

# Background Paper

## Habitat Regulations Appraisal



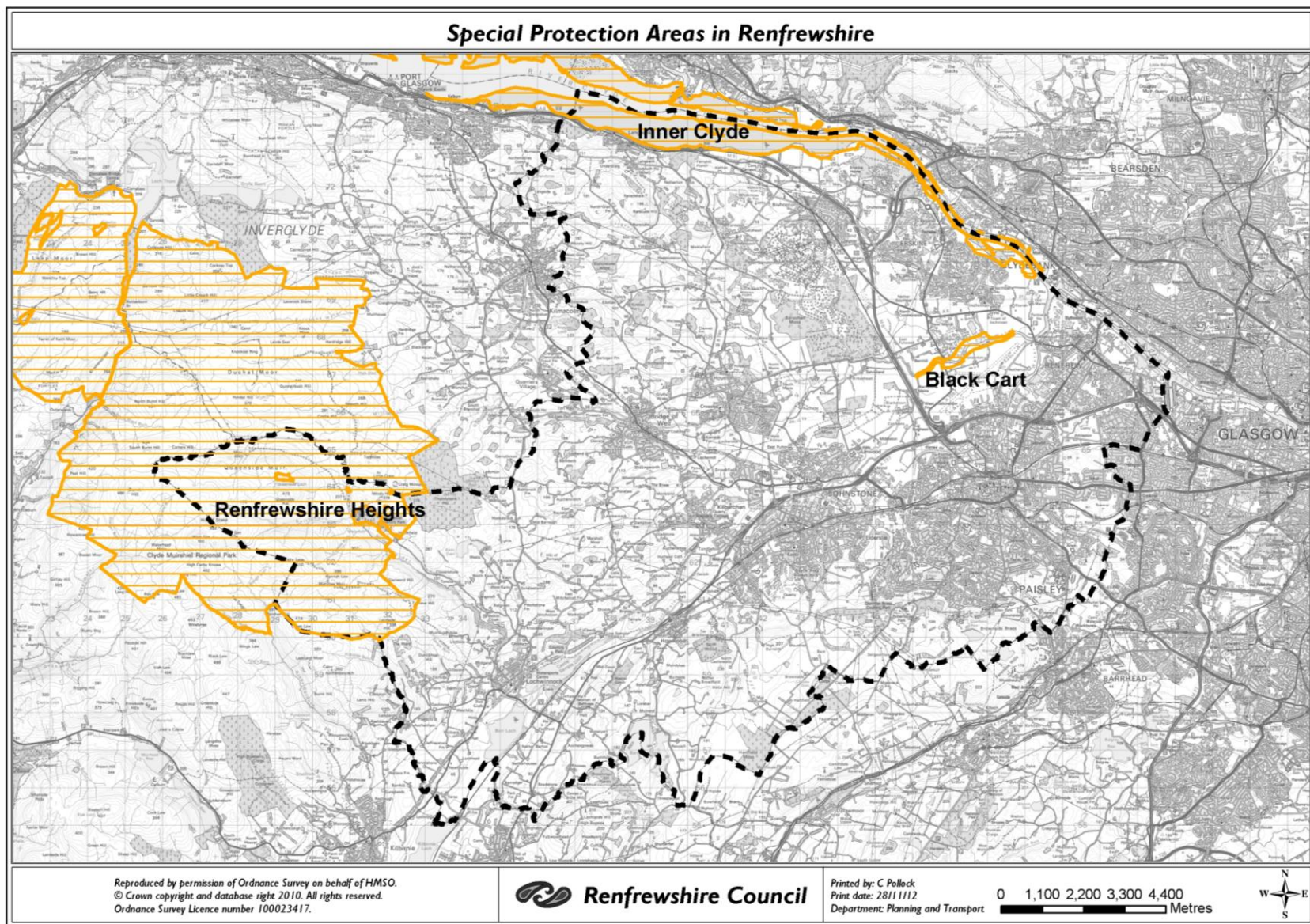
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## 1. Introduction

- 1.1 Natura sites represent the very best of Scotland's nature. Natura is the term given to **Special Areas of Conservation** (SACs) and **Special Protection Areas** (SPAs). These internationally important sites are designated under European legislation relating to nature conservation, the Habitats and Birds Directives respectively.
- 1.2 In Scotland, European sites are *Special Protection Areas*, classified under the *Birds Directive*, *Special Areas of Conservation*, designated under the EC Habitats Directive 1992, and 'candidate' Special Areas of Conservation (cSAC). The parts of SPAs, SACs and cSACs which lie below Mean High Water Spring tide are also referred to as '*European Marine Sites*', and those in the offshore marine area are also called 'European Offshore Marine Sites' (EOMS).
- 1.3 There are no SACs in Renfrewshire, however, there are three SPAs namely the Renfrewshire Heights, Black Cart Water and the Inner Clyde Estuary that have been identified as being of particular importance for several species of bird that are to be found on the sites. Figure 1 outlines the location of Renfrewshire's Special Protection Areas.

**FIGURE 1 – Location of Renfrewshire's Special Protection Areas**



## 2. Habitats Regulation Appraisal

- 2.1 Regulation 85B of the Habitats Regulations<sup>1</sup> and Article 6(3) of the Habitats Directive<sup>2</sup> requires that any plan or project, which is not directly connected with, or necessary to, the management of a European site, i.e. a Natura 2000 site, but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, shall be subject to an ‘*appropriate assessment*’ of its implications for the European site in view of the site’s conservation objectives.
- 2.2 In the light of the conclusions of that assessment, and subject to the provisions of Article 6(4) of the Habitats Directive, the competent authority, which in the context of the Proposed Local Development Plan (LDP) is Renfrewshire Council, may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.
- 2.3 Article 6(4) provides that if, in spite of a negative assessment of the implications for the site, and in the absence of alternative solutions, the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, the Member State shall take all

compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected.

- 2.4 The term ‘Habitats Regulations Appraisal’ (HRA) is used to describe the multi-stage process which includes:
- The decision on whether the Renfrewshire Local Development Plan (LDP) should be subject to appraisal;
  - The ‘screening’ process for determining whether an ‘appropriate assessment’ is required; and
  - Any ‘appropriate assessment’ that may be required.
- 2.5 An appropriate assessment is only required where the plan-making body determines that the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, and the plan is not directly connected with or necessary to the management of the site.

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<sup>1</sup> The Conservation (Natural Habitats, &c.) Amendment (Scotland) regulations 2007

<sup>2</sup> Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora.

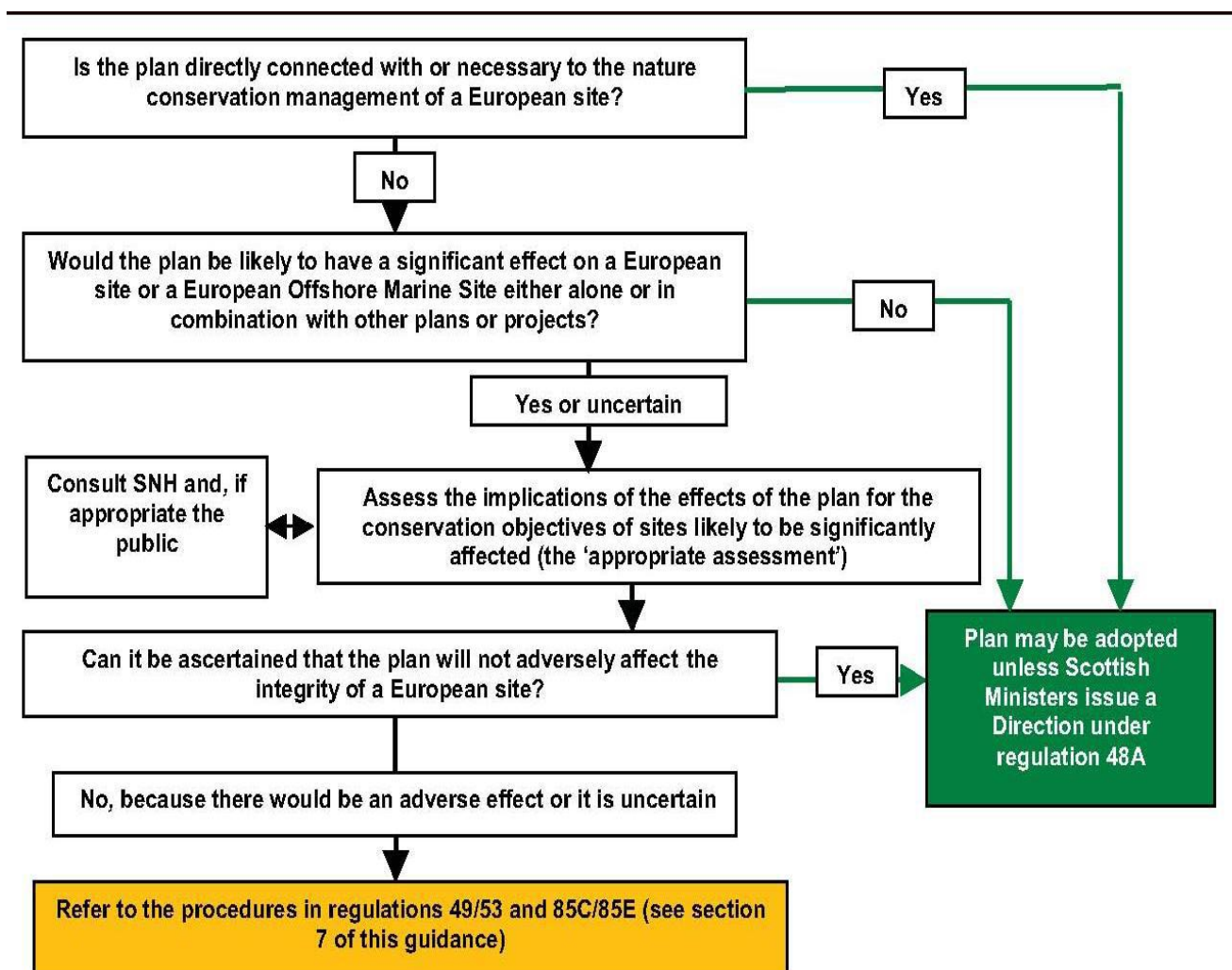
### 3. Purpose of Report

- 3.1 The purpose of this report is to consider whether the policies and proposals of the Renfrewshire LDP, including in-combination' are likely to have a significant effect on a Natura 2000 site.
- 3.2 If there are any likely significant effects, the report will also determine whether or not the Renfrewshire LDP would adversely affect the integrity of these sites. For Renfrewshire Council to adopt the Renfrewshire LDP, it is necessary to be certain that there is no adverse affect on the integrity of the Natura 2000 sites. Only in exceptional circumstances where there are no alternative solutions and reasons of overriding public interest could the Council adopt the LDP where it policies were known to adversely affect the integrity of a Natura 2000 site.
- 3.3 Through the HRA and any subsequent Appropriate Assessment, full consideration is given to the qualifying interests and the conservation objectives of the Natura 2000 sites. Where there is a possibility of adverse effects on site integrity, it may be possible to avoid these through mitigation.

