



INVERCLYDE LOCAL DEVELOPMENT PLAN
2014

STRATEGIC ENVIRONMENTAL ASSESSMENT - ENVIRONMENTAL REPORT

SUPPLEMENTARY GUIDANCE on RENEWABLE ENERGY

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NON TECHNICAL SUMMARY

This Environmental Report accompanies the Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy and forms the Strategic Environmental Assessment of the Supplementary Guidance. The Supplementary Guidance qualifies for assessment as it could have significant environmental effects as defined under the Environmental Assessment (Scotland) Act 2005. This Report has been prepared in accordance with that Act.

The preparation of a Local Development Plan is a statutory obligation for all Councils under The Planning etc. (Scotland) Act 2006, and it follows extensive stakeholder consultation. The need to prepare Supplementary Guidance was set out in the Local Development Plan and agreed with Scottish Ministers in order to reflect changes in national policy.

The scope and level of detail of information for inclusion in the Environmental Report was agreed with the Consultation Authorities. It was also agreed that the following environmental resources could be significantly affected by the implementation of the Local Development Plan 2014 – Supplementary Guidance on Renewable Energy and should be considered in the Environmental Report:

- Biodiversity, Flora & Fauna;
- Population and Human Health;
- Soil;
- Water Environment;
- Climatic Factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage;
- Landscape; and
- The inter-relationship between the above aspects.

The environmental information held by the Council and a constraints map of the Inverclyde area were used as the basis for the assessment.

The environmental assessment shows that, overall, the plan should have a neutral impact on the environment by protecting but not improving designated environmental resources and providing mitigation for any significant negative impacts. The main positive impacts are on:

- population and human health, particularly for those with respiratory problems, from greenhouse gas reductions as well as the protection of communities and individual dwellings in terms of residential amenity, noise and shadow flicker;
- climatic factors due to a reduction in greenhouse gas emissions and;
- material assets from enabling the provision of additional wind energy infrastructure, as well as the protection of public access routes, historic environmental resources, tourism and recreation, aviation and defence interests, telecommunications and broadcasting installations, the built heritage, road safety and service infrastructure.

The main negative impacts are on soil from compaction and sealing due to development and on the landscape, where the most significant impacts should be mitigated but minor impacts will still occur. Mitigation for these negative impacts have been identified and indicated through the assessment process.

Monitoring will be undertaken as part of the ongoing Local Development Plan process as well as by other Council Services as part of their statutory obligations and this will feed in to the Environmental Assessment monitoring, particularly where negative impacts have been identified. Where monitoring indicates that mitigation measures are not effective, or that there are unexpected negative impacts, this will be taken into account in deciding new proposals as part of the cumulative impact assessment process and the need for stronger mitigation measures will be considered in the development of the new Local Development Plan.

BACKGROUND

Introduction

1.1 This Environmental Report forms the Strategic Environmental Assessment of the Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy. It has been prepared in accordance with The Environmental Assessment (Scotland) Act 2005.

1.2 The Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy was prepared under The Planning etc. (Scotland) Act 2006 for the Inverclyde Council area by the Regeneration and Planning Service.

1.3 The Environmental Report is being published in conjunction with the Local Development Plan 2014 – Supplementary Guidance on Renewable Energy. Both documents have been deposited at the Inverclyde Council Customer Service Centre, Municipal Buildings, Greenock, all Inverclyde Council libraries and on the Council's website, www.inverclyde.gov.uk.

Requirement to Prepare Supplementary Guidance on Renewable Energy

1.4 Inverclyde Council adopted the first Local Development Plan on the 29th of August 2014. Supplementary guidance provides detailed material associated with policies in the Inverclyde Local Development Plan, thereby allowing the Plan to focus on the spatial strategy and the main policies and proposals. Supplementary guidance has a statutory basis and should be read in conjunction with the Plan.

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

1.6 The Supplementary Guidance has been prepared to allow for the assessment of a variety of types of renewable energy development proposals aiming for a balance between promoting renewable technologies and

meeting national guidance on other areas such as those relating to the natural environment. The Environmental Assessment will focus on the Spatial Framework for wind energy developments as the area identified through screening as potentially likely to have significant environmental effects. The Supplementary Guidance will cover the entire Authority area, see **Appendix A**.

Requirement to Undertake a Strategic Environmental Assessment

1.7 The Environmental Assessment (Scotland) Act 2005 applies to plans, programmes and strategies, which relate solely to the whole or any part of Scotland and which are subject to preparation or adoption, or both, by a responsible authority at national, regional or local level (para.4(1) of the Act). The Act requires such plans, programmes and strategies to be accompanied by an Environmental Report. The Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy qualifies under section 5(3) of the Act, because it is subject to preparation and adoption by a responsible authority, Inverclyde Council. The Plan is prepared for renewable energy and its implementation is likely to impact on all aspects of the environment except air.

1.8 This Environmental Report has been prepared in accordance with the Environmental Assessment (Scotland) Act 2005 and PAN 1/2010: Strategic Environmental Assessment of Development Plans. The SEA Act and PAN provide the context for this Environmental Report and the Strategic Environmental Assessment Tool Kit – version 1/2006 and the Strategic Environmental Assessment Guidance 2013, both produced by the Scottish Government, have provided guidance in the Report's preparation.

Stages in the Strategic Environmental Assessment

1.9 *Screening* of the Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy was undertaken under Section 9 of the Environmental Assessment (Scotland) Act 2005 in October 2014. Initially, the Council was of the view that the Supplementary Guidance was unlikely to have significant environmental effects. SNH agreed with this view, but SEPA and Historic Scotland felt that the introduction of the Spatial Framework for wind energy could potentially lead to significant effects. Based on these views, a Determination was made by the Council under Section 8(1) of the Act, that an Environmental Assessment was required and advertised in the local paper, the Greenock Telegraph on the 28th of November 2014. *Scoping* was then undertaken under Section 15(1) of the Act in December 2014.

1.10 The comments received from the Consultation Authorities through the Scoping consultation were taken into account in the preparation of the Environmental Report accompanying the Draft Supplementary Guidance, both of which were subject to *consultation* in February 2015. Following this, the Supplementary Guidance was reviewed in order to provide more information and clarity, but with no substantive change to the content of the Guidance, based on the comments received through the consultation and put to Committee for approval to adopt. The Committee decided the Supplementary Guidance should undergo another period of consultation, and this was carried out from the 5th of June to the 17th of July 2015. The changes made to the Supplementary Guidance had not led to any change to the Environmental Assessment, so the Environmental Report was published alongside the revised Supplementary Guidance for consultation, but was not re-submitted to the Consultation Authorities through the SEA Gateway. The responses received to both consultations have been taken into account in this Environmental Report, which accompanies the Adopted Supplementary Guidance on Renewable Energy.

The Environmental Report

1.11 The Environmental Report is divided into six chapters, with this introductory chapter setting out the statutory requirement for the Report, the stages undertaken in the Strategic Environmental Assessment process and the content of the remainder of the document.

1.12 Chapter 2 provides information on the Local Development Plan 2014 – Supplementary Guidance on Renewable Energy, including its purpose, relationship with other plans, programmes and strategies and the comparative timetable in its preparation and undertaking the Strategic Environmental Assessment.

1.13 Chapter 3 describes the current state of the environment in Inverclyde, the major issues and problems identified in the area and the likely state of the environment and public health without the implementation of the Local Development Plan 2014 –Supplementary Guidance on Renewable Energy.

1.14 Chapter 4 sets out the methodology used in the Strategic Environmental Assessment of the Local Development Plan 2014 –Supplementary Guidance on Renewable Energy and the preferred options and alternatives considered.

1.15 Chapter 5 summarises and concludes the environmental assessment of the Local Development Plan 2014 – Supplementary Guidance on Renewable Energy, as detailed in **Appendix F**, and the environmental mitigation, where required.

1.16 Chapter 6 sets out the next stages in the Strategic Environmental Assessment process.

1.17 Hereafter, the following acronyms are used in this report:

- ‘SEA’ for Strategic Environmental Assessment;
- ‘SEA Act’ for The Environmental Assessment (Scotland) Act 2005;
- ‘ER’ for Environmental Report;
- ‘CA’ for Consultation Authorities;
- ‘LDP’ for the Inverclyde Local Development Plan 2014;
- ‘Draft SG’ for Inverclyde Council Local Development Plan 2014 – Draft Supplementary Guidance on Renewable Energy; and
- ‘Planning Act’ for The Planning etc. (Scotland) Act 2006.

