the Natura site if the criteria are met.

- 4.5 GD1 Development Control applies to all new development and covers a wide range of issues in order to determine planning applications. It includes the requirement that valuable species and habitats are conserved and that the proposal should be consistent with other Local Plan policies. There would therefore be a direct attributable impact on the Natura site if the sensitivities of the SPA are not considered in the determination of a planning application on the north bank of the Clyde.
- 4.6 LE1 Industrial & Business sites covers both existing and proposed industrial and business class sites with a presumption in favour of extending the permanent employment uses on such sites. LE2 Mixed Business and Retail uses within industrial/ business uses and LE3 Development outwith designated industrial and business use sites sets out criteria for mixed uses on industrial sites and industrial and business uses outwith designated areas. Criteria for alternative uses of the sites are set out essentially to ensure that there will be a sufficient supply of industrial and business land and that there are no adverse impacts. The development or redevelopment of these sites could therefore significantly impact on the Natura site.

- 4.7 LE8 Tourist industry development supports tourist industry applications subject to listed criteria particularly within the Firth of Clyde Tourist Development Area. Whilst the criteria are to avoid adverse impacts, any development on the Clyde coast could adversely affect the Natura site.
- 4.8 H1/H2/H3 Housing Land Supply indicates that if assessments of supply and demand indicate that additional sites be allocated then sites will be brought forward as required. This could impact on the Natura site particularly as preference is given to brownfield sites.
- 4.9 H4 and H5 set out criteria for the development of new housing and development within existing housing estates. Such detailed consideration of development along the Clyde would impact on the Natura site as the designated housing sites are developed or after they are built.
- 4.10 Retail policies direct development forwards town centres and it is not anticipated these policies would impact on the Natura site as such development is not near the Clyde except for the retail opportunities within the Queens Quay development, Clydebank.
- 4.11 T2 Access Improvements seeks to identify access improvements for the regeneration priority areas in policy RP1 and develop an alternative route to the A82 at Milton/ Bowling. The development of such routes close to the Clyde could impact on the Natura site.
- 4.12 Environment policies generally seek to conserve the natural and built environment however policy BE3 encourages and supports the renovation of derelict buildings and lists opportunities including Dunglass Castle which is adjacent to the Clyde. This policy could therefore significantly affect the Natura site.
- 4.13 R1 Retention of Open Space has a presumption against development on areas of open space and sets out criteria for development on such sites. The potential development on open space areas under these criteria could thus impact on the Natura site.
- 4.14 R4 Forth & Clyde canal sets out the general considerations required of development near the canal including the Bowling Basins area. Given the proximity to the Clyde these policies could impact on the Natura site.
- 4.15 R5 Access Opportunities encourages access for footpaths, cycle ways and bridleways with a special emphasis on riverside areas. There is to be an effort to create a Clyde riverside walking route under this policy therefore there is a potential to affect the sensitivities of the Natura site.

- 4.16 R7 Dumbarton Football Stadium presumes the retention of the stadium but sets out criteria for non-stadium related uses. If the stadium is further developed or redeveloped there could be an impact on the Natura site.
- 4.17 PS1 Public Service Provision sets to protect established public utility uses and considers alternative uses for the sites. The sewerage facilities adjacent to the Clyde designated under this policy could therefore have an impact on the Natura site.
- 4.18 DC4 Telecommunications sets out the criteria for the consideration of telecommunications equipment such as masts for mobile phone networks and such development could adversely affect the Natura site. Similarly DC6 Renewable Energy considers possible renewable energy development which could affect the Natura site.
- 4.19 Policies, F1, F2 and F3 on flooding and sustainable urban drainage has relevance for all development and as drainage could impact on the sensitivities of the Natura site, these policies would have a significant effect.
- 4.20 In addition the following opportunity sites under various different policies could significantly affect the Natura site:

	H1 (15)	Shed 7, Dumbarton
	H1 (17)	Castlegreen Street, etc. Dumbarton
	GD2 (13)	Dumbuck Bonds, Dumbarton
		Esso, Bowling
	BE4 (6)	Dunglass Castle, Bowling
LE4	GD2 (11)	Scott's Yard, Bowling
	GD2 (10)	Bowling Basins, Bowling
	H2 (22)	Carless, Old Kilpatrick
	LE1 (8)	Carless, Old Kilpatrick
	GD2 (7)	Erskine Ferry Road, Old Kilpatrick
	LE1 (1)	Riverside Industrial Estate, Clydebank
	LE1 (2)	Clydebank Industrial Estate, Clydebank
	H2 (9)	Cable Depot Road, Clydebank
	H2 (2)/ H2 (3)/ H4 (3)	Queen's Quay, Clydebank
	RET3 (4)	Queen's Quay, Clydebank

5 How the Natura 2000 Site is Likely to be affected by the Local Plan Allocations

5.1 The Inner Clyde SPA (and Ramsar Site)

5.2 The Conservation Objectives and the Sensitivities of the SPA were obtained from SNH and these are outlined in Appendix 3. The following table summarises the sensitivities:

Site Type	Qualifying Interests	Conservation Objectives	Sensitivities
SPA	Redshank (<i>Tringa totanus</i>)	To avoid the deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring the integrity of the site is maintained; and to ensure for the qualifying species that the following are maintained in the long term: Population of the species as a viable component of the site; Distribution of the species within the site; Structure, function and supporting processes of habitats supporting the species; No significant disturbance of the species.	1) Disturbance: acoustic, visual, predator, seasonal. 2) Habitat loss: roosting loss (limited on northern shore); feeding loss. Possible effect of sea defences with sea level changes. 3) Pollution: wholly indirect impacts – impacts on prey species; main risks likely to be point impacts, high potential impacts from rare events. 4) Cumulative: very complex interactions at varying sites and carrying types and levels of impacts.

6 The Principal Safeguarding Policies

6.1 The sensitivities, identified in Appendix 3 and summarized in the above table, have been assessed against the principal safeguarding policies as shown below – see Appendix 1 and 2. Appendix 1 lists some of the potential effects on the sensitivities identifies for the SPA site and the potential mitigation measures that could be undertaken following an Appropriate Assessment for any proposed development. These potential mitigation measures do no cover all the measures that may be undertaken and do not exclude other mitigation measures. The measures have been chosen to show that the Local Plan policies meets the requirements of the Habitats Directive because it should be possible to implement all of the developments which could possibly affect the SPA in a manner which would not have significant effects, and the provisions of the Plan ensure that this is tested and delivered at the development control stage.

