

SEA Post-Adoption Statement: PART 1

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Or

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SEA Post-Adoption Statement: PART 2

An SEA Post-Adoption Statement
is attached for:

Local Development Plan 2

The Responsible Authority is:

East Dunbartonshire Council

SEA Post-Adoption Statement: PART 3

Contact Details

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Date	6 th December 2022

**STRATEGIC ENVIRONMENTAL ASSESSMENT
POST-ADOPTION STATEMENT**

**East Dunbartonshire Council
Local Development Plan 2**



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East Dunbartonshire Council

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SEA Post-Adoption Statement: PART 4

Introduction

The Council has recently adopted the Local Development Plan 2 (LDP2). The purpose of the East Dunbartonshire Local Development Plan 2 is to set out the policy framework and a spatial strategy for the assessment of future developments in East Dunbartonshire based on a comprehensive assessment of economic, environmental, social and other material constraints.

Strategic Environmental Assessment

The LDP2 has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included:

- Taking into account the views of the Consultation Authorities regarding the scope and level of detail that was appropriate for the Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft Plan which included consideration of:
 - The baseline data relating to the current state of the environment;
 - Links between the strategic action with other relevant policies, plans, programmes, strategies and environmental objectives;
 - Existing environmental problems affecting the strategic action;
 - The strategic action's likely significant effects on the environment (positive and negative);
 - The mitigation measures envisaged;
 - An outline of the reasons for selecting the alternatives chosen;
 - Monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report.
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the strategic action.
- Committing to monitoring the significant environmental effects of the implementation of the plan to identify any unforeseen adverse significant environmental effects and to taking appropriate remedial action. The key findings are incorporated into the following sections.

Post-Adoption Statement

The Post-Adoption Statement demonstrates how the findings of the SEA have been taken into account in the adopted LDP2. In accordance with the Environmental Assessment (Scotland) Act 2005, the Post-Adoption Statement will demonstrate:

- The integration of environmental considerations into the LDP2;
- How the findings of the Environmental Report have been taken into account;
- How opinions expressed, from both the Community and Consultation Authorities, during the consultation of the Environmental Report have been taken into account;
- The reasons for choosing the LDP2 as adopted in light of other reasonable alternatives; and,
- The measures to be taken to monitor the significant effects of the implementation of the LDP2.

Section 1: Key Facts	Section 1 details of the LDP2 remit and the enabling legislation.
Section 2: Environmental Considerations	Section 2 details how environmental considerations have been integrated into the LDP2 and notes how the environmental problems identified in the Scoping and Environmental Reports have been addressed.

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Section 3: Consideration of Alternatives	Section 3 details the methods adopted to develop the LDP2.
Section 4: Consultation	Section 4 sets out the responses received from the Consultation Authorities and other interested parties, which are of relevance to the SEA Environmental Report. It states the actions taken as a result of the responses received from the Consultation Authorities. *Note – No response submitted by SEPA on the Proposed Plan ER.
Section 5: Monitoring	Section 5 details the monitoring required to ensure compliance with the LDP2.
Section 6: Conclusion	Section 6 summarises how the SEA process has informed the development of the LDP2.
Appendix 1: Consultation Responses to the Proposed Plan Environmental Report	Consultation responses received from NatureScot and Historic Environment Scotland in response to the draft Environmental Report. *Note – No response submitted by SEPA on the Proposed Plan ER.

Section 1: Key Facts

Responsible Authority:	East Dunbartonshire Council
Title of PPS:	Local Development Plan 2
What prompted the PPS?	Legislative provision through the Planning etc (Scotland) Act 2006.
Subject:	Development planning
Period covered:	2022 - 2027
Frequency of updates:	5 yearly, Note – this will be subject to the review of planning legislation, when this becomes law.
Area covered by the PPS:	East Dunbartonshire Council area and not restricted to specific settlements or areas.
Purpose of the PPS:	The purpose of the East Dunbartonshire Local Development Plan 2 is to set out the policy framework and a spatial strategy for the assessment of future developments in East Dunbartonshire based on a comprehensive assessment of economic, environmental, social and other material constraints.
LDP2 Aims:	To provide a land use strategy for the Council which: <ul style="list-style-type: none">• Delivers the land use requirements of the Local Outcomes Improvement Plan• Acts a framework for the determining of planning applications.• Operates within a statutorily defined framework
Contact Details:	Neil Samson Strategic Environmental Assessment Technical Officer Sustainability Policy Place, Neighbourhood and Corporate Assets Southbank House Strathkelvin Place Kirkintilloch G66 1XQ Tel: 0141 578 8615 Email: Neil.Samson@eastdunbarton.gov.uk

Section 2: Environmental Considerations

2.1. Integration of Environmental Considerations in the Local Development Plan 2

2.1.1. This chapter highlights how environmental considerations have been integrated into the final Local Development Plan 2 (LDP2). **Table 1** highlights how the environmental problems identified in the Scoping and Environmental Reports have been addressed. **Table 1** also highlights how environmental impacts predicted through the SEA process have been addressed through inclusion of actions or the alteration of existing actions within the LDP2.

Table 1: Implementing Environmental Considerations

Local Development Plan 2			
Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
Biodiversity, Flora and Fauna	Development has the potential to have direct and indirect impacts on East Dunbartonshire’s wide range of designated and non-designated sites of ecological importance and European or National protected species. This is seen through a number of Local Nature Conservation Sites, Wildlife Corridors, Tree Preservation Orders and Local Nature Reserves. East Dunbartonshire also has 6 Sites of Special Scientific Interest (SSSI).	✓	Policy 17: Natural Environment of the LDP2 builds on the previous LDP approach to protecting international, national and local biodiversity assets by introducing a ‘no net loss’ requirement. This new requirement is intended to ensure that all development contributes positively to biodiversity and achieves no net loss of biodiversity through siting and design, avoiding and minimising any adverse impacts on habitats, species or network connectivity, either resulting from the development or as a result of the cumulative effects of development locally. As with the previous LDP, Policy 17 incorporates the mitigation hierarchy, meaning that all development must first avoid any impact on biodiversity as a result of development, before considering how any impacts can be minimised or
	River and canal corridors in East Dunbartonshire contribute significantly to wide ranging habitats and biodiversity. Many are artificially confined, lacking riverside woodland, and locally dominated by non-native invasive plant species, for e.g. the River Kelvin. The natural environment plays a considerable role in healthy lives and the attractiveness of East Dunbartonshire as an economic and habitable centre.	✓	
	Biodiversity and habitats can be protected and/or enhanced by reducing, avoiding or providing appropriate mitigation where development will result in habitat disturbance, fragmentation or removal. With the integration of appropriate measures or mitigation	✓	

