

Cover Note

PART 1

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

Or

SEA Gateway
Scottish Executive
Area 1H (Bridge)
Victoria Quay
Edinburgh

PART 2

A post-adoption SEA statement is attached for the PPS entitled:

East Renfrewshire Council Local Development Plan 2

The Responsible Authority is:

East Renfrewshire Council

PART 3

Contact name

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Senior Strategy Officer

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Post adoption SEA statement for:

East Renfrewshire Council Local Development Plan 2

Adopted on:

31st March 2022

Responsible Authority:

East Renfrewshire Council

Introduction

This document (referred to here as the post –adoption SEA statement) has been prepared in accordance with the Environmental Assessment (Scotland) 2005 Act.

Availability of Documents

Website:

The Local Development Plan as adopted along with the Environmental Report and post-adoption SEA Statement are available on East Renfrewshire Councils website at:

East Renfrewshire Council Local Development Plan2

www.eastrenfrewshire.gov.uk/ldp2

Strategic Environmental Assessment Local Development Plan/Post Adoption Statement

www.eastrenfrewshire.gov.uk/sea

Office Address:

They may also be inspected free of charge at the Council offices of the Responsible Authority

Contact name, address and telephone number

Andrew Bennie (Senior Strategy Officer)

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and Council Headquarters, 211 Main Street Barrhead, G78 1SY 07918445335

Times at which the document may be inspected or a copy obtained

9am – 5pm, Monday to Friday (except public holidays)

Key Facts

Name of Responsible Authority

East Renfrewshire Council

Title of PPS

East Renfrewshire Local Development Plan 2 (LDP2)

Purpose of the PPS

The Local Development Plan 2 sets out the Council's detailed policies and proposals for the use, development, protection and improvement of land. It provides a framework for the promotion of development opportunities and a basis for Development Management.

What prompted the PPS (e.g. a legislative, regulatory or administrative provision)

Legislative and Regulatory provision

Subject (e.g. transport)

Land Use Planning

Period covered

2021 - 2031

Frequency of updates

5 Years

Area of PPS (e.g. geographical area)

East Renfrewshire Council Boundary

Summary of nature/content of PPS

The Local Development Plan 2 sets out the Council's policies to guide development in the area and provides proposals for specific sites.

Date adopted

31st March 2022

Contact name & job title. Address, email & telephone number

Andrew Bennie (Senior Strategy Officer)

East Renfrewshire Council
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Date 26 April 2022

Strategic Environmental Assessment Process

The Local Development Plan 2 (March 2022) prepared by East Renfrewshire Council has been subject to a process of Strategic Environmental Assessment (SEA) under the Environmental Assessment (Scotland) Act 2005.

The SEA process has included the following activities:

- A Scoping Report was submitted to the Consultation Authorities in April 2016.
- An Interim Environmental Report based on the Main Issues Report was submitted to the Consultation Authorities and for public consultation in October 2016.
- Taking into account the comments received from the consultation on the Main Issues Report an Environmental Report was prepared to consider the proposals set out in the Proposed Local Development Plan 2.
- In preparing the Environmental Report on the proposed Local Development Plan 2 the following information was considered:
 - The baseline data relating to the current state of the environment
 - Links between the Plan and other relevant strategies, policies, plans, programmes and environmental protection objectives
 - Existing environmental issues affecting the Plan
 - The plan's likely significant effects on the environment (positive and negative)
 - Measures envisaged for the prevention, reduction and offsetting of any significant adverse effects
 - Monitoring measures to ensure that any unforeseen environmental effects will be identified allowing appropriate remedial action to be taken.
- Both the Proposed Local Development Plan 2, and Environmental Report were subject to consultation which commenced in October 2019.
- A revised Environmental Report was prepared in March 2022 following the examination of the Local Development Plan 2 and associated documents. The revision includes the relevant modifications and amendments to the Local Development Plan proposed by the Reporters.
- Committing to monitoring the significant environmental effects of the implementation of the Local Development Plan 2. This will also identify any unforeseen adverse significant environmental effects and enable appropriate remedial action to be taken.

How environmental considerations have been integrated into the Local Development Plan 2 and how the Environmental Report has been taken into account

The protection and enhancement of the environment is a fundamental principle upon which the Local Development Plan 2 is founded and underpins the development strategy. Comments received to the consultation on the Main Issues Report and associated Interim Environmental Report have been taken into account in preparing a revised strategy and suite of policies for the plan.

