

SEA POST-ADOPTION STATEMENT

JULY 2017



EDINBURGH LOCAL DEVELOPMENT PLAN

STRATEGIC ENVIRONMENTAL ASSESSMENT

POST ADOPTION STATEMENT



July 2017

Email: localdevelopmentplan@edinburgh.gov.uk

View more information at: www.edinburgh.gov.uk/localdevelopmentplan

LDP SEA POST ADOPTION STATEMENT

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1. INTRODUCTION

1.1 Purpose of this Statement

The Edinburgh Local Development Plan (LDP) was adopted in November 2016. A statement is required under Part 3, Section 18 of the 2005 Strategic Environmental Assessment (Scotland) Act to set out how the consultation responses and the findings of the Environmental Report have been taken into account in the preparation of the Plan.

1.2 Key facts

The key facts relating to this Edinburgh LDP are set out below:

Name of Responsible Authority	The City of Edinburgh Council (CEC)
Title of PPS	Edinburgh Local Development Plan (LDP)
What prompted the PPS	Legislative requirement
Subject	Land use planning
Period covered by PPS	10 years from date of adoption
Frequency of updates	At least every 5 years
Area covered by PPS	The City of Edinburgh Council area (see figure 1)
Purpose of the PPS	<ul style="list-style-type: none"> – Set out a clear spatial strategy for the Council area – Allocate land to meet the requirements of the Strategic Development Plan for the city region – Provide a clear basis for determining planning applications
Contact name	Naomi Sandilands
Job title	Planning Officer
Address	The City of Edinburgh Council, Waverley Court, Business Centre G3, 4 East Market Street, Edinburgh, EH8 8BG
Telephone number	0131 529 4692
E-mail	naomi.sandilands@edinburgh.gov.uk