### 4. Requirement for HRA

- 4.1 The Council as the responsible authority is required to determine whether the LDP qualifies in terms of need for assessment. Figure 2 outlines the procedural requirements for HRA.
- 4.2 The Renfrewshire LDP is not directly connected with, or necessary to the management of any Natura 2000 sites. The Council is required, therefore to carry out a 'screening' exercise which will facilitate a determination about whether the LDP would result in any significant effects on Natura 2000 sites, either individually, or in combination with other plans or projects.
- 4.3 The Renfrewshire LDP contains policies and proposals that will be used to assess future development. It would be used, therefore, to assess planning applications that may result in significant effects on Natura 2000 sites. The LDP does not promote any development on Natura 2000 sites, however, it will be used to assess development proposals that could affect these sites. In light of this it is considered that the LDP qualifies for the appraisal process.

Figure 2: Procedural Requirements for HRA



Source: SNH (2010)<sup>3</sup>

<sup>3</sup> David Tyldesley and Associates for SNH (2010) Habitats Regulations Appraisal of Plans – Guidance for Plan Making Bodies in Scotland

## 5. National Policy

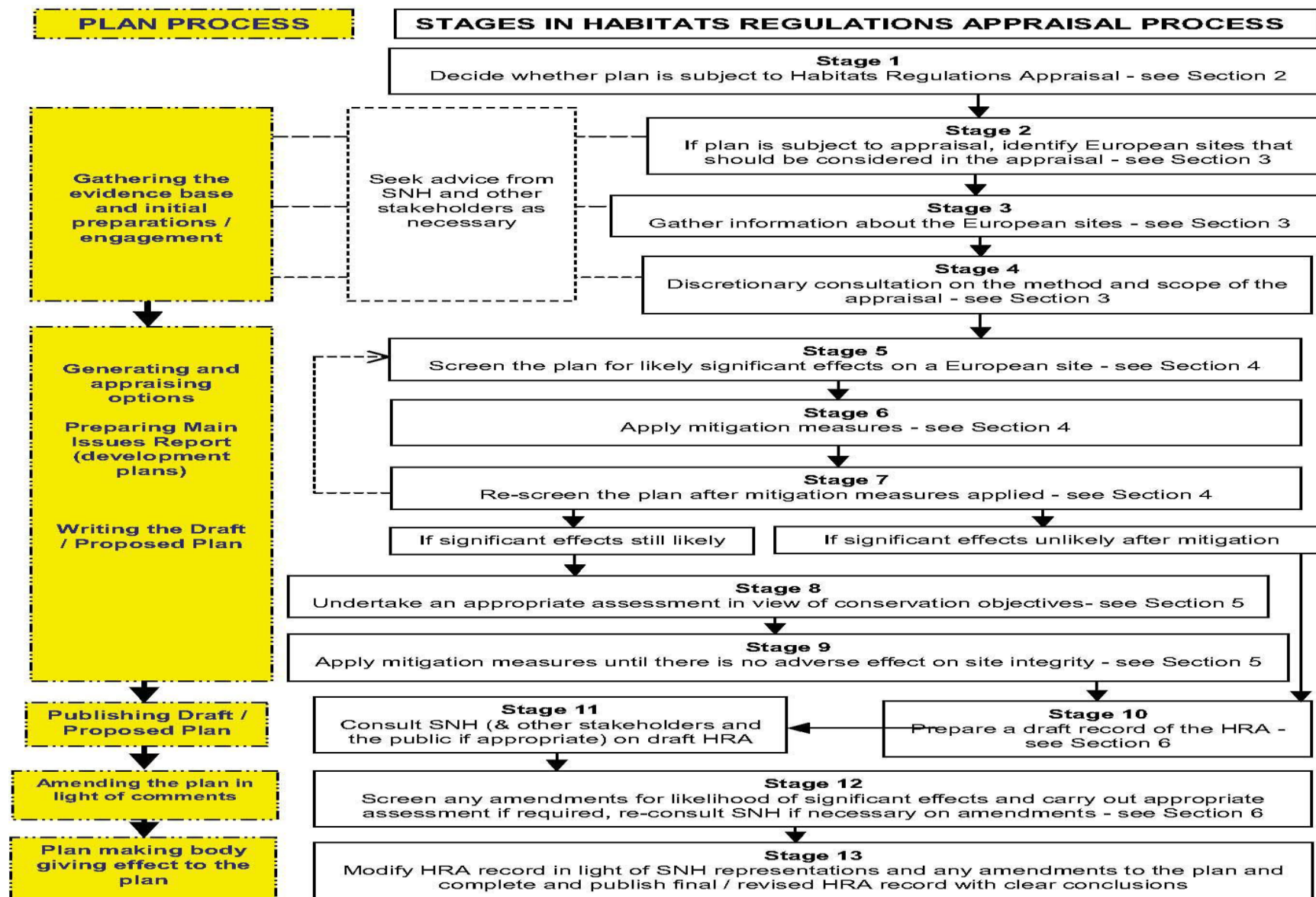
- 5.1 Scottish Planning Policy provides guidance on how the Government's policies for the conservation and enhancement of Scotland's natural heritage should be reflected in land use planning. The guidance states that development which could have a significant effect on a Natura site can only be permitted where:
- An appropriate assessment has demonstrated that it will not adversely affect the integrity of the site, or,
  - There are no alternative solutions; and,
  - There are imperative reasons of overriding public interest, including those of a social or economic nature.

## 6. National Regulations

- 6.1 An appendix to Development Planning Circular 1 2009 was published in August 2010 which provides guidance on the application of the Habitats Regulations. It states that when submitting a proposed development plan to Scottish Ministers, a Strategic Development Planning Authority or planning authority should include a Habitats Regulation Appraisal Record setting out:
- How the authority has determined that there is not likely to be a significant effect on a European site (if that is the case);
  - Where a likely significant effect has been determined and an Appropriate Assessment has been undertaken, the

conclusions reached and what action is proposed or has been undertaken to comply with the Habitats Regulations; and,

- A copy of any relevant correspondence from SNH.
- 6.2 The Circular states that further advice on the methodology of carrying out Habitats Regulations Appraisal can be found in Scottish Natural Heritage's Guidance for Plan-Making Bodies in Scotland. The document prepared by David Tyldesley and Associates provides detailed guidance on the separate stages of carrying out an appraisal, and the considerations that will need to be taken into account. Figure 3, taken from the guidance shows the key stages of a Habitats Regulations Appraisal.
- 6.3 In line with the SNH guidance, the LDP needs to be Natura-complaint by ensuring that each policy and proposal within the plan will not adversely affect the integrity of a Natura 2000 site. As such, it is accepted that where necessary, policies will need to be altered (including mitigation) in order to make them Natura-compliant. While natural heritage is reflected in the LDP, both SNH's guidance and Planning Circular 1 2009 are clear that reliance upon an overarching policy is not considered to be an appropriate method of effectively protecting Natura 2000 sites.



## 7. The Renfrewshire Local Development Plan

7.1 The Renfrewshire Local Development Plan sets out the spatial strategy that will guide the future use of land and facilitate investment opportunities with policy statements providing a framework for decision making to ensure that development and changes in land use are appropriate.

7.2 The preparation of the LDP is a legislative requirement providing the land use planning framework for Renfrewshire, setting out an overarching, clear, concise and easy to understand, map-based guide for shaping the area for the 10 years from adoption of the plan, with the plan being reviewed after 5 years.

7.3 With a focus on supporting sustainable economic growth, the LDP presents an outcome-focussed approach outlining where future development should and should not occur, identifying opportunities for change, regeneration and enhancement, directing developments to locations that are more economically, socially and environmentally sustainable.

7.4 The Renfrewshire LDP has taken account of, and been informed by, many other plans, policies and strategies in preparing this plan. These include Scottish Government's policies that are set out in Scottish Planning Policy (SPP), National Planning Framework 2 (NPF2) along with all other legislation and guidance that are relevant to this LDP. The Glasgow and the Clyde Valley Strategic Development Plan (SDP) sets out the long term development strategy for the area, providing a strategic context and vision for the LDP. The Renfrewshire LDP is consistent with the SDP.

7.5 The Renfrewshire LDP is in two parts it consists of the written statement containing the overall spatial strategy for Renfrewshire and how this can be achieved, with key policies and proposals structured around five themes forming the bulk of the document, these include:

-  Economy;
-  Centres;
-  Infrastructure;
-  Places;
-  Environment.

