

STRATEGIC ENVIRONMENTAL ASSESSMENT

POST ADOPTION STATEMENT

Westerhill Regeneration Area Masterplan for East Dunbartonshire Council

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1 Introduction

- 1.1.1. East Dunbartonshire is set to benefit from a £34.88 million City Deal investment in East Dunbartonshire Council's City Deal Place and Growth Programme. The programme, which aims to boost the East Dunbartonshire economy, links to the wider city region across three projects:
- The Westerhill Regeneration Area (WRA) Masterplan (including The Westerhill Development Road (WDR))
 - A803 Corridor Improvements
 - Bishopbriggs Town Centre Regeneration.
- 1.1.2. The WRA was identified in the emerging Local Development Plan (2)(3.R) in 2020, (currently under examination). The area is shown in Figure 1.1 and is referred to as 'the Site'.
- 1.1.3. As part of the SCAPE Framework, Triskelion are providing specialist support to East Dunbartonshire Council, including the WRA Masterplan, which will help to inform the decision-making process at a strategic level.
- 1.1.4. As part of the development of this strategy, East Dunbartonshire Council have undertaken a Strategic Environmental Assessment (SEA), in line with the Environmental Assessment (Scotland) Act 2005 (hereafter referred to as 'the Act').
- 1.1.5. The SEA Environmental Report reports the environmental and consultation considerations taken into account through the SEA process and the assessment of the WRA Masterplan options.
- 1.1.6. This document, the SEA post-adoption statement (PAS) has been produced following completion of the SEA Environmental Report January 2023 and finalisation of the WRA Masterplan October 2023. The purpose of this document is to outline how the environmental assessment and consultation was taken into account in the final WRA Masterplan.

2 Strategic Environmental Assessment

- 2.1.1. As part of the requirements of the Act, Scottish public bodies undertake a SEA when preparing a plan, programmes or strategy (PPS), if it is likely to have significant environmental effects. This applies to plans with significant positive or negative environmental effects.
- 2.1.2. SEA is a means for public bodies to judge the likely impact of PPS on the environment and to seek ways to minimise significant adverse effects and enhance potential benefits.
- 2.1.3. The SEA process also enhances the understanding of a plan's effect on the environment for decision-makers, stakeholders and the public, so they are better informed. Reporting requirements improve the transparency of decision making and potentially greater appreciation of the reasoning behind decisions.
- 2.1.4. As part of the development of the WRA Masterplan, East Dunbartonshire Council have completed the assessment and necessary reporting steps within the SEA process, including:
- Scoping
 - Environmental assessment
 - Consultation

- Post-adoption statement

2.1.5. **Table 2-1** provides more detail on the SEA steps completed for the WRA Masterplan.

Table 2-1: Summary and dates for completed SEA steps

Step	Key Dates	Summary
Screening	No Screening Letter submitted	n/a
Scoping	Scoping Report Submitted: October 2020 Scoping Opinion received: November 2020	<p>The Scoping Report was submitted to the Consultation Authorities and East Dunbartonshire Council.</p> <p>As part of the process, environmental objectives were set out to assess the WRA Masterplan options and a proposed methodology for assessing potential likely significant effects.</p> <p>The Consultation Authorities are then given 35 days to review and provide their Scoping Opinion, which agrees the methodology for assessment in the SEA Environmental Report.</p>
Environmental assessment	Environmental Report submitted: January 2023 Consultation Authority review comments received: February 2023	<p>The environmental assessment and the findings are presented in the Environmental Report. This included a compatibility assessment on the proposed WRA Masterplan options, and conclusions on likely significant (positive and negative) environmental effects of the WRA Masterplan.</p> <p>The Environmental Report also identified ways to minimise adverse effects and promote enhancement opportunities through a set of recommendations.</p> <p>This detail provided transparency for statutory consultees, stakeholders and the wider public.</p> <p>The Consultation Authorities were then provided with the report for review and comment.</p>
Consultation	Public Consultation: 10 th April to 16 th May 2023	Public consultation on the draft WRA Masterplan was an opportunity for comment before finalising the WRA Masterplan and the identified environmental outcomes.

3 Post Adoption Statement

- 3.1.1. As per Section 18(3) of the Act, the responsible authority (East Dunbartonshire Council) are required to answer a series of questions as soon as reasonably practicable after the adoption of a qualifying plan or programme (the WRA Masterplan). These are set out as follows:

- **How the environmental considerations have been integrated into the plan or programme**

East Dunbartonshire Council produced a number of WRA Masterplan options. Before undertaking the environmental assessment, environmental objectives and indicators were established in consultation with the wider East Dunbartonshire Council environmental technical teams and Consultation Authorities. This approach was set out in the SEA Scoping Report.