To ensure the LDP2 has an environmental focus the following environmental matters have been addressed:

- Strengthening of LDP Objectives to provide more environmental focus;
- Increased emphasis on place making and design and creating sustainable places;
- Incorporation of Designing Streets principles throughout the LDP;
- Continued emphasis on the regeneration of brownfield sites and directing development to the urban areas;
- Directing new development to areas with good, sustainable transport links;
- Strengthening of approach towards sustainable transport with increased emphasis on promoting sustainable modes of travel and active travel;
- Continued emphasis on environmentally led masterplans and development briefs to be prepared for all new sites;
- Continued emphasis on the provision of strong defensible green belt boundaries and continued protection of the green belt and countryside;
- Strengthening of approach towards the environmental benefits of tourism;
- Continued promotion of new development in the town and neighbourhood centres;
- Strengthening of our approach to inclusive economic growth and the continued safeguarding of existing employment locations;
- Strengthening the approach towards improving the health and well-being of the population;
- Strengthening of approach towards the green network, green infrastructure and the provision and protection of open space;
- Introduction of new Policies on protecting air and soil quality and noise impacts;
- Continued protection and provision of community, education and sports facilities; and,
- Strengthening of approach towards renewable energy and energy efficiency with a move towards a net zero carbon economy.

Table 1

(Derived from Appendix 3 of the Environmental Report)

Environmental Considerations and findings from the Environmental Report	Integrated into PPS (YES/NO)	How integrated/taken into account or reason for not being taken into account	Relevant Local Development Plan policies that address the environmental considerations and findings
Impact of land use change.	Yes	Careful master planning to provide environmentally lead approach to development. Policies which bring green infrastructure to the forefront of the development process.	Strategic Policy 1 M1, M2, M2.1, M2.2, M3, M4 and M5. D1, D3, D4 and D5. *SG – Green Network and Environmental Management
Negate future negative impact on green belt by ensuring development provides defensible boundaries preventing further urban sprawl.	Yes	Careful master planning to ensure Strategic Development Sites provide defensible green belt boundaries. Control and limitation of further development in the green belt.	Strategic Policy 1 M1 D1, D3, D4 *SG – Rural Development Guidance *SG – Green Network and Environmental Management
Mitigate against environmental impacts such as flooding and fragmented green space by ensuring green infrastructure and green networks are incorporated at the outset of the design process.	Yes	Proposals requiring the need for a flood risk assessment. Policies addressing flooding and surface water drainage. Policies which bring green infrastructure/networks to the forefront of the development process.	Strategic Policy 1 & Strategic Policy 2 D1, D3, D4, D5, D6, D7, D17 and D20. E7SG1M1 *SG – Green Network and Environmental Management *SG – Development Contributions
Mitigate against the impact of development and protect the integrity of SSSIs, Local nature reserve, Local Biodiversity sites.	Yes	Natural features policy outlining a strong presumption against development that with negatively impact such sites.	D7 *SG – Green Network and Environmental Management

Ensure trees within tree preservation orders and areas of ancient woodland are not adversely impacted.	Yes	Natural features policy outlining a strong presumption against development that with negatively impact such sites.	D7 *SG – Green Network and Environmental Management
Prevent the fragmentation and/or degradation of core paths and path networks.	Yes	Policy concerning the protection of outdoor access.	D8 and D9 *SG – Green Network and Environmental Management
Ensure negative impacts of potential contamination issues are negated.	yes	Policy concerning, amongst other things, site decontamination and remediation.	E10
Ensure sites of archaeological interest are not negatively impacted through development.	Yes	Policy relating to the management and protection of the built heritage which seeks to safeguard sites of archaeological interest.	D14 D18
Increase in Householder and commercial waste resulting from increase in residential and commercial properties to be delivered through the implementation of the plan	Yes	Provision for re-use/recycling of residential and commercial waste to minimise the impact of increased volume of waste. Safeguard waste management facilities.	D1 E11

**The Council has commenced the review of the existing Supplementary Guidance, however, until the Supplementary Guidance for LDP2 have been adopted, the existing documents will be used as non-statutory guidance and continue to provide more detailed guidance on the planning policies contained in LDP2.*