THE INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – DRAFT SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY

The Local Development Plan 2014 – Draft Supplementary Guidance on Renewable Energy

2.1 This SG has been prepared to allow for the assessment of a variety of types of renewable energy development proposals aiming for a balance between promoting renewable technologies and meeting national guidance on other areas such as those relating to the natural environment. The SG covers the entire Authority area, see [Appendix A](#), and supplements the LDP, adopted in August 2014.

2.2 The SG, to which this ER relates, is informed by the responses to the Screening Report, which was sent to the Consultation Authorities on the 14th of October 2014; the Scoping Report, which was sent to the Consultation Authorities on the 4 December 2014; and the ER that accompanied the Draft SG that was published for consultation, and sent to the Consultation Authorities, on the 31st of January 2015. A second consultation was carried out on the SG from 5 June to 27 July 2015 at the request of the Environment and Regeneration Committee to provide another opportunity for views to be submitted. Some changes were made to the SG based on the responses to the first consultation to clarify how the Spatial Framework would apply in Inverclyde. These changes did not alter the assessment of the SG, therefore the draft ER remained the same and was not re-submitted to the Consultation Authorities. No comments on the ER were received through this consultation.

2.3 The SG supplements the LDP and directs renewable energy development to the most appropriate locations. It provides a spatial framework upon which proposals for wind energy development will be determined. It provides guidance to developers and all other stakeholders, including members of the public, who have an interest in their local area, town and environment.

2.4 The SG is made up of a number of chapters. Chapter 1 is the introduction; Chapter 2 sets out the relevant policy, guidance and legislation the SG has regard to; Chapter 3 sets out the different types of renewable technology the SG applies to; Chapter 4 sets out the renewable energy infrastructure currently

in place in Inverclyde; and Chapter 5 is the conclusion. 2 figures show the Group 2 areas of significant protection and the Spatial Framework groups and a further 4 diagrams and an appendix illustrate the turbine size and landscape sensitivity, landscape character type, turbine size and sensitivity, wind energy applications granted in Inverclyde, other considerations and the Glasgow Airport Safeguarding Zone.

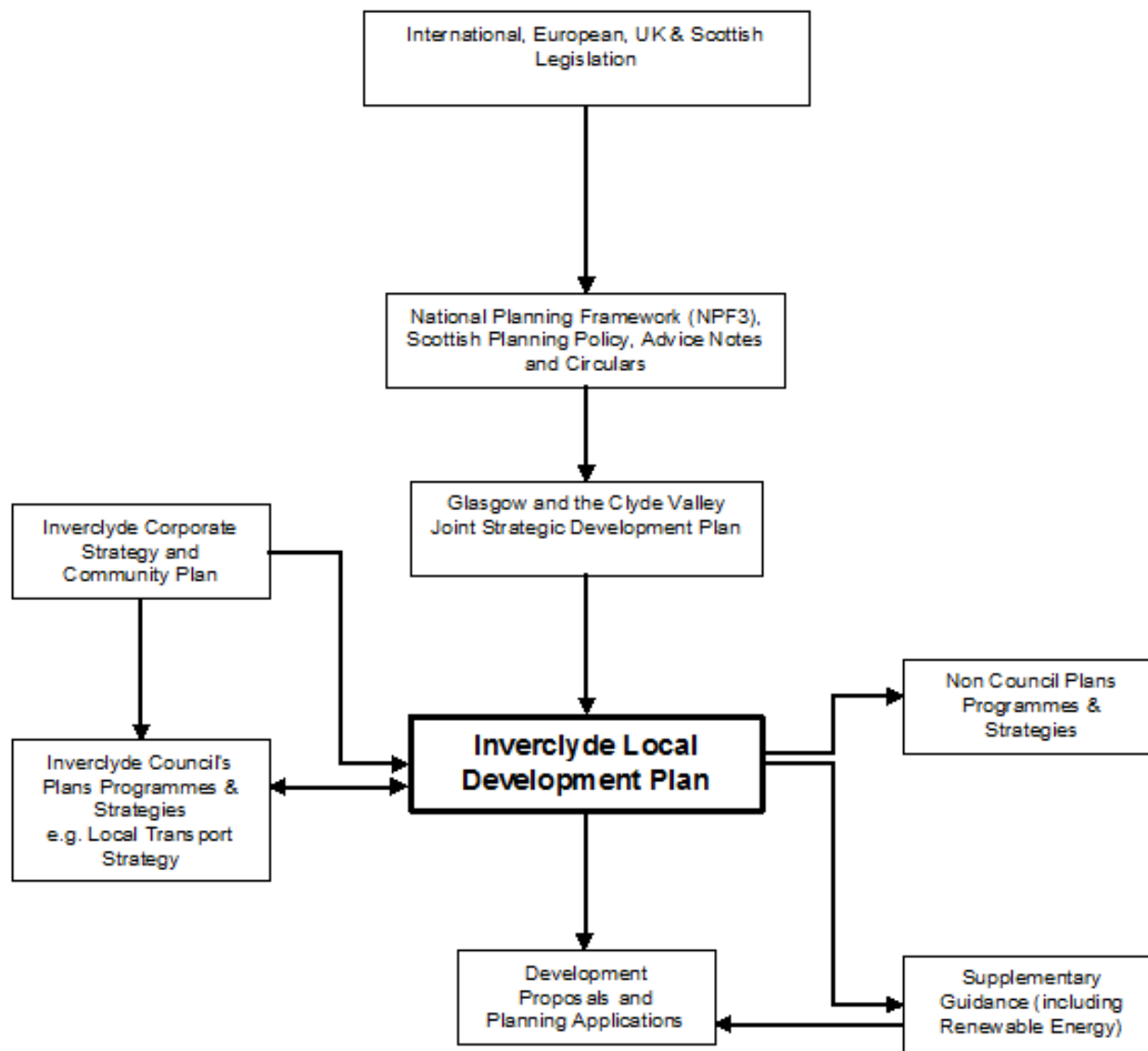
2.5 It should be noted that the SG should be read alongside the Inverclyde Local Development Plan 2014, particularly Policy INF1, as well as all other relevant policies, which would be considered together in the determination of any application for wind energy development.

The Hierarchy of Plans, Programmes and Strategies

2.6 The SG sits within a hierarchy of plans, programmes and strategies as shown in [Figure 1](#). This wide range of international, European, national and local plans, programmes and strategies that influence the SG and their environmental objectives require to be fully taken into account. Some of the objectives contained in higher levels of legislation have been transposed down to the UK and Scottish level and, where this is the case, the latter have been considered to be more pertinent to this locally-based Plan. The SG will, in turn, be a material consideration in development proposals and in the assessment of planning applications.

2.7 [Appendix B](#) lists the plans, programmes and strategies, which are relevant to the SG. These have been taken into account in the preparation of the SG, the scoping of environmental issues, the setting of environmental objectives in the SEA Scoping Report, and the analysis of the SG in the ER.

FIGURE 1: INTER-RELATIONSHIP OF LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY WITH OTHER PLANS, PROGRAMMES AND STRATEGIES



The Timetable for the Local Development Plan 2014 – Supplementary Guidance on Renewable Energy and Strategic Environmental Assessment

2.8 The SEA Act requires the environmental assessment process to be fully integrated with the preparation of the SG. The processes, wherever possible, were run in tandem. [Table 1](#) below timetables the SG and the SEA processes. The SEA process and findings, wherever possible, influenced the SG and vice versa.

TABLE 1: TIMETABLING FOR SUPPLEMENTARY GUIDANCE AND SEA		
	SG	SEA
October 2014	Development of Draft Supplementary Guidance	Screening of Draft Supplementary Guidance and publication of Determination.
December 2014		SEA Scoping Report for consultation with the Consultation Authorities.
January 2015		Consultation Authority's response to Scoping Report. Prepare Environmental Report and consult on requirement for Appropriate Assessment.
Jan/Feb 2015	Publication of Draft Supplementary Guidance and consult with the community for a period of 4 weeks	Publish the Environmental Report and consult with the community and the Consultation Authorities for 4 weeks.
March 2015	Prepare finalised Supplementary Guidance	Prepare relevant updates/supplements to the Environmental Report, as necessary. Prepare Appropriate Assessment if required.
April/May 2015	Submit to Committee for approval and thereafter to Scottish Government for approval to adopt.	
June 2015	Adopt Supplementary Guidance	Adopt Environmental Report (and Appropriate Assessment, if appropriate)
July 2014		Post Adoption Statement
	Monitor and Review	

3.0 STATE OF THE ENVIRONMENT

The Inverclyde Profile and Current State of the Environment

3.1 In order to assess the possible effects of the SG, a reliable picture of the current state of the environment was compiled. [Appendix C](#) lists the sources of that information and [Table 2](#) sets out a summary of the Environmental Baseline information for Inverclyde. A fully comprehensive and current record of information is retained by the Regeneration and Planning Service of Inverclyde Council. The SG has been assessed using this information and by referring to the environmental constraints map, [Appendix D](#), which illustrates the Council's natural environment and built heritage designations.