Due to the high degree of similarities between the spatial options, a preliminary appraisal was undertaken to identify the key points of difference, as shown in Appendix B of the Environmental Report. A preferred Spatial Option with supporting justification is set out in Chapter 7: Preferred WRA Masterplan of the Environmental Report.

A compatibility matrix was used to assess the Preferred WRA Masterplan against the SEA environmental topics to identify the likely significant effects. The conclusion of the assessment informed mitigation and enhancement recommendations to better integrate environmental considerations into the Preferred WRA Masterplan.

The WRA Masterplan has sought to integrate a number of environmental considerations into its vision, objectives, and program. The plan includes phased development and adopts the Environmental and Social Performance (ESP) framework, particularly focusing on preserving peat/carbon rich soils. The ESP outlines Key Performance Indicators (KPI), targets, and recommended actions for various components, such as diversified low carbon energy solutions, energy-efficient buildings, and minimising construction waste. Additionally, the plan emphasises building with nature to promote nature recovery, including peatland conservation, habitat creation, biodiversity net-gain, and improvements to local health and wellbeing.

- **How the Environmental Report has been taken into account**

The SEA Environmental Report assessed the likely effects of the proposed WRA Masterplan on the environment. A series of recommendations to improve the integration of environmental considerations in the WRA Masterplan were set out for East Dunbartonshire Council to consider and action in balance with their vision, objectives and programme.

The assessment considered potential significant environmental effects and also assessed the likely residual effects with proposed mitigation and enhancement in place. This was to inform the decision makers drafting the final WRA Masterplan design and provide transparency for consultation.

Key recommendations included in the Masterplan from the Environmental Report:

- **Phased development**
 - 2023 – 2031; Promoting existing businesses and brownfield land development.
 - 2026 – 2035; Economic growth through delivery of high-quality jobs on newly released development land
 - 2035 onwards; Future land reserve and future promotion.
- **Active travel routes**

- Wider distribution of active travel routes with more direct routes to key areas of the proposed for development and surrounding key community hubs, attractions and exiting / planned transport networks;
- Active travel corridors linking with existing woodland, wetland and watercourses to facilitate a diverse network of habitats, in balance with protecting habitat space.
- **Recreational routes**
 - Evidence of 'complete' recreational routes with uninterrupted paths, exploring the green space in and around the Site with options for short, medium and long walks.
 - Reduction in number and density of recreational routes within locally valued habitat.
- **Biodiversity improvements**
 - Avoided removing existing high quality biodiversity areas through careful design
 - Improving areas with biodiversity potential and incorporate a wider, connecting strategy for all sites proposed for development to achieve greater biodiversity mitigation and enhancement.
 - Promote greater number of green corridors that traverse the Site to help generate a 'green network' of which the WDR should be integrated with.
 - Prioritise the retention of green / open space before seeking to replace habitat.
- **Water environment**
 - Promotion of green / blue infrastructure and habitat creation.
 - Masterplan accounts for potential impact on flood risk area in proximity to Park Burn.
- **Avoidance of peat**
 - Proactively engaged with consultees and peat specialists
 - Additional peat surveys
 - The WRA Masterplan limits peatland disruption by application of the mitigation hierarchy i.e. avoiding peat areas for the proposed development
 - For the WDR and active travel routes, as essential infrastructure, best practice construction methods and mitigation measures are to be applied where avoidance is not possible to minimise the volume of peat and carbon rich soils to be excavated and to minimise the footprint of disturbance.

Key recommendations **not** included in the Masterplan from the Environmental Report:

There are a number of recommendations from the Environmental Report not yet represented in the WRA Masterplan. This is due to the appropriate level of detail at this stage of design, and are expected to be considered in later stages as the development progresses through planning.

Recommendations to consider are:

- Climate resilience;
- Carbon emissions;
- Westerhill Road traffic calming;
- Community facilities;

- Heritage development; and
- Electric vehicle charging.

In summary, East Dunbartonshire Council have used the SEA process to develop the actions with greater focus and representation of the wider environment, accounting for the Environmental Report and contributing to the delivery of a fairer and more sustainable masterplan.

- **How the opinions expressed by consultees have been taken into account**

Throughout the SEA process, East Dunbartonshire Council have engaged with the following key groups as part of the WRA Masterplan:

- **Statutory Environmental Bodies**

- Historic Environment Scotland (HES)
- Nature Scot
- Scottish Environmental Protection Agency (SEPA)

Statutory engagement with these consultees influenced the direction and scope of the assessment, which shaped any recommendations for the WRA Masterplan. East Dunbartonshire Council used the SEA process to engage regularly with the Consultation Authorities and gave opportunity to provide feedback. Consultation was recorded and provides transparency to the decision-making process.