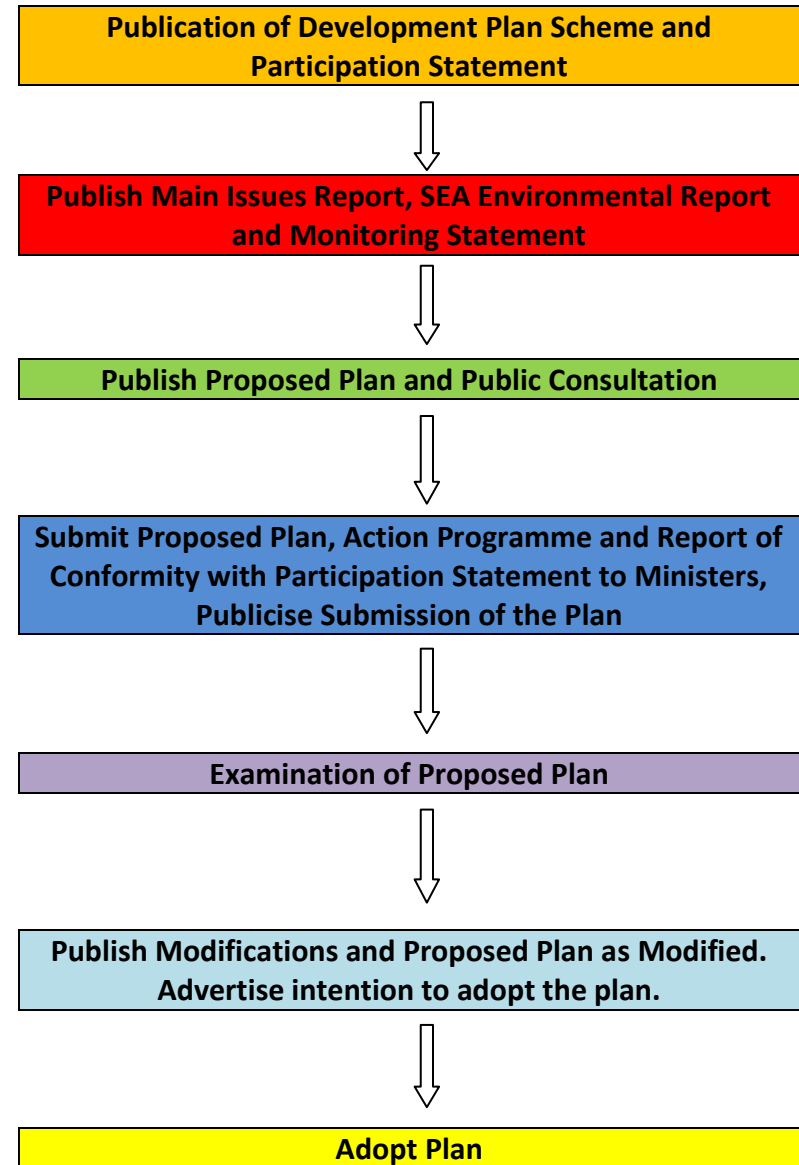
7.6 The second part of Renfrewshire's LDP is the New Development Supplementary Guidance (SG) which provides more detailed criteria and guidance to assess new development. It outlines what developers need to do in designing, delivering and implementing development, with a particular emphasis on place making and sustainable development. The format of the SG is similar to the LDP with the detailed criteria and guidance structured within the five themes.

7.7 Together both of these documents constitute the Renfrewshire LDP. Both provide an integrated development framework by which all proposals must be considered against to ensure that there is a consistent approach to the assessment of planning applications.

## 8. Preparation of the Renfrewshire Local Development Plan

8.1 The formation of LDP has involved several stages as is illustrated in Figure 4. The LDP sets out the Council's settled view as to what the final adopted content of the LDP should be and has/will be subject to the necessary consultation requirements with both members of the public and relevant consultation authorities. However, there remains scope for alterations to be made to the plan, where alterations are necessary as a result of the HRA process.

Figure 4: Stages in the preparation of the Local Development Plan



## 9. Compliance with National Policy / Regulations

- 9.1 It should be noted that the Renfrewshire LDP is consistent with SPP. The Proposed LDP contains a policy which is reflective of SPP guidance (Natural Heritage policy detailed in Figure 5) and protects Natura 2000 sites from adverse effects upon their integrity; and ensures that Natura 2000 sites are protected in all instances unless there are no alternative solutions and imperative reasons of overriding public interest. Furthermore the New Development SG provides further criteria and guidance and this which is set out in Figure 6 and Figure 7.

Figure 5: Renfrewshire's LDP Policy Framework

### **POLICY ENV 2 - Natural heritage**

The Council welcome any development which does not have an adverse effect on the integrity of sites protected for their natural conservation interest, which have the potential to protect and enhance designated nature conservation sites and the wider biodiversity of the area, and where appropriate, will seek to improve these resources. All proposals will be assessed in terms of the cumulative impact of development based on the precautionary principle considering the effect on the following:

- Natura 2000 and Ramsar Sites;
- Protected Species;
- SSSI's;
- LNRs, SINC's and wildlife corridors;
- Biodiversity;
- Trees – Ancient and semi- natural woodland, TPOs and Conservation Areas;

Developments and change of uses affecting those outlined above will be assessed against criteria set out in the New Development SG.

**Figure 6: Criteria from the New Development SG**

**Environment Development Criteria**

- The openness of green belts require to be preserved and development does not undermine their core role and function by individual or cumulative impacts
- Proposals should enhance biodiversity through the creation and restoration of habitats and incorporating existing habitats
- Development must have due regard to the importance of international, national and local designated sites and demonstrate that they do not have an adverse effect on the integrity of any sites protected as a Natura 2000 site
- Landscaping and planting requires to be integral to the development of a site, providing an attractive setting and an appropriate relationship to the surrounding area
- Proposals should minimise woodland loss and protect woodlands and trees where they have a significant biodiversity value, and/or make a contribution to the green network or landscape character
- Prior extraction of mineral resources must be considered
- Appropriate measures are required to ensure that the character and integrity of listed buildings and sites within conservation areas are not compromised and the enhancement of the characteristics, historic value and setting is considered

**Figure 7: Guidance from the New Development SG**

**International Designations**

Development proposals should consider potential significant impacts on Natura 2000 sites. Developments that are likely to have a significant effect on a Natura site, either individually or in combination with other proposals or plans will only be permitted where an Appropriate Assessment that demonstrates that:

- They will not adversely affect the integrity of the site; or
- There is no alternative solution and there are imperative reasons of over-riding public interest including social or economic implications.

## 10. Methodology

- 10.1 The Scottish Habitat Regulations do not prescribe a particular methodology for carrying out an appraisal; however, Scottish Natural Heritage (SNH) produced a guidance document in August 2010 (updated in August 2012) which has been used to form the methodology for this appraisal. This guidance is entitled 'Habitats Regulations Appraisal of Plans: Guidance for Plan-Making bodies in Scotland'. The guidance outlines a number of key stages to the process which are outlined in Figure 3 above. These key stages are broadly used to inform the process appraisal.

## 11. European sites to be included in the appraisal

- 11.1 In Renfrewshire, there are three areas designated under the Birds Directive as Special Protection Areas; the Black Cart, Inner Clyde and Renfrewshire Heights. There are no sites designated under the Habitats Directive in Renfrewshire.
- 11.2 All of the aforementioned Natura 2000 sites are included within the appraisal. It is important to consider, however, whether there are any European sites which could potentially be significantly affected by the LDP that lie outwith the plan area. Utilising the criteria set out within SNH's guidance on the 'Habitats Regulations Appraisal of Plans', and after consultation with SNH, it is evident that there are **no** sites outwith the plan area which require to be included within the appraisal.

## 12. Gathering information about the European sites

- 12.1 This section outlines each of the Natura 2000 sites that are included within the appraisal and provides details of their qualifying interests, conservation objectives and site conditions to ensure that the appraisal focuses on the most relevant aspects of each site. The qualifying interests potentially affected will vary between the different European sites, but effects should relate to these interests for the sites classification (SPAs). It is necessary to consider how the LDP policies and proposals may affect the achievement of the conservation objectives.

Figure 8 provides details of each site included within the appraisal.

**Figure 8: Summary of European Sites to be included in the Appraisal**

	Site 1	Site 2	Site 3
<b>Site Name</b>	Black Cart	Inner Clyde	Renfrewshire Heights
<b>Designation Status</b>	SPA	SPA	SPA
<b>Site Area (Ha)</b>	56	1,826	8,943
<b>Date of Designation</b>	07/12/2000	27/03/2000	17/12/2007
<b>Qualifying Interests</b>	Whooper swan ( <i>Cygnus cygnus</i> ), non-breeding	Redshank ( <i>Tringa totanus</i> ), non-breeding	Hen harrier ( <i>Circus cyaneus</i> ), breeding
<b>Conservation Objectives</b>	<p>To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and,</p> <p>To ensure for the qualifying species that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site;</li> <li>• Distribution of the species within site;</li> <li>• Distribution and extent of habitats supporting the species;</li> </ul>	<p>To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and,</p> <p>To ensure for the qualifying species that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site;</li> <li>• Distribution of the species within site;</li> <li>• Distribution and extent of habitats supporting the species;</li> </ul>	<p>To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and ,</p> <p>To ensure for the qualifying species that the following are maintained in the long term:</p> <ul style="list-style-type: none"> <li>• Population of the species as a viable component of the site;</li> <li>• Distribution of the species within site;</li> </ul>

**Figure 8: Summary of European Sites to be included in the Appraisal**

	Site 1	Site 2	Site 3
	<ul style="list-style-type: none"> <li>• Structure, function and supporting processes of habitats supporting the species;</li> <li>• No significant disturbance of the species</li> </ul>	<ul style="list-style-type: none"> <li>• Structure, function and supporting processes of habitats supporting the species;</li> <li>• No significant disturbance of the species</li> </ul>	<ul style="list-style-type: none"> <li>• Distribution and extent of habitats supporting the species;</li> <li>• Structure, function and supporting processes of habitats supporting the species;</li> <li>• No significant disturbance of the species</li> </ul>
<b>Site Condition</b>	Whooper swan ( <i>Cygnus cygnus</i> ), non-breeding: Favourable Declining	Redshank ( <i>Tringa totanus</i> ), non-breeding: Favourable Maintained	Hen harrier ( <i>Circus cyaneus</i> ), breeding: Unfavourable Declining
<b>Factors Currently Influencing the Site</b>	Land use changes affecting roosting and feeding habitat in the wider Black Cart floodplain  Grazing management	Riverfront development Improvements to water quality Recreational access (particularly dogs off the leash)	Moorland management practices Predation of nests
<b>Vulnerabilities to Change/potential effects of the Plan</b>	Development in the Black Cart floodplain and in particular the Glasgow Airport Zone could have potential for impacts in some cases.	Riverfront development and in particular the Erskine Town Centre could have potential for impacts in some cases.	Not currently considered vulnerable to development in Renfrewshire

### 13. Screening the Renfrewshire LDP for its Potential Effects

- 13.1 The screening stage is used to inform the scope of the appropriate assessment. Although guidance on conducting appropriate assessment exists there is currently no standardised methodology for HRA and therefore the approach taken has been determined through consideration of good practice and discussion with Scottish Natural Heritage (SNH). Initial responses from SNH have been taken into account.
- 13.2 In identifying the policies and proposals of the Renfrewshire LDP that can be screened out, this appraisal has taken a three stage approach:

**Step 1** – screening out general policy statements, including general criteria based policies. A general policy statement sets out a strategic aspiration for a certain issue. A general criteria based policy is one which expresses the tests or expectations when it comes to consider particular proposals;

**Step 2** – screening out projects referred to in, but not proposed by, the Renfrewshire LDP; and,

**Step 3** – screening out aspects of the Renfrewshire LDP that could have no likely significant effect on a site, alone or in combination with other aspects of the Proposed Renfrewshire LDP, or with other plans or projects.