Existing Environmental Problems and Potential Problems

3.2 The environmental problems and potential problems in the Inverclyde area have been identified in [Table 2](#).

Strategic Environmental Assessment Objectives

3.3 The Environmental objectives for the ER (see [Appendix E](#)) were developed based on the objectives of the relevant Plans, Programmes and Strategies set out in [Appendix B](#), the environmental issues scoped in ([Appendix G](#)), the current state of the environment and the environmental and potential problems in the Inverclyde area as shown in [Table 2](#).

TABLE 2. THE ENVIRONMENTAL BASELINE AND PROBLEMS AND POTENTIAL PROBLEMS FROM THE IMPLEMENTATION OF THE DRAFT SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY

SEA ISSUES	BASELINE INFORMATION	INFORMATION SOURCE	PROBLEMS and POTENTIAL PROBLEMS
Biodiversity, Flora, Fauna	<p>2 Special Protection Areas/Ramsar Site; 7 Sites of Special Scientific Interest.</p> <p>Clyde Muirshiel Regional Park, (that part within Inverclyde); 2 Local Nature Reserves and 3 Gardens and Designed Landscapes.</p> <p>52 Sites of Importance for Nature Conservation.</p> <p>32 Tree Preservation Orders.</p> <p>Green Network of open spaces and watercourses.</p>	<p>Inverclyde Council</p> <p>Scottish Natural Heritage</p> <p>Scottish Environment Protection Agency</p>	<p>Potential damage to protected environmental designations from turbine and associated infrastructure development.</p> <p>Potential loss of green space and connections by development.</p> <p>Potential disturbance to species by development.</p> <p>Potential damage or destruction of habitats by development.</p> <p>Potential for waste due to tree felling to allow for development.</p>
Population & Human Health	<p>Inverclyde had a population of 81,500 in the 2011 census and an estimated population of 80,310 in 2013.</p> <p>82% of residents live in the main urban area of Greenock/Port Glasgow and Gourock. The landward area of Inverclyde, mainly comprising Clyde Muirshiel Regional Park, is sparsely populated.</p> <p>The proportion of residents living in neighbourhoods ranked among the 15% most deprived in Scotland is more than twice the national average.</p> <p>6,040 working age people claimed incapacity benefit and employment and support allowance in 2014 (11.7% of the working age population compared to 7.7% in Scotland).</p>	<p>Inverclyde Council</p> <p>General Register Office for Scotland</p> <p>Scottish Neighbourhood Statistics</p> <p>Scottish Government</p> <p>NOMIS</p>	<p>Potential impacts on amenity, through noise pollution and shadow flicker</p>

TABLE 2. THE ENVIRONMENTAL BASELINE AND PROBLEMS AND POTENTIAL PROBLEMS FROM THE IMPLEMENTATION OF THE DRAFT SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY

SEA ISSUES	BASELINE INFORMATION	INFORMATION SOURCE	PROBLEMS and POTENTIAL PROBLEMS
Soil	<p>Contaminated land is a major issue in Inverclyde due to its history of shipbuilding, manufacturing and industry.</p> <p>In 2014 there were 133 vacant and derelict sites covering 146ha. 50% of these had been unused for more than 10 years, and 45% more than 15 years.</p> <p>Substantial areas of peat within Inverclyde.</p>	Inverclyde Council	<p>Soil compaction arising from new development.</p> <p>Substances used in construction and redevelopment could potentially contaminate the soil.</p> <p>Potential disturbance and destruction of peat land during construction</p>
Water	<p>The River Clyde and Clyde Estuary border two sides of the Authority area. There are lochs, the Greenock Cut, rivers and smaller watercourses.</p> <p>Large areas of Inverclyde are identified as Potentially Vulnerable Areas and many areas are subject to flooding, including the main access route, the A78. Inverclyde has set in place a Flood Action Plan and work is commencing according to the priorities set out in that Plan.</p> <p>A system is being developed to improve the management of the five Council owned reservoirs that feed into the Greenock Cut canal system. This will better manage the peak flows in key watercourses running through Inverclyde.</p> <p>The classification of water bodies in Inverclyde by SEPA as part of the River Basin Management Planning process, shows that a number fall below good status, and identifies the pressures on these bodies, as well as those that achieve good status.</p>	<p>Inverclyde Council</p> <p>Scottish Environment Protection Agency</p> <p>Scottish Water</p>	<p>Potential pollution of water bodies, from new developments.</p> <p>Potential for development to disrupt groundwater flows and thereby damage Groundwater Dependent Terrestrial Ecosystems.</p>

TABLE 2. THE ENVIRONMENTAL BASELINE AND PROBLEMS AND POTENTIAL PROBLEMS FROM THE IMPLEMENTATION OF THE DRAFT SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY

SEA ISSUES	BASELINE INFORMATION	INFORMATION SOURCE	PROBLEMS and POTENTIAL PROBLEMS
Climatic Factors	<p>Air Quality Objectives for NO₂ have been exceeded in 1 location and monitoring is ongoing to determine if further measures are required to bring these back within limits.</p> <p>Renewable energy based companies have already relocated to the area. Inverclyde has been identified in the National Renewables Infrastructure Plan as a potential offshore renewables site.</p> <p>In 2007 Inverclyde Council became a signatory of 'Scotland's Climate Change Declaration'. Amongst the actions, the declaration commits signatories to producing a plan to reduce emissions from their operations and to ensure that emission reduction measures are included in the Council's plans and strategies.</p>	<p>Inverclyde Council</p> <p>Scottish Government</p> <p>Scottish Environment Protection Agency</p>	<p>Potential for development to increase renewable energy generation, reduce greenhouse gas emissions and mitigate climate change.</p>
Material Assets	<p>Public buildings, schools, libraries, community centres, sports centres, swimming pools, a museum and art gallery and Council leased properties and land.</p> <p>Major transport infrastructure including road, rail, bus, cycling and walking networks. Identified Core Paths.</p> <p>A wide range of parks, (including Gourrock Park, Battery Park, and Coronation Park) playing fields and facilities within the district.</p>	<p>Inverclyde Council</p>	<p>Potential damage to the green network by development.</p> <p>Potential damage and obstruction of the core paths network by development.</p>

TABLE 2. THE ENVIRONMENTAL BASELINE AND PROBLEMS AND POTENTIAL PROBLEMS FROM THE IMPLEMENTATION OF THE DRAFT SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY

SEA ISSUES	BASELINE INFORMATION	INFORMATION SOURCE	PROBLEMS and POTENTIAL PROBLEMS
	<p>Numerous grass and blaes football and rugby pitches and children's play areas located throughout the Authority area in parks and housing areas.</p> <p>The Green Network, including water bodies and courses.</p>		
<p>Cultural Heritage (Including Architectural and Archaeological Heritage)</p>	<p>33 Scheduled Monuments;</p> <p>244 listed buildings, 25 Cat A listed, 145 Cat B listed and 74 Cat C;</p> <p>5 Conservation Areas;</p> <p>3 proposed new Conservation Areas;</p> <p>3 Gardens and Designed Landscapes.</p>	<p>Inverclyde Council</p> <p>Historic Scotland</p>	<p>New development could potentially impact on historical buildings and remains and their setting.</p>
<p>Landscape</p>	<p>The main urban areas of Greenock, Gourock and Port Glasgow sit on a coastal strip on the southern banks of the River Clyde. Development is constrained by the steep inclining hills behind the towns. The villages of Inverkip and Wemyss Bay also sit on the coast. Kilmacolm and Quarriers Village are the only inland settlements.</p> <p>Only 18% of the land area (16,200ha) of Inverclyde is within the urban area. The remaining rural area is primarily within Clyde Muirshiel Regional Park.</p>	<p>Inverclyde Council</p>	<p>Potential for development to harm the setting of the settlements.</p> <p>Potential for development to harm landscape character.</p> <p>Potential for cumulative impact in areas where wind turbines already exist.</p>

The Environment Without the Local Development Plan 2014 – Supplementary Guidance on Renewable Energy

3.4 The aim of the SG is to achieve a balance between promoting a variety of renewable technologies and meeting national guidance on other areas such as those relating to the natural environment. Without the SG, development proposals for renewable technologies would be considered against the Policy INF1 of the Inverclyde Local Development Plan 2014, as well as any other relevant policies. INF1 sets out the Council's support for the generation of energy from renewable sources, unless any economic, environmental and social benefits of a proposal are outweighed by significant adverse effects upon a number of criteria, including natural heritage designations, the landscape, built heritage, biodiversity and the water environment and air quality, including cumulative effects. The policy does not include the Spatial Framework for wind energy, which SPP states Development Plans should include, to identify which areas are likely to be most appropriate for onshore wind farms as a guide for developers and communities. Without this framework, the application of the criteria in INF1 would be done on a case by case basis and could be applied differently by different officers and under different circumstances, potentially leading to negative environmental outcomes, particularly in terms of the cumulative impact of turbine development.