Sensitivity	Safeguarding Policies
All sensitivities	Policy E 2A Development likely to have a significant effect on an international nature conservation site (Natura 2000 site) will be subject to an appropriate assessment. Where an assessment is unable to conclude that the development will not adversely affect the integrity of the site, development will only be permitted where: (a)there are no alternative solutions; (b)there are imperative reasons of overriding public interest. These can be of a social or economic interest except where the site has been designated for a European priority habitat or species. Consent can only be issued in such cases where the reasons for the overriding public interest relate to human health, public safety, beneficial consequences of primary importance for the environment or other reasons subject to the opinion of the European Commission (via Scottish Ministers).
Pollution	Policy E2A addition: Proposed developments or engineering works that would have an adverse effect on the water quality, ecological status or riparian habitat of a Natura 2000 site will be refused.
Pollution/Drainage	Policy F2 4 th Paragraph 2 nd bullet point add: '(for significant effects on a Europa 2000 site see Policy E2A)'.

- 6.2 NPPG 14 Natural Heritage indicates that planning authorities are required to meet the requirements of the Habitats and Birds Directives and Guidance is given in SOEnd Circular 6/1995 (as updated in 2000). The Conservation (Natural Habitats etc.) Regulations 1994 require that where an authority concludes that a development proposed unconnected with natural heritage management is likely to have a significant effect on a Natura 2000 site, it must undertake an appropriate assessment of the site. This assessment is of the implications for the conservation interests for which the area was designated. NPPG 14 indicates the circumstances when development which could have a significant effect on the conservation interests should be permitted. The SEDD Pilot Model Policy Study – Conclusions and Next Steps (January 2006) sets out the model policy following the NPPG 14 guidance on the need for appropriate assessment.
- 6.3 The above policy E2A follows the model policy guidance which is considered will safeguard the Inner Clyde SPA from potential developments along the north bank of the Clyde which may significantly effect the conservation objectives of the site. Currently the detail of the potential development of the opportunity sites covered in Appendix 1 is not known. As indicated in the Interim Guidance for Assessing Development Plans in Terms of the Need for Appropriate Assessment (SEDD May 2006) where the outcomes from the policy proposals are not apparent until a later stage a broader level of assessment for development plans as a whole is acknowledged by the EC in their Article 6 Guidance.

6.4 It is recognized that the Local Plan does not consider pollution of nature conservation site specifically therefore it is considered appropriate to add a paragraph in Policy E2A on the possible pollution related to Natura 2000 sites in order to protect the sensitivity related to the pollution of the prey species (see Section 6). This additional paragraph seeks to safeguard the conservation objectives concerning the 'structure, function and supporting processes of habitats supporting the species.' Related to pollution is the drainage of development sites therefore a reference to Policies E2A is felt appropriate for Policy F2 on Sustainable Urban Drainage, Drainage Impact Assessments and Culverts

7 How the Plan Might Affect the Site

7.1.1 It has been identified that the policies and proposals in the Local Plan listed in Appendix 1 are likely to have a significant effect on the Inner Clyde SPA and Ramsar site. The sensitivities of the site are shown in the Appendix 1 Table having regard to the sites conservation objectives. The development of housing, business and industry, retailing and leisure uses on sites adjacent to the Europa site may affect the site. In addition the more general policies of the Plan which would influence development on other sites near to the SPA or on alternative development of the sites listed in Appendix 1 could affect the site.

7.2 Safeguarding

7.2.1 Safeguarding against the effects identified is provided by Policy E2A and the amendment to Policy F2 as described in Section 6 above.

7.3 Additional Safeguarding

7.3.1 Policy LE 1 refers to development sites LE1(2) Riverside Industrial Estate, Clydebank and LE1(18) Carless, Old Kilpatrick adjacent to the Inner Clyde SPA. There is current activity investigating the development of these sites therefore it is considered appropriate to refer to the requirements of Policy E2A within the Policy by adding the following statement:

“Proposals for sites adjacent to the Inner Clyde SPA must satisfy the requirements of Policies E2A.”

7.3.2 Similarly site LE4 the former Esso Bowling Terminal, Bowling is currently being considered as part of a Masterplanning exercise for Bowling and therefore it is considered that it would be appropriate to refer to the safeguarding policies within Policy LE4. The following wording has been added to Policy LE4:

“Proposal for the Esso Bowling Terminal site must satisfy the requirements of Policy E2A relating to the Inner Clyde Special Protection Area and Ramsar site adjacent to the site.”

- 7.3.3 Policy GD2 refers to the comprehensive development of sites for mixed uses and refers to sites GD2(13) Dumbuck Warehouses, Dumbarton, GD2(11) Scott's Yard, Bowling, GD2(10) Bowling Basins and GD2(7) Erskine Ferry Road, Old Kilpatrick. It is therefore considered appropriate to add the following phrase to Policy GD2 to ensure compliance with the safeguarding policies above:
"Proposals for sites adjacent to the Inner Clyde SPA must satisfy the requirements of Policies E2A."
- 7.3.4 Policy H1 refers to the development of housing sites and includes sites H1(15) Shed 7, Dumbarton, H1(17) Castlegreen Street/Diamond Power/ Mary Fisher Crescent, Dumbarton, H2(22) Carless, Old Kilpatrick, H2(9) Cable Depot Road, Clydebank and H2(2)/H2(3)/H4(3) Queens Quay, Clydebank which and all adjacent or near to the Inner Clyde SPA. It is felt appropriate, therefore, to add the following phrase to Policy H1 in order to highlight the need for compliance with the requirements of the safeguarding policies above:
"Proposals for sites adjacent to the Inner Clyde SPA must satisfy the requirements of Policies E2A."
- 7.3.5 For all built development Appendix 1 indicates that there is potential disturbance during the building phase. Given that the requirements of the conservation objectives of the SPA relate to the over-wintering of redshank it is appropriate to indicate the potential requirement of restricting building operations between September and April inclusive. This restriction will depend on the nature and extent of the building works which would be considered more closely in the Appropriate Assessment for any individual site.
- 7.3.6 Various types of development shown in Appendix 1 could potentially result in cumulative and pollution impacts. In order to mitigate the potential adverse impacts on the feeding habitat from pollution it is appropriate to indicate the potential requirement for discharge management of any runoff from developments on or near the north bank of the River Clyde adjacent to the Inner Clyde SPA. This requirement will depend on the nature of the runoff or discharges from the development sites which would be considered more closely in the Appropriate Assessment for any individual site.
- 7.3.7 As it is not known what form the development will be on the above development site adjacent to the River Clyde and the Inner Clyde SPA it is considered inappropriate to prepare development briefs for all these sites. The sites are likely to have some mix of uses even though the designation of the sites may be for residential or business and industrial uses. The use type and the scale of development would be considered in the Appropriate Assessment for the sites as required by Policies E2A and the references in each of the above development site policies. It is considered that this cross referencing to the Policies relating to the need for Appropriate Assessment if the Natura 2000 site is likely to be significantly affected by development is a robust safeguarding of the Conservation Objectives and Sensitivities identified for the Inner Clyde SPA.