How opinions expressed during consultation have been taken into account (including any consultation required with other EU member states)

How the opinions expressed in response to the invitation mentioned in section 16 of the 2005 Act have been taken into account:

Organisation	Issue	Concern/Comments	How addressed in SEA
Environmental Report			
SEPA	Assessment Matrix	Unclear in the matrix which of the rows relate to the site allocations and whether an assessment of all sites has been included.	An assessment of policies and proposals have been set out in the matrix. The Council agrees that this could have been clearer and will reflect this in future reports.
Nature Scot	Monitoring Strategy	It is considered that it would be useful to set out specific indicators relating to the SEA Objectives which could be displayed in simple table.	The Council notes these comments. Section 2.4 and Chapter 10 of the Environmental Report sets out the monitoring undertaken to support and inform the Environmental Report and the LDP. Monitoring data is also presented in the State of the Environment Report which informs the Environmental Report. The Council is of the opinion that this adequately covers monitoring requirements.
Nature Scot	Cumulative Impact of Development	It is considered that the information presented is unclear and should be provided in a way that is less ambiguous.	The assessment matrix requires proposals to be assessed against all environmental criteria and as part of this assessment process the potential cumulative impacts of developments will be taken into account.
Nature Scot	Strategy (General)	Specific monitoring measures using specified indicators should be introduced.	Refer to those comments made above in relation to “Monitoring Strategy”.
Nature Scot	Strategy 3.2 Lavern Link Road	Requires mitigation measures to be introduced in response to significant impacts to landscape objs. 9, 10 and 12.	Appropriate mitigation information has been added to the comments section of the matrix.
Nature Scot	Policy M2 Barrhead South	The terms of the Policy should be amended to include specific mitigation measures relating to biodiversity.	The matrix has been updated and the comments section now clearly identifies mitigation measures for the master plan area.
Nature Scot	Policy SG6.4 Dams to Darnley Aurs Road	No mitigation measures to offset the potential impact of the proposed development are identified the Policy.	The policy has been referenced incorrectly and should refer to Policy read SG6.3. The comments section has been updated to set out mitigation requirements.

Nature Scot	Policy SG6.8 Spiersbridge Business Park	The Policy should be amended to require specific mitigation measures against the identified impacts.	The Policy has been referenced incorrectly and should have read SG6.7. The matrix has been updated to reflect the required mitigation.
Nature Scot	Policy SG8 Digital Communications	The Policy should be amended to identify potential for landscape impacts and identify mitigation measures.	The matrix has been updated to include landscape mitigation measures.
Nature Scot	Policy SG9 Tourism & Economy	The symbols shown in the matrix require to be updated.	The matrix has been updated to reflect brownfield and landscape mitigation.
Nature Scot	Housing Schedule	The assessment of the LDP1 housing sites with mitigation measures should be shown.	The existing housing land supply was assessed as part of the Strategic Environmental Assessment (SEA) for LDP1. We have reviewed the sites which were subject to detailed assessment through LDP1 and considered them against the updated baseline data. We consider the SEA for LDP1 to still be relevant for Policy SG1.
Historic Environment Scotland	Housing Schedule	The assessment of Housing Impact from the LDP1 should be included.	The existing housing land supply was assessed as part of the Strategic Environmental Assessment (SEA) for the Adopted LDP1. We have reviewed the sites which were subject to detailed assessment through LDP1 and considered them against the updated baseline data. We consider the SEA for LDP1 to still be relevant for Policy SG1.
Historic Environment Scotland	Restoration materials.	Query “the use of unsustainable materials in the restoration of historic buildings. Note that the proposed mitigation for this is to encourage “sourcing of more sustainable alternatives and incorporate advice into Guidance”. Our recent report on the current provision, challenges and opportunities for Scotland’s Traditional Building Materials may be beneficial here.	The Environmental Report was referring to the use of energy efficient and sustainable materials whilst recognising that materials should be appropriate to the character and appearance of a listed building. This is/will be covered in more detail under Policy E1 and the future Low and Zero Carbon SG. The scoring reflects the environmental impact arising from non-locally sourced materials. The matrix now shows an updated score to reflect mitigation i.e. if materials were sourced locally.