- 13.3 The spatial elements of the Renfrewshire LDP, in terms of allocated development sites, must also be appraised alone and in combination, as part of the process to determine any likely significant impacts upon any of the European sites included within the appraisal.
- 13.4 The screening exercise has involved; the identification of relevant Natura sites along with a description of those sites including the qualifying features, current condition, threats and key areas; the consideration of other plans and proposals in combination, and the screening of the Renfrewshire LDP policies and proposals to determine which were 'likely to have a significant effects' in general and the 'likely significant effects' on the integrity and protection on Natura sites.
- 13.5 Pre-screening of the policies provided a filter for those policies which were unlikely to have a significant effect due to their nature. The remaining policies and the proposals were then considered as to whether they were likely to have a significant effect on each Natura site.
- 13.6 In making the judgement of a 'significant effect' on a site, the likelihood of the impact, the sites condition in relation to its main sensitivities and the location and the magnitude of any impact has been considered. Any effect that could undermine the conservation objectives of the Natura site has been identified. Importantly, the precautionary principle has been applied to the screening assessment. If sufficient information is not available or where there is an

element of doubt and further research is needed the HRA should proceed to stage 2 of the assessment.

- 13.7 The case ruling (Waddenzee case C-127/02) stated that ‘any plan or project not directly connected with or necessary to the management of the site is to be subject to an appropriate assessment of its implications for the site, in view of the sites conservation objectives if it cannot be excluded, on the basis of objective information, that it will have a significant effects on that site, either individually or in combination with other plans or projects’. Therefore it is critical to consider cumulative impacts.
- 13.8 These policies and guidance have been grouped into Categories A – F to reflect the reason for not considering the policy or guidance further. It should be noted that several policies fall into more than one category as they refer to site specific proposals but also allow for potential future non site specific proposals.
- 13.9 Figure 9 below indicates the policies and proposals within the Renfrewshire LDP that is unlikely to have a significant effect on a European site. The reasons for not considering the policy or proposal further are also given along with any further information that is considered relevant. These policies will not be considered further through this appraisal.

**Figure 9 - Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone and Reasons for Screening Policies Out of Further Assessment**

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
General policy statements (Step 1a)			
General policy statements (Step 1b)	Spatial Strategy		The policy is a general statement of intent or general policy aspiration which has been screened out because it is unlikely to have a significant effect on the environment.
Projects excluded from the appraisal because they are not proposals generated by the RPLDP	POLICY I3 – Potential Transport Improvements	Infrastructure Development Criteria  Connecting Places	These proposals were generated by the higher level Regional Transport Strategy 'A Catalyst for Change', Strathclyde Partnership for Transport (2008). The Renfrewshire LDP has to reflect the requirements of these documents, therefore, the proposals have been screened out.
	POLICY I4 - Fastlink	Fastlink	

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
Policies which protect the natural environment, including biodiversity, or conserve or enhance the natural, built or historic environment (step 3a)	POLICY ENV 1 - Green Belt Development	Acceptable Forms of Development in the Green Belt Housing in the Green Belt Green Belt Development Criteria	These policies are intended to protect the natural, built and cultural heritage. None of the policies actively encourage development; they are designed to protect particular features of the environment and therefore can have no effect on any European sites.
	POLICY ENV 2 - Natural heritage	Biodiversity International Designations National Designations Local Designations: Sites of Importance for Nature Conservation (SINCs) / Local Nature Reserves (LNR) Trees, Woodland and Forestry Environmental Impact Assessment	The Natural Heritage policy in this section is specifically concerned with the protection of Natura 2000 sites. The 'Key Policy will only permit development which does not have an adverse effect on the integrity of any sites protected for its natural conservation interest. The more detailed policy in the SG specifically protects Natura 2000 sites and requires an Appropriate Assessment where significant effects are predicted.

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
	POLICY ENV3 - Built Heritage	Conservation Areas Listed Buildings Demolition of Listed Buildings Scheduled Ancient Monuments / Unscheduled Sites of Archaeological Significance / Gardens and Designed Landscapes	
	POLICY ENV 4 – The Water Environment	The Water Environment	
	POLICY P7 - Green Network and Open space	Green Networks Open Space Open Space Provision in New Developments Regional and Country Parks	
Policies which will not lead to development or other change (Step 3b)		Noise Contaminated Land Pipelines and Control of Major Accident Hazards Site Investigations	The policies will not lead to development, therefore it will not have an impact on any Natura 2000 sites.

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
Aspects of the Plan which make provision for change but which could have no conceivable effect on a European site, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect or would not otherwise undermine the conservation objectives of the site (Step 3c)	POLICY C2 – Development Outwith the Network of Centres	Strategic Town Centres and Core Centres  Local Centres  Meeting Local Neighbourhood Demand  Hot Food, Public Houses and Licensed Clubs.  Applications for Advertisement Consent  Out of Centre retail and Commercial Centres	These policies do promote development, however it is considered that none of them would have any impact on European Sites. The Natura sites are either at a significant distance from the development proposed by the policy, or there is considered to be no possible link between the type of development proposed and European sites.
	POLICY I2 - Freight  POLICY I3 – Potential Transport Improvements  POLICY I5 – Flooding and Drainage  POLICY I6 – Renewable and Low Carbon Energy Developments  POLICY I7 - Low Carbon Energy Developments	Freight  Infrastructure Development Criteria  Flooding and Drainage Drainage Assessment  Renewable and Low Carbon Technologies  Low Carbon Development	

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
	<p>POLICY P1 – Renfrewshire's Places</p> <p>POLICY P2 – Housing Land Supply</p> <p>PROPOSAL P3 – Additional Housing Sites – Greenfield</p> <p>POLICY P4 – Housing Action Programme Sites</p> <p>POLICY P5 – Community Growth Areas</p> <p>POLICY P6 – Paisley South Community Expansion Area</p>	<p>Places Development Criteria</p> <p>Alterations and extensions to existing properties</p> <p>Residential Development Within Garden Grounds</p> <p>Change of use from amenity space to garden ground</p> <p>Core Town Centre Housing</p> <p>Upper Floor Residential Developments</p> <p>Re-Use/redevelopment of Institutional Premises</p> <p>Design and Access Statements</p>	

<b>Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone</b>	<b>'Key Policy'</b>	<b>Supplementary Guidance Elements</b>	<b>Reasons for Screening Out</b>
Aspects of the Plan which make provision for change but which could have no significant effect on a European site, because any potential effects would be trivial, or 'de minimis' or so restricted that they would not undermine the conservation objectives for the site (Step 3d)			Policies contained within this section will generally have no impact upon any European sites. However, this cannot be comprehensively concluded. The nature of these policies is such that any development which could come forward in association with their content would be so minimal as to rule out the potential for any significant effects. Any effects associated with these policies are deemed to be minimal.
Aspects which are too general so that it is not known where, when or how the aspect of the Plan may be implemented, or where any potential effects may occur, or which European sites, if any, may be affected (Step 3e)	POLICY I1 – Connecting Places	Infrastructure Development Criteria  Connecting Places  Transport Assessment	These policies are general and therefore it is impossible, in some circumstances to predict where, when and how any effects may occur. In relation to all of these policies, it is considered that any impacts upon European sites are extremely unlikely due to the location of the European sites. The issues covered within these

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
			<p>policies are summarised below:  The public transport policy promotes the use of public transport and encourages modal shift from the private car. It is considered that the general nature of this policy makes it impossible to predict where, when and how any impacts could occur.</p>
	POLICY I8 - Waste Management	Waste Management	<p>A policy framework to achieve sustainable waste management in accordance with the objectives identified in the Scottish Government's Zero Waste Plan has been set out within the LDP with criteria outlined in the New Development SG. At the present time, it is unclear where such development will be located and whether it would be likely to have an adverse affect on the integrity of any Nature 2000 site, therefore, the policy has been screened out.</p>

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
	POLICY E4 – Tourism	<p>Tourist Accommodation and Facilities –</p> <ol style="list-style-type: none"> <li>1. Criteria for Existing /Expansion</li> <li>2. New Facilities</li> <li>3. Large Scale Tourism Facilities</li> </ol>	<p>The LDP and SG support sustainable tourism development which will maintain and improve tourist facilities, in particular where development supports the economy. Tourism is an important element in the economic, social and cultural well-being of Renfrewshire's places and rural environment. The policy and guidance outline development criteria and seek to protect Renfrewshire from negative impacts associated with tourist related development, including impacts on the environment. It is considered, however that the general nature of the policy and guidance makes it impossible to predict where, when and how any impacts could occur.</p>

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
		Communications Infrastructure	Expansion of the communications network including telecommunications, broadband and digital infrastructure is supported by the Council where the infrastructure is designed, positioned and sited as sensitively as possible taking account of the surrounding environment and any cumulative impact. The precise location of where these developments are likely to occur is not known.
		Mineral Extraction	The SG requires all proposals for minerals extraction to provide detailed information regarding potential impacts of the development, including proposals for control, mitigation, monitoring and restoration, so that a full assessment can be made, as set out in Scottish Planning Policy. The Council supports proposals for the prior extraction of

Aspects of the Renfrewshire Proposed LDP which would not be likely to have a significant effect on a European Site Alone	'Key Policy'	Supplementary Guidance Elements	Reasons for Screening Out
			minerals from development sites subject to the same full assessment, however, the general nature of the policy and guidance makes it impossible to predict where, when and how any impacts could occur. The policy presumes against the extraction of Coal outwith the areas of search identified in the Glasgow and the Clyde Valley Strategic Development Plan.

## 14. Plans and Project considered 'in combination'

14.1 The Habitats Directive also requires consideration of the implications of the plan for sites likely to be affected in combination with other plans and projects. It has been considered that the following plans and projects might, as these in combination with the Renfrewshire LDP Plan, might have an effect on Natura sites in Renfrewshire:

- The Glasgow and the Clyde Valley Strategic Development Plan (2012);
- West Dunbartonshire Local Development Plan (Main Issues Report);
- Inverclyde Local Development Plan (Main Issues Report) (2011)
- Argyll and Bute Council Main Issues Report (2011)
- Renfrewshire Core Path Plan;
- Renfrewshire Local Housing Strategy; and,
- Glasgow Airport Masterplan

## 15. Screening Outcomes

15.1 Figure 10 identifies all of the policies within the Proposed LDP which have been screened out as having no LSE. The final column of Figure 10 outlines the reasons why the various policy sections have been screened out at this stage. As stated above, a precautionary approach was taken when screening out the policies of the Proposed LDP to ensure that any policies with the potential for having an impact

upon any of the European sites are taken forward into the next stage of the process.