8 Conclusion

- 8.1 It has been identified that the policies and proposals of the West Dunbartonshire Local Plan are likely to result in significant effects on the qualifying interests of the Inner Clyde SPA (and Ramsar site). However, the assessment of the Plan's policies and proposals, together with the safeguarding mechanisms outlined in Section 7.3 above, indicate that the Plan could be implemented without adverse effects on the integrity of the Inner Clyde SPA (and Ramsar site) and the Plan is capable of implementation without adverse effects on the Natura 2000 site.

**Appendix I – West Dunbartonshire Local Plan Appropriate Assessment
Assessment of Potential Effects of Development and Potential Mitigation Measures**

Ref No.	Policy	Potential Development Issues	Potential Effects on Sensitivities	Potential Mitigation Measures (not exclusive)
1	GB1 Greenbelt	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff.	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;
2	LE1 Business and Industry	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events).	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations;
3	LE 8 Tourist Development	Built development; Increased movement of people; Increased drainage and	Disturbance during building phase; Lights causing visual intrusion;	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea

		runoff; River/flood defences; Harbour development and use; Movement late at night; Dredging harbour.	Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds.	defence design; Additional water treatment; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic;
4	H1/H2/H3 Housing	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;
5	H4/H5 Housing development	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff.	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;

6	T2 Access Improvements	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Increased traffic movement; Increased air pollution; Increased drainage and pollution from road runoff.</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Continuing acoustic and visual disturbance particularly at night; Cumulative and pollution impacts.</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Amended design to mitigate noise/visual impacts; Additional water treatment;</p>
7	BE3 Listed Building Opportunities	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Use of building for housing, business or tourism (as per LE1, LE8, H1/H2/H3 above)</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events). Habitat loss to enable harbour development and use; Increased night disturbance;</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Appropriate pollution controls;</p>

			Increased waterborne traffic disturbing feeding grounds; Visual and pollution from fires particularly in autumn and winter	
8	R1 Retention of Open Space	Increased use of site; Barbeques/fires; Kite flying; Sports activities; Part built development; Increased movement of people; Floodlighting.	Disturbance from acoustic and visual sources due to increased people movements and games; Disturbance from fires; Visual disturbance from kite movement and sports.	Restrictions on sports/leisure activities; Appropriate pollution controls;
9	R4 Forth and Clyde Canal	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Increased use of site; Barbeques/fires; Kite flying; Sports activities; Part built development; Increased movement of people; Floodlighting; Use of building for housing, business or tourism (as per LE1, LE8, H1/H2/H3 above),	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events);	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Changes in lighting design; Amended design for emergency situations; Appropriate pollution controls;

			Visual and pollution from fires particularly in autumn and winter.	
10	R5 Access Opportunities	Construction works; Dog walking/horseriding; Increased people movements.	Disturbance during building phase; Possible lighting causing increased visual disturbance; Predator disturbance from animals; Disturbance, both visual and acoustic, from people.	Phasing development; Appropriate changes in lighting design; Restrictions on animals; Amended design to mitigate noise/visual impacts;
11	R7 Dumbarton Football Club	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Issues dependant on development use.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; As development use as above	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;
12	PS1 Public Service Provision	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Issues dependant on development use.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; As development use as	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;

			above	
13	DC4 Telecommunications	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Tall structures	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual disturbance from size of structure.	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Restrictions on high/scale/massing of structures;
14	DC6 Renewable Energy/DC7 Micro-renewables	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Tall structures; Windfarm and micro-renewable blade movement	Visual disturbance and potential blade impact; Acoustic disturbance	Locational/design reassessment of turbines to mitigate impact; Design changes to mitigate noise impacts;
15	F1/F2/F3 Flooding and Drainage	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Increased drainage;	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level;	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Amended design for emergency

		Water treatment and septic tank construction and use; Land raising and flood defences.	Possible cumulative effect of increased drainage and runoff; Potential pollution from accident (rare event); Pollution and cumulative impacts;	situations; Additional water treatment for cumulative impacts;
16	H1(15) Shed 7, Dumbarton; H1(17) Castlegreen St./etc. Dumbarton	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;
17	GD 2 (13) Dumbuck Warehouses 1 &7, Dumbarton	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques; Or: Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter; Disturbance from industrial	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;Noise mitigation measures; Changes in lighting design; Amended design for emergency situations;

			<p>noise; Visual intrusion of security lighting; Pollution from accidents (rare events).</p>	
18	LE4 Esso Bowling	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials. Harbour development and use; Movement late at night; Dredging harbour. Increased traffic movement; Increased air pollution; Increased drainage and pollution from road runoff; Barbeques/fires; Kite flying; Sports activities; Part built development; Floodlighting.</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events); Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds; Continuing acoustic and visual disturbance particularly at night; Cumulative and pollution impacts; Disturbance from acoustic and visual sources due to increased people</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Restrictions on sports/leisure activities; Amended design to mitigate noise/visual impacts at night;</p>

			<p>movements and games; Disturbance from fires; Visual disturbance from kite movement and sports.</p>	
19	BE4(6) Dunglass Castle, Bowling	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Use of building for housing, business or tourism (as per LE1, LE8, H1/H2/H3 above)</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events). Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds; Visual and pollution from fires particularly in autumn and winter</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Amended design to mitigate noise/visual impacts at night;</p>
20	GD2(11) Scott's Yard, Bowling	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences;</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment;</p>

		<p>Harbour development and use; Movement late at night; Dredging harbour; Burning garden waste/barbeques;</p>	<p>with rising sea level; Possible cumulative effect of increased drainage and runoff; Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds; Visual and pollution from fires particularly in autumn and winter</p>	<p>Appropriate pollution controls; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Amended design to mitigate noise/visual impacts at night;</p>
21	GD2(10) Bowling Basins	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Harbour development and use; Movement late at night; Dredging harbour; Burning garden waste/barbeques; Increased use of site; Barbeques/fires; Kite flying; Sports activities.</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Habitat loss to enable harbour development and use; Increased night disturbance; Increased waterborne traffic disturbing feeding grounds; Visual and pollution from fires particularly in autumn and winter; Disturbance from acoustic and visual sources due to increased people</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amendments to harbour design and use; Amended design to mitigate noise; Restrictions on water traffic; Restrictions on sports/leisure activities; Amended design to mitigate noise/visual impacts at night;</p>

			<p>movements and games; Disturbance from fires; Visual disturbance from kite movement and sports.</p>	
22	H2(22) Carless, Old Kilpatrick	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques;</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;</p>
23	GD2(7) Erskine Ferry Road, Old Kilpatrick	<p>Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques; or Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.</p>	<p>Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents</p>	<p>Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations; Amended design to mitigate noise; Restrictions on water traffic;</p>