4.0 THE STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

Assessment Methodology

4.1 The methodology used in the assessment of the Draft SG has been formulated from:

- the guidance in the SEA Act. Schedule 3 of the Act sets out the information required in the Environmental Report;
- the advice in PAN 1/2010: Strategic Environmental Assessment of Development Plans;
- the Scottish Government's SEA Guidance published in 2013;
- the advice and example tables contained in the SEA Toolkit; and
- the SEA of the Inverclyde Local Development Plan 2014 and other Council plans, programmes and strategies that have been subject to SEA.

Alternatives

4.2 The SEA process requires that "reasonable alternatives" be considered. The SG introduces the Spatial Framework set out in SPP into the Inverclyde LDP, as described in the LDP para. 10.5 and agreed by Scottish Ministers. As LDPs require to accord with the broad principles identified in SPP, it would not be reasonable not to produce the SG. The environmental designations the SG seeks to protect have been set at a higher level by other bodies or were introduced through the LDP, which the SG must accord with, therefore there is no alternative but to take these into account as they are designated. This means there are no reasonable alternatives to the approach taken in the SG.

5.0 ENVIRONMENTAL ASSESSMENT OF THE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY

Areas of the SG Considered in this Environmental Report

5.1 The areas of the SG considered in the ER and environmentally assessed in [Appendix F](#), are outlined in [Table 3](#) below.

TABLE 3 AREAS OF DRAFT SG CONSIDERED	
Chapter	
1: Introduction	No matters require to be considered in the environmental assessment
2: Renewable Energy Technology	No matters require to be considered in the environmental assessment
3: Policy, Guidance and Legislation	No matters require to be considered in the environmental assessment
4: Renewable Energy in Inverclyde	<ul style="list-style-type: none"> • Table 2: Spatial Frameworks • Complementary Criteria • Policy/INF1: Renewable Energy Developments • Other considerations
5: Conclusion	No matters require to be considered in the environmental assessment

Assessment of the Local Development Plan 2014 – Draft Supplementary Guidance on Renewable Energy

5.2 The SG is environmentally assessed in [Appendix F](#).

5.3 The environmental assessment shows that, overall, the plan should have a neutral impact on the environment by protecting but not improving designated environmental resources and providing mitigation for any significant negative impacts. The main positive benefits are for population and human health, climatic factors and material assets. Health benefits arise from criteria controlling development in relation to its impact on communities and residential amenity through noise and shadow flicker, as well as secondary

impacts from reduced greenhouse gas emissions. Material assets are protected by criteria controlling impact on public access routes, historical environmental resources, tourism and recreation, aviation and defence interests and telecommunication and broadcasting installations as well as Policy INF1 which protects built heritage, road safety and service infrastructure from significant adverse effects. There are also positive benefits from enabling the provision of additional wind energy infrastructure. Climatic factors are improved through the reduction in greenhouse gases associated with renewable energy generation.

5.4 Negative impacts occur for soil due to increased compaction and sealing caused by development and to the landscape due to the intrusiveness of wind turbine developments which mitigation can lessen but not alleviate. Where negative impacts are anticipated, or potentially could occur, mitigation measures would be required to be put in place in order for the development to be considered to be in accordance with the Development Plan.

5.5 Cumulative impacts on the landscape could potentially arise where a number of wind turbines are developed in proximity to one another. The SG states that cumulative impacts must be taken into account, and that existing developments may mean that some areas are not appropriate for further development. The number and location of proposals for development, their size and whether they are implemented is monitored by the Planning Policy team quarterly and this information will be used, along with the other considerations shown in the SG, to determine whether cumulative impacts need to be taken into account.

5.6 There are not expected to be any adverse effects caused by the issues raised on neighbouring EU Member States.

Mitigation

5.7 The requirement for mitigation is suggested in the table in [Appendix F](#). Where negative impacts are anticipated, the requirement for mitigation measures should be investigated, and they should be agreed and put in place where necessary, by the developer before development commences. This will be administrated through the development management process in approving relevant planning applications.

6.0 NEXT STEPS

Habitats Regulation Appraisal of Plans

6.1 Inverclyde has two SPA sites, the Inner Clyde Estuary and Renfrewshire Heights (see constraints map, [Appendix D](#)). The Inner Clyde Estuary site is also identified as a Ramsar site. Guidance on the Habitats Regulation Appraisal of Plans advises that implications for the SPA/Ramsar site should be considered during the preparation of the LDP. Following screening in consultation with Scottish Natural Heritage it was decided that there might be significant impacts for both of the European sites within Inverclyde as well as the Black Cart SPA in Renfrewshire. A screening assessment was therefore undertaken and an Appropriate Assessment completed which resulted in the inclusion of an extra statement in the SG as simple mitigation of any likely significant effects.

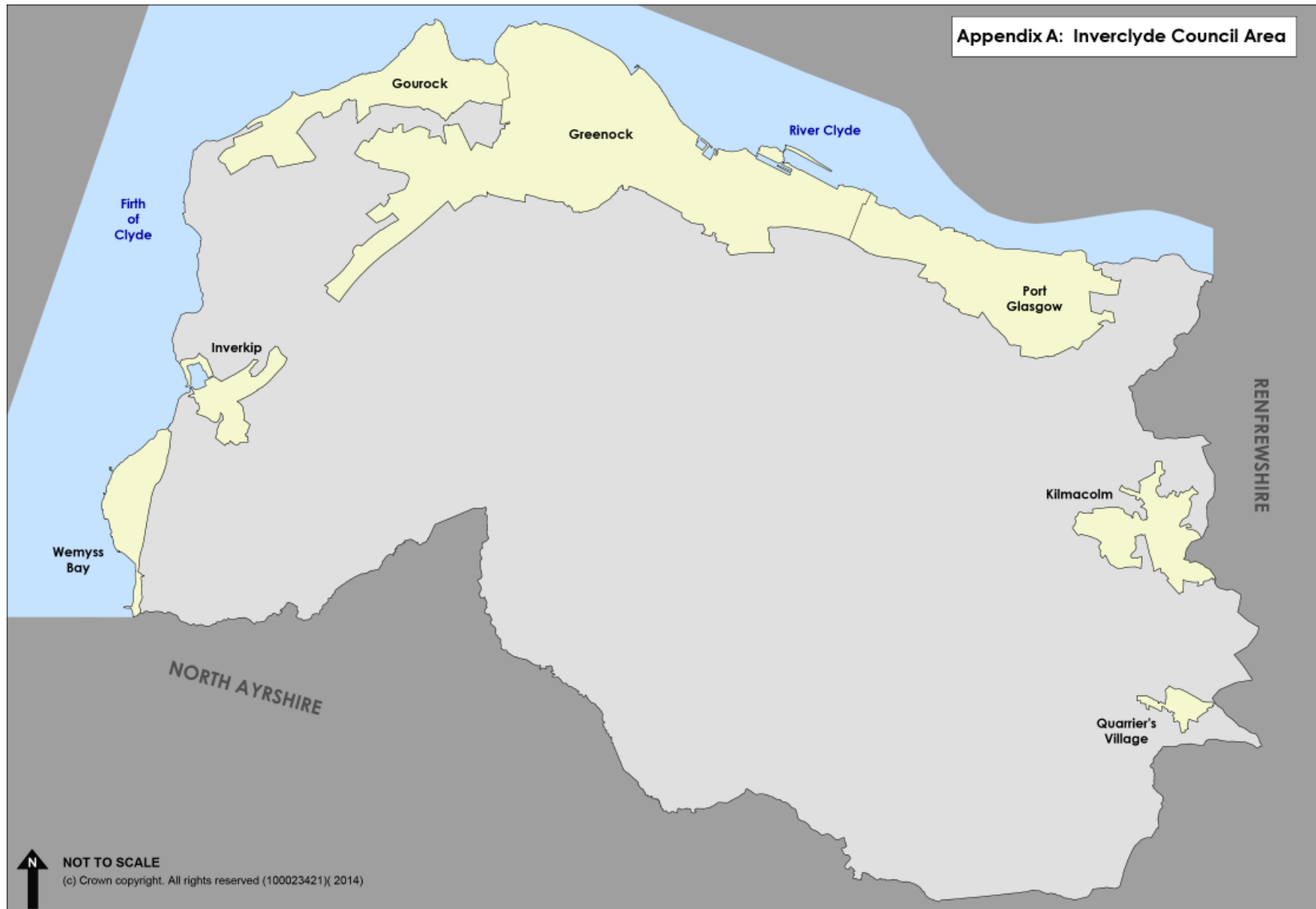
Monitoring

6.2 Regular monitoring is a crucial element in the implementation of all development plans. Together with national planning policy (SPP), it forms the justification for the development strategy, the policies and proposals contained within the LDP and this SG. LDPs and all associated SG require to be reviewed every five years, and the direction and substance of the policies contained within the Plan, and the SG, will be influenced by accurate and regular monitoring. It will also help to identify those policies and SG that require to be revisited.