- **East Dunbartonshire Council**

The wider East Dunbartonshire Council environmental officers were consulted through workshop sessions to review and input to the environmental objectives. Their experience and expertise provided scrutiny, which informs the and improves viability of the proposals.

- **Public Consultation**

Public consultation was held for 5 weeks from 10th April to 16th May 2023. This included both digital and physical consultation activities. The SEA Environmental Report was used to inform consultation material presented to the public.

A project website was setup as ArcGIS StoryMap for digital engagement.

The webpage was live for the entire consultation period and received 939 views. The consultation was launched with a media release on 13th April 2023, which was published on the Council website, where it was viewed 148 times. There was also coverage in Scottish Construction Now and Kirkintilloch Herald.

The consultation feedback is recorded in the Westerhill Masterplan Stakeholder Engagement and Consultation Report (June 2023).

The WRA Masterplan has engaged with a broad range of consultees and provided regular, meaningful engagement that shaped the WRA Masterplan.

- **How the results of any relevant consultation have been taken into account**

In addition to how the opinions of consultees were accounted for (detailed above), the Consultation Authorities were consulted at regular stages of the SEA process and this directly influenced the environmental assessment and recommendation of the WRA Masterplan.

The environmental objectives were established in consultation with the wider East Dunbartonshire Council environmental officers and the statutory environmental bodies. These objectives set the scope of assessment and influenced the decision-making process when optioneering.

The SEA Environmental Report was submitted to the Consultation Authorities for additional comment. This is not a statutory requirement but East Dunbartonshire Council valued the consultation response, which included:

HES feedback

HES responded to the scoping document with some suggestions to include in the SEA, regarding other wide ranging beneficial impacts that the historic environment brings, such as the contribution to education, outdoor activities, the green network, human health and sustainability. This feedback was integrated into the recommendations into the SEA Environmental Report.

Further feedback from HES is included in the public consultation summary.

No response received from HES on the Environmental Report.

NatureScot feedback

Overall, NatureScot approved of the approach in the SEA process for the WRA Masterplan, including integrating an Ecosystems Approach.

NatureScot commented on a number of key parameters:

Baseline

“As noted in our 2020 scoping advice for this SEA, NatureScot is satisfied that appropriate data sources have been used to establish the environmental baseline at the Masterplan area for those receptors that relate to our remit.”

Incorporating Feedback

“[NatureScot] are pleased to note that the suggestions offered by us at scoping stage have generally been accommodated or addressed within the current ER.”

Assessment Approach

“[NatureScot] also welcome that approach taken to the Environmental Assessment methodology, and in particular the assessment of genuine alternative options to the delivery of the Masterplan’s objectives.”

Preferred Option

“[NatureScot] agree with the assessment of Spatial Option 1 as having the lesser negative environmental impacts, however the differences between the two are marginal and we accept the rationale that Option 2 would provide significant additional potential for social and economic benefit with few additional environmental dis-benefits.”

SEPA feedback

The response to the Scoping Report suggested information to be considered moving forward including mitigation measures and the suggestion to prepare a summary of key SEA findings that are relevant to the WRA Masterplan to assist with data sources and environmental baseline information.

In April 2022, following engagement with SEPA, they agreed with *“the principles used to generate the peat risk map and support the proposed three phase approach to future surveys, including areas with the High Moss Plantation and Low Moss Plantation local nature sites.”*

Further consultation was undertaken in July and August 2023, specific to impacts on peat. SEPA welcomed the pre-application engagement gave site-specific advice. In summary, SEPA agreed:

- with the approach / conclusion of the Baseline Carbon Calculations Technical Note

- that there appears to be significant area available for development within the red line boundaries, even after excluding the areas underlain by peat.
- the Westerhill Development Road and active travel routes have been identified as essential infrastructure, thus complies with National Policy Framework 4 Policy 5c).
- active routes over peat must seek to minimise their volume of excavation and the footprint of disturbance of peat soil.
- the route of the potential Western Development Road corridor does not appear be underlain by peat.
- that the peat specialist, as part of the WDR EIA, engage with SEPA, in addition to NatureScot, to agree a methodology prior to undertaking future surveys.
- a minimum buffer around existing peat and carbon rich soil to exclude development is not required
- that the peat surveys undertaken should remain valid unless activities take place which are likely to change the peat depth and condition.
- offsetting for peat will require a net benefit and should seek to achieve the best outcome possible, which in some circumstances can be best achieved by offsite restoration.
- Boardwalks over peatland are possible in principle, and preferred to dirt paths.
- SuDS and planting are permissible where it can be demonstrated that it will result in restoration of peatland habitats.
- further peat surveys are not required where the previous surveys have not identified peat.