			(rare events).	
24	LE1(1) Riverside IE, Clydebank; LE1(2) Clydebank IE, Clydebank	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Security lighting; Industrial noise; Tall buildings; Storage of hazardous materials.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Disturbance from industrial noise; Visual intrusion of security lighting; Pollution from accidents (rare events).	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Noise mitigation measures; Changes in lighting design; Amended design for emergency situations;
25	H2(9) Cable Depot Road, Clydebank; H2(2)/H2(3)/H4(3) Queens Quay, Clydebank	Built development; Increased movement of people; Increased drainage and runoff; River/flood defences; Burning garden waste/barbeques.	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff; Visual and pollution from fires particularly in autumn and winter	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design; Additional water treatment; Appropriate pollution controls;
26	RET3(4) Queens Quay, Clydebank	Built development; Increased movement of people; Increased drainage and runoff;	Disturbance during building phase; Lights causing visual intrusion; Possible habitat loss from	Phasing development; Appropriate changes in lighting design; Appropriate changes in sea defence design;

		River/flood defences; Increased traffic movements, heavy vehicles.	sea defences in combination with rising sea level; Possible cumulative effect of increased drainage and runoff.	Additional water treatment;
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Appendix II – West Dunbartonshire Local Plan Appropriate Assessment – Assessment of Potential Effects of Development Summary

Policy	Built development	Increased movement of people	Increase drainage and runoff	Sea/Flood defences	Security lighting/floodlighting	Industrial noise	Tall buildings/structures	Storage of hazardous materials	Harbour development/Dredging	Water treatment	Land raising	Increased traffic movement	Increased air pollution	Increase drainage and pollution from run-off	Increased sport and recreation activity	Blade movement	Disturbance during building phase	Lights causing visual intrusion	Possible habitat loss: sea defences, rising sea level	Possible cumulative effect of increased drainage & runoff	Disturbance from industrial noise	Visual intrusion of security lighting	Pollution from accidents (rare events)	Possible habitat loss: harbour development and use	Increased waterborne traffic disturbing feeding grounds	Continuing acoustic and visual disturbance	Cumulative and pollution impacts	
GB1	●	●	●	●													●	●	●	●								
GD2(7)	●	●	●	●	○	○	○	○				○	○	○			●	●	●	●						●		
GD2(10)	●	●	●	●					○			○	○	○			●	●	●	●				●	●	●		
GD2(11)	●	●	●	●								●	●	●	●		●	●	●	●	●	●	●			●		
GD2(13)	●	●	●	●	○	○	○	○				○	○	○			●	●	●	●	●	●	●			●		
LE1	●	●	●	●	●	●	●	●									●	●	●	●	●	●	●					
LE4	●	●	●	●																								
LE8	●	●	●	●					●								●	●	●	●			●	●				
H1/2/3	●	●	●	●													●	●	●	●								
H4/5	●	●	●	●													●	●	●	●								
T2	●	●	●	●								●	●	●			●	●	●	●							●	
BE3	●	●	●	●													●	●	●	●	●	●	●	●	●			
BE4(6)	●	●	●	●																								
R1	○	●			○										●										●			
R4	●	●	●	●													●	●	●	●				●	●			
R5		●													●		●	●								●		
R7	●	●	●	●													●	●	●	●								
PS1	●	●	●	●													●	●	●	●								
DC4	●	●	●	●			●										●	●	●	●						●		
DC7/8	●	●	●	●												●	●	●	●							●		
F1/2/3	●	●	●	●						●	●			●			●	●	●	●			●	●				
RET3(4)	●	●	●	●								●					●	●	●	●							●	

○ Potential Development Issue – dependent on use

Appendix III

Conservation Objectives of the Inner Clyde SPA

To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained.

To ensure for the qualifying species that the following are maintained in the long term:

- Population of the species as a viable component of the site;
- Distribution of the species within the site;
- Distribution and extent of habitats supporting the species;
- Structure, function and supporting processes of habitats supporting the species;
- No significant disturbance of the species.

Qualifying Species: Redshank (*Tringa tetanus*)

Inner Clyde SPA Sensitivities as identified by Scottish Natural Heritage

Sensitivities of Inner Clyde SPA - written with reference to potential impacts of development within West Dunbartonshire:

Requirements of the qualifying feature: over-wintering redshank - Sept to April inclusive (includes both autumn passage to other wintering locations, and 'true' over-wintering):

Roosting - redshank roost on intertidal areas when possible, but during high tides (especially springs) and/or bad weather (especially high winds) they need space for displacement onto coastal strip (can include built structures). If safe/sheltered roosting is not available, energy expended in moving when should be resting up.

Feeding - muddy intertidal supporting main prey species – some bias towards areas with freshwater input (close to mouths of burns). Follows tidal cycle both diurnally (therefore not set times of day) and longer-term; certain higher areas only. Busy feeding during springs but approaching highs they assume great importance and therefore any disturbance much more significant. Good feeding areas crucial in coldest weather because (a) highest energetic requirement, (b) invertebrate prey burrow deeper out of reach in frosts.

Sensitivities: These are defined as being the types of impacts that could threaten the conservation objectives. The following categories do not simply read-across to the conservation objectives, unfortunately.

1. *disturbance - often a combination of:*

acoustic - during development (including ground preparation), depends on continuity, abruptness/ unpredictability and volume relative to existing noise environment. After development, can expect some habituation of redshank to noise but also could reduce their use of an area in long-term (quieter areas may become more attractive).

visual - the above comments mostly apply. Site-specifics will be important - sightlines etc

predator - anything that increases presence of an actual predator, or apparent predator (e.g. humans, dogs), or perceived predator (other moving objects) could increase disturbance.

seasonality - redshank are most sensitive to disturbance (greatest potential mortality or loss of breeding success) not only in coldest weather, but also when numbers highest during the winter when there is less potential for disturbed birds to relocate whether feeding or roosting.

2. habitat loss or habitat physical disturbance

Roosting - redshank numbers not especially likely to be limited by potential roosting sites along the Clyde's extensive north shore, so significance of loss of roost sites is relatively lower.

Feeding - significance of impact of loss/damage is highly dependent on quality of habitat, however habitat quality can shift location because (a) it's a geomorphologically active estuary - intertidal flats can change; (b) RELATIVE quality as experienced by redshank depends on how long a mudflat is exposed during tidal cycles.

It's worth noting that possible sea-level rise, in combination with the constraining of the Clyde within artificial banks / sea defences, could lead to loss of habitat through 'squeezing' of intertidal areas.

3. pollution

Almost wholly indirect impacts (though obviously a major petroleum or chemical incident could directly affect birds through water contact). Mainly via impacts on prey species which filter estuary water and sediment. Chemical pollution of water & sea, and physical pollution – smothering of prey species. Main risks from development these days are most likely to be point impacts, high potential impacts from rare events e.g. failure of pollution control, or runoff exceeding design limits of SUDS / sewers.