15.2 As can be seen from Figure 10, policies have been screened out at this stage for a variety of reasons. One of the main considerations when appraising any potential impacts upon Natura 2000 sites is to take into account the locations of the Natura 2000 sites included within this appraisal and their proximity to the main areas of development. Two of the sites, the Black Cart and the Inner Clyde SPAs, are located in close proximity to main centres of population and areas likely to be developed. Despite the location of these sites, the policies that have been screened out above are not considered to result in any development within these areas that will have a LSE.

15.3 The Renfrewshire Heights is located in the upland area in the west of Renfrewshire. It is a predominantly rural area where there is less pressure for development. The location and landscape associated with the Renfrewshire Heights could have made this area a target for wind turbine development, however, this type of potential development is very limited in Renfrewshire due to the restrictions placed on it by the Civil Aviation Authority and Ministry of Defence in relation to RADAR requirements. In this instance, the Natura 2000 site is not in a location where any form of intensive development is likely to take place and it is therefore evident that there will be no likely significant

effects upon any Natura 2000 sites as a consequence of these policies.

- 15.4 The final row of Figure 10 screens out policies on the basis that the policies are too general for it to be possible to accurately predict how they could affect any of the Natura 2000 sites, if at all.

## **16. Policies further investigated in light of any mitigation**

- 16.1 It is evident that there are a number of policies which can be screened out as having no LSE. At this stage, mitigation measures need to be considered for the remaining five (screened in) policies in order to remove the potential for LSE. Figure 10 identifies the policies which have been screened in for further investigation on the basis of objective information. All policies whose effects cannot be mitigated at this stage need to be the subject of 'appropriate assessment'.

**Figure 10 – Policy Assessment**

Policies where there is potential for a significant effect	Natura Sites that could be affected	Qualifying Interest of the European Site	Summary of the potential significant effect	Mitigation	LSE Fully Addressed by Mitigation
<b>POLICY E1 – Renfrewshire's Economic Investment Locations</b>	Black Cart/ Inner Clyde	Whooper swan (Cygnus cygnus), non-breeding	<p>Development may result in land use changes affecting roosting and feeding habitat in the wider Black Cart floodplain</p> <p>Grazing management</p> <p>Riverfront development improvements to water quality recreational access (particularly dogs off the lead)</p>	<p>Through this policy, the Council aims to promote and guide investment opportunities to Strategic Economic Investment Locations in the first instance which includes Inchinnan Business Park, as well as other locally important economic areas such as the Erskine Riverfront and then to other local industrial and local centres where appropriate. The locations of these economic centres are sustainable, close to existing transport networks, with much of the key infrastructure already in place. Many of these sites were identified in the previous Renfrewshire Local Plan as being investment locations for economic development and the new LDP is reflecting an established land use allocation.</p> <p>The LDP aims to secure the principles of the spatial strategy in each new development and therefore all development proposals will require to be considered in relation to the spatial strategy diagrams and overarching policy. Although it is possible that development at these site could have a significant adverse effect on either of the Natura sites.</p>	<p>No.</p> <p>Appropriate assessment required.</p>

Policies where there is potential for a significant effect	Natura Sites that Could be affected	Qualifying Interest of the European Site	Summary of the potential significant effect	Mitigation	LSE Fully Addressed by the Mitigation
<b>POLICY E2 – Glasgow Airport Zone</b>	Black Cart	Whooper swan (Cygnus cygnus), non-breeding	Land use changes affecting roosting and feeding habitat in the wider Black Cart floodplain  Grazing management	<p>The policy seeks to promote the area around Glasgow Airport for economic development, In particular Inchinnan Business Park, Westway , Linwood and Hillington / Renfrew North are identified as a key locations which will support economic growth; the operational requirements of the airport; and, the regeneration and renewal of the Cart Corridor and Murray Street.</p> <p>Inchinnan Business Park is identified through this policy and Policy E1 as being suitable for economic investment and associated development. It is adjacent to the Black Cart SPA and development at this location could potentially have a significant effect.</p>	<p>No.</p> <p>Appropriate assessment required.</p>

Policies where there is potential for a significant effect	Natura Sites that Could be affected	Qualifying Interest of the European Site	Summary of the potential significant effect	Mitigation	LSE Fully Addressed by the Mitigation
<b>POLICY E3 – Transition Areas</b>	Inner Clyde	Redshank (Tringa totanus), non-breeding	Riverfront development Improvements to water quality Recreational access (particularly dogs off the lead)	Renfrewshire has a very large supply of business and industrial land within its boundary. The LDP has sought to rationalise this supply and some areas previously zoned for business and industrial uses, have either been replaced by a new Transition Area policy or have been absorbed into the existing built-up area and are covered by P1 Places Policy. Erskine Riverfront is identified as a Transition Area where business and industrial uses within classes 4, 5 and 6 of the use class order, residential, hotels, residential institutions, educational facilities, nurseries, leisure, and restaurants would be considered appropriate. The range of development that would be acceptable at this site is fairly broad.	No.  Appropriate assessment required.

Policies where there is potential for a significant effect	Natura Sites that Could be affected	Qualifying Interest of the European Site	Summary of the potential significant effect	Mitigation	LSE Fully Addressed by the Mitigation
<b>POLICY E5 – Glasgow Airport Operational Land</b>	Black Cart	Whooper swan (Cygnus cygnus), non-breeding	Land use changes affecting roosting and feeding habitat in the wider Black Cart floodplain  Grazing management	In addition to promoting the areas identified in Policy E2 as the part of the Glasgow Airport Zone, the Council recognises the important role that the Airport plays in the success of the tourism industry and national economy. An appropriate area of land has been identified, therefore, through the LDP to ensure that the airport can continue to operate and fulfil this function. It is possible that development at the airport potentially result in a significant adverse effect on the Black Cart SPA as the area identified as operational land is adjacent to this Natura site.	No.  Appropriate assessment required.

Policies where there is potential for a significant effect	Natura Sites that Could be affected	Qualifying Interest of the European Site	Summary of the potential significant effect	Mitigation	LSE Fully Addressed by the Mitigation
<b>POLICY C1 – Renfrewshire Network of Centres</b>	Inner Clyde	Redshank (Tringa totanus), non-breeding	Riverfront development Improvements to water quality  Recreational access	Strengthening of the vitality and viability of Renfrewshire's centres requires investment to be channelled to facilitate a diverse range of activities and uses to develop. The LDP supports existing uses and encourages new uses which contribute positively to the economic and cultural life of centres as well as improving the quality of offer, creating sustainable mixed communities and reducing the need to travel. Erskine Town Centre is identified as a Core Centre, providing retail, leisure and commercial facilities for Erskine, Bishopton and Inchinnan and is considered to be part of the Clyde Riverside cluster of centres. The LDP seeks to strengthen the role and function of the town centre, creating a place with a range and quality of facilities. The overall quality of the town centres' public spaces and linkages to the waterfront and the town's residential areas also require improvement to help it achieve a sustainable future.	No.  Appropriate assessment required.

Policies where there is potential for a significant effect	Natura Sites that Could be affected	Qualifying Interest of the European Site	Summary of the potential significant effect	Mitigation	LSE Fully Addressed by the Mitigation
<b>POLICY C1 – Renfrewshire Network of Centres (Cont)</b>				It is recognised that Erskine Town Centre is in close proximity to the Inner Clyde SPA. In order to secure the centre’s vitality and viability and to ensure that it will continue to provide services to the local communities without adversely affecting the integrity of the neighbouring Natura site, an appropriate caveat was included within Policy C1. The caveat is site specific, relating only to Erskine Town Centre, and it should allow adequate flexibility for development to proceed without the integrity of the Inner Clyde SPA being adversely affected.	

## 17. Appropriate Assessment

- 17.1 All of the policies have now been considered in terms of the Natura 2000 sites in Renfrewshire, how they could be affected, if there were significant effects on the conservation objectives of the qualifying interests of the sites and whether the likely significant effects could be mitigated at this stage. As indicated in Figure 10 it is considered that appropriate mitigation has not been provided for the five policies that were identified as having the potential to have a significant adverse effect on the integrity of a Natura 2000 Site; therefore, appropriate assessment of these policies is required.
- 17.2 Figure 11 summarises the likely significant effects arising on the nature conservation interest of the Black Cart and Inner Clyde SPAs from the five policies. The Appropriate Assessment then goes on to consider whether it is possible to provide suitable mitigation measures that will remove the likelihood of any negative significant effects on the integrity of the Natura 2000 sites.

**Figure 11: Summary of the Likely Significant Effects Resulting from Policies**

Policy likely to have a significant effect	Natura site/s which will be affected	Qualifying interest on the Site	Summary of the likely significant effects
<b>POLICY E1 – Renfrewshire’s Economic Investment Locations</b>	Black Cart/ Inner Clyde	<p>Whooper swan (<i>Cygnus cygnus</i>), non-breeding</p> <p>Redshank (<i>Tringa totanus</i>), non-breeding</p>	<p>The Council aims to promote and guide investment opportunities to Strategic Economic Investment Locations in the first instance through this policy which includes Inchinnan Business Park, as well as other locally important economic areas such as the Erskine Riverfront and then to other local industrial and local centres where appropriate.</p> <p>It is possible, however, that development at Inchinnan Business Park may result in land use changes affecting roosting and feeding habitat in the wider Black Cart floodplain. Other change in land use that may have a significant effect includes changes in the grazing regime or management on land used by the whooper swans. In addition, other economic investment locations (Linwood Phoenix) are associated with sites that support the integrity of the Natura designation and development at these locations could potentially have a significant effect.</p> <p>Riverfront development in close proximity to the River Clyde and the SPA at Erskine could result in disturbance to the qualifying species. Development may also result in changes to the water quality, however, until the type of development is known, it is not possible to predict the impact on the water quality.</p>

