



Scottish Natural Heritage

All of nature for all of Scotland

Stuart McMillan
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Planning and Transport Services
Renfrewshire Council
Renfrewshire House
Cotton Street
Paisley
PA1 1LL

SG ref: SEA00587

Your ref:

03 May 2011

Dear Mr McMillan,

**THE ENVIRONMENTAL ASSESSMENT (SEA) OF PLANS &
PROGRAMMES (SCOTLAND) REGULATIONS 2004
SEA SCOPING REPORT – RENFREWSHIRE LOCAL DEVELOPMENT PLAN (LDP)**

Thank you for distributing the above document for formal comment via the Scottish Government SEA Gateway. In accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, I have reviewed the report on behalf of Scottish Natural Heritage (SNH) in its role as a Consultation Authority under the above Act.

As we discussed at the useful meeting on 9th March in terms of the SEA, I can confirm SNH to be broadly content with the scope of assessment being proposed for the LDP and believe there is a good logical approach being taken which should draw out the key issues. However I would offer the following comment.

Alternatives

SNH is, in general, hopeful that the new Local Development Planning process will involve an innovative use of SEAs leading to policies and proposals that meet the development needs of the area in a way that is genuinely as environmentally sustainable as possible. It is proposed that the SEA will assess the relative environmental impacts of alternatives put forward in the MIR. This needs to be done only at a level of detail that will allow comparisons to be made at a strategic level, and we would suggest that - where possible - generic maps are used, as well as analysis, to illustrate the various alternatives being considered.

Methodology for the SEA

The proposed range of “SEA issues” against which each set of strategy, policy and proposal alternatives are to be considered, seems broadly appropriate. However these issues reflect the complex situation that the planning authority must consider as it develops its LDP and it should be noted that there can be a significant degree of overlap between them. We would hope that the SEA could be used to draw out these linkages - not only to avoid negative

impacts, but also to ensure that the LDP takes advantage of the many opportunities for positive 'synergies' and other environmental benefits that such linkages could give rise to.

Appendix 1 Plan's, Programmes and Strategies to be used to inform the Local Development Plan

We have looked at the list of plans, programmes and strategies in Appendix 1 and would suggest that in terms of Regional Level Guidance, it should include the Glasgow & The Clyde Valley Landscape Assessment (Land Use Consultants for SNH, 1999). This document is referred to in a number of the policies of the existing Renfrewshire Local Plan. For reference, this document can be accessed on-line at:

<http://www.snh.org.uk/publications/on-line/LCA/glasgow.asp>

Secondly, the Birds Directive was updated with a new Directive pulling together a number of modifications and amendments made to it over the years and it should now be referenced with the same name but a new ref. no. - 2009/147/EC 2009 (i.e. instead of 79/409/EEC 1979).

I hope that this response is of assistance to you. This advice is provided in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be separately consulted for our views regarding the Environmental Report and on the LDP itself.

If you would like to discuss any of the points made in this scoping report response, please do not hesitate to contact Derek Manson or myself on 0141 951 4488 or via SNH's SEA Gateway at sea.gateway@snh.gov.uk

Yours sincerely



ARTHUR KELLER
Operations Manager

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