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1 July 2008

By email: sea.gateway@scotland.gsi.gov.uk

Dear Catherine

**Environmental Assessment (Scotland) Act 2005
Renfrewshire Draft Core Paths Plan – Scoping Consultation**

I refer to your Scoping consultation submitted under the above Act in respect of the Renfrewshire Draft Core Paths Plan. This was received by SEPA via the Scottish Government SEA Gateway on 30 May 2008. As required under Section 15(2) of the Act, SEPA has considered the document submitted and comments as follows in respect of the scope and level of detail to be included in the Environmental Report (ER).

As you are aware SEPA was of the opinion that, in a SEA context, the Plan is unlikely to have significant environmental effects in respect of SEPA's areas of competence. While SEPA is of the opinion that significant environmental effects are unlikely, comments have been provided below on the proposed assessment with a view to making the assessment as useful as possible.

The Scottish SEA Toolkit (available for download at: www.scotland.gov.uk/Publications/2006/09/13104943/0) provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA stage. SEPA has used the toolkit to inform this scoping response which is attached as Annex 1.

On completion, the Environmental Report and the plan to which it relates should be submitted to the Scottish Government SEA Gateway (sea.gateway@scotland.gsi.gov.uk) which will forward it to the Consultation Authorities.

If you wish to discuss any of the content of this response, please do not hesitate to contact me on 01355 574 302 or via SEPA's SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely



Lorna Maclean
Senior Planning Officer (SEA)

Encs

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Annex 1: Comments on the Scoping Report

The scoping report is well set out and SEPA is satisfied with the proposed scope and level of detail proposed for the SEA. The list of plans, programmes and strategies in appendix B appear comprehensive. The Council may however also wish to consider whether the following SEPA policies, available on our website, are relevant to the strategy: Groundwater Protection Policy for Scotland (Policy 19) and Policy on the Culverting of Watercourses (Policy 26) and SEPA's position statement on the culverting of watercourses.

Baseline data

Flooding is identified as a problem in lower lying areas however the baseline environmental data does not refer to flooding.

A useful baseline source which the Council might want to use to inform assessment and monitoring of the plan is; SEPA's 2nd generation Indicative River and Coastal Flood Map (Scotland) which provides an indication of the 1 in 200 year (0.5 % annual probability) return period flood extent for both riverine and coastal flooding. The Flood Map has been produced following a consistent, nationally applied methodology for catchment areas equal to or greater than 3 km² using a Digital Terrain Model (DTM) to define river cross-sections and low lying coastal land. The Flood Map is designed to be used as a national strategic assessment of flood risk to support planning policy in Scotland and is available on SEPA's website <http://www.sepa.org.uk/flooding/mapping/index.htm>. SEPA's website page on flooding also includes guidance on planning and flooding of particular interest is section 3 which looks at sources and types of information that are likely to inform a Strategic Flood Risk Assessment, http://www.sepa.org.uk/pdf/flooding/planning_flooding.pdf .

With regards to water quality it should be noted that SEPA is in the process of working on a new waterbody classification system which should be available later this year. In line with the requirements of the Water Framework Directive the results reported will reflect the overall water environment rather than a more limited quality approach and should therefore provide a better source of information for the SEA process in the future.

Alternatives

SEPA notes that there are no reasonable alternatives to the Plan. SEPA is satisfied with the approach proposed whereby alternatives within the Plan, e.g. alternative alignments for any individual paths, will be considered. However, it should be noted that the environmental assessment should be carried out on all aspects of the Plan that are likely to result in significant environmental impacts such as the Plan's objectives, principles, policies, proposals and alternatives.

Assessment Methodology and mitigation

SEPA is satisfied with the proposed assessment methodology. With regard to mitigation SEPA would expect the Environmental Report to include full details of mitigation measures. SEPA considers that mitigation measures are a crucial part of SEA in that they offer an opportunity to not

only address potential adverse effects of a plan, but also to make a plan even more positive than it already may be. These should follow the mitigation hierarchy: avoid, reduce, remedy or compensate for negative effects, and enhance where appropriate for positive effects. It would be extremely helpful to set out all 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.

Consultation Period

SEPA is satisfied with the proposed consultation period of 8 weeks.