4. cumulative

Very complex, poorly understood interaction between conditions at varying sites, and varying types and levels of impacts as described above. Likely to be thresholds e.g. of widespread pervasive pollution damaging prey, or of widespread acoustic/visual disturbance meaning displaced birds have nowhere to go. It is necessary to understand, for birds using any one area or site (a) which other areas are important to them and when; (b) significance of those birds within the SPA population.

Appendix 10

Monitoring Programme

Significant Environmental Indicator	SEA Objective(s)	Monitoring Activity to be Undertaken	Data Source
Greenfield/Brownfield Development	1, 3, 7, 14	Monitor Planning Applications	WDC
Quality of rivers, canals and freshwater bodies	1, 3, 4	Monitor Water Quality	Scottish Water/SEPA
Habitat loss due to land degradation or development	1, 2, 3, 4, 6	Proportion of protected nature sites in favourable condition (National Indicator 33)	SNH
Area or number of vacant or derelict sites	1, 3, 7, 14	Vacant and Derelict Land Survey	WDC
Area or number of contaminated sites	1, 3, 7	Review changes in land use for known contaminated sites/conduct site investigations for potential contaminated sites	WDC
Percentage of West Dunbartonshire covered by design guides/Conservation Area Appraisals	7, 8, 9, 10	Consult Local Plan	WDC
Percentage of planning applications refused on design grounds	1, 5, 8, 9, 10, 11	Monitor Planning Applications	WDC
Installed renewable energy capacity	13, 18, 17, 18	Monitor Planning Applications (permissions granted)	WDC
Sustainable transport	14, 15, 17	Percentage of adults driving a car to work (National Indicator 39)	Scottish Household Survey
Sustainable transport	14, 15, 17	Percentage of children travelling to school by public or active transport	WDC/ Sustrans
Waste sent to landfill/recycling rates	16, 17, 18	Tonnage of biodegradable municipal waste landfilled (National Indicator 39); Percentage of municipal waste collected that was recycled/composted.	SEPA
Changes in Air Quality	17	Air Quality Monitoring – NO ₂ and PM ₁₀ Concentration	WDC

Appendix 11

Addendum to Environmental Report – September 2009

1 Introduction

- 1.1 The West Dunbartonshire Local Plan Environmental Report is part of the Strategic Environmental Assessment (SEA) of the West Dunbartonshire Local Plan (WDLP). SEA is a requirement of the *Environmental Assessment (Scotland) Act 2005* which implements EC Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, also referred to as the SEA Directive.
- 1.2 This document forms an addendum to the Environmental Report published in May 2008, updating the SEA to take account of proposed modifications to the WDLP. In addition to the Environmental Report the addendum should be read alongside the WDLP Finalised Draft (August 2007) and the consolidated Proposed Modifications (September 2009).
- 1.3 The comments from the SEA Consultation Authorities received in June/July 2008 following publication of the Environmental Report are noted at Appendix 1 and in accordance with Article 8 of the SEA Directive, the Council has a duty to take account of these responses before adopting the local plan. It is not intended to revise the Environmental Report at this stage in order to reassess policies or proposals following the consultation, however it is acknowledged that improvements to the assessment process could be made. The purpose of this document is to assess the proposed modifications only.

2 Background

- 2.1 The Notice of Intention to Start Preparation of the West Dunbartonshire Local Plan (WDLP) was published on 19 October 2004 and at that time a determination was made that SEA would be required. A **Scoping Report** for the SEA was then prepared by West Dunbartonshire Council and submitted to the consultation authorities in December 2004. In addition, although not required by the Regulations, the Scoping Report was published for public consultation in February 2005. Following the scoping stage of the SEA, Jacobs Babbie was appointed to carry out the remainder of the assessment.
- 2.2 The Consultative Draft WDLP and **Environmental Report** were published in January 2006 for a 10 week consultation period. Approximately 100 separate representations were received to the Environmental Report and a report of the representations received and the Council's response was included in the Statement of Publicity and Consultation (dated August 2007) that accompanied the Finalised Draft WDLP.
- 2.3 Alongside preparation of the Finalised Draft WDLP, the Environmental Report was revised to take account, where appropriate, of representations received and changes to the WDLP e.g. revised/new policies and proposals. Following consultation on the Finalised Draft and the preparation of Proposed Pre-Inquiry Modifications, a **Revised Environmental Report** was deposited with the Pre-Inquiry Modifications to the Finalised Draft WDLP in May 2008.

3 Proposed Modifications

- 3.1 The Proposed Modifications placed on deposit in September 2009 represent a consolidated list of all proposed changes to the Finalised Draft WDLP. These include Proposed Pre-Inquiry Modifications (May 2008), which have previously been consulted upon; Further Proposed Pre-Inquiry Modifications (October 2008) and modifications recommended by the Reporter within the Local Plan Inquiry Report (March 2009). Additional modifications have also been proposed to take account of decisions taken on planning applications or Council commitments and to correct errors, clarify or factually update the Plan.
- 3.2 It is necessary to assess whether modifications to the WDLP proposed after the deposit of the finalised draft and environmental report (and therefore not previously assessed) would be likely to have a significantly different environmental effect.
- 3.3 The majority of proposed modifications relate to text which provides contextual information or the reasoned justification for the policies of the Plan and are not within the scope of the SEA, which assesses policies and proposals (development sites) only. An assessment of new and revised policies and proposals introduced by the proposed modifications has been carried out and is described in the following two sections.

4 Policies

- 4.1 Section 12 of the Environmental Report outlines the assessment of the policies within the WDLP, including the May 2008 Proposed Pre-Inquiry Modifications. The policy assessment has been undertaken on the assumption that all policies, having been prepared to conform to the plan objectives, are consistent with the SEA objectives. The assessment identifies the likely impact that the policy will have on the environmental parameters established in the Directive. A number of additional assumptions are made in the assessment and these are listed at paragraph 12.5 of the Environmental Report.
- 4.2 An assessment of new and modified policies arising from the Proposed Modifications can be found at Appendix 2. Initially, the revised policies have been screened to determine whether the proposed modification significantly alters the likely environmental effect of the policy. As with the Environmental Report, where a policy relates specifically to a proposal the policy has not been assessed because the proposal assessment will provide detail of the likely form of that impact and reference should be made to section 13 of the Environmental Report and section 5 of this addendum.
- 4.3 The assessment carried out shows that the new policies which have not previously been assessed are not likely to have a negative effect on the environment and where the Proposed Modifications would alter an existing policy, the modification would not result in significantly different environmental effects.