Applications for wind turbines are monitored quarterly by the Council and this will assist with identifying cumulative impacts. **Table 3** below shows the indicators and data sources that will be used to monitor the impact of the Draft SG on each SEA objective. This, along with the Action Programme that accompanies the LDP, constitutes the monitoring regime that will be undertaken as part of the ongoing development plan process.

TABLE 4 MONITORING FRAMEWORK			
SEA Objective	Indicator	Data Source	Frequency of updating
Biodiversity, Flora and Fauna	Adverse impacts on National and/or International natural heritage designations	SNH http://gateway.snh.gov.uk/sitelink/	Annually
	Impact on local natural heritage designations Impact on the wider biodiversity, flora and fauna	Inverclyde Council 'Biodiversity Duty Report' (published December 2014)	Every 3 years.
Population and Human Health	Changes in population, household size and tenure	Glasgow and the Clyde Valley Housing Market Partnership 'Housing Need and Demand Assessment'.	Every 5 years
		Inverclyde Housing Land Supply Inverclyde Council 'Housing Land Survey'	Annually Annually
	Impact on Open Space Provision	Inverclyde Open Space Strategy (to be developed)	To be determined
Soil	Loss of deep peat and prime agricultural soils	GIS data on distribution of deep peat soils (James Hutton Institute)	Annually
		GIS data on distribution of prime agricultural land (James Hutton Institute)	Annually
	Remediation of contaminated land	Inverclyde Council - Contaminated Land Officer Inverclyde Council - Monitoring of planning applications for wind turbines and development in the greenbelt.	Annually

TABLE 4 MONITORING FRAMEWORK			
SEA Objective	Indicator	Data Source	Frequency of updating
Water Environment	Impact on the number of flood events	Inverclyde Council-Roads monitoring	Annually
	Impact on water quality Impact on morphology of watercourses	SEPA - Clyde Area Catchment Management Plan	Every 6 years
Climatic Factors	Number of Air Quality Management Areas	Inverclyde Council – 'Local Air Quality Monitoring Progress Reports'	Annually
	Increase in Greenhouse Gas Emissions	Inverclyde Council – 'Carbon Management Plan' Department of Energy and Climate Change 'UK Greenhouse Gas Emissions Statistics'	Annually Annually
Material Assets	Impact on Council assets	Inverclyde Council – Property Monitoring	Annually
Cultural Heritage	Impact of new development on Listed Buildings, Conservation Areas, Gardens and Designed Landscapes and Archaeological sites	Inverclyde Council - Monitoring of planning applications related to listed buildings, Conservation Areas, Gardens and Designed Landscapes and Archaeological sites.	Annually
Landscape	Impact of development on the Green Belt/Countryside	Glasgow and Clyde Valley Strategic Development Plan – Monitoring of Green Belt/Countryside	Every 5 years



STRATEGIC ENVIRONMENTAL ASSESSMENT - ENVIRONMENTAL REPORT

APPENDIX B: Plans, Programmes and Strategies used in the Preparation of the Inverclyde Local Development Plan 2014 – Supplementary Guidance on Renewable Energy

PLANS, PROGRAMMES AND STRATEGIES USED IN THE PREPARATION OF THE INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY	
NAME OF PLANS, PROGRAMMES AND STRATEGIES	KEY ENVIRONMENTAL OBJECTIVES
European Level	
Directive 2009/147/EC on the conservation of wild birds (2009)	The conservation of all species of naturally occurring birds in the wild state and their nests, eggs and habitats. Establishes Special Protection Areas.
Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (1992) (as amended 2007)	The conservation of natural habitats and wild fauna and flora of community interest, which should be maintained at, or restored to, favourable conservation status. Economic, social and cultural requirements and regional and local characteristics should be taken into account. Establishes Special Areas of Conservation.
Renewed EU Sustainable Development Strategy (2006)	Environmental protection, social equity and cohesion, economic prosperity and meeting international obligations.
European Landscape Convention (2000)	Promotes landscape protection, management and planning.
Water Framework Directive (2000) as amended	The protection of water with an aim to achieve good status for all waters by 2015.

PLANS, PROGRAMMES AND STRATEGIES USED IN THE PREPARATION OF THE INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY	
NAME OF PLANS, PROGRAMMES AND STRATEGIES	KEY ENVIRONMENTAL OBJECTIVES
National Level	
National Planning Framework 3 (2014)	Reducing carbon emissions and adapting to climate change Protecting and enhancing our natural and cultural assets.
Scottish Planning Policy (2014)	Create well designed, sustainable places Reduce carbon emissions and adapt to climate change Protect and enhance natural and cultural assets.
Nature Conservation (Scotland) Act (2004)	The conservation of biodiversity. Sets out the duties and offences relating to SSSIs and other sites of interest and how they are to be implemented and monitored.
Scottish Biodiversity Strategy (2004) including 2020 Challenge for Scotland's Biodiversity (2013)	The conservation and enhancement of biodiversity in Scotland.
Wildlife and Countryside Act (1981)	The protection of wildlife (birds, and some animals and plants), the countryside, National Parks, and the designation of protected areas, and public rights of way.
Wildlife and Natural Environment (Scotland) Act 2011	Amends the Wildlife and Countryside Act (1981) to ensure legislation which regulates and manages the natural environment is fit for purpose.

PLANS, PROGRAMMES AND STRATEGIES USED IN THE PREPARATION OF THE INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY	
NAME OF PLANS, PROGRAMMES AND STRATEGIES	KEY ENVIRONMENTAL OBJECTIVES
Climate Change (Scotland) Act (2009)	The reduction of greenhouse gas emissions. The mitigation of and adaptation to climate change
The UK Climate Change Programme (2006)	To deliver the UK's Kyoto Protocol target and reduce carbon dioxide emissions.
Scottish Historic Environment Policy (2011)	Identify the many aspects of our historic environment and protect and manage them in a sustainable way.
Ancient Monuments and Archaeological Areas Act (1979)	The protection of scheduled ancient monuments and areas of archaeological importance.
The Government's Economic Strategy (2011)	Provide leadership to support the transformation to a low carbon economy.
The Scottish Soil Framework (2009)	The sustainable management and protection of soils.
SEPA Regulatory Position Statement – Developments on Peat (2010)	Minimise peat excavation and disturbance to prevent unnecessary production of waste soils and peat.
The river basin management plan for the Scotland river basin district 2009-2015	To improve waters currently under pressure and protect those already in good condition, taking into account the effects of climate change and changing demands for water.