Records of the consultation with SEPA is in Annex A of the PPRA (December 2023). This feedback shaped the resulting Masterplan and monitoring considerations.

No response received from SEPA on the SEA Environmental Report.

- **The reasons for choosing the plan or programme as adopted, in light of other reasonable alternatives considered**

Spatial Option 1 emerged as the preferred choice in the preliminary appraisal due to its positive aspects such as new active travel infrastructure, green/blue habitats, and the smallest development footprint. However, concerns arose over its impact on the environment, including the creation of 785m of new road and potential traffic increase. The road alignment of Spatial Option 1 had the potential to impact residents on the western side of the Site. Moreover, development on deep peat north of the proposed road could have led to the generation of significant adverse effects.

Spatial Option 2, although potentially having a greater environmental impact, offers a significantly larger area for employment space compared to Option 1, providing a better ratio of benefits and efficiencies to road length requirements.

Options 3 and 4 have higher carbon costs and reduce available land for development compared to Option 2.

Given the limited evidence of additional social, economic, and environmental benefits in Option 1, Spatial Option 2 was considered to be the preferred choice. It presents the best environmental score in the appraisal and offers a greater proportionate opportunity for development and socio-economic improvements. Further investigation is recommended to understand economic, transport, and environmental considerations, with Spatial Option 2 selected for compatibility assessment against SEA objectives to guide decision-making for East Dunbartonshire Council and stakeholders.

- **the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme**

As part of the SEA process, the WRA Masterplan has already taken into account environmental considerations as part of the design to avoid significant environmental effects. This is summarised under question 'how the Environmental Report has been taken into account', but includes:

- phased development
- active travel routes
- recreational routes
- biodiversity improvements
- water environment
- avoidance of peat

For the identified significant environmental effects, these will need to be considered as the WRA Masterplan develops. For environmental monitoring, there are two key components to the WRA Masterplan that will allow East Dunbartonshire Council to consider the significant environmental effects beyond this SEA:

- **WDR**

The WDR is currently subject to an EIA, which is a detailed assessment of potential environmental effects. The assessment is undertaken by experts and in consultation with East Dunbartonshire Council, statutory environmental bodies, the public and other stakeholders. The EIA is part of the town planning consenting process and thereby subject to the scrutiny of East Dunbartonshire Council and statutory environmental bodies.

- **Individual Developments**

As individual plots within the WRA Masterplan apply for town planning consent from East Dunbartonshire Council, this will provide an opportunity to review the proposals against the SEA objectives as well as relevant policy and guidance.

As the WRA Masterplan develops, East Dunbartonshire Council should as a minimum, consider the significant adverse and unknown environmental residual effects identified within the SEA Environmental Report following the updated WRA Masterplan. This is summarised [table 3-1](#).

In addition, East Dunbartonshire Council should review the recommendations made, which are to be considered as the design progresses into a more detailed stage. This is summarised under question 'how the Environmental Report has been taken into account', but includes:

- Climate resilience;
- Carbon emissions;
- Westerhill Road traffic calming;
- Community facilities;
- Heritage development; and
- Electric vehicle charging.

Table 3-1: Environmental topics for monitoring following the updated WRA Masterplan (October 2023)