5 **Proposals**

- 5.1 Section 13 of the Environmental Report assesses the likely positive and negative environmental impacts of 129 proposed development proposals contained in the WDLP Finalised Draft. The purpose of the proposal assessment is to identify local plan proposals (proposed development sites) which require detailed consideration through the SEA process and to omit from further assessment proposals that are unlikely to have a significant environmental effect.
- 5.2 All Schedules in the WDLP have been updated to reflect the position at 31st March 2009. The Schedules take account of: sites which have been completed or are under construction and are therefore no longer opportunities; new sites which have been granted planning permission or represent a Council commitment; and sites which have been included or amended as a result of negotiations with objectors and stakeholders.
- 5.3 Appendix 3 applies the assessment methodology used within the Environmental Report to consider new sites promoted through the Proposed Modifications and not previously assessed. Appendix 3a lists sites which are included with the Environmental Report but have been deleted through the Proposed Modifications. Proposals which have an extant planning permission have not been assessed.
- 5.4 Sixteen new development sites are introduced into the WDLP by the Proposed Modifications. Thirteen of these sites have planning permission and of the other three, all are assessed as Category A Sites. Paragraph 13.7 of the Environmental Report discusses these classifications further.

6. **Cumulative, Synergistic and Secondary Effects**

- 6.1 Annex I of the SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects. The Environmental Report has taken a map-based approach to the assessment of cumulative, synergistic and secondary effects by highlighting general areas where cumulative impacts may occur based on clusters of major proposed sites and environmental assets and constraints.
- 6.2 A review of the Proposals introduced by the Proposed Modifications – including those with planning permission – shows that the majority of the sites are relatively small and spatially dispersed. A number of sites, however, do fall within identified areas where cumulative impacts may occur, potentially increasing the likelihood of negative impacts on the environment. Within the Queen's Quay area, the Proposed Modifications identify additional residential development at Cable Depot Road West (H2 (9)), North Douglas Street (H2 (11)) and John Knox Street (H2 (14)) and the extension of the Riverside Industrial Estate – Clyde Gate (LE1 (2)) and Cable Depot Road (LE1 (10)). Additionally the expansion of the Kilmalid site (LE 5A) within the Strathleven Area is proposed. The environmental assets/constraints associated with each area are listed in Table 3 of the Environmental Report.

6.3 Mitigation measures have been identified for individual sites in Section 13 of the Environmental Report and Appendix 3 to address potential negative environmental effects of developing these sites. Within the areas identified in Section 13, it may be appropriate to take a more coordinated approach to mitigation in order to avoid negative cumulative effects.

7. Conclusion

7.1 The Proposed Modifications to the Finalised Draft West Dunbartonshire Local Plan are assessed as **not likely to have significantly different environmental effects**.

8. Next Steps

8.1 Consultation on this document will run alongside the consultation on the Proposed Modifications and will last for 6 weeks until 30th October 2008. In accordance with Article 8 of the SEA Directive, the Council has a duty to take account of any responses before adopting the local plan. Following adoption of the West Dunbartonshire Local Plan a Post Adoption SEA Statement will be prepared.

Appendix 1 - Consultation Authority Responses, June/July 2008

Historic Scotland

- Section 12.5: "application of the historic environment policies included within in the Plan" should be included within the list of assumptions. Will act to mitigate the potentially adverse effects of other policies and proposals in the plan.
- Unsure why a number of policies were assessed to have significant positive effects on the historic environment simply because they included criteria relating to avoiding adverse effects on the historic environment simply because they include criteria related to avoiding adverse effects on the historic environment. The remains the case and we do not agree with the following policy assessments: **T2, T5, E3A, E7, R6, R7, DC1, DC2, DC4, DC6 & DC7**. We consider that the effect of these policies on the historic environment would be more appropriately assessed as neutral.
- Filtering method used in the proposals assessment may not identify all the potential impacts on historic environmental features, in particular effects on the setting of scheduled monuments and listed buildings are unlikely to be captured.
- Although a number of our detailed comments on the proposals assessment are noted as having been accepted by the Council in Appendix 4, the table on pages 53-65 remains unchanged, including **H2(17-19)** and **GD(11)** and we would welcome clarification on this point.
- Alongside the mapping of potential cumulative effects it would be useful to include an assessment of the likely effect, and proposals for mitigation where appropriate.

SEPA

- It would have been useful if a description of what changes have been made to the report had been provided and where the ER has been revised.
- It should be noted that it is a requirement of Schedule 2(10) of the Regulations to provide a non-technical summary of the findings of the ER
- The Council may wish to consider the following additional PPS in the Environmental Report (Appendix 2): EU Floods Directive and the Water Environment Water Services (Scotland) Act 2003.
- As well as a summary of the environmental objectives and requirements of the PPS's the Environmental Report should outline the relationship between these PPS's and the Local Plan.
- Consider that there are some key facts missing from the environmental context outlined in chapter 5, including an outline of water quality, areas of fluvial or coastal flooding and air quality. SEPA supports the production of a detailed state of the environment report to be used as baseline data for future PPS's

- SEPA is surprised that no potential negative effects have been identified in the assessment of the plans objectives and policies. Some element of conflict would usually be expected between new development and the natural development.
- The SEA process includes the assessment of proposals using GIS assessment which is based on categorising proposals based on the proximity of sites to a number of environmental assets. However, this does not take into account all of the environmental issues covered by the SEA objectives. Using the SEA objectives would have given a more thorough assessment of the proposals.
- A number of the proposed sites are potentially at risk from flooding and this should be identified as a potential constraint. There may also be the need for a Strategic Flood Risk Assessment as a mitigation measure to inform Local Plan making in relation to specific site allocations and flood risk.
- Some of the sites proposed for development are on brownfield land and therefore may have contamination issues. Mitigation measures should refer to the need to carry out appropriate risk assessment and meditation.
- Table 3 and Appendix 8 identify areas where cumulative impacts may arise and list the environmental assets/constraints however there is no explanation of the potential impacts or how they could be mitigated.
- Monitoring programme and indicators set out in Appendix 10 does not include a number of the indicators listed in Appendix 6, for example flooding. The Council may wish to review the monitoring programme to include some of the indicators in Appendix 6.