PLANS, PROGRAMMES AND STRATEGIES USED IN THE PREPARATION OF THE INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY	
NAME OF PLANS, PROGRAMMES AND STRATEGIES	KEY ENVIRONMENTAL OBJECTIVES
Water Environment and Water Services (Scotland) Act (2003)	The protection of the water environment.
Regional Level	
Improving the quality of Scotland's water environment: Clyde Area Management Plan 2010-2015	<p>Supplements the RBMP for the Scotland River Basin District.</p> <p>To protect and improve the water environment in the Clyde area.</p> <p>Maintain at good status those water bodies that already meet that criteria and to secure continuous improvement in the ecological status of those that are currently at less than good status.</p>
Glasgow and the Clyde Valley Strategic Development Plan (2012)	<p>Meet climate change emissions targets</p> <p>Found energy on low carbon sources and systems</p>
<p>Clyde Muirshiel Park Authority Framework Guidance Document</p> <p>for windfarm development proposals affecting</p> <p>Clyde Muirshiel Regional Park (2010)</p>	To consider the impacts of windfarm developments on the Regional Park's attributes and assets as well as the Park Authority's aims and objectives.
Clyde Muirshiel Park Authority Park Strategy 2008-2011 (2007) Extended to 2012	<p>To contribute to, safeguard and enhance biodiversity in the Park</p> <p>To conserve and enhance the built heritage of the Park</p> <p>To conserve and enhance the landscape character of the Park</p>

PLANS, PROGRAMMES AND STRATEGIES USED IN THE PREPARATION OF THE INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY	
NAME OF PLANS, PROGRAMMES AND STRATEGIES	KEY ENVIRONMENTAL OBJECTIVES
Local Level	
Inverclyde Corporate Statement 2013-17	Protecting our Environment
Inverclyde Local Development Plan (2014)	<p>Reduce carbon emissions and energy use</p> <p>Achieve the right development in the right place</p> <p>Place Making and the creation of quality environments</p> <p>Safeguarding and enhancing the Green Network</p> <p>Enhancement of biodiversity and protecting habitats</p> <p>Making the most of natural and environmental assets and exploiting the potential of the built heritage</p>
Lower Clyde River Valley Project Nature Conservation Strategy (1995)	<ul style="list-style-type: none"> ● Promote the protection of important nature conservation sites and rare species of wildlife. ● Highlight the importance of wildlife corridors ● Integration of nature conservation with other planning interests. ● Promote and encourage habitat management and habitat creation.
Local Biodiversity Action Plan (2004)	<ul style="list-style-type: none"> ● To promote improvement of the environment on a local scale ● To guide development and nature conservation ● To raise awareness of the plight of certain species and habitats that are particularly important and what can be done to improve the situation
Inverclyde Biodiversity Report 2011-2014	Reports on the actions taken to meet the Council's biodiversity duty.

PLANS, PROGRAMMES AND STRATEGIES USED IN THE PREPARATION OF THE INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY	
NAME OF PLANS, PROGRAMMES AND STRATEGIES	KEY ENVIRONMENTAL OBJECTIVES
Inverclyde Council Core Paths Plan (2009)	Aims to create a path network that meets people's needs, which they can understand, follow easily and use with confidence and which safeguards the essential operation and economic interests of land managers.
Inverclyde Green Network Study (2008)	Raise the quality of the Green Network
Area Renewal and the Inverclyde Green Network (2010)	Create strategic legible green links through the urban area between the waterfront and the regional part, making them accessible for both residents and visitors.

APPENDIX C: Environmental Baseline Data Sources

BASELINE ENVIRONMENTAL DATA	SOURCE OF INFORMATION
Lochs, rivers and watercourses and their Quality	Inverclyde Council / SEPA
Special Protection Areas/Ramsar	Inverclyde Council/SNH
Tree Preservation Orders	Inverclyde Council
Flooding Information	Inverclyde Council / SEPA
Special Areas of Conservation	Inverclyde Council/SNH
Sites of Special Scientific Interest	Inverclyde Council/SNH
Regional Park	Inverclyde Council/Clyde Muirshiel Regional Park
Green belt and Green belt corridor	Inverclyde Council
Local Nature Reserve	Inverclyde Council
Sites of Importance for Nature Conservation	Inverclyde Council
Historic Gardens and Designed Landscapes	Inverclyde Council/Historic Scotland
Corridors of wildlife/landscape importance	Inverclyde Council
Woodlands and Areas of Ancient or Semi-Natural Woodland	Inverclyde Council/SNH
Public and amenity open space	Inverclyde Council
Footpaths and Rights of Way	Inverclyde Council
Listed Buildings	Inverclyde Council/Historic Scotland
Scheduled Monuments	Inverclyde Council/Historic Scotland

BASELINE ENVIRONMENTAL DATA	SOURCE OF INFORMATION
Conservation Areas	Inverclyde Council
Archaeological sites	Inverclyde Council
Local Biodiversity Action Plan	Inverclyde Council/SNH
Inverclyde Biodiversity Report 2011-2014	Inverclyde Council
Water Quality	Inverclyde Council/SEPA/Scottish Water
Landscape Capacity Assessment for Wind Energy in the Clydeplan Area	Clydeplan SDPA
Glasgow and the Clyde Valley Landscape Character Assessment	SNH
Vacant and Derelict Land	Inverclyde Council / Scottish Executive.
Contaminated Land	Inverclyde Council

Appendix E: SEA Objectives and Questions for Assessment

SEA ISSUES	OBJECTIVES FOR SEA	Will Supplementary Guidance on Renewable Energy?
Biodiversity, Flora, Fauna	<p>Avoid adverse impacts on protected habitats and species</p> <p>Conserve and enhance biodiversity</p> <p>Maintain and/or enhance green networks, including connectivity and function.</p> <p>Minimise waste from tree felling.</p>	<p>Protect, provide and improve habitats to enhance biodiversity?</p> <p>Affect the conservation objectives of any International, European, National or Locally designated site?</p> <p>Affect populations of any protected species, their habitats and resting places or roosts? (Protected species include Otters, Bats, Red Squirrels, water Vole, Badgers and species in the Local Biodiversity Action Plan for East Renfrewshire, Renfrewshire and Inverclyde)</p> <p>Result in or provide opportunity for enhancement and expansion of the green network?</p> <p>Avoid habitat fragmentation and/or enhance habitat connectivity?</p> <p>Protect and enhance areas of existing trees, woodland and hedges?</p> <p>Seek to promote watercourses as valuable wildlife habitats?</p> <p>Lead to the production of waste from tree felling?</p>
Population & Human Health	<p>Promote economic growth, social inclusion and environmental improvement</p> <p>Avoid adverse impacts on health, safety and quality of life</p> <p>Improve the health and living environment of people and communities</p>	<p>Provide sufficient housing and employment land/opportunities to support identified population needs?</p> <p>Provide a range of house types and sizes to support identified population needs?</p> <p>Support an aging population by providing appropriate type and location of housing, facilities and public transport?</p> <p>Deliver affordable housing?</p> <p>Impact on residential amenity?</p> <p>Impact on health issues?</p> <p>Improve existing and provide new open space and sporting facilities and/or access to them?</p>

SEA ISSUES	OBJECTIVES FOR SEA	Will Supplementary Guidance on Renewable Energy?
Soil	<p>Avoid adverse impacts on soil quantity and quality</p> <p>Avoid adverse impacts on valuable soils, e.g. prime agricultural land, and carbon rich soils etc.</p> <p>Reduce vacant, derelict and contaminated land.</p> <p>Avoid the excavation or disturbance of peat and minimise waste.</p>	<p>Cause soil sealing and compaction?</p> <p>Result in the release of substances during construction, cleaning or redevelopment that could potentially contaminate the soil?</p> <p>Remediate existing contaminated land?</p> <p>Increase the amount of waste produced and sent to landfill?</p> <p>Lead to the excavation or disturbance of peat?</p> <p>Create waste associated with peat excavation?</p>
Water	<p>Avoid adverse impacts on and, where possible, improve the ecological status of water bodies.</p> <p>Avoid and reduce flood risk.</p> <p>Avoid disruption of groundwater flows that will affect GWDTEs.</p>	<p>Result in the release of water-borne pollution into watercourses, groundwaters or reservoirs?</p> <p>Require or promote connection to the public sewerage system?</p> <p>Maintain water abstraction within current licensed levels (i.e. CAR)?</p> <p>Increase the amount of development at risk of flooding?</p> <p>Increase or decrease flood risk in local and/or wider areas?</p> <p>Increase the amount of surface water run-off into water bodies?</p> <p>Increase development that negatively impacts on the morphology of water bodies?</p> <p>Significantly damage GWDTEs through changes to groundwater flows?</p>
Climatic Factors	<p>Avoid increasing greenhouse gas emissions</p> <p>Support actions which contribute to the reduction of greenhouse emissions</p> <p>Support adaptation to climate change and 'future proofing' of new development.</p>	<p>Promote sustainable and active travel, reducing congestion and traffic pollution by promoting alternative to cars through walking, cycling and the location of facilities?</p> <p>Significantly increase energy consumption?</p> <p>Promote the use of renewable energy and the efficient use of energy and water?</p> <p>Result in the development of peat rich soils?</p> <p>Increase the area at risk from flooding, or result in increased flooding in other areas?</p>