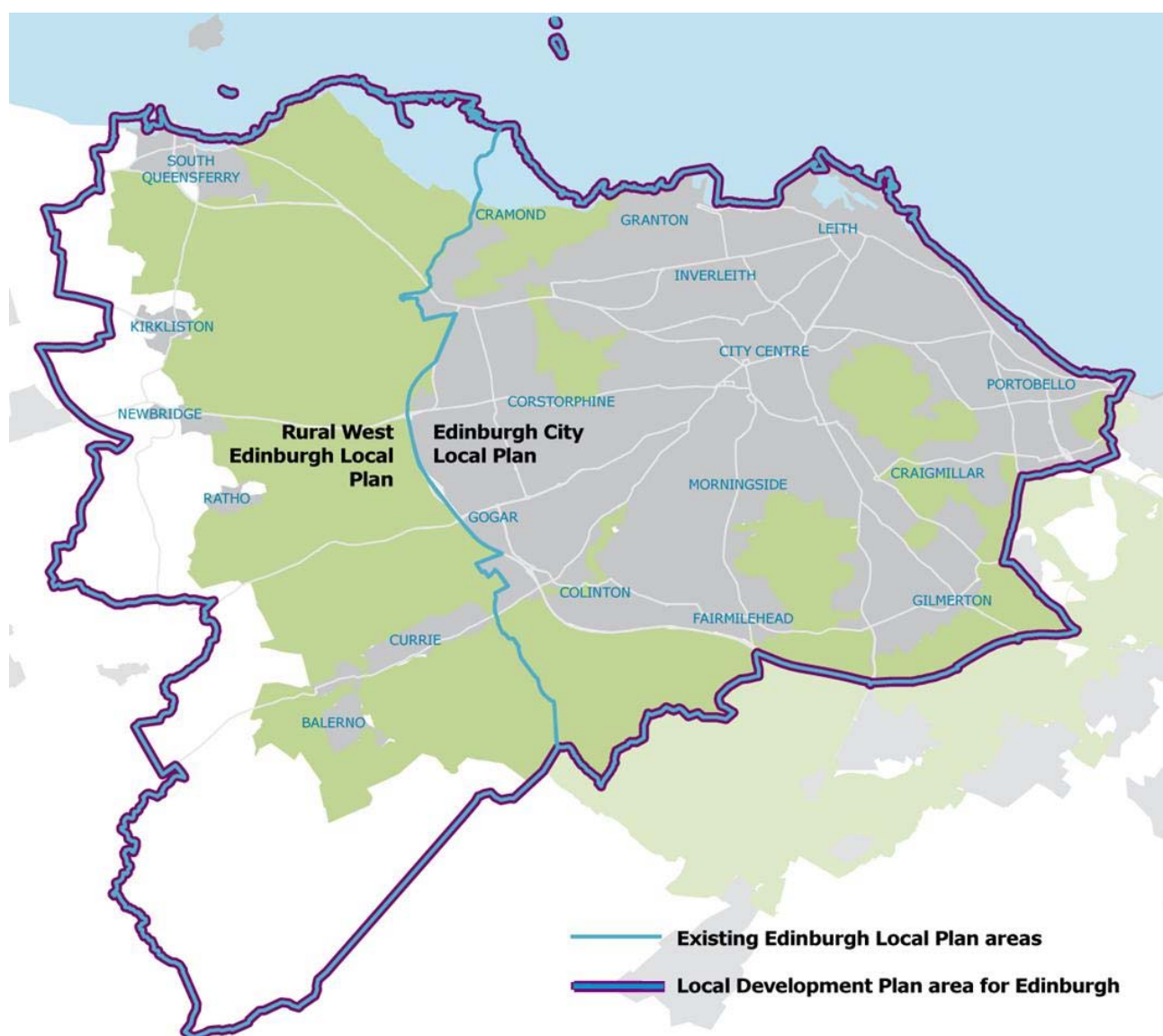


Figure 1: The City of Edinburgh Council area and previous local plan boundaries

1.3 SEA activities to date – brief summary of stages.

A Strategic Environmental Assessment (SEA) was undertaken at all stages in the preparation of the Edinburgh LDP. At the Main Issues Report (MIR) stage in 2011, the MIR issues and their reasonable alternatives were assessed and published in the first Environmental Report (ER) (Vol. 1 & 2, 2011). This assessment was therefore available to read alongside the MIR and allowed the public to understand the environmental impact of the options at the MIR consultation stage.

A revised Environmental Report (Vol. 1 & 2) was prepared and published alongside the LDP Proposed Plan (March 2013). This Environmental Report revision provided a summary of the

assessment of the MIR options and identified which option was taken forward in the Proposed Plan, any implications this choice had, noting any further action the Proposed Plan took in including the options.

As a result of the approval of the South East Scotland Strategic Development Plan (SDP) and its Supplementary Guidance, which set out a higher housing requirement for Edinburgh's LDP, a Second Proposed Plan was prepared in 2014 with additional housing allocations added. Therefore a second revised Environmental Report was prepared. This considered the significant environmental impact of the additional housing sites and relevant formal representations to the Plan. This resulted in some changes to proposals, supporting text and policy wordings in the published Second Proposed Plan. This edition of the Environmental Report was published in June 2014 (Vol. 1 & 2).

The Environmental Report and its subsequent two revisions, was taken into account and referred to in the Council's responses to issues raised in statutory representations. The Council's responses were set out in the summary of unresolved representations, and can be found in the Report of Examination.

The Second Proposed LDP was submitted to Scottish Ministers in May 2015 for examination by the Directorate of Planning and Environmental Appeal reporter. The Report of Examination was published in June 2016 and recommended post-examination Modifications. In order to ensure the environmental impacts of the entire plan, including cumulative and synergistic impacts were considered, the recommended modifications were subject to an environmental assessment using the same methodology as the first and Second Proposed LDP's. A third revision of the Environmental Report (Vol. 1 only) was published, advertised and consulted on in July 2016. The Environmental Report Third Revision included updating the policy and proposal assessment and an update of Appendix 4: Landscape and Visual Effects Cumulative Assessment. A summary of comments received was published in August 2016.

The findings of the Environmental Report Third Revision informed the decision to publish the Plan as Modified, following examination in September 2016. The relevant report to [Planning Committee is available \(dated 5 September 2016\)](#).

A more detailed timeline of the stages of the SEA is summarised in Appendix 1: Chronology of SEA Activities during the preparation of the LDP to adoption.

2. How environmental considerations in the Environmental Report and the consultation response have been taken into account in the Local Development Plan

In advance of the SEA assessment, an initial review of the possible environmental problems and issues was undertaken. The review set out how the problems affected each SEA topic areas, and set out the implications for the LDP. The problems affecting each SEA topic area were recorded in Table 5 in each edition of the Environmental Report. This Statement now reflects on how these identified issues were then integrated into the LDP, as set out in the rightmost column of Table 1 below.

Table 1			
Problem	Topic	Implications for Plan	Taken into account in the Plan?
Loss of prime agricultural land through development	Population and Human Health Soil	Meeting the scale of the housing requirement set by the Approved Strategic Development Plan (SDP) will require the release of prime agricultural land across the Council area (see figures 2 and 8).	Majority of housing sites adversely impact on these objectives. There is likely to be a cumulative and synergistic negative effect on soil quality due to the scale of housing proposals. The scale of development proposed by the Strategic Development