SNH

- Appreciate that this is an update of the December 2005 Environmental Report of the SEA of the Finalised Draft Local Plan, focused entirely on the subsequent Proposed Pre-Inquiry Modifications to have been entirely acceptable.
- Given the progress that has been made, paragraph 8.3 stating “there are no examples of SEA in Scotland” needs to be updated. We believe that some best practice examples should now be available. Consideration of these might have suggested ways of enhancing the SEA process and the Report.
- Section 6: we remain concerned that the list of issues focuses on problems *in* the environment whereas SNH consider that threats *to* the environment would be an important addition, e.g. threat of urban expansion. The Council’s previous response stated that new development is either on brownfield sites or has been assessed through the Local Plan and SEA process. However, neither of these provisions prevents impacts on the natural heritage, such as the locally valuable habitats that have arisen on many brownfield sites. If the issue of urban expansion were raised here it could be explicitly related to the analysis of cumulative impacts in Section 13.
- Section 11: the analysis continues to over-simplify the alternatives that must have been considered in formulating the Topic Options with regard to natural heritage assets and their protection. Table of Topic Options (p22 -27) does not in any way record the choice in the degree of protection afforded to such sites. As a result there is little indication of the SEA process having informed development of the Plan at this level.
- Section 12: the analysis of impacts of each policy still appears to be compared simply to the absence of that Policy. This leaves no room for considering the relative strength of the actual policy wording. Welcome improvements have been made to policies that protect natural heritage, but in contrast the impacts identified in the table (p30-48) have barely changed since the December 2005 report. The analysis of impacts clearly lacked the flexibility to allow the iterative process that is supposed to characterise SEA and make it a worthwhile tool.
- For many policies SNH question the identification of impacts on biodiversity and landscape as positive. Stipulations such as ‘no detrimental effects’ on these resources, or ‘assess against impacts on’ these resources (**DC4, DC8, R6**) will not necessarily result in positive impacts. The Transport and Flooding policies lack even that caveat yet their impact is still identified as positive. We believe ‘positive’ mainly only applies to policies directly related to the environmental resources. ‘Neutral’ would be more appropriate for a considerable number of policies.
- Section 13: we reiterate that environmental assessment and/or surveys do not on their own constitute mitigation for impacts. (This is commonly highlighted in EIA, where even the most comprehensive mitigation proposals in an Environmental Statement lack any application until they are enshrined in a planning consent.) Such work could, potentially, highlight such significant impacts on natural heritage interests that a proposal could not be implemented as anticipated in the Plan. Therefore it is the application of environmental policies in the Plan that

should provide for mitigation (including if necessary modification to proposed development) and this should be noted in the assessment.

- Wildlife corridors should be listed at 15.5 as an environmental asset.
- SNH cannot be responsible for monitoring loss or natural features or landscape character. SNH may be able to advise on how the Council could implement such monitoring under the terms of SOA and as part of a commitment to the rolling SEA process.
- Appendix 8: we appreciate that the relevant policies and proposals are now listed for each mapped area of cumulative impact. However there is no accompanying analysis as required by the SEA Regulations. In order to help inform the Local Plan, the nature of such impacts should be discussed, leading to how they might be avoided or mitigated. Without this, the SEA is providing no strategic benefit in this regard.
- Appendix 9: Recognise that the list of measures is not intended to be all-embracing, however, 'noise mitigation measures' would be a common requirement for most build development and we recommend it is specified for many more of the proposals than shown.
- Assume that 'phasing development' is intended to incorporate avoidance of winter working, but we suggest this could be worded more explicitly.
- SNH agree that for the policies and proposals with likely significant effects, it should be possible to mitigate potential impacts in a way that results in no adverse effect on integrity from the various proposed developments. We accept the conclusion of no adverse effect on integrity of Inner Clyde SPA from implementation of the Local Plan.
- Ensuring precise use of the language derived from the Habitats Regulations is essential in helping developers understand the nature and gravity of protection for Natura Sites. We recommend the following amendments:
 - Para 6.1: replace "significant effects" with "adverse effects on integrity"
 - Para 8.1: reword the concluding sentence: "...indicate that the Plan could be implemented without adverse effects on the integrity of the Inner Clyde SPA (and Ramsar site)". The phrase 'detrimental impact' is potentially confusing.

Appendix 2 – Policy Assessment

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships	
NEW	Policy LE1B – Jamestown East	5.09	NEW POLICY: limits use of LE 1(10) site to expansion of adjacent sawmill.	See Environmental Report - Proposal Assessment (Reference 30)													
16	Policy LE5 - Specialised Economic Development Site: Kilmalid	5.15	Site LE5A(i) extended to 25 metres from the burn. Presumption against car sales deleted. 25m landscape buffer along western boundary required.	See Environmental Report - Proposal Assessment & Appendix 2 (Reference 40)													
21	Policy LE10 – Access and Design Quality of Industrial Estates and Business Sites	5.19	Lomond Gate added to list of specified industrial estates.	?	+	+	?	?	?	?	?	o	+	o	+	o	
				<p>NO CHANGE: Policy LE10 applies to <i>all</i> industrial estates in the Plan area, not just those specifically named. It is assessed that the modification would therefore not result in significantly different environmental effects.</p>													
42	E2A – International Nature Conservation Sites (Natura 2000)	9.03	Last sentence of policy deleted.	+	+	+	+	+	+	+	+	o	o	o	o	+	+
				<p>NO CHANGE: The deleted sentence was ambiguous and unnecessarily qualified the policy. It is assessed that modification would not result in significantly different environmental effects.</p>													
44	E3A – Local Nature Conservation Sites	9.04	Features important to local geodiversity identified as an environmental resource of the plan area. Additional sentence states regard must be had to available survey work when considering proposals for the development of sites which may have importance for nature conservation but are not identified by the Plan	+	o	+	+	+	+	+	+	o	o	o	o	+	+
				<p>NO CHANGE: The proposed modifications widen the environmental resources specifically defined by the Plan, potentially strengthening the positive effect the policy would have on Biodiversity, Flora and Fauna. Overall it is assessed that modification would not result in significantly different environmental effects.</p>													

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships
				NB: Unrelated to Proposed Modification Cultural Heritage changed + → o following representations by Historic Scotland.												
NEW	E3C – Protection and Enhancement of the Fisheries Resource of the River Leven	9.05	NEW POLICY: seeks to protect and enhance the River Leven fisheries.	+	o	o	+	+	+	+	+	+	o	o	o	+
				It is assessed that the implementation of this Policy is likely to have a positive impact on many of the environmental parameters and no negative impacts												
50	Policy E8 – Environmental Improvement Opportunities	9.12	“Low use residential development” added to Proposed Use for E8(2) site, Cochno Waterworks. Site Area extended to north.	See Environmental Report - Proposal Assessment & Appendix 2 (Reference 108)												
F57	Policy BE6A – Antonine Wall	9.15	Minor amendment to wording to reflect fact Antonine Wall has now been inscribed as a World Heritage Site.	NO CHANGE: The Proposed Modification does not alter the likely impact of the Policy.												
58	Policy BE6B – Antonine Wall Buffer Zone	9.15	Minor amendment to wording to reflect fact Antonine Wall has now been inscribed as a World Heritage Site.	NO CHANGE: The Proposed Modification does not alter the likely impact of the Policy.												
62	Policy R2 – Open Space Provision	10.03 – 10.07	New sentence: ‘The requirement for each different type of provision should be added together to provide the minimum provision’. A Children’s Equipped Play Area – or Toddlers Play Area where less than 50 dwellings) will be acceptable as an alternative to a financial contribution for all developments less than 400m from a Children’s Equipped Play Area or amenity open space capable of locating such an area.	+	+	+	+	+	?	?	?	?	+	o	+	o
				NO CHANGE: To Modification adds further detail and clarification to the policy without altering its likely impact. It is assessed that modification would not result in significantly different environmental effects.												