SEA ISSUES	OBJECTIVES FOR SEA	Will Supplementary Guidance on Renewable Energy?
Material Assets	<p>Avoid adverse impacts on existing infrastructure and/or provide suitable new infrastructure.</p> <p>Promote good quality services.</p> <p>Protect and enhance outdoor access opportunities and access rights</p>	<p>Provide adequate community facilities etc. to meet the needs of people in Inverclyde?</p> <p>Protect existing and, where appropriate, provide necessary infrastructure, including transport, energy, education, health, water, waste management, sports, business, flood prevention and regeneration programmes?</p> <p>Promote the provision of safe pedestrian access links?</p> <p>Provide improved access to natural and built assets?</p> <p>Remove or sever any core path or right of way?</p>
Cultural Heritage (Including Architectural and Archaeological Heritage)	<p>Avoid adverse impacts on the protected and wider historic environment and its setting</p> <p>Enhance, where appropriate, the historic environment</p>	<p>Conserve and, where appropriate, enhance listed buildings, scheduled ancient monuments, archaeological sites, Conservation Areas and Gardens and Designed Landscapes?</p> <p>Conserve and, where appropriate, enhance the wider historic environment?</p> <p>Impact on the setting of historic assets?</p>
Landscape	<p>Maintain and support landscape character, settings and local distinctiveness.</p>	<p>Reduce valued public open space and green space in Inverclyde?</p> <p>Detract from or harm the landscape setting of settlements?</p> <p>Impact on landscape or geological features?</p> <p>Degrade the estuarine setting of Inverclyde?</p>

SEA Topic	Objectives	Score	Comments	Mitigation (where required)
Biodiversity, Flora and Fauna	<p>Avoid adverse impacts on protected habitats and species.</p> <p>Conserve and enhance biodiversity.</p> <p>Maintain and/or enhance green networks, including connectivity and function.</p> <p>Minimise waste from tree felling.</p>	0	<p>Directs wind energy development away from protected habitats and species. The Spatial Framework states that any development would have to demonstrate that any significant effects on the qualities of Natura 2000, Ramsar or Sites of Special Scientific Interest can be substantially overcome. Policy INF1 states that international and national designations should not be compromised unless there are no alternative solutions and there are reasons of overriding public interest.</p> <p>No likely significant impact on green networks.</p> <p>Wind energy development is likely to take the form of single or small groups of turbines and is therefore unlikely to lead to large scale tree felling. The majority of Inverclyde is composed of rugged moorland hills, which are not generally afforested. Any waste that was generated from tree-felling would be subject to SEPA's guidance on the Management of Forestry Waste.</p>	
Population and Human Health	<p>Promote economic growth, social inclusion and environmental improvement.</p> <p>Avoid adverse impacts on health, safety and quality of life.</p> <p>Improve the health and living environment of people and communities.</p>	+	<p>One of the criteria that complement the Spatial Framework is the control of impacts on communities and individual dwellings, including residential amenity, i.e. noise and shadow flicker. There are also secondary positive impacts on health from reduced greenhouse gas emission from renewable energy generation which will particularly benefit people with respiratory problems.</p>	

SEA Topic	Objectives	Score	Comments	Mitigation (where required)
Soil	<p>Avoid adverse impacts on soil quantity and quality.</p> <p>Avoid adverse impacts on valuable soils, e.g. prime agricultural land, and carbon rich soils etc.</p> <p>Reduce vacant, derelict and contaminated land.</p> <p>Avoid the excavation or disturbance of peat and minimise waste.</p>	-	<p>Negative impact on soil quality from increased compaction and sealing during wind energy development.</p> <p>The Spatial Framework requires development on areas of carbon rich soils, deep peat and priority peatland habitat to demonstrate that any significant effects can be substantially overcome and the complementary criteria include impacts on carbon rich soils.</p>	<p>All of the areas of peat in Inverclyde are found in the Green Belt or Countryside. Policy ENV2 states that development in the Green Belt will only be considered favourably in exceptional or mitigating circumstances, while development in the Countryside will only be considered favourably where it can be supported with reference to a number of criteria, including not adversely impacting on peat land with a high value as a carbon store.</p> <p>Any development that resulted in the disturbance or excavation of peat would be subject to SEPA's guidance on Developments on Peatland and their Regulatory Position Statement on Developments on Peat.</p>
Water	<p>Avoid adverse impacts on and, where possible, improve the ecological status of water bodies.</p> <p>Avoid and reduce flood risk.</p> <p>Avoid disruption of groundwater flows that will affect Groundwater Dependent Terrestrial Ecosystems.</p>	0	<p>There are unlikely to be any significant positive or negative impacts on the water environment. One of the criteria that complement the Spatial Framework is the effects on hydrology, the water environment and flood risk. Policy INF1 also does not support development required for the generation of renewable energy where there are significant adverse effects upon biodiversity and the water environment.</p>	

SEA Topic	Objectives	Score	Comments	Mitigation (where required)
Climatic Factors	<p>Avoid increasing greenhouse gas emissions</p> <p>Support actions which contribute to the reduction of greenhouse emissions</p> <p>Support adaptation to climate change and 'future proofing' of new development.</p>	+	The Draft SG supports the development of renewable energy generation, which will contribute to the reduction of greenhouse gas emissions.	
Material Assets	<p>Avoid adverse impacts on existing infrastructure and/or provide suitable new infrastructure.</p> <p>Promote good quality services.</p> <p>Protect and enhance outdoor access opportunities and access rights.</p>	+	The criteria that complement the Spatial Framework include the impact on public access routes, historic environmental resources, tourism and recreation, aviation and defence interests, and telecommunication and broadcasting installations, while Policy INF1 contains criteria protecting the built heritage and road safety and service infrastructure from significant adverse effects. The main positive impact comes from enabling the provision of additional wind energy infrastructure.	
Cultural Heritage	<p>Avoid adverse impacts on the protected and wider historic environment and its setting.</p> <p>Enhance, where appropriate, the historic environment.</p>	0	There are unlikely to be any significant positive or negative impacts on cultural heritage. The Spatial Framework directs development away from the most sensitive locations, while the complementary criteria include assessment of impacts on the historic environment, including scheduled monuments, listed buildings and their setting.	

SEA Topic	Objectives	Score	Comments	Mitigation (where required)
Landscape	Maintain and support landscape character, settings and local distinctiveness.	-	Although the criteria that complements the Spatial Framework includes landscape and visual impacts, the other conditions highlighted includes the Landscape Capacity Study undertaken for the GCV area as illustrated in diagram 2, and Policy INF1 includes criteria for the landscape and wider environment which will reduce the impact of wind energy developments, particularly on the most sensitive areas of landscape there will always be direct, and at times cumulative, impacts where wind turbines are erected.	Policy ENV1 protects strategic and local natural heritage designations that would fall within Group 3 in the Spatial Framework. Policy ENV2 protects the Green Belt and Countryside more generally. In the case of the Green Belt, development will only be considered favourably in exceptional or mitigating circumstances, whereas development in the Countryside will be considered against a range of criteria, including the impact on landscape character and visual amenity.

Appendix G: Scoping of Environmental Issues

SCOPING OF SEA ISSUES			
SEA ISSUES	SCOPED IN	SCOPED OUT	IF SCOPED OUT WHY
Biodiversity, Flora, Fauna	IN		
Population & Human Health	IN		
Soil	IN		
Water	IN		
Air		OUT	Identified air quality issues in Inverclyde are restricted to the A8 and are related to traffic, which this SG is unlikely to impact upon. There may be air pollutions issues during construction / decommissioning, but these will be controlled by relevant legislation and will not be significant.
Climatic Factors	IN		
Material Assets	IN		
Cultural Heritage (Including Architectural and Archaeological Heritage)	IN		
Landscape	IN		
Inter-relationship	IN		

STRATEGIC ENVIRONMENTAL ASSESSMENT - ENVIRONMENTAL REPORT

Appendix H: Comments from Consultation Authorities on the Scoping Report and Council's Response