How the results of any consultation under regulation 14 of the Environmental Assessment of Plans and Programmes Regulations 2004 have been taken into account.

Due to the relatively local scale and nature of the Local Development Plan 2, no trans-boundary consultations were undertaken or comments received under section 14 of the 2004 Regulations.

Reasons for choosing the Local Development Plan 2 as adopted in the light of other reasonable alternatives

Alternative proposals

The Main Issues Report assessed the environmental impact of 2 different options.

These options were identified in order to explore how and where future development could best be accommodated and to meet the housing requirements of SPP and the approved Strategic Development Plan ‘Clydeplan’ (2017). The key features of each option, areas of commonality and areas where different approaches were promoted are clearly shown in Table 2.

The 2 options were as follows:

- Option 2A – Consolidation, Regeneration and controlled edge of settlement growth
- Option 2B – Consolidation and Regeneration

Common to both options was the continued focus upon development in the urban area and delivery of the key Strategic Development Opportunities (SDOs), as per the current strategy of LDP1. Both options were also supportive of appropriate infill development in the rural settlements and allocating new sites for 100% affordable housing.

Option 2B did not promote any new development outside the current urban areas. However, Option 2A promoted limited expansion of settlements through the identification of a number of small-medium scale sites.

Table 2: Key Features of Development Strategies

Common Features for Option 2A – Consolidation, Regeneration and controlled edge of settlement growth and Option 2B – Consolidation and Regeneration
<p>Both Options will:</p> <ul style="list-style-type: none"> • Ensure efficient use of land and buildings that maximises the re-use of brownfield sites and regeneration priorities; • Retain a focus upon delivering the Strategic Development Opportunities (SDOs) at Maidenhill, Barrhead North and South and other allocations of LDP1; • Promote appropriate Infill development in all villages; • Contribute to the viability of the rural economy; • Allocate new sites for 100% affordable housing; • Encourage more new housing in our Town Centres, both new build and conversions of vacant units (Issue 5) – this would be optimised through Option 2A; • Promote limited new development to support appropriate small scale enhancements to existing sporting facilities (Issue 7.2); • Locate development close to the existing transport infrastructure, jobs and services and facilities; and • Sustain sustainable transport network and existing local services and facilities.

Option 2A – Consolidation, Regeneration and controlled edge of settlement growth	Option 2B – Consolidation and Regeneration
<p>In addition this option would:</p> <ul style="list-style-type: none"> • Direct new development to areas with good public transport links; • Broaden the range and choice of location for new housing in terms of size and location across the Authority; • Support small to medium scale sites. These sites require less upfront infrastructure and can be easier to integrate with existing settlement form; • Provide increased opportunities for delivering affordable and particular needs housing with a greater percentage of affordable housing on specific sites; • Provide further flexibility and generosity to the housing land supply and ensure LDP2 can accommodate any changes resulting from the SDP2 Examination; • Phased release of sites to ensure infrastructure is in place or will be provided; • Deliver further sustainable economic growth to the area; • Continue to safeguard existing employment sites with the exception of those sites specifically identified as proposed housing opportunities; and • Improve and enhance local services, community facilities and infrastructure, sustainable transport network, open spaces and maintain the viability of existing facilities. 	<p>In addition this option would:</p> <ul style="list-style-type: none"> • Retain existing Green Belt boundaries; • Prevent urban sprawl; • Protect character of existing settlements; and • Continue to safeguard all existing employment sites.

Summary of Options 2A and 2B

Both options would meet the housing requirements of the approved Strategic Development Plan ‘Clydeplan’ (2017). Option 2B would retain the existing green belt boundaries set out in LDP1 and would not promote any new development outside the current urban areas. While there are environmental merits for Option 2B it would not provide significant additional opportunities to increase affordable and particular needs housing delivery.

Option 2A was not a significant shift away from the strategic approach promoted in LDP1. The objectives of this approach remain sound with a focus upon delivering brownfield sites in the urban area and the key Strategic Development Opportunities (SDO). Option 2A also aimed to deliver a broader distribution and flexible supply of land for housing around all communities through the

promotion of a number of new small-medium scale sites, some of which would be released from the Green Belt. These sites were located in sustainable locations close to services and facilities and a variety of modes of transport including bus and/or train or provide potential opportunities for improvements in these areas and will support the Plans' wider agenda of creating healthy active communities. These sites were viewed as effective and deliverable in the short to medium term. Site delivery will be phased and monitored to ensure infrastructure is in place or will be provided through Development Contributions.