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships
67	Policy R4D – Forth and Clyde Canal	10.13	Second sentence of Policy deleted, which sought to discourage public access to the offside of the canal in public areas with a view to protecting natural habitats and promoting wildlife diversity.	?	+	+	?		o	+	o	o	+	+	+	+
				The likely impact of the policy on Biodiversity, Fauna and Flora is changed from positive (+) to unknown (?)												
74	Policy R5 – Access Opportunities	10.15	Policy reworded to omit reference to cycleways and bridleways. Council will additionally undertake to protect Core Paths.	+	+	+	o	o	o	o	o	o	+	+	+	+
				NO CHANGE: It is assessed that modification would not result in significantly different environmental effects.												
86	Policy DC6 – Renewable Energy	12.01	Proposal to be additionally assessed against impact on sport and recreation interests.	+	+	+	+	+	?		+	+	+	o	+	+
				NO CHANGE: The Proposed Modification may strengthen the positive effect the Policy would have on human health by safeguarding areas used for sport and recreation.												
				NB: Unrelated to Proposed Modification Cultural Heritage assessment changed + → o following representations by Historic Scotland. Landscape assessment changed + → o following representations by SNH.												

Environmental Report Ref:	WDLP Policy	Proposed Modification Reference	Summary of Modification	Biodiversity	Population	Human Health	Fauna	Flora	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape	Inter-relationships
88	Policy DC8 – Minerals	12.03	Proposal to be additionally assessed against impact on sport and recreation interests.	+	+	+	+	+	+	o	o	o	o	o	+	o
				<p>NO CHANGE: The Proposed Modification may strengthen the positive effect the Policy would have on human health by safeguarding areas used for sport and recreation.</p> <p>NB: Unrelated to Proposed Modification Cultural Heritage assessment changed + → o following representations by Historic Scotland. Landscape assessment changed + → o following representations by SNH.</p>												

Key for assessment:

Postive effect	+
Neutral/No effect	o
Negative effect	-
Unknown effect	?

Appendix 3 – Proposal Assessment

Environmental Report Ref:	Local Plan Site ID*	Site Location	Assessment Comment	Site Category	Environmental Assets/Constraints	Proposed Mitigation
NEW	GD2 (18)	Dumbarton, St Mary's Way/Risk Street/Church Court	NEW SITE	A	Archaeology – site is within a WoSAS consultation area.	Archaeology – Archaeological Survey
22	LE1 (2)	Clydebank, Clyde Gate	Extension of LE 1(2) site, Riverside Industrial Estate PLANNING PERMISSION			
22	LE1 (10)	Clydebank, Cable Depot Road	Extension of LE 1(2) site, Riverside Industrial Estate	A#	Nature Conservation – site extends into Inner Clyde SPA, RAMSAR and SSSI	Nature Conservation – Habitat and Species survey, Environmental Statement.
40	LE 5A	Kilmalid	Extension of LE5A(i) site to 25 metres from the burn	A	Nature Conservation – site is adjacent to Murroch Burn wildlife corridor	Nature Conservation – Habitat and Species survey/Environmental Statement
NEW	H1 (6)	Bonhill, Burn Street	NEW SITE PLANNING PERMISSION			
NEW	H1 (16)	Dumbarton, Valeview Terrace	NEW SITE PLANNING PERMISSION			
30	H1 (18)	Jamestown, Jamestown Industrial Estate	Part of site previously identified as Industrial and Business Class Opportunity Site – LE1 (10), Main Street	C	No constraints	N/A
NEW	H2 (9)	Clydebank, Cable Depot Road West	NEW SITE	A#	Nature Conservation – site extends into Inner Clyde SPA, RAMSAR and SSSI	Nature Conservation – Habitat and Species survey, Environmental Statement.
NEW	H2 (11)	Clydebank, North Douglas Street	NEW SITE PLANNING PERMISSION			

Environmental Report Ref:	Local Plan Site ID*	Site Location	Assessment Comment	Site Category	Environmental Assets/Constraints	Proposed Mitigation
NEW	H2 (12)	Clydebank, Graham Avenue	NEW SITE PLANNING PERMISSION			
NEW	H2 (13)	Clydebank, 834 Dumbarton Road/Scott Street	NEW SITE PLANNING PERMISSION			
NEW	H2 (14)	Clydebank, John Knox Street	NEW SITE PLANNING PERMISSION			
NEW	H2 (19)	Hardgate, Hardgate Hall	NEW SITE PLANNING PERMISSION			
NEW	H3 (6)	Bonhill, Golfhill Drive	NEW SITE PLANNING PERMISSION			
NEW	H3 (15)	Haldane, McInnis Street	NEW SITE PLANNING PERMISSION			
NEW	RET4 (5)	Lomond Galleries, Alexandria	NEW SITE PLANNING PERMISSION			
NEW	RET4 (6)	College Way/Risk Steet, Dumbarton	NEW SITE	A	Archaeology – site is within a WoSAS consultation area.	Archaeology – Archaeological Survey
108	E8 (2)	Cochno Waterworks	Site area increased to 1.2 ha - Proposed Uses now include low density residential development	C	No constraints	N/A
NEW	PS3 (9)	North Main Street, Alexandria	NEW SITE PLANNING PERMISSION			

Environmental Report Ref:	Local Plan Site ID*	Site Location	Assessment Comment	Site Category	Environmental Assets/Constraints	Proposed Mitigation
NEW	PS3 (10)	Boulevard Site, north of A82, Clydebank	NEW SITE PLANNING PERMISSION			
NEW	PS3 (11)	Lesser Boll of Meal Park, Alexandria	NEW SITE PLANNING PERMISSION			

* refers to revised Schedules

re-assigned following Consultation

Appendix 3a – Proposal Assessment: Deleted Sites

Environmental Report Ref	Local Plan Site ID*	Site Location	Site Category
7	GD 2 (7)	Old Kilpatrick, Erskine Ferry Road	A
48	H1 (8)	Dumbarton, Castlehill	C
58	H1 (18)	Renton, Leven Street	A
61	H1 (21)	Renton, 245-251 Main Street	C
62	H2 (1)	Bowling, Littlemill Distillery (N)	A
71	H2 (11)	Clydebank, Cochno Street	C
73	H2 (14)	Clydebank, Milton Mains Road	A
74	H2 (15)	Dalmuir, Whiteinch Demolition	A
88	H3 (6)	Dumbarton, Stoneyflatt Road	C
91	H3 (11)	Haldane, Shearer Quadrant	C
100	H4 (4)	Clydebank, Cart Street	A

Environmental Report Ref	Local Plan Site ID*	Site Location	Site Category
102	H4 (7)	Clydebank, French Street	A
109	E8 (3)	Clydebank, The Boulevard	C

* refers to Finalised Draft WDLP