MAIN COMMENTS AND RECOMMENDATIONS MADE BY THE CONSULTATIVE AUTHORITIES TO INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY SCOPING REPORT		
	CONSULTATIVE AUTHORITIES' COMMENTS AND RECOMMENDATIONS	COUNCIL RESPONSE
CA	Comment/ Recommendation	
SEPA		
1	May also wish to consider including: SEPA's Regulatory position statement – development on peat; Guidance on the assessment of peat volumes, reuse and excavated peat and the minimisation of waste; and SEPA guidance on the Management of Forestry Waste to the PPS listed I Appendix B.	Noted.
2	May wish to consider: issues around the reuse of extracted surplus peat; waste arising from tree felling; and the potential risk to Groundwater Dependant Terrestrial Ecosystems from development.	These issues will be considered in the environmental assessment of the SG.
3	There may be alternatives to the strategies, policies and proposals within the guidance. Any reasonable alternatives identified should be assessed as part of the SEA process and the findings inform the choice of the preferred option. This should be documented in the ER.	Any alternatives identified will be assessed as part of the environmental assessment of the SG and this will be recorded in the ER.
4	Satisfied with the proposal to scope air out of the assessment.	Noted.
5	Content with proposed detailed assessment matrix and welcome use of a commentary box to fully explain rationale behind assessment results.	Noted.
6	Welcome inclusion of questions set out in table 3, such an approach is usually very helpful. May wish to add questions related to the issues outlined above.	Noted, the objectives and related questions will be amended to include the issues around peat and waste from tree felling identified.
7	Where the mitigation proposed does not relate to modifications to the Plan itself, it should be clear how the mitigation will be achieved and by whom. This should follow the mitigation hierarchy. It would be	It is not considered necessary to expand on each mitigation measure for the following reasons: <ul style="list-style-type: none"> The majority of measures identified in Appendix F relate to other LDP policies, which are detailed in the Plan and implemented by the

MAIN COMMENTS AND RECOMMENDATIONS MADE BY THE CONSULTATIVE AUTHORITIES TO INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY SCOPING REPORT		
	CONSULTATIVE AUTHORITIES' COMMENTS AND RECOMMENDATIONS	COUNCIL RESPONSE
CA	Comment/ Recommendation	
	extremely helpful to set out mitigation measures in a way that clearly identified (1) the measures required (2) when they would be required and (3) who will be required to implement them.	<p>Regeneration and Planning Service at the development management (DM) stage.</p> <ul style="list-style-type: none"> SEPA's Guidance Note on the management of tree waste will also be applied by the R&P service at the DM stage, in consultation with SEPA.
8	Monitoring is a requirement of the Act and the approach to be taken should be given early consideration, particularly in the choice of indicators. It would be helpful if the ER included a description of the measures envisaged to monitor the significant environmental effects of the plan.	A description of the monitoring approach and the indicators that will be used to measure the environmental effects of the plan will be included in the ER.
9	Satisfied with proposed 4 week consultation period for the ER.	Noted.
SNH		
1	Scoping report appears comprehensive, the level of detail proposed is good and the significant issues appear to have been identified. Subject to comments below are content with the scope and level of detail proposed for the ER.	Noted
2	SEA objectives appear satisfactory. One additional suggestion for the landscape objectives is to 'Avoid adverse impacts on areas of wild land'. The related question could be 'Will Supplementary Guidance on Renewable Energy "protect areas of wild land"?'	There are no areas of wild land within Inverclyde. It is therefore considered unnecessary to include this as an objective within the assessment process.
3	Content with proposed 4 week consultation period for the ER.	Noted.

MAIN COMMENTS AND RECOMMENDATIONS MADE BY THE CONSULTATIVE AUTHORITIES TO INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY SCOPING REPORT		
	CONSULTATIVE AUTHORITIES' COMMENTS AND RECOMMENDATIONS	COUNCIL RESPONSE
CA	Comment/ Recommendation	
4	Note you are already considering whether there may be a 'likely significant effect' on the Natura Site and that an Appropriate Assessment may be required. Please let us know if you need help with this.	Noted.
5	<p>Suggest additional baseline data sources relevant to this SEA.</p> <ul style="list-style-type: none"> • Hope to launch a consultation on a map identifying areas of carbon rich soils, deep peat and priority peatland habitat. Useful information can also be found on the Soils Scotland website. • The Landscape Capacity Assessment for Wind Energy in Clydeplan Area (Land Use Consultants 2014). • Landscape Character: Glasgow and Clyde Valley Landscape Character Assessment (SNH 1999) 	These additional sources will be added to the baseline information used to assess the Supplementary Guidance in the ER.
HS		
1	Scoping report provides a clear description of the approach to the assessment and content with the scope and level proposed for the SEA. Note and welcome the inclusion of the historic environment.	Noted.
2	Content with the proposed 4 week consultation period for the ER.	Noted.
3	Note the historic environment has been scoped in to the assessment, content to agree with this.	Noted.
4	Welcome the inclusion of the SEA objectives and related questions. Suggest the question relating to the setting of the historic environmental assets should refer	The question relating to the setting of historic environmental assets will be changed accordingly in the ER.

MAIN COMMENTS AND RECOMMENDATIONS MADE BY THE CONSULTATIVE AUTHORITIES TO INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY SCOPING REPORT		
	CONSULTATIVE AUTHORITIES' COMMENTS AND RECOMMENDATIONS	COUNCIL RESPONSE
CA	Comment/ Recommendation	
	solely to the "setting of the historic environment" as opposed to the "landscape setting" as setting in this context does not equate wholly to landscape considerations and can be influenced by many other factors. Further information can be found in our Managing Change Guidance note on Setting.	
5	Confirms there are no Inventory Historic Battlefields currently within Inverclyde.	Noted.

Appendix I: Comments from Consultation Authorities on the Environmental Report for the Draft Supplementary Guidance on Renewable Energy and Council's Response

MAIN COMMENTS AND RECOMMENDATIONS MADE BY THE CONSULTATIVE AUTHORITIES TO INVERCLYDE LOCAL DEVELOPMENT PLAN 2014 – DRAFT SUPPLEMENTARY GUIDANCE ON RENEWABLE ENERGY ENVIRONMENTAL REPORT		
	CONSULTATIVE AUTHORITIES' COMMENTS AND RECOMMENDATIONS	COUNCIL RESPONSE
SEPA		
1	Satisfied that an adequate assessment of the SG has been carried out and would agree with the overall findings.	Noted.
2	Welcome the inclusion of appendix H summarising the comments on the scoping report and how they have been considered.	Noted.
3	Note that the ER has taken into account the issues raised in our scoping consultation response.	Noted.
4	Appendix F clearly outlines any potential impacts and mitigation required.	Noted.
5	Request our Guidance on Assessing the impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems (GWDTE) is followed to avoid potential impacts to GWDTE.	Where no negative impacts were anticipated no mitigation measures were identified, but the Guidance has been included in the table in Appendix F to be used as an assessment tool where any impacts may occur.
SNH		
1	Broadly, the environmental issues/concerns and key trends have been correctly identified, the assessment of likely significant effects on the environment have been carried out satisfactorily and the measure that could prevent, reduce or offset any significant adverse effects on the environment when implementing the Supplementary Guidance have been clearly identified.	Noted.
HS		
1	Welcome that our comments at the scoping stage have been taken into account.	Noted.
2	Welcome the concise nature of the assessment, however consider the ER would have benefitted from being more explicit regarding the specific assessment methodology utilised in Section 4. Assume the SEA objectives and assessment questions in Appendix E were used to test the spatial framework and criteria of the guidance.	Noted. Correct that the SEA objectives and questions were used to test the spatial framework and criteria. Section 4 has been updated to clarify this.
3	In the absence of a single spatial framework map in the guidance depicting Group 3 areas, also assume the assessment has been carried out on a principle basis.	A single spatial framework map has now been included in the SG. Figure 1 shows the Group 2 areas within Inverclyde (there are no Group 1 areas) as set out on page 8 of the SG. As development may occur in Group 2 or Group 3 areas, the assessment was done on an in principle basis assuming proposals could come forward in either area, but would only be acceptable where they met the criteria in both the SG and the LDP (and where appropriate, the SDP).
4	Understand we consider the guidance is unlikely to have a significant environmental effect on the historic environment. However, as the criteria aim to mitigate the effect of the spatial framework in relation to such assets as scheduled monuments and listed buildings we consider that for the purposes of the report the guidance should be scored as having a negative effect. This only becomes a residual neutral effect upon appropriate application of the spatial framework and its accompanying mitigating criteria (in conjunction with the application of development plan policies for the historic environment).	It was decided to use a consistent approach to assessing the areas of the environment scoped in. Where there are mitigating measures within the criteria in the SG it was assessed as neutral, but where the mitigating criteria are in other LDP policies, it was assessed as negative and the LDP policies are identified as the required mitigation measures. We have added to the commentary on the assessment of cultural heritage setting this out and recognising that there is potential for negative impacts on listed buildings and scheduled monuments due to their inclusion in Group 3, which is identified in the Spatial Framework as areas where development is more likely to be acceptable.

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