Option 2A would deliver increased numbers of affordable and particular needs housing in areas where supply is currently limited. Applying our 25% affordable housing policy to these new LDP2 sites and where sites are proposing a higher percentage of affordable, this could provide an additional 323 affordable homes.

However, it is recognised that there would be some landscape and visual impacts resulting from this option but these can be mitigated through good place making, design and landscaping. All sites released from the Green Belt would be required to provide a strong defensible Green Belt boundary. There would be some impact upon the local road network, although due to the spread of locations promoted in the MIR these should be manageable.

Preferred Option

The progressive plan led approach of Option 2A was initially selected by the Council as their preferred option for the Proposed LDP2 as it would deliver the most effective strategic approach for LDP2. This option would ensure a phased and managed approach to growth and development and would improve housing options for all sections of the community.

Meeting educational needs was raised in the MIR as a key issue for LDP2. In preparing the Proposed Plan further detailed research and analysis was undertaken to inform long term planning of educational infrastructure and understanding of requirements. The long term strategic analysis undertaken identified that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas; and that there was no viable solution to provide sufficient additional education places to accommodate the further housing releases as originally proposed in the LDP2 MIR. The existing schools would support LDP1 and approved windfall development however any additional housing would cause capacity problems within the school estate.

The Development Strategy included in the Proposed Plan reflected the results of this process and analysis resulting in a change of strategic approach than that recommended at MIR stage i.e. movement away from Option 2A. The strategic focus for the Proposed Plan was on regeneration and consolidation of the urban areas and the enhancement of existing places centred around 3 spatial objectives in line with Option 2B of the MIR. The Proposed Plan was focused on delivering sustainable and inclusive economic growth and a move towards a low carbon place and economy and seeks to direct all new development to the urban area, which is considered to be the most sustainable option. This approach was in line with the 'compact city' approach and vision set out in the Clydeplan.

Measures that are to be taken to monitor significant environmental effects of the implementation of the PPS

Regular monitoring takes place for all of the main Local Development Plan topics, including the following:

Action Programme – is reviewed and updated at least every 2 years.

Development and Change – Including monitoring development management decisions and their conformity to Local Development plan policies and the impact of development proposals on environmental resources (e.g. Green Belt, green spaces, Sites of Special Scientific Interest, Local Biodiversity Sites, important species and habitats identified in the Local Biodiversity Action Plan, archaeological remains, etc)

Vacant and derelict land (V&DL) – An annual survey is carried out of the numbers and locations of derelict land sites and the level of take up over the previous year. Information is also gathered about the preferred end use for each site and its condition. This information is sent to the Scottish Government for their national monitoring purposes

Housing land Supply Audit – Monitors the level of housing completions and updates the supply and programming of established and effective sites

Industrial Land Audit – Measures the availability and take up of industrial land by type and location

Economic trends – monitoring changes in employment, economic activity and performance trends through the SOA

Retail Monitoring – monitoring the performance, vitality and viability of the town and neighbourhood centres

Baseline Environmental Data – the baseline environmental data and associated state of the environmental report is updated annually in order to assist in the identification of environmental trends

It is intended that a series of monitoring analysis on a range of subjects covered in the Local Development Plan will be carried out regularly (mostly on an annual basis) within the monitoring statement. This will offer an indication as to the effectiveness of the Plan and the extent to which it is being appropriately implemented on the ground. This is especially important due to the fact that the true impact of many of the policies will be determined by how they are implemented through Development Management decisions. The results of monitoring will also be used to inform the review of the policies and proposals to be included in Local Development Plan 2.

Any issues that are raised through monitoring not adequately addressed in the Local Development Plan will be dealt with if necessary by alteration to it, or through the issuing of Supplementary Planning Guidance. Any future Supplementary Planning Guidance produced will be subject to the SEA process.

Conclusions

It is our view that the SEA has had a positive effect on the preparation of Local Development Plan 2. The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures.

The SEA process has resulted in new policies and the rewording/strengthening of policies within the Local Development Plan 2.