Policy likely to have a significant effect	Natura site/s which will be affected	Qualifying interest on the site	Summary of the likely significant effects
<b>POLICY E2 – Glasgow Airport Zone</b>	Black Cart	Whooper swan (Cygnus cygnus), non-breeding	<p>Investment in Glasgow Airport and the three surrounding industrial areas is an important element of the LDP's role in facilitating sustainable economic growth in Renfrewshire. The policy promotes the area around Glasgow Airport for economic development. Of particular concern with regard to Natura 2000 designations is Inchinnan Business Park which is identified as a key location which will support economic growth and the operational requirements of the airport. The capacity for further development at Inchinnan is relatively limited and it is difficult to determine precisely what type of development would occur, however, as the business park shares a boundary with the Black Cart SPA, development associated with the Glasgow Airport Zone at this location could potentially have an LSE on the Natura site.</p> <p>The development could result in,</p> <ul style="list-style-type: none"> <li>• Land use changes affecting roosting and feeding habitat of the area used by the whooper swans; or,</li> <li>• Other changes in land use that may have a significant effect includes changes in the grazing regime or management on land used by the whooper swans.</li> </ul> <p>In this instance, the impact caused by the second of these factors may be limited by the small area of land that can be developed within Inchinnan. The sites in question are not currently used by the swans, however, there could be a minor impact associated with development of these sites.</p>

Policy likely to have a significant effect	Natura site/s which will be Affected	Qualifying interest on the site	Summary of the likely significant effects
<b>POLICY E3 – Transition Areas</b>	Inner Clyde	Redshank ( <i>Tringa totanus</i> ), non-breeding	<p>The policy is promoting the rationalisation of the industrial land supply in certain areas of Renfrewshire. A range of alternative uses has been proposed for an area of land at Erskine riverfront, adjacent to the Inner Clyde SPA. Change of land use is anticipated at this location where a range of appropriate economic uses have been proposed. The precise development type is not know at this time, however, it could result in:</p> <ul style="list-style-type: none"> <li>• The development itself causing disturbance of the protected species</li> <li>• There could be an increased recreational use associated with the development resulting in longer term disturbance issues; and,</li> <li>• Any of these development types may result in a change in water quality thus potentially resulting in a significant adverse impact on the Inner Clyde SPA.</li> </ul>

Policy likely to have a significant effect	Natura site/s which will be affected	Qualifying interest on the site	Summary of the likely significant effects
<b>POLICY E5 – Glasgow Airport Operational Land</b>	Black Cart	Whooper swan ( <i>Cygnus cygnus</i> ), non-breeding	<p>The land identified for operational use for Glasgow Airport lies to the south of the Black Cart SPA. The boundary at the eastern end of the SPA is coincident with the land identified through Policy E5. The airport terminal is located in the southern part of the operation land where there is intensive built development, however, the runway, taxi ways and airfield are parallel to the Natura designation. There is a significant area of farmland in the eastern part of the site at Netherton Farm which has been included within the land required for operational use.</p> <p>It is considered that the close proximity of the land identified through Policy E5 to the Natura 2000 site and the inclusion of a significant area of farmland could result in:</p> <ul style="list-style-type: none"> <li>• Land use changes affecting roosting and feeding habitat of the area used by the whooper swans; or,</li> <li>• Other changes in land use that may have a significant effect includes changes in the grazing regime or management on land used by the whooper swans.</li> </ul>

Policy likely to have a significant effect	Natura site/s which will be affected	Qualifying interest on the site	Summary of the likely significant effects
<b>POLICY C1 – Renfrewshire Network of Centres</b>	Inner Clyde	Redshank ( <i>Tringa totanus</i> ), non-breeding	<p>The area identified as Erskine Town Centre lies to the south of the River Clyde SPA. It is within 400m metres of the Natura 2000 site. The precise nature of development within the Centre is not known at present. However, therefore, development at this location could result in:</p> <ul style="list-style-type: none"> <li>• The development itself causing disturbance of protected species;</li> <li>• There could be an increased recreational use associated with the development resulting in longer term disturbance issues; and,</li> <li>• Any of these development types may result in a change in water quality potentially resulting in a significant adverse impact on the Inner Clyde SPA.</li> </ul>

## 18. Appropriate Assessment

### POLICY E1 – Renfrewshire’s Economic Investment Locations

#### Reasons for Appropriate Assessment

Through this policy, the Council aims to promote and guide investment opportunities to Strategic Economic Investment Locations in the first instance which includes Inchinnan Business Park which is adjacent to the Black Cart SPA. The locally important economic area identified through the LDP at Erskine Riverfront is adjacent to the Inner Clyde SPA. The policy could facilitate development at either site that could potentially have a negative effect on the nature designations.

#### Suitable Mitigation Measures

The policy has been identified as potentially affecting the Black Cart and Inner Clyde SPA because it is possible that development could occur on the sites that may have a negative impact on the sites. It is considered therefore that mitigation is required in order to ensure that the integrity of the Natura sites is not adversely affected by the content of the policy. The policy was required to provide flexibility thus allowing development to proceed without adversely affecting the integrity of the Natura site. In recognition of the potential effect that economic development proposals could have on the two Natura sites, therefore, Policy E1 has been amended to include specific reference to Natura 2000 sites and it reads as follows:

#### POLICY E1 – Renfrewshire’s Economic Investment Locations

The Council identifies and promotes Strategic Economic Investment Locations and a number of Local Business / Industrial areas for the development of Class 4 Business, Class 5 General Industry and Class 6 Storage and Distribution development and ancillary service provision. Development proposals require to be assessed against the criteria detailed in New Development SG. The Council welcomes development which can demonstrate that it does not have an adverse effect on the integrity of any Natura 2000 sites.

***It is considered that appropriate mitigation has been provided.***

## **POLICY E2 – Glasgow Airport Zone**

### **Reasons for Appropriate Assessment**

The policy seeks to promote the area around Glasgow Airport for economic development. In particular Inchinnan Business Park, Westway, Linwood and Hillington / Renfrew North are identified as a key locations which will support economic growth; the operational requirements of the airport; and, the regeneration and renewal of the Cart Corridor and Murray Street. Inchinnan Business Park is identified through this policy and Policy E1 as being suitable for economic investment and associated development. It is adjacent to the Black Cart SPA and development at this location could have a potentially significant effect on the Black Cart SPA.

### **Suitable Mitigation Measures**

The sites referred to in this policy include the Renfrewshire Economic Investment locations as outlined in Policy E1. Any development proposals will therefore be subject to the measures outline in policy E1 including the specific protection provided for Natura 2000 sites. It was not considered necessary to repeat the specific policy caveat referring to the Natura 2000 site in this policy.

## **POLICY E2 – Glasgow Airport Zone**

The Council promotes the area around Glasgow Airport and in particular Inchinnan Business Park, Westway, Linwood and Hillington / Renfrew North as a key locations which will support economic growth; the operational requirements of the airport; and, the regeneration and renewal of the Cart Corridor and Murray Street . All development proposals will be assessed against the relevant criteria as detailed in the New Development SG.

***It is considered that appropriate mitigation has been provided.***

## **POLICY E3 – Transition Areas**

### **Reasons for Appropriate Assessment**

The policy promotes rationalisation of the industrial land supply in certain areas of Renfrewshire. A range of alternative uses has been proposed for an area of land at Erskine riverfront. The area identified through the LDP is currently a fully serviced greenfield site which could accommodate a range of uses. A change of use would provide an opportunity to transform the waterfront area creating a sense of place, increasing connectivity with the town centre and enhancing the green network. Business and industrial uses within classes 4, 5 and 6 of the use class order, residential, hotels, residential institutions, educational facilities, nurseries, leisure and restaurants are considered to be appropriate, whilst retail uses would not be acceptable. The area identified is adjacent to the Inner Clyde SPA. The anticipated change of land use at this location could result in a range of appropriate economic uses that may have a potentially significant effect on the Natura 2000 site.

### **Suitable Mitigation Measures**

In recognition of the proximity of Erskine Riverfront to the Inner Clyde SPA and the potential for development to cause an adverse effect on the integrity of the site, an appropriate caveat was included within Policy E3, it is as follows:

### **POLICY E3 – Transition Areas**

The Council has identified a number of Transition Areas that could support a mix of uses. Figure 9 and the proposals maps highlight the areas identified as being in transition. Development proposals or a change of use within Transition Areas should be able to co-exist with existing uses, having no significant affect on the character and amenity of the surrounding area including the impact on the vitality and viability of the Network of Centres and demonstrate that it does not have an adverse effect on the integrity of any Natura 2000 sites. Proposals require to be assessed against the criteria detailed in the New Development SG.

***It is considered that appropriate mitigation has been provided.***

## **POLICY E5 – Glasgow Airport Operational Land**

### **Reasons for Appropriate Assessment**

The Council recognises the important role of Glasgow Airport in the supporting tourism and the national economy. An area of land has been identified through the LDP to ensure that the airport can continue to operate and fulfil this function. The land is adjacent to the Black Cart SPA and it is possible that development at the airport may potentially result in a significant adverse effect on the Natura 2000 site.

### **Suitable Mitigation Measures**

In recognition of the proximity of Glasgow Airport to the Black Cart SPA and the potential for development to cause an adverse effect on the integrity of the site, an appropriate caveat has been included within Policy E5. The inclusion of the caveat is intended to provide flexibility to allow development to go ahead without causing a significant negative impact.

## **POLICY E5 – Glasgow Airport Operational Land**

The Council promotes the area around Glasgow Airport as a key location which will support economic growth and the requirements of the airport. Within the operational land and land surrounding the airport there will be a presumption in favour of uses associated with the operational functions of the airport, or uses which are compatible and do not compromise the airport functionality; this includes land required to improve surface access arrangements, including sustainable transport and travel. Enhanced connectivity to and from the airport requires the support of a number of stakeholders and the Council will continue to work in partnership to ensure enhanced connections in and around the airport. Any development proposals in or around the airport should not have a significant impact on the infrastructure of the airport or surrounding environment and demonstrate that it does not have an adverse effect on the integrity of any Natura 2000 Site.

***It is considered that appropriate mitigation has been provided.***

## POLICY C1– Renfrewshire Network of Centres

### Reasons for Appropriate Assessment

The LDP seeks to strengthen the role and function of the town centre, creating a place with a range and quality of facilities. The overall quality of the town centres' public spaces and linkages to the waterfront and the town's residential areas also require improvement to help it achieve a sustainable future.

### Suitable Mitigation Measures

It is recognised that Erskine Town Centre is in close proximity to the Inner Clyde SPA. In order to secure the centre's vitality and viability and to ensure that it will continue to provide services to the local communities without adversely affecting the integrity of the neighbouring Natura site, an appropriate caveat was included within Policy C1. The caveat is site specific, relating only to Erskine Town Centre, and it should allow adequate flexibility for development to proceed without the integrity of the Inner Clyde SPA being adversely affected.