Environmental topic	Indicators Change to...	Identified effect	Comment	Outcome
Population and Human Health	Need for travel	-	<p>The WRA Masterplan is likely to increase the need for travel in and around the Site.</p> <p>The WRA Masterplan has the potential to divert the distribution of new traffic away from the A803 and Bishopbriggs town centre.</p> <p>Traffic modelling will inform the optioneering process for the WDR and detailed environmental assessment will be reported in the EIA process. This includes statutory consultation with the local planning authority, statutory environmental bodies and the public.</p>	<p>Likely significant effects identified are related to the WDR.</p> <p>Potential significant effects will be assessed in greater detail as part of the EIA process. The outcomes of the EIA will inform monitoring requirements and be part of the town planning consent.</p>
Population and Human Health / Socioeconomics	Access	Unknown	<p>Provision of the WDR route and active travel infrastructure across the Site is likely to increase access opportunities for low scoring SIMD.</p> <p>Traffic modelling will inform the optioneering process for the WDR and detailed environmental assessment will be reported in the EIA process. This includes statutory consultation with the local planning authority, statutory environmental bodies and the public.</p>	<p>Likely significant effects identified are related to the WDR.</p> <p>Potential significant effects will be assessed in greater detail as part of the EIA process. The outcomes of the EIA will inform monitoring requirements and be part of the town planning consent.</p>
Air Quality	AQMA	Unknown	<p>Changes in traffic may impact the AQMA.</p> <p>The WRA Masterplan has the potential to divert the distribution of new traffic away from the existing AQMA.</p> <p>Traffic modelling will inform the optioneering process for the WDR and detailed environmental assessment will be reported in the EIA process. This includes statutory consultation with the local planning authority, statutory environmental bodies and the public.</p>	<p>Likely significant effects identified are related to the WDR.</p> <p>Potential significant effects will be assessed in greater detail as part of the EIA process. The outcomes of the EIA will inform monitoring requirements and be part of the town planning consent.</p>
Soil and Geology	Impact food production relating to soils	-	<p>WRA Masterplan includes removal of prime agricultural land.</p> <p>WRA Masterplan prioritises brownfield development over agricultural land.</p> <p>WRA Masterplan includes community area and green habitat nodes. Recommended to include community food production sites (orchards, allotments, etc) in more detailed design stages.</p>	<p>Likely significant effects identified will be captured in part by the WDR.</p> <p>Potential significant effects will be assessed in greater detail as part of the EIA process. The outcomes of the EIA will inform monitoring requirements and be part of the town planning consent.</p> <p>In addition, East Dunbartonshire Council should consider the impacts in a food security strategy and review cumulative agricultural soil</p>

				impacts in future decision making.
	Impact Sites of geological importance	-	<p>WRA Masterplan maximises use of existing road network footprint in proximity to the glacial meltwater channel.</p> <p>Drainage design will inform the optioneering process for the WDR and detailed environmental assessment will be reported in the EIA process. This includes statutory consultation with the local planning authority, statutory environmental bodies and the public.</p>	<p>Likely significant effects identified are related to the WDR.</p> <p>Potential significant effects will be assessed in greater detail as part of the EIA process. The outcomes of the EIA will inform monitoring requirements and be part of the town planning consent.</p>
Carbon Emissions / Materials and Waste / Energy	Construction emissions	- -	Increase in construction emissions based on the WRA Masterplan impacting East Dunbartonshire Council's carbon budget.	<p>Peat and carbon rich soils have been avoided where possible as part of the SEA process.</p> <p>Likely significant effects identified will be captured in part by the WDR.</p>
	Operational emissions	- -	The operation emissions of the WRA Masterplan and the tail pipe emissions of the proposed WDR route alignment are likely to impact East Dunbartonshire Council's carbon budget.	<p>Potential significant effects will be assessed in greater detail as part of the EIA process. The outcomes of the EIA will inform monitoring requirements and be part of the town planning consent.</p>
	Promote the sustainable use and protection of natural resources	-	<p>Use of materials and resulting waste during construction / operation / decommissioning of the components of the WRA Masterplan are likely to have adverse effects.</p> <p>Materials will inform the optioneering process for the WDR and detailed environmental assessment will be reported in the EIA process. This includes statutory consultation with the local planning authority, statutory environmental bodies and the public.</p>	<p>In addition, East Dunbartonshire Council should consider the impacts in the context of their climate goals and this should inform future decision making for all projects, plans and programmes (including activities associated within the WRA Masterplan) with carbon emissions.</p>
	Energy strategies	Unknown	The energy strategy has not been available for review at this stage.	An energy strategy should be established and reviewed against the SEA objectives.

4 Summary

- 4.1.1. East Dunbartonshire Council have employed the SEA process to inform the development of the WRA Masterplan and proactively engaged with consultation.
- 4.1.2. Public consultation and proportionate environmental assessment at an early stage allows for direct input to the development of ideas and actions for the future of the WRA Masterplan. Engagement with the wider teams in East Dunbartonshire Council, including environmental officers, and the Consultation Authorities has shaped the direction and scope of assessment to deliver a viable, greener and more sustainable WRA Masterplan.
- 4.1.3. The environmental assessment identified mitigation and enhancement measures to amplify positives and avoid adverse effects, which has influenced the decision-making process.
- 4.1.4. Using the SEA process there are measurable positive changes to the WRA Masterplan, reducing the likelihood of significant adverse effects and enhancing the probability of beneficial environmental outcomes.
- 4.1.5. Following the finalisation of the WRA Masterplan, the PAS has identified monitoring actions, which East Dunbartonshire Council will undertake as part of the monitoring delivery plan.