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	<p>into development this may enhance the connectivity of habitats and species.</p>		<p>reduced. The last stage, compensation, must only be used as a last resort and only after options for avoidance and reduction have been fully considered. The use of the mitigation hierarchy during the design process must be evidenced and justification provided for where biodiversity losses cannot be avoided and/or reduced.</p>
<p>Population and Human Health</p>	<p>East Dunbartonshire has datazones which fall into the top 25% most deprived areas in Scotland; these datazones are located in Auchinairn, Hillhead and Harestanes, Lennoxton and Twechar.</p>	<p>✓</p>	<p>Integration with Community Planning has been a key element of preparing the LDP2. All of the datazones in East Dunbartonshire that fall into the 25% most deprived areas are subject to a Place Plan which has been prepared by the Council in conjunction with local communities and other community planning partners. Each Place Plan sets out the key issues and challenges for that community and how these will be overcome.</p> <p>The LDP2 takes a community approach to spatial planning by splitting the authority into seven community areas. This approach enables the policies in the plan to be tailored to the different needs and characteristics of each community, and for areas that contain datazones within the most 25% deprived in Scotland, the spatial elements of the Place Plan have been incorporated into policy. New development within the Place Plan areas will be expected to support the land use projects identified in each of the following policies in the LDP2 where appropriate:</p> <ul style="list-style-type: none"> • Policy 3.P Auchinairn Place Plan • Policy 4.P Hillhead and Harestanes Place Plan • Policy 5.P Lennoxton Place Plan

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	<p>Some town centre environments within East Dunbartonshire are neglected, run down and in need of regeneration. Development and regeneration of these areas should consider the populations access to amenities and services while implementing good design principles and sustainable, active travel alternatives in order to link communities and residential areas.</p>	<p>✓</p>	<ul style="list-style-type: none"> • Policy 8.P Twechar Place Plan <p>The approach to town centres is based on the ‘town centre first principle’, as set out in Policy 14: Network of Centres and Retailing. In land use terms this means that the health of town centres must be placed at the heart of the decision making process. All significant footfall generating uses including retail, leisure and other key community services should therefore be directed to town centres as a priority before other locations are considered, ensuring that they are accessible to everyone. In addition, the policy introduces a new requirement to support healthy lifestyle choices by restricting uses that can have negative impacts on physical and mental health and wellbeing of local communities. Finally, relevant Community Area policies incorporate the actions contained within adopted town centre strategies which together aim to improve the overall health, condition and environmental quality of each town centre.</p>
	<p>Given the ageing population there is the potential for unsustainable economic position which can determine the different service needs.</p>	<p>✓</p>	<p>The Council’s Planning Service, along with the Housing Service and Health and Social Care Partnership, have commissioned a research project into older peoples and specialist housing. The purpose of the research is to understand the particular issues faced in East Dunbartonshire as a result of the aging population and how these could be addressed. A holistic and coordinated approach will ensure that relevant services respond positively and consistently to the challenges posed by demographic aging. The research project has been approved by the Council and Health and</p>

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		<p>Social Care Partnership and sets out a number of key recommendations.</p> <p>The planning system is a key vehicle in improving the supply of good quality homes that meet the needs and demands of older people and those with specialist requirements. The existing Local Development Plan currently supports this agenda by encouraging the development of housing specifically for older people and by requiring a mix of different housing types and sizes in all new developments. Policy 12 Housing of the LDP2 builds upon this by seeking the following:</p> <ul style="list-style-type: none">• Further focus on delivering a more diverse range of housing sizes and types.• The need to provide 25% of units of all tenures as wheelchair accessible housing.• Introducing a requirement for sites within 400m walking distance of town and village centres to provide 50% of the units on site as smaller housing.• Wording enhancements to the current older peoples and specialist housing section. <p>The measures seek to increase the supply of housing suitable for older people, but will also benefit other demographic groups through the development of smaller housing and an increased turnover in the existing housing stock.</p>
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			In addition to the above requirements, Policy 24 Developer Contributions seeks to create a robust framework for requiring developer contributions relating to the impact of new housebuilding and care homes on primary healthcare.
Water Quality	Development proposals have the potential to result in direct or indirect water pollution, particularly when developments are in close proximity to water courses. Appropriate management measures should be promoted and integrated within development proposals during construction in order to reduce sediment deposition into watercourses.	✓	The protection and enhancement of East Dunbartonshire's water environment is addressed in Policy 18: Water Environment and Flood Risk. This policy recognises the Council's responsibilities, under the European Water Framework Directive and Scotland River Basin Management Plan, to contribute towards the improvement of the water environment to good ecological status or potential. Specifically, it states that development and riverbank works must protect and improve the quality and ecological status of the water environment ensuring water bodies are maintained at, or enhanced to, a good or high condition.
Climatic Factors	Domestic emissions account for the largest proportion of carbon dioxide in East Dunbartonshire, although emissions from transport account for the largest proportion of NO ₂ and PM10 emissions. This contributes to the effects of climate change which include changing	✓	Policy 9 of the Proposed Plan – Climate Change, Sustainability and Energy Infrastructure – is a new policy that places significant new requirements on proposed developments. Its core aim is to ensure

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	<p>temperatures and rainfall patterns, and increased incidences of extreme weather events. The LDP can have an influence on reducing greenhouse gas emissions in a number of ways including through sustainable location of new development, promotion of active/sustainable travel, supporting energy efficiency in new development and support for renewable energy.</p>		
	<p>Climate change has a direct link to flood risk. The SEPA Flood Risk Map has identified several locations within the East Dunbartonshire Council area, which could have significant impacts on communities. Appropriate siting of developments and integration of LDP Policies can support sustainable flood management options and contribute to reducing localised flood risks.</p>		<p>that all new developments are built to high sustainability standards and that climate change mitigation and adaptation are fully embedded in the design process. The policy incorporates the principles of the 'energy hierarchy', which includes specific expectations on reducing the demand for energy and standards to minimise carbon emissions.</p> <p>The impact of climate change on flood risk is recognised and addressed through both Policy 9: Climate Change, Sustainability and Energy Infrastructure and Policy 18: Water Environment and Flood Risk. Policy 9 requires development that is subject to a flood risk assessment to accord with the climate change allowances set out in SEPAs 'Climate change allowances for flood risk assessment in land use planning' document, as part of Climate Change Adaptation.</p> <p>Policy 18 requires the sustainable location and design of development as a way of ensuring sustainable flood risk management. It also incorporates the flood risk framework (as set out in SPP), stating that development proposals will be assessed against this, and that flood risk issues should be considered at an early stage of the design process. Finally, the policy contains six criteria relating to flood risk that proposals must demonstrate compliance with. This includes the precautionary principle, avoiding the flood plain, the use of SuDS, natural flood alleviation</p>

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			measures, formal flood protection measures and SEPA climate change allowances.
Landscape	Through the LDP, the implementation of key principles relating to good design and strong sense of place within development projects can have a positive impact on the landscape and visual amenity of East Dunbartonshire, by enhancing and creating landscape features as integral parts of developments.	✓	The importance of protecting East Dunbartonshire's different areas of landscape value are addressed in Policy 17: Natural Environment. This policy states that:
	East Dunbartonshire hosts five Local Landscape Areas. These areas provide additional protection for the landscape value for East Dunbartonshire in terms of retaining local distinctiveness, landscape character of the area and conserving settlement patterns.		<i>"Development will conserve and enhance the landscape character of East Dunbartonshire, including the landscape character types of rugged moorland hills, drumlin foothills, broad valley lowland and rolling farmlands. Landscapes will be managed to conserve and enhance landscape character"</i> .
	Multiple development projects, even of a relatively small-scale, can have a cumulative impact on East Dunbartonshire's landscape character.		It also makes clear that development must conserve and enhance the special qualities and overall integrity of Local Landscape Areas. Specific Local Landscape Areas are identified within the relevant community area policies, including a summary of their respective qualities to help inform their protection, enhancement or management where required. Natural Environment planning guidance provides further details of designated areas and supports the policy.

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<p>Air Quality</p>	<p>Unacceptably high levels of air pollution can be harmful to the environment and human health. East Dunbartonshire currently has two designated Air Quality Management Areas (Bishopbriggs and Bearsden Cross). These are managed through Air Quality Management Plans. New developments have the potential to increase traffic levels, emissions and pollutants in the local area which can exacerbate existing air quality issues. The allocation of sustainably located development sites within the LDP along with the implementation of appropriate measures such as cultural changes and design alternatives within new developments can contribute to reducing these impacts.</p>	<p>✓</p> <p>Policy 1 includes nine Plan Objectives. Objective A includes improving air quality.</p> <p>Policy 9 – Climate Change, Sustainability and Energy Infrastructure includes that proposals will be assessed against renewable and low carbon energy criteria, specifically, their impact or contribution to transport infrastructure including road traffic and air quality.</p> <p>Policy 11 – Transport ensures that development should be directed to locations where in line with Scottish Planning Policy - the need to travel is reduced, there are already existing active travel routes and public transport services, and the effect on air quality is minimised. To assist with this a Transport and Air Quality Appraisal was carried out through the site assessment process to better understand the potential implications for air quality each site could have and including potential actions for mitigation where appropriate.</p> <p>Policy 11 also includes the requirement for development proposals to prioritise movement to/from the site in line with the Sustainable Travel Hierarchy. This therefore means that consideration must be given to sustainable modes before the private car to ensure walking, cycling, wheeling and public transport options are prioritised in the development planning and design process including through Policy 10 – Design and Placemaking. This approach was carried forward to the housing sites in each community policy by</p>
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			<p>including key requirements to ensure the Sustainable Travel Hierarchy is delivered on and the effect on air quality is minimised/improved.</p> <p>Specific mention and attention is given to housing sites and overall implications for air quality in the Bearsden and Bishopbriggs community policies given the existence of Air Quality Management Areas. All development in Bearsden and Bishopbriggs must therefore make particular focus on minimising adverse impacts on local air quality by ensuring sustainable access and travel to/from development is prioritised over vehicle traffic.</p> <p>Policy 11 also contains further requirements and information on air quality and includes that the Council will require developers to submit an Air Quality Assessment where developments are likely to have a significant impact on the natural, historic or community environments or existing Air Quality Management Areas. Further details on the consideration of air quality through the development management process is contained within the Air Quality Planning Guidance and further information on direct actions linked to the Air Quality Management Areas can be found in the respective Air Quality Action Plans for Bearsden and Bishopbriggs.</p>
<p>Soil and Geology</p>	<p>There are a number of potentially contaminated land areas in East Dunbartonshire along with vacant and derelict land sites which are underutilised. The LDP should promote the appropriate remediation of potentially contaminated land within development proposals and</p>	<p>✓</p>	<p>Policy 24: Developer Contributions provides further detail on the level and type and compensation required where biodiversity loss is likely as a result of development. Again, it is made clear that compensation must only be used as a last</p>

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	<p>the reuse of brownfield land over the development of green field alternatives, where appropriate.</p>		<p>resort and only after options for avoidance and reduction have been fully considered.</p> <p>The prioritisation of brownfield land over greenfield release is a key objective of the LDP2 and forms the basis of the Spatial Development Strategy. The SDS states that:</p> <p><i>“Prioritising the use of brownfield land and sites which become vacant and derelict, in urban areas, before greenfield release is important for the sustainability of East Dunbartonshire and the wider Glasgow City Region. Applicants must prove to the satisfaction of the Council that there are no suitable brownfield sites of a similar size that are available within the urban locality before new development on greenfield land is considered”</i>.</p> <p>As part of the Plan preparation process, the Council has undertaken a comprehensive review of brownfield sites in East Dunbartonshire, incorporating vacant and derelict land sites. To support the prioritisation of these sites, they are identified within the individual community policy areas. Each site is designated a required use and includes a series of key requirements to guide any development proposal.</p>
	<p>The LDP should protect good quality soils from erosion or compaction, for their value to agriculture and woodland. Carbon-rich soils, such as peatland are an important resource in terms of carbon storage, natural drainage and flood alleviation which should be protected from disturbance through the LDP.</p>	<p>✓</p>	<p>Policy 17: Natural Environment sets out a protective policy framework for good quality soils, including prime agricultural land, ensuring that development does not adversely impact on these resources. Similarly, peat and other carbon rich soils are afforded protection through Policy 17 and it is made clear that they must not be drained or</p>

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			<p>disturbed by development. The community area policies provide further details of these at a community level, including maps to show their extent and aid the development process. Finally, Policy 17 outlines the circumstances in which relevant key agencies (SNH and SEPA) must be consulted, and where a peatland management plan may be necessary.</p>
	<p>There are 36 sites identified as being geologically diverse, of which 34 have been assigned as Local Geodiversity Site (LGS). The area also hosts 1 RIGS (Regionally Important Geological or Geomorphological Site) and 1 SSSI of geological importance. The LDP has a role to play in ensuring the protection and conservation of these assets as well as avoiding impacts by ensuring that developments are considered in terms of their siting, density and design.</p>	<p>✓</p>	<p>Policy 17 includes policy framework for the protection of geologically important sites. Specifically, it states that development that affects such sites will only be permitted where the overall geological value and the opportunities for learning and enjoyment of the site are not compromised. In addition, development should conserve and enhance locally designated sites to maintain and improve their geological learning value,</p> <p>The Community Policies provide details of designated geological sites at a community level, including relevant mapping to illustrate their location, while the Natural Environment Planning Guidance contains more detailed information on these designations.</p>

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<p>Cultural Heritage</p>	<p>There are a large number and variety of historic environment assets in East Dunbartonshire including the Antonine Wall (UNESCO World Heritage Site) and the Forth and Clyde Canal which require protection and management, but also contribute to East Dunbartonshire as a tourist destination. The role the historic environment plays in the distinctive local character and sense of place within East Dunbartonshire and its contribution to health and wellbeing and placemaking is also a key issue. Development proposals should take such protected sites into consideration with regards to the protection and setting while still encouraging appropriate access to such sites to the population.</p>	<p>✓</p> <p>The LDP2 largely continues the approach of the previous LDP by setting out a presumption against any development that would adversely affect the setting, integrity or special qualities of any historic environment asset. This includes the Antonine Wall World Heritage Site, Listed Buildings, Conservation Areas, Townscape Protection Areas, Scheduled Monuments, Archaeological Sites and Gardens & Designed Landscapes as set out in Policy 19: Historic Environment. Further guidance on the protection and enhancement of historic environment assets will be set out in refreshed planning guidance, including updated conservation area appraisals.</p> <p>Specific assets are identified in the individual Community Area policies, and the policy makes it clear that these must be considered as part of the development process in terms of their protection and/or enhancement. Policy 24: Developer Contributions provides further detail on the circumstances in which applicants will be expected to provide a financial contribution towards the historic environment.</p>
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<p>Material Assets</p>	<p>As a result of new developments in East Dunbartonshire, main roads are likely to suffer from increased traffic volumes and congestion as well as increased pressure on existing infrastructure and the potential for new infrastructure.</p>	<p>✓</p> <p>Policy 9 – Climate Change, Sustainability and Energy Infrastructure includes that proposals will be assessed against renewable and low carbon energy criteria, specifically, their impact or contribution to transport infrastructure including road traffic and air quality.</p> <p>Policy 11 – Transport ensures that development should be directed to locations where in line with Scottish Planning Policy - the need to travel is reduced, there are already existing active travel routes and public transport services, and the effect on air quality is minimised. To assist with this a Transport and Air Quality Appraisal was carried out through the site assessment process to better understand how each site could potentially impact on the transport network. Sites which were remote from existing active travel and public transport networks and town centres and associated facilities were highlighted as increasing the need to travel with emphasis on private vehicular traffic. This information was used through the SEA/site assessment process in considering the merits and issues of each site.</p> <p>Policy 11 also includes the requirement for development proposals to prioritise movement to/from the site in line with the Sustainable Travel Hierarchy. This therefore means that consideration must be given to sustainable modes before the private car to ensure walking, cycling, wheeling and public transport options are prioritised in the development planning and design process</p>
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		<p>including through Policy 10 – Design and Placemaking. This approach was carried forward to the housing sites in each community policy by including key requirements to ensure the Sustainable Travel Hierarchy is adhered to.</p> <p>In addition to the above requirements for the development site and surrounding areas, the Plan also includes a requirement for contributions to be received by the developer to ensure onward journeys on the main transport corridors are improved for sustainable modes. Policy 24 – Developer Contributions requires contributions towards the delivery of projects included within the Local Transport Strategy and Active Travel Strategy for the A81 and A803/806 corridors. The objectives in both strategies focus on sustainable travel by walking, cycling and public transport and reducing vehicle mileage in East Dunbartonshire.</p>
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	<p>There are a series of Core Path networks and open spaces in East Dunbartonshire which create recreational opportunities, promote active travel and provide a sense of community. These assets should be protected where possible as part of the LDP and open spaces created to compensate for any loss.</p>	<p>✓</p>	<p>The core path network is considered and included in the key requirements for sites where the network runs close or through the site boundary. The key requirements in the community policies all require the development proposal to enhance and protect the core path network as well as ensuring direct access to the network from the development site where appropriate.</p> <p>Policy 1 ensures the protection of key walking and cycling routes, the Forth and Clyde Canal (National Cycle Route 754) and Strathkelvin Railway Path (National Cycle Route 755).</p> <p>Policy 9 – Climate Change, Sustainability and Energy Infrastructure includes that proposals will be assessed against renewable and low carbon energy criteria, specifically, their impact or contribution to tourism and recreation, including core paths, long distance walking routes and public access.</p>
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Section 3: Consideration of Alternatives

3.1. Consideration of Alternatives within the LDP2

- 3.1.1. The Environmental Assessment (Scotland) Act 2005 requires the effects of 'reasonable alternatives' to be identified, described and evaluated. The Act states that the Responsible Authority shall give 'the reasons for choosing the plan, or programme as adopted, in the light of the other reasonable alternatives considered'.
- 3.1.2. The development of East Dunbartonshire's LDP2 is a statutory requirement of the Planning etc (Scotland) Act 2006 and as such there is no reasonable alternative to the development of the Plan itself. However, there are alternatives as to how the strategic priorities, policy framework and allocation of sites within the LDP2 are delivered which have been considered and assessed within the through the SEA process to inform and influence the development of the LDP2.
- 3.1.3. The Proposed Plan sets out a land-use strategy and policy framework to improve the quality of East Dunbartonshire as a place to live, work and visit. Within the Proposed Plan, East Dunbartonshire Council area has been divided up into community areas (groupings set out below). The policy framework and site-specific allocations for each community area have been assessed along with reasonable alternative scenarios (where provided) in order for the SEA process to identify and mitigate all significant environmental impacts and provide the planning service with the best environmental options. Through the assessment of the impacts of all alternatives, the Environmental Report, played a key role to inform and determine the Council's preferred options for the LDP2.
- 3.1.4. However, the environmental assessment also, where appropriate, proposes further alternatives or suggested alterations. This process guides any required mitigation measures in order to reduce any potential adverse impacts or to suggest enhancements to those receptors that provide potential positive impacts to East Dunbartonshire.

Section 4: Consultation

4.1. Environmental Report Consultation Responses

- 4.1.1. The Environmental Report, which provided details of the likely environmental effects of the LDP2, was published for consultation with the SEA Consultation Authorities from 19th October 2020 – 15th January 2021. The consultation on the Environmental Report provided an opportunity to respond to the findings of the report and influence the final LDP2.
- 4.1.2. **Table 3** sets out the responses received from the Consultation Authorities and other interested parties, which are of relevance to the SEA Environmental Report. It states the actions taken as a result of the responses received.
- 4.1.3. It should be noted, that all responses to the draft Environmental Report for the previous LDP2 Main Issues Report stage are contained within the Proposed Plan Environmental Report (**Appendix B**).

Table 3: Consultation Responses

Consultee	Consultation Response	Incorporating Consultation Response
NatureScot	General Comments	
	We are generally content that the Environmental Report provides a comprehensive assessment of the potential environmental impacts. We have however provided some additional comments and suggestions in Annex 1.	Comment noted and no modification required.
	Consideration of Previous Comments (including the Westerhill Regeneration Area)	
	We provided comments on the Environmental Report (ER) for the LDP 2 at the Main Issues Report (MIR) stage. We note and welcome the consideration given to these comments in Appendix B. of this ER.	Comments noted and no modification required.
	In response to our comments of concern about proposals for development in the Westerhill Regeneration Area, we note that “The Westerhill Regeneration Area will be taken forward through a Masterplan process. All development proposals, reasonable alternatives and environmental considerations	

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Consultee	Consultation Response	Incorporating Consultation Response
	<p>(impacts and enhancement opportunities) will be explored through Masterplan production and corresponding SEA exercise”.</p> <p>Whilst we support the Masterplan approach and would welcome the opportunity for involvement in this process, we continue to have concerns over development proposals in this area. Further comments are contained in the Annex to this response.</p>	
<p>Annex Appendix B – Consultation Authority Responses to the LDP2 MIR Environmental Report</p>		
	<p>As indicated overleaf, the proposal to adopt a Masterplan approach in response to concerns raised about development proposals for the “Westerhill Regeneration Area” is welcomed. However, it is stated here that the “lack of reasonable alternatives” to the Council’s proposals for this area has been explained and justified in “Monitoring Statement Appendix 8 – Site Assessments”. We consider that there does not appear to be any clear provision of an alternative or justification to what is being proposed for Westerhill in the ER.</p>	<p>The housing proposals within the Regeneration Area have been included as part of the cumulative assessment for this Community Area within LDP2. Some sites, including those within the Westerhill Regeneration Area were classified as ‘Subject to Further Assessment’ at the MIR stage. These sites have now been allocated within the Bishopbriggs Community Policy as they meet the Council’s Spatial Strategy (Monitoring Statement Appendix 8: Site Assessments). Proposed mitigation/Key Requirements have been developed for the individual housing and business and employment proposals.</p> <p>The Westerhill Regeneration Area will be taken forward through a Masterplan process. All development proposals, reasonable alternatives and environmental considerations (impacts and enhancement opportunities) will be explored through Masterplan production and corresponding SEA exercise.</p> <p>The Council concurs that for any development to take place that clear, detailed and robust site specific mitigation will be required that ensures protection of the peatland, the LNCS, and the future LNR along with the new recreational access routes to it.</p>
<p>Annex Appendix E – Policy Assessments – Community Policy 3 - Bishopbriggs</p>		
	<p>We are generally in agreement with the assessments of policies provided in this Appendix.</p>	<p>Within the MIR ER, the SEA proposed to remove the sites subject to further assessment as the SEA preferred option for the Bishopbriggs Community.</p>

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Consultee	Consultation Response	Incorporating Consultation Response
	<p>However, Community Policy 3 – Bishopbriggs includes the Westerhill proposals. Two alternatives are provided, each containing a suite of proposed development sites, with the second of these being taken forward to the Plan. However the only difference between the first ‘alternative’ and the second ‘alternative’ appears to be the removal of a residential development site (Duncryne Place). Both ‘alternatives’ are assessed as having almost precisely the same impacts (mainly major negative/uncertain) across all of the SEA Objectives. Whilst, we broadly agree with assessments provided and potential impacts, it remains unclear in the ER as to the approach taken given the negative findings and potentially damaging implications of the assessments.</p> <p>We note the reference to the proposed production of a Master Plan for the Westerhill Regeneration Area and that a separate SEA will be undertaken to ensure environmental considerations are taken into account during the decision –making process, Masterplan development and corresponding ER. We welcome this approach.</p>	<p>All of the sites submitted through the call for sites at the MIR stage were assessed and the outcomes of the process meant that only one site met the criteria for an alternative site within this community area. Both packages of sites were then assessed within the Proposed Plan ER.</p> <p>Given the negative findings for the package being taken forward into the Plan, the Masterplan and corresponding SEA will identify developable areas in line with the LDP2 policy framework and provide appropriate mitigation and enhancement measures. This is in line with the Policy (3.R) which sets out which surveys and investigations will be required to inform developable areas.</p>
<p>Appendix H - SEA Site Assessments for Business and Employment Sites</p>		
	<p>We consider the assessments provided here to be satisfactory across each of the sites. We do not agree however with that provided for Low Moss Industrial Estate (3.BE6). The SEA commentary states <i>“The presence of peat within adjacent Low Moss LNCS has the potential to be negatively impacted by the development of this site without appropriate mitigation”</i>. However, the assessment of the allocation against Soil & Geology is identified as ‘positive’. Whilst, we acknowledge that development of the site may involve the remediation of contaminated land, we consider that the assessment should at best be ‘neutral’. Furthermore, while the peatland nature of</p>	<p>Low Moss Industrial Estate 3.BE6 individual site assessment (along with all corresponding ER Appendices and findings within the ER) have been updated to reflect the comments noted.</p>

Post-Adoption Statement

Consultee	Consultation Response	Incorporating Consultation Response
	<p>the LNCS means that adjacent development is likely to have an adverse impact either directly or via the hydrology of the habitat, the Biodiversity impacts are assessed as 'uncertain'. Again we consider the assessment to be inaccurate and consider a 'negative' assessment to be more appropriate.</p> <p>The associated Westerhill Business Park, Bishopbriggs (3.BE8) and Westerhill Industrial Estate 3.BE8 extract (North-east part of 3.BE8 with no housing proposal) are however correctly assessed as having uniformly negative environmental consequences for those topics that are within our remit. The mitigation here for both refers to the need to masterplan for these sites.</p>	
<p>Section 4: Mitigation and Monitoring 4.1 Mitigation Measures</p>		
	<p>We welcome the identification of mitigation measures and incorporation into each of the assessments where necessary, in order to avoid, reduce, mitigate or offset any potential adverse environmental impacts and enhance any neutral or positive environmental impacts identified.</p> <p>We also note and welcome that when applications are received by the Council for proposed development, the SEA suggested alterations and mitigation measures will be used to form key requirements and put conditions in place to ensure that the SEA information is integrated into the project level in an efficient process.</p>	<p>Comments noted and no modification required.</p>
<p>4.2 Monitoring</p>		
	<p>We note that the specific measures to be taken to monitor the significant environmental effects of implementation of the LDP2 will form part of the Post- adoption Statement. We also note that the indicators and SEA Monitoring Framework (Table 5) will directly align with the Monitoring Framework for LDP2.</p>	<p>Comments noted and no modification required.</p>

Post-Adoption Statement

Consultee	Consultation Response	Incorporating Consultation Response
SEPA	No response provided by SEPA on the Proposed LDP2	
Historic Environment Scotland	Part 2: Environmental Report	
	We welcome the assessment that has been undertaken to support the development of the plan. The Environmental Report sets out a thorough and considered assessment with an adequate level of detail and a clear narrative setting out its conclusions. We have comments on some elements of the information provided, and these are set out below.	Comments noted and no modification required.
	2.2 – Baseline Environmental Data	
	Table 1 gives a summary of the baseline data; under cultural heritage we note that 178 listed buildings are identified within East Dunbartonshire. Our records indicate that there are currently 176 listed buildings within your local authority area and you may wish to update this data. We also note that under Buildings at Risk, the only reference is to transport structures, which is a change from the MIR ER which noted 9 buildings at risk in East Dunbartonshire. Again, you may wish to update this information, although we note that the LDP itself refers to the appropriate buildings at risk in the Community Policies.	Records checked and information updated to ensure consistency with HES and between the LDP2 and Final ER.
	We welcome the enhanced description of cultural heritage in Table 2 on Environmental Issues and consider that this provides a more rounded and appropriate reflection of the historic environment in East Dunbartonshire.	Comments noted and no modification required.
	Section 4 – Mitigation and Monitoring	
We welcome that mitigation measures for negative effects have been identified and considered throughout the assessment. In particular we welcome that these measures have been pulled through to the policies in the Plan to form key requirements to	Comments noted and no modification required.	

Post-Adoption Statement

Consultee	Consultation Response	Incorporating Consultation Response
	ensure that the mitigation will be effective when determining planning applications.	
	We note that our comments regarding the monitoring objectives for cultural heritage have been taken into account in Table 5 and we welcome that these will directly align with the monitoring framework for LDP2.	Comments noted and no modification required.
<i>Appendix B – Consultation Authority Responses to the LDP2 MIR Environmental Report</i>		
	We welcome that our comments on the MIR ER have been taken into consideration in the Proposed Plan ER. We would like to clarify that our comments on the MIR Appendix D referring to the SEA criteria for the Antonine Wall were intended to note the difference between the Buffer Zone of the World Heritage Site and the wider setting as indicated in the Supplementary Planning Guidance (page 17). The aim was to ensure that all impacts on the setting of the World Heritage Site are considered.	Comments noted and no modification required.
<i>Appendix E – Policy Assessments</i>		
	We are content with the assessments of the policies in the Proposed Plan and in particular welcome the inclusion of objective D in Policy 1. We agree with the assessment that with this objective in place the policy has the potential to provide positive impacts on cultural heritage.	Comments noted and no modification required.
	At Policy 3 Bishopbriggs we note the reference to the production of a Masterplan for the Westerhill Regeneration Area and we will be happy to provide advice on the Masterplan as it progresses. We note that the assessment finds no significant effect on cultural heritage for this policy. As noted in our representation on this policy in the Plan, we consider that there should be an additional requirement to protect and enhance the setting of the Antonine Wall World Heritage Site in the Masterplan. With this additional requirement in place we	Proposed additional requirement integrated into the Plan to protect and enhance the setting of the Antonine Wall WHS within the Masterplan. With this addition, HES would consider no significant effect a reasonable assessment rating.

Post-Adoption Statement

Consultee	Consultation Response	Incorporating Consultation Response
	<p>consider that the finding of no significant effect may be reasonable, however, without it there would be the potential for a significant adverse effect on the World Heritage Site and cultural heritage.</p>	
	<p>We are largely content with the assessment of Policy 19 Historic Environment; however, we would note that we do not consider the greenbelt section of this policy to provide a positive objective for the historic environment. The phrasing of this section of the policy appears to prevent the rehabilitation and restoration of any buildings at risk or buildings in disrepair in the greenbelt. We therefore disagree with the assessment that this section positively contributes to the conservation of the greenbelt and the historic environment and consider that this section of the policy is removed as suggested in our representation on the Plan.</p>	<p>As requested the 'Existing Buildings of Architectural Merit' section of the policy has been removed to satisfy the representation. This issue is also covered in Policy 1 – Greenbelt exceptions.</p>
	<p><i>Appendices F, G, H, I, J, K and Appendix 8 of the Monitoring Statement</i></p>	
	<p>We are content with the assessments in these appendices. In particular we found that Appendix F was useful for providing additional clarification of the Community Policy assessments in Appendix E.</p>	<p>Comments noted and no modification required.</p>

Section 5: Monitoring

5.1. Monitoring Framework

- 5.1.1. The Environmental Report contained a draft monitoring framework, which set out the proposals for monitoring the effects of the LDP2. This allowed the Consultation Authorities to provide comments and suggestions regarding the monitoring proposals, which were taken into action when establishing the final monitoring framework contained within the ER.
- 5.1.2. Monitoring of the significant environmental effects will be carried out in line with both the SEA and Plan monitoring framework by the Council and any other relevant bodies in order to implement remedial action, if required, as a result of unforeseen environmental impacts over the life of the Plan, or in line with the relevant review stages.

Section 6: Conclusion

6.1. The Influence of SEA on the LDP2

- 6.1.1. The Strategic Environmental Assessment process has been a useful and informative tool in assisting with the development of the LDP2 and for highlighting the environmental issues and benefits associated with the Plan.
- 6.1.2. Through the assessment of each stage of the LDP2 development (Main Issues Report and Proposed Plan), there have been notable examples of the positive influence of the SEA, including the acceptance of the vast majority of SEA preferred options and suggested alterations and proposed mitigation measures to be integrated into the LDP2. The SEA process also played a key role in identifying reasonable policy alternatives, informing policy option discussions and shaping the policy options taken forward into the Proposed Plan. The SEA preferred options were fed back into the policy development process and an agreement was made to adopt these into the Proposed Plan for consultation, where appropriate considering other factors.
- 6.1.3. The SEA was an essential part of the development and implementation of the Joint Planning Policy and SEA Assessment Methodology and assessment framework for development proposals (Sites). This process ensured the environmental considerations were fully integrated during the site assessments, site package collation and overall decision-making.
- 6.1.4. However, there were instances where proposed sites (and packages) were clearly identified by the SEA as having significant adverse impacts. Without the removal of particularly adverse sites or the identification of reasonable alternative sites/packages, which met the Council's Spatial Strategy, the justification for this decision-making was required and outlined other factors.
- 6.1.5. Mitigation measures have also been identified as part of the assessments where appropriate and discussed with the relevant stakeholders in order to avoid adverse impacts, reduce the significance of the effects or enhance neutral or positive impacts. Mitigation has also taken the form of suggested alterations to the wording of the Subject Policies considered and project level mitigation. This information has been taken into account for each site allocation and incorporated as Key Requirements within the Proposed Plan, along with spatial mapping to illustrate the overall decision-making and opportunities for protections and enhancement for each site.

Post-Adoption Statement

Appendix 1: Consultation Responses to the Proposed Plan Environmental Report



Sustainability Policy

Place, Neighbourhood & Corporate Services

East Dunbartonshire Council

07 January 2021

Broomhill Industrial Estate

Our ref: CEA160994

Kilsyth Road

Your ref: 01419

Kirkintilloch

G66 1TF

Dear Sir/Madam

ENVIRONMENTAL ASSESSMENT (SCOTLAND) ACT 2005

EAST DUNBARTONSHIRE COUNCIL – PROPOSED LOCAL DEVELOPMENT PLAN 2 - ENVIRONMENTAL REPORT

Thank you for your consultation on the Environmental Report (ER) of the Proposed East Dunbartonshire Local Development Plan 2 (LDP 2) received via the Scottish Government SEA Gateway on 28 October 2020. We have reviewed the document in relation to our natural heritage remit.

General Comments

We are generally content that the Environmental Report provides a comprehensive assessment of the potential environmental impacts. We have however provided some additional comments and suggestions in Annex 1.

Consideration of Previous Comments (including the Westerhill Regeneration Area)

We provided comments on the Environmental Report (ER) for the LDP 2 at the Main Issues Report (MIR) stage. We note and welcome the consideration given to these comments in Appendix B. of this ER.

In response to our comments of concern about proposals for development in the Westerhill Regeneration Area, we note that “The Westerhill Regeneration Area will be taken forward through

a Masterplan process. All development proposals, reasonable alternatives and environmental considerations (impacts and enhancement opportunities) will be explored through Masterplan production and corresponding SEA exercise”.

Whilst we support the Masterplan approach and would welcome the opportunity for involvement in this process, we continue to have concerns over development proposals in this area. Further comments are contained in the Annex to this response.

We hope that you will find these comments useful. Should you wish to discuss this response further, please contact Ann Marie Quinn Ann.Marie.Quinn@nature.scot and Dave Lang Dave.Lang@nature.scot or via our SEA Gateway at SEA_GATEWAY@nature.scot

Yours faithfully

KERRY WALLACE

Area Manager

Strathclyde & Ayrshire

cc. sea_gateway@nature.scot

sea.gateway@hes.scot

sea.gateway@sepa.org.uk

Annex

Appendix B – Consultation Authority Responses to the LDP2 MIR Environmental Report

As indicated overleaf, the proposal to adopt a Masterplan approach in response to concerns raised about development proposals for the “Westerhill Regeneration Area” is welcomed. However, it is stated here that the “*lack of reasonable alternatives*” to the Council’s proposals for this area has been explained and justified in “*Monitoring Statement Appendix 8 – Site Assessments*”. We consider that there does not appear to be any clear provision of an alternative or justification to what is being proposed for Westerhill in the ER.

Appendix E – Policy Assessments – Community Policy 3 - Bishopbriggs

We are generally in agreement with the assessments of policies provided in this Appendix.

However, Community Policy 3 – Bishopbriggs includes the Westerhill proposals. Two alternatives are provided, each containing a suite of proposed development sites, with the second of these being taken forward to the Plan. However the only difference between the first ‘alternative’ and the second ‘alternative’ appears to be the removal of a residential development site (Duncryne Place). Both ‘alternatives’ are assessed as having almost precisely the same impacts (mainly major negative/uncertain) across all of the SEA Objectives. Whilst, we broadly agree with assessments provided and potential impacts, it remains unclear in the ER as to the approach taken given the negative findings and potentially damaging implications of the assessments.

We note the reference to the proposed production of a Master Plan for the Westerhill Regeneration Area and that a separate SEA will be undertaken to ensure environmental considerations are taken into account during the decision –making process, Masterplan development and corresponding ER. We welcome this approach.

Appendix H - SEA Site Assessments for Business and Employment Sites

We consider the assessments provided here to be satisfactory across each of the sites. We do not agree however with that provided for Low Moss Industrial Estate (3.BE6). The SEA commentary states “*The presence of peat within adjacent Low Moss LNCS has the potential to be negatively impacted by the development of this site without appropriate mitigation*”. However, the assessment of the allocation against Soil & Geology is identified as ‘positive’. Whilst, we acknowledge that development of the site may involve the remediation of contaminated land, we consider that the assessment should at best be ‘neutral’. Furthermore, while the peatland nature of the LNCS means that adjacent development is likely to have an adverse impact either directly or via the hydrology of the habitat, the Biodiversity impacts are assessed as ‘uncertain’. Again we consider the assessment to be inaccurate and consider a ‘negative’ assessment to be more appropriate.

The associated Westerhill Business Park, Bishopbriggs (3.BE8) and Westerhill Industrial Estate 3.BE8 extract (North-east part of 3.BE8 with no housing proposal) are however correctly assessed

as having uniformly negative environmental consequences for those topics that are within our remit. The mitigation here for both refers to the need to masterplan for these sites.

Section 4: Mitigation and Monitoring

4.1 Mitigation Measures

We welcome the identification of mitigation measures and incorporation into each of the assessments where necessary, in order to avoid, reduce, mitigate or offset any potential adverse environmental impacts and enhance any neutral or positive environmental impacts identified.

We also note and welcome that when applications are received by the Council for proposed development, the SEA suggested alterations and mitigation measures will be used to form key requirements and put conditions in place to ensure that the SEA information is integrated into the project level in an efficient process.

4.2 Monitoring

We note that the specific measures to be taken to monitor the significant environmental effects of implementation of the LDP2 will form part of the Post- adoption Statement. We also note that the indicators and SEA Monitoring Framework (Table 5) will directly align with the Monitoring Framework for LDP2.



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: sea.gateway@gov.scot

Heather Holland
Local Development Plan
East Dunbartonshire Council

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
Switchboard: 0131 668 8600
HMConsultations@hes.scot

Our case ID: 300020233
Your ref: 01419
15 January 2021

Dear Heather Holland

[Environmental Assessment \(Scotland\) Act 2005](#)
[01419 Environmental Report - East Dunbartonshire Council - Proposed Plan](#)

Thank you for your consultation which we received on 26 October 2020 about the above and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the Plan, with part two focusing upon its environmental assessment.

Part 1: 01419 Environmental Report - East Dunbartonshire council - Proposed Plan

We have provided representations to the Plan via the local development plan mailbox. For ease of reference, a copy of these is included in Annex 1 of this letter.

Alongside the representations we have the following comments to offer on the Proposed Plan.

We welcome the inclusion of the historic environment in objective D of the Plan Objectives; this approach will help to promote the importance of the historic environment in East Dunbartonshire. We welcome the inclusion of policies for the historic environment within the Community Policies which help to highlight the assets within these areas and should aid in enhancing awareness of these assets, safeguard them from harmful development and promote enhancement opportunities. While we have requested some amendments to the historic environment policies in our representations, overall, we consider that the policies are robust and will help to protect and enhance the historic environment within East Dunbartonshire.

We note that the Historic Environment planning guidance which supports the LDP policies is in the process of being revised and merged with the Archaeology planning guidance. We request the opportunity to review the planning guidance and provide advice on this guidance document. We consider that there is the opportunity to provide considerable support for positive management of the historic environment through this guidance, including more detailed guidance on a positive approach to maintenance,

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



enhancement and appropriate and sympathetic adaptation of listed buildings and unlisted buildings in Conservation Areas for example.

Review of local historic environment designations – we understand that a review of local historic environment designations is currently ongoing and the results will be incorporated within the revised Historic Environment planning guidance. Based on the information we have seen so far we welcome the positive approach to reviewing all of the designations concurrently and the commitment to producing new appraisals for the Conservation Areas. We look forward to reviewing the appraisals during the consultation and the revised planning guidance as noted above and we will provide detailed comments at that stage.

We note that the review has identified two local gardens and designed landscapes which may have the potential to be of national importance following further research. While we have no detailed comments to offer at present if you would like to propose them for the inventory, we would invite you to submit an application form for each site. The form can be accessed at [Propose a Garden or Landscape for the Inventory | Hist Env Scotland \(historicenvironment.scot\)](https://www.historicenvironment.scot/propose-a-garden-or-landscape-for-the-inventory). If you would like to ask any questions about the designation assessment process please contact Julie.Candy@hes.scot. If you would like to discuss the potential for inclusion on the Inventory as further research is undertaken we would be happy to discuss this.

Part 2: Environmental Report

We welcome the assessment that has been undertaken to support the development of the plan. The Environmental Report sets out a thorough and considered assessment with an adequate level of detail and a clear narrative setting out its conclusions. We have comments on some elements of the information provided, and these are set out below.

2.2 – Baseline Environmental Data

Table 1 gives a summary of the baseline data; under cultural heritage we note that 178 listed buildings are identified within East Dunbartonshire. Our records indicate that there are currently 176 listed buildings within your local authority area and you may wish to update this data. We also note that under Buildings at Risk, the only reference is to transport structures, which is a change from the MIR ER which noted 9 buildings at risk in East Dunbartonshire. Again, you may wish to update this information, although we note that the LDP itself refers to the appropriate buildings at risk in the Community Policies.

We welcome the enhanced description of cultural heritage in Table 2 on Environmental Issues and consider that this provides a more rounded and appropriate reflection of the historic environment in East Dunbartonshire.



Section 4 – Mitigation and Monitoring

We welcome that mitigation measures for negative effects have been identified and considered throughout the assessment. In particular we welcome that these measures have been pulled through to the policies in the Plan to form key requirements to ensure that the mitigation will be effective when determining planning applications.

We note that our comments regarding the monitoring objectives for cultural heritage have been taken into account in Table 5 and we welcome that these will directly align with the monitoring framework for LDP2.

Appendix B – Consultation Authority Responses to the LDP2 MIR Environmental Report

We welcome that our comments on the MIR ER have been taken into consideration in the Proposed Plan ER. We would like to clarify that our comments on the MIR Appendix D referring to the SEA criteria for the Antonine Wall were intended to note the difference between the Buffer Zone of the World Heritage Site and the wider setting as indicated in the Supplementary Planning Guidance (page 17). The aim was to ensure that all impacts on the setting of the World Heritage Site are considered.

Appendix E – Policy Assessments

We are content with the assessments of the policies in the Proposed Plan and in particular welcome the inclusion of objective D in Policy 1. We agree with the assessment that with this objective in place the policy has the potential to provide positive impacts on cultural heritage.

At Policy 3 Bishopbriggs we note the reference to the production of a Masterplan for the Westerhill Regeneration Area and we will be happy to provide advice on the Masterplan as it progresses. We note that the assessment finds no significant effect on cultural heritage for this policy. As noted in our representation on this policy in the Plan, we consider that there should be an additional requirement to protect and enhance the setting of the Antonine Wall World Heritage Site in the Masterplan. With this additional requirement in place we consider that the finding of no significant effect may be reasonable, however, without it there would be the potential for a significant adverse effect on the World Heritage Site and cultural heritage.

We are largely content with the assessment of Policy 19 Historic Environment; however, we would note that we do not consider the greenbelt section of this policy to provide a positive objective for the historic environment. The phrasing of this section of the policy appears to prevent the rehabilitation and restoration of any buildings at risk or buildings in disrepair in the greenbelt. We therefore disagree with the assessment that this section positively contributes to the conservation of the greenbelt and the historic environment and consider that this section of the policy is removed as suggested in our representation on the Plan.



Appendices F, G, H, I, J, K and Appendix 8 of the Monitoring Statement

We are content with the assessments in these appendices. In particular we found that Appendix F was useful for providing additional clarification of the Community Policy assessments in Appendix E.

None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements who can be contacted by phone on 0131 668 8730 or by email on Victoria.Clements@hes.scot.

Yours faithfully

Historic Environment Scotland



Annex 1 – Representations to the Plan

Community Policies: 2.HE, 3.HE, 4.HE, 5.HE, 6.HE, 7.HE, 8.HE:

Object - "Development should preserve and enhance the character, **appearance** and setting of the historic environment in ..."

We suggest that the word **appearance** should be removed from the wording of these policies and replaced with **cultural significance**. Our view is that, consistent with the Historic Environment Policy for Scotland (HEPS), decisions should be based on an understanding of the cultural significance of an asset. While in many cases preserving appearance will be consistent with preserving cultural significance, this is not universally the case. A presumption in favour of preserving appearance also does not recognise the potential for enhancement, improvement and restoration. We suggest that the word appearance is removed to ensure that the policies apply equally to all aspects of the historic environment.

Community Policies: 2.HE, 3.HE, 4.HE, 5.HE, 6.HE, 7.HE, 8.HE:

Object - undesignated historic environment assets

The wording in these policies relating to non-nationally important designated historic environment assets is limited to two types of sites - locally important gardens and designed landscapes and significant archaeological sites. To be consistent with paragraph 137 of Scottish Planning Policy (SPP) and HEPS it is our view that this should be expanded to include a wider range of assets such as locally important unlisted buildings, for example.

Community Policy 3.R:

Object - add a requirement to avoid adverse impacts on the site and setting of the Antonine Wall World Heritage Site (Page 40).

As part of the Westerhill Regeneration Area falls within the Buffer Zone of the Antonine Wall World Heritage Site, we recommend that the following wording is added to this policy as an additional requirement:

"Protect and enhance the setting of the Antonine Wall World Heritage Site in accordance with policy WH1 Frontiers of the Roman Empire (Antonine Wall) World Heritage Site and HE1 Buffer Zone in Policy 19 Historic Environment. Prior archaeological investigation including excavation may be required."



Community Policies 3.T, 4.T, 8.T:

Object - add reference to potential requirement for scheduled monument consent

As there is the potential for developments to have direct impacts on the scheduled monument of the Forth & Clyde canal, the following wording should be included in the policy at the end of the section GN2 following the words, "...subject to other policies" :

"and scheduled monument consent from Historic Environment Scotland where required."

Community Policy 3.BR1:

Object - add requirement to protect the setting of the Antonine Wall World Heritage Site (page 48)

As site 3.BR1 lies within the Buffer Zone of the Antonine Wall World Heritage Site we request that a similar key requirement to that for site 3.BR3 is included:

"Protect the setting of the Antonine Wall World Heritage Site"

Community Policy 3.BR5:

Object - add requirement to protect the setting of the Forth & Clyde Canal scheduled monument (page 48)

As site 3.BR5 lies adjacent to the Forth & Clyde Canal scheduled monument we request that a similar key requirement to that for site 3.BR3 is included:

"Protect the setting of the Forth & Clyde Canal scheduled monument"

Community Policy 8.TR:

Object - add reference to requirement for scheduled monument consent

The policy refers to the Twechar towpath and crossings improvement project. As the Forth and Clyde canal is a scheduled monument any improvement works to the towpath or crossings may require scheduled monument consent we suggest that the wording of this section on page 146 should be amended to read:

"Twechar towpaths and crossing improvements, subject to scheduled monument consent from Historic Environment Scotland as required."



Community Policy 8.HE:

Object - remove statement about the re-use and restoration of the Shirva Stables on the Forth and Clyde Canal scheduled monument (page 150)

The section of the policy on the scheduled canal states that, "The ruined Shirva Stables are part of this Scheduled Monument, west of Twechar, and provide an opportunity for reuse and restoration." The Shirva Stables are included in the description of the scheduled monument as an integral part of the monument. It therefore cannot be assumed that there is an opportunity for re-use of these structures. While we recognise that there may be an opportunity for creative re-use, this would be contrary to current policy for scheduled monuments and would require very careful and detailed discussions. As there is no guarantee that such an opportunity is possible at this time, we recommend that this sentence is removed from the policy.

Subject Policy 19 Historic Environment:

Object - remove the section on Existing Building of Architectural Merit in the Green Belt (page 189)

We consider this section to be incongruous in the context of the historic environment policies and it is not clear how this section of the policy meets a historic environment objective. This section of the policy raises a particular issue in the context of buildings at risk and buildings of interest which have fallen into disrepair. This is because the policy requires a building to be sound, wind and watertight for rehabilitation to be supported. We suggest that this green belt section is removed from the historic environment policy.

Subject Policy 18 Water Environment and Flood Risk:

Object - request amendment to wording under Water Quality and Drainage on page 186.

This section of the policy states that "Proposals will be encouraged to connect SuDS to the Forth & Clyde Canal..." As the Forth and Clyde Canal is a scheduled monument we request that this sentence is amended to read as follows:

"Proposals may be permitted to connect SuDS to the Forth and Clyde Canal subject to early discussion with and scheduled monument consent from Historic Environment Scotland."

Historic Environment Scotland

15 January 2021