### POLICY C1 – Renfrewshire Network of Centres

*Each of the centres in Renfrewshire form part of a diverse, interconnected network of places to live, shop, work, enjoy entertainment, leisure and cultural activities and gain access to important transport connections. The Council welcomes development that will strengthen the network and enhance its centres, ensuring they are places which are vibrant, inclusive and accessible and complementary, as well as compatible with surrounding land uses. All proposals will be considered in line with the hierarchy and role and function of centres detailed in Figure 11 and against the development criteria set out within the New Development SG.*

**Figure 11 – Renfrewshire Network of Centres Role & Function**

<b>Erskine Town Centre</b>	Local retail, leisure and commercial centre providing local community services for Erskine, Bishopton and Inchinnan.	Strengthen the role and function of the town centre, creating a place with a range and quality of facilities appropriate for a town of its size. Opportunity to improve overall quality of the town centres' public spaces and linkages to the waterfront. There is a need to demonstrate that development does not have an adverse effect on the integrity of the Inner Clyde SPA.
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***It is considered that appropriate mitigation has been provided.***

## 19. In-combination Effects of Screened-in policies

- 19.1 Only an assessment of the in-combination effects for the sites identified at Erskine water front and the Inner Clyde SPA, and the Glasgow Airport land allocations and the Black Cart SPA were considered necessary. No further assessments are required as none of the policies were screened out under step 3d of Figure 10 and therefore, no 'de-minimis' effects were identified for any aspects of the LDP.
- 19.2 Figure 12 considers whether there is likely to be an in-combination effect associated with policies E1 – Local Industrial Areas, E3 – Transition Areas and C1 - Core Town Centre at Erskine waterfront and the Inner Clyde SPA. Figure 13 considers the whether there is likely to be an in-combination effect associated with policies E1 – Strategic Economic Investment Locations, E2 – Glasgow Airport Zone and E5 – Glasgow Airport Operational Land and the Black Cart SPA.

**Figure 12: Assessment of Policy Related In-combination Effects for Inner Clyde SPA**

Policy	How will the policy impact upon the site and to what extent?	Potential in-combination effects between the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
<b>E1 - Local Industrial Areas</b>	The locally important economic area identified through the LDP at Erskine Riverfront is adjacent to the Inner Clyde SPA. The policy could facilitate development that could potentially have a negative effect on the Natura designation. Development of the area for industry could result in disturbance of the protected bird species or a change in the water quality.	The policy will result in development of the site for industrial use which could potentially result in associated negative impacts. Development of the neighbouring E3 – Transition site could have a similar impact on the Natura 2000 site. Both sites have already been the subject of a degree of development without there being a detrimental impact on the SPA. The policies will allow for a further intensification of this development. The C1 - Core Town Centre is situated approximately 400m from the waterfront and has previously been the subject of retail and community related development. There is limited scope for further large scale development, however, there could potentially be negative impacts associated with any town centre improvements, development or improved access arrangements. Mitigation has been provided through an appropriate caveat in each relevant policy. After discussions with SNH, it is considered that even if the sites were developed simultaneously, there is adequate flexibility in the policy through the provision of the aforementioned caveats to ensure that there would be no in-combination effects. The plan contains no aspects which alone or in-combination which would adversely affect the integrity of the Inner Clyde SPA.	No

Policy	How will the policy impact upon the site and to what extent?	Potential in-combination effects between the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
<b>E3 – Transition Areas</b>	<p>The policy promotes rationalisation of the industrial land supply in certain areas of Renfrewshire. A range of alternative uses has been proposed for an area of land at Erskine riverfront. The area identified through the LDP is currently a fully serviced greenfield site which could accommodate a range of uses. Development of the area for industry could result in disturbance of the protected bird species or a change in the water quality. Recreational uses may also be appropriate in this area resulting in improvements to the access routes and potentially disturbance of the protected bird species, (e.g. pedestrians or dogs not kept under control)</p>	<p>The policy will result in development of the site for a range of uses which could potentially result in associated negative impacts. Development of the neighbouring E1 – Local Industrial Area site could have a similar impact on the Natura 2000 site. Both sites have already been the subject of a degree of development without there being a detrimental impact on the SPA. The policies will allow for a further intensification of this development. The C1 - Core Town centre is situated approximately 400m from the waterfront and has previously been the subject of retail and community related development. There is limited scope for further large scale development, however, there could potentially be negative impacts associated with any town centre improvements, development or improved access arrangements. Mitigation has been provided through an appropriate caveat in each relevant policy. After discussions with SNH, it is considered that even if the sites were developed simultaneously, there is adequate flexibility in the policy through the provision of the aforementioned caveats to ensure that there would be no in-combination effects. The plan contains no aspects which alone or in-combination which would adversely affect the integrity of the Inner Clyde SPA.</p>	No

Policy	How will the policy impact upon the site and to what extent?	Potential in-combination effects between the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
<b>C1 - Core Town Centre</b>	The policy seeks to strengthen the role and function of the town centre, creating a place with a range and quality of facilities. The overall quality of the town centres' public spaces and linkages to the waterfront and the town's residential areas also require improvement to help it achieve a sustainable future. Although not on the water front, the site is in close proximity to the Natura 2000 site. Development of the town centre could result in disturbance of the protected bird species or a change in the water quality. Improvements to the access routes may increase recreational use in this area resulting in potential disturbance of the protected bird species, (e.g. pedestrians or dogs not kept under control)	The C1 - Core Town centre is situated approximately 400m from the waterfront and has previously been the subject of retail and community related development. There is limited scope for further large scale development, however, there could potentially be negative impacts associated with any town centre improvements, development or improved access arrangements. The E1 Local Industrial Area to the north will result in development of the site for industrial use which could potentially result in associated negative impacts. Development of the neighbouring E3 – Transition site could have a similar impact on the Natura 2000 site. Both sites have already been the subject of a degree of development without there being a detrimental impact on the SPA. The policies will allow for a further intensification of this development. Mitigation has been provided through an appropriate caveat in each relevant policy. After discussions with SNH, it is considered that even if the sites were developed simultaneously, there is adequate flexibility in the policy through the provision of the aforementioned caveats to ensure that there would be no in-combination effects. The plan contains no aspects which alone or in-combination which would adversely affect the integrity of the Inner Clyde SPA.	No

**Figure 13: Assessment of Policy Related In-combination Effects for Black Cart SPA**

Policy	How will the policy impact upon the site and to what extent?	Potential in-combination effects between the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
E1 – Strategic Economic Investment Locations	Through this policy, the Council aims to promote and guide investment opportunities to Strategic Economic Investment Locations in the first instance which includes Inchinnan Business Park which is adjacent to the Black Cart SPA. The policy could facilitate development that could potentially have a negative effect on the Natura designation. Development may result in land use changes affecting roosting and feeding habitat in the wider Black Cart floodplain or changes to grazing management which could also have a negative impact.	The policy will result in development of the site for industrial use which could potentially result in associated negative impacts. The site is located to the north of the Natura designation and is already the subject of a significant amount of business and industry related development. Previous development has been required to accommodate appropriate mitigation measures to ensure that there has not been any significant adverse effect on the integrity of the SPA. There is limited scope for further development, however, it is recognised that there could potentially be a negative impact. It is possible that development on this site may occur as development within the E5 policy area to the south of the SPA comes on stream. Mitigation has been provided, however, through an appropriate caveat in each relevant policy. After discussions with SNH, it is considered that even if the sites were developed simultaneously, there is adequate flexibility in the policy through the provision of the aforementioned caveats to ensure that there would be no in-combination effects. The plan contains no aspects, therefore, which alone or in-combination which would adversely affect the integrity of the Black Cart SPA.	No

Policy	How will the policy impact upon the site and to what extent?	Potential in-combination effects between the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
E2 – Glasgow Airport Zone	<p>The policy seeks to promote the area around Glasgow Airport for economic development. In particular Inchinnan Business Park is identified as a key location which will support economic growth and the operational requirements of the airport. Inchinnan Business Park is identified through this policy and Policy E1 as being suitable for economic investment and associated development. It is adjacent to the Black Cart SPA and development at this location could have a potentially significant effect on the Black Cart SPA as outlined above.</p>	<p>The policy will result in development of the site for industrial use which could potentially result in associated negative impacts. The site is located to the north of the Natura designation and is already the subject of a significant amount of business and industry related development. Previous development has been required to accommodate appropriate mitigation measures to ensure that there has not been any significant adverse effect on the integrity of the SPA. There is limited scope for further development, however, it is recognised that there could potentially be a negative impact. It is possible that development on this site may occur as development within the E5 policy area to the south of the SPA comes on stream. Mitigation has been provided, however, through an appropriate caveat in each relevant policy. After discussions with SNH, it is considered that even if the sites were developed simultaneously, there is adequate flexibility in the policy through the provision of the aforementioned caveats to ensure that there would be no in-combination effects. The plan contains no aspects, therefore, which alone or in-combination which would adversely affect the integrity of the Black Cart SPA.</p>	No

Policy	How will the policy impact upon the site and to what extent?	Potential in-combination effects between the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
E5 – Glasgow Airport Operational Land	<p>The Council recognises the important role of Glasgow Airport in the supporting tourism and the national economy. An area of land has been identified though the LDP to ensure that the airport can continue to operate and fulfil this function. The land is adjacent to the Black Cart SPA and it is possible that development at the airport may potentially result in a significant adverse effect on the Natura 2000 site as outlined above.</p>	<p>The policy will result in development of the site for uses that will facilitate the operation of Glasgow Airport which could potentially result in associated negative impacts on the integrity of the Black Cart SPA. The site is located to the south of the Natura designation and is already the subject of airport related development. It is recognised that there could potentially be a negative impact. It is possible that development on this site may occur as development within the E1 policy area to the north of the SPA comes on stream. Mitigation has been provided, however, through an appropriate caveat in each relevant policy. After discussions with SNH, it is considered that even if the sites were developed simultaneously, there is adequate flexibility in the policy through the provision of the aforementioned caveats to ensure that there would be no in-combination effects. The plan contains no aspects, therefore, which alone or in-combination which would adversely affect the integrity of the Black Cart SPA.</p>	No

## 20. In combination effects with other plans and projects

20.1 It has been concluded that development of the economic investment locations at Inchinnan and Erskine Riverfront could potentially impact upon the Natura 2000 sites. In addition, there could potentially be an impact caused by the development of Erskine Town Centre. It has been possible, however, through the use of appropriate mitigation measures to ensure that there will be no impacts upon the integrity of these sites alone or in combination. It is logical to consider the impacts which other plans and projects could have upon either of the two Natura 2000 sites in order to determine if there will be any cumulative effects with the allocation of these locations for development.

