
Revisions to Environmental Report

Introduction

1. This report is to update the Joint Committee on changes that have been made to the Environment Report that accompanies the 2006 Alteration to the Structure Plan. In line with the Strategic Environmental Assessment Regulations a consultation on the Environment Report was carried out in parallel to the Structure Plan process.
2. As part of the 2006 Review of the Structure Plan, it was decided by the Joint Committee to carry out an SEA on the parts of the Structure Plan that would be changing. Whilst reserving the Joint Committee's position on whether this is a legal obligation, it is seen as good practice. This assessment is not required to cover sections of the plan that will remain unaltered, which includes the core Structure Plan Strategy.
3. The SEA is being developed in line with the requirements of the Directive and good practice and in close consultation with the Consultative Authorities (SEPA, SNH and Historic Scotland). The SEA report is being produced in four sections which deal with the following issues. Together they form the environment report:

Section 1 – Context of the Structure Plan Review and SEA Process.

Section 2 – Current State of the Environment.

Section 3 – Assessment of 2006 Structure Plan Alteration.

Section 4 – Next Steps in SEA and Structure Plan Process.

4. In line with good practice, the assessment is being carried out as the policies and supporting text are produced. The SEA also assesses the options that were considered during Plan review process and will include a full assessment of both the ones chosen and rejected.

Main issues raised by Assessment

5. There are several key areas that are emerging that the assessment process focussed on. This conclusion has been accepted by the Consultation Authority. These issues are as follows:
 - Growth Option – The plan promotes a higher level of economic growth than the **2000 Plan** and this could have environmental implications. Both the growth option chosen and the other options considered need to be assessed.
 - Community Growth Areas – The identification of locations for future urban expansion has a bearing on the environment of the individual areas and also at a regional level due to their cumulative impacts. Assessment needs to be undertaken to check the environmental implications of all sites considered and their effect on the environmental capacity of the area.

- Renewable Energy – An assessment process has been carried out to identify areas suitable for large windfarm developments. This has a potential impact on landscape and communities that needs to be investigated.
6. The results of the assessment have been updated on the basis that the recommended changes to the **2000 Plan** being considered by the Joint Committee elsewhere on the agenda are agreed. Whether revised assessment will be required will depend on whether changes of environmental significance are made to the plan as a result of any further public consultation, but such assessment will be the responsibility of Scottish Ministers, as the responsible authority.

Updated SEA

7. The main changes that have been made to the Environment Report in the light of the latest comments received are to Part 3. This is the most important part of the Report as it highlights the results of the assessment of the Structure Plans policies and options that were considered during its preparation. The other three parts of the Environment Report have had only minor changes. Full copies of Environment Report are available to the Joint Committee on request.
8. In line with Section 17 (b) of the Environmental Assessment (Scotland) Regulations, a full account has been taken of every opinion expressed during the consultation period. Also in line with the SEA Regulations (Part 17 (a)) a full account has been taken of the findings of the Environment Report when changes were being made to the Structure Plan.

Main Issues Raised

9. The three consultation authorities were generally pleased with the structure and content of the Environment Report and that it covered the requirements of the SEA Regulations. However they still had a number of issues that they wanted to see reflected in the Environment Report and in particular in Part 3 (the Assessment). The main changes requested to the report were as follows:
10. The main issue raised was the need for further justification of the growth scenario that has been chosen for the 2006 Structure Plan. This is addressed in Part 3 of the Environment Report. Although the respondents accepted the option chosen, they believed that within Option 2 there were still different levels of growth that could be assessed. The most obvious one was the result of having a growth strategy that did not include any Greenfield release.
11. In the assessment of the possible Community Growth Areas SNH in particular did not believe that there was enough justification for saying that the options chosen would not have a detrimental impact on some specific environmental assets.
12. SEPA requested that a greater emphasis be given to flooding issues and there was scope for a greater level of assessment of the proposed community growth areas as well as an overall assessment of flood risk across the GCV area.

13. Most of the issues raised through the consultation process have been accepted and appropriate changes have been made to the various sections of the Environment Report. The only issue which has not resulted in changes is the issue raised by SEPA on flooding. While the issue of flooding is recognised as being of high importance to the Structure Plan the level of assessment that was being asked to be included in the Environment Report was seen as being overly detailed and not practical due to a lack of up to date flooding data. Further discussions with SEPA are planned to identify alternative methods for dealing with their comments.

Next Steps

14. The Environment Report will be further revised in preparation for its submission with the 2006 Alteration of the Structure Plan to Scottish Ministers. From then on any changes or further assessment that needs to be carried out will become the responsibility of the Scottish Ministers, as the responsible authority.

Recommendation

15. The Joint Committee is asked:
 - (a) to approve the proposed changes that have been made to the Environment Report; and,
 - (b) to authorise the Structure Plan Manager, in consultation with the Structure Plan Steering Group, to finalise the SEA/Environmental Report for submission to the relevant authorities, and to take any steps required in relation to fulfilling the SEA regulations.

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