20.2 The plans that are considered to be of relevance in the in-combination assessment are as follows:

- The Glasgow and the Clyde Valley Strategic Development Plan (2012);
- West Dunbartonshire Local Development Plan (Main Issues Report);
- Inverclyde Local Development Plan (Main Issues Report) (2011)
- Argyll and Bute Council Main Issues Report (2011)
- Renfrewshire Core Path Plan;
- Renfrewshire Local Housing Strategy; and,
- Glasgow Airport Masterplan

Plan or Project	Has a HRA been conducted of this plan or project?	Natura 2000 sites potentially affected	How the plan or project will impact upon the site and to what extent?	Potential interactions with the 'development sites'	Will the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
The Glasgow and the Clyde Valley Strategic Development Plan (2012)	Yes	The Black Cart SPA was identified as potentially being affected by development and in light of the HRA, any development proposals are required to demonstrate that they would not adversely affect the Natura 2000 Site.	Inchinnan is identified as a Strategic Economic Investment Location through the Strategic Development Plan (SDP) where economic activity and industrial development are considered to be appropriate. Depending on the location of this type of development there could be a change in land use that could affect the feeding habitat or roosting of the area used by the Whooper swans that use this site. Grazing regimes/management could also be affected by development proposals directly or indirectly.	The SDP sets the strategic policy framework for the LDP, therefore there will be an interaction between the two documents. In light of this, both documents recognise the sensitivity of this site in term of its nature conservation value. Through the HRA process and appropriate assessment mitigation measures have been put in place to ensure that the interaction does not result in a significant adverse effect on the Black Cart SPA.	No

Plan or Project	Has a HRA been conducted of this plan or project?	Natura 2000 sites potentially affected	How the plan or project will impact upon the site and to what extent?	Potential interactions with the 'development sites'	Will the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
Renfrewshire Core Path Plan	No	The Inner Clyde SPA could potentially be affected by development.	The Core Paths Plan identifies a route along River Clyde which coincides with the Green Belt and the area defined in the Renfrewshire Proposed LDP as a Transition Area through policy E3. The Core Path is already in place at this location as formal promenade type of route along the River Clyde. Improvements to the route or development of the transition area could result in disturbance of the protected bird species and recreational uses have the potential to cause disturbance or a negative impact (e.g. dogs not kept under control). Development may also result in a change in water quality which could also have a negative impact.	<p>The Core Paths Plan (CPP) was formally approved in 2009. None of the routes contained within the CPP were new routes and have been in existence for some time. Any impacts resulting from the CPP and the path at Erskine have been in existence for a number of years.</p> <p>Any additional impacts would therefore be as a result of the Renfrewshire LDP and these have been addressed within this document.</p>	No

Plan or Project	Has a HRA been conducted of this plan or project?	Natura 2000 sites potentially affected	How the plan or project will impact upon the site and to what extent?	Potential interactions with the 'development sites'	Will the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
West Dunbartonshire Local Development Plan (Main Issues Report)	No	The Inner Clyde SPA could potentially be affected by development.	The West Dunbartonshire Local Development Plan Main Issues Report (MIR) identifies the main land use planning issues for the local authority. Through the document 5 large areas on the northern shore of the Natura 2000 site have been identified as key regeneration areas with a series of preferred uses. In addition, there is a Strategic Economic Investment Location at Clydebanks Riverside and other waterfront opportunities for housing and recreation identified along the Inner Clyde SPA. The qualifying species could be the subject of disturbance, recreational use could be increased and the preferred options and alternative uses suggested through the Main Issues Report could result in a reduction in water quality.	The MIR presents a series of issues with associated preferred options and alternatives which are open to consultation. Land uses within West Dunbartonshire will not be confirmed until the local authority reaches the Proposed LDP stage. The timing of the preparation of the Proposed LDPs for Renfrewshire and West Dunbartonshire is a crucial factor in considering the possibility of potential interactions and in combination effects. At present there are no firm land use policy proposals in place in terms of West Dunbartonshire LDP. It is considered, therefore, that there are no in-combination effects arising from the interactions of these two LDPs Plans. The possibility of in-combination effects will be reviewed as the LDPs evolve and once West Dunbartonshire Council progresses its MIR to the Proposed LDP stage.	No

Plan or Project	Has a HRA been conducted of this plan or project?	Natura 2000 sites potentially affected	How the plan or project will impact upon the site and to what extent?	Potential interactions with the 'development sites'	Will the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
Inverclyde Local Development Plan (Main Issues Report) (2011)	No	The Inner Clyde SPA could potentially be affected by development.	The Inverclyde Local Development Plan Main Issues Report (MIR) identifies the main land use planning issues for the Local authority. A number of areas are identified along the riverfront from Port Glasgow to Gourock for business and industry land uses. One of the preferred options relates to the development of Inchgreen in Greenock for green energy hub. The qualifying species could be the subject of disturbance and the preferred options, particularly that suggested for Inchgreen, and alternative uses suggested through the Main Issues Report could result in a reduction in water quality	The Inverclyde MIR presents a series of issues with associated preferred options and alternatives which are open to consultation. Land uses within Inverclyde will not be confirmed until the local authority reaches the Proposed LDP stage. The timing of the preparation of the Proposed LDPs for Renfrewshire and Inverclyde is a crucial factor in considering the possibility of potential interactions and in combination effects. At present there are no firm land use policy proposals in place from Inverclyde. It is considered, therefore, that there are no in-combination effects arising from the interactions of these two LDPs. The possibility of in-combination effects will be reviewed as the LDPs evolve and once Inverclyde Council progresses its MIR to the Proposed LDP stage.	No

Plan or Project	Has a HRA been conducted of this plan or project?	Natura 2000 sites potentially affected	How the plan or project will impact upon the site and to what extent?	Potential interactions with the 'development sites'	Will the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
Argyll and Bute Council Main Issues Report (2011)	No	The Inner Clyde SPA could potentially be affected by development.	The Argyll and Bute Development Plan Main Issues Report (MIR) identifies the main land use planning issues for the Local authority. A number of locations are identified along the north coast of the Natura 2000 site for a range of uses including waterfront regeneration at Helensburgh. The qualifying species could be the subject of disturbance and the preferred options and alternative uses suggested through the Main Issues Report could result in a reduction in water quality	The MIR presents a series of issues with associated preferred options and alternatives which are open to consultation. Land uses within Argyll and Bute will not be confirmed until the local authority reaches the Proposed LDP stage. The timing of the preparation of the Proposed LDPs for Renfrewshire and Argyll and Bute is a crucial factor in considering the possibility of potential interactions and in combination effects. At present there are no firm land use policy proposals in place from Inverclyde. At the MIR stage It is considered, therefore, that that there are no in-combination effects arising from the interactions of these two LDPs. The possibility of in-combination effects will be reviewed as the LDPs evolve and once Argyll and Bute Council progresses its MIR to the Proposed LDP stage.	No

Plan or Project	Has a HRA been conducted of this plan or project?	Natura 2000 sites potentially affected	How the plan or project will impact upon the site and to what extent?	Potential interactions with the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
Renfrewshire Local Housing Strategy 2011 - 2016	No	The Inner Clyde SPA could potentially be affected by development.	The Local Housing Strategy (LHS) is Renfrewshire Council's main strategic document on housing, homelessness and related issues. The LHS considers housing needs and demands and the Local Development Plan identifies the sites to meet these requirements. The Transition Area identified at Erskine Riverfront includes housing as an acceptable use at this location. Should this development type proceed, the qualifying species could potentially be the subject of disturbance and there may be an associated change in water quality.	The LHS helps to set the policy context for the housing land requirements in Renfrewshire and does not identify specific sites to meet the housing needs and demands. It is considered, therefore, that there are no in-combination effects arising from the interaction of the LDP and the LHS.	No

Plan or Project	Has a HRA been conducted of this plan or project?	Natura 2000 sites potentially affected	How the plan or project will impact upon the site and to what extent?	Potential interactions with the 'development sites'	Will the aspect of the Renfrewshire LDP adversely affect the integrity of a European site, in-combination as well as alone.
Glasgow Airport Draft Master plan (2011)	No	The Black Cart SPA could potentially be affected by development.	The draft Master Plan follows the recommendations set out in the 2003 Government White Paper, The Future of Aviation, and updates the existing 2006 Glasgow Airport Master Plan. The land use at the airport to 2020 is considered in some detail. Land use beyond 2020 to 2040 is also considered including the possibility of a second runway as the first reaches capacity. The proposed land use up to 2020 does not show any change to the airport boundary to the north and adjacent to the Black Cart SPA. Beyond 2020 additional land is identified for ancillary uses and the second runway. Surface access to the airport is also covered.	The Master Plan has not been finalised. The Master Plan also covers a much longer timescale than the LDP which only considers land use requirements in Renfrewshire for next 5 years. The LDP will take the Airport's land use requirements into account, however, only for the next 5 years. It is considered, therefore, that there are no in-combination effects arising from the interaction of the LDP and the Draft Master Plan.	No

## 21. Conclusions

- 21.1 The initial screening stage of general policies in the HRA record identified that there were a very limited number of policies which could have a 'likely significant effect' upon any Natura 2000 sites. The next stage of the process demonstrated that the potential effects of each of these policies could be mitigated by altering the policies.
- 21.2 It is therefore concluded that, pending the representations from SNH, implementation of the policies and proposals of the Renfrewshire LDP alone or in-combination would have no adverse effects upon the integrity of any Natura 2000 sites. It is recognised that it is possible that as new policy documents come into being that there may potentially be significant adverse impacts on the integrity of Natura 2000, particularly in relation to in-combination effects. Renfrewshire is the first Council within the Glasgow and the Clyde Valley Strategic Development Plan area to reach the Proposed LDP stage in the review of their Local Development Plan. The Local Authorities surrounding Renfrewshire are all in the process of reviewing their LDPs which will result in potential land use changes that may affect the integrity of the SPAs within Renfrewshire. The HRA and Appropriate Assessment are considered to be 'live' documents and will be reviewed and updated as required in light of these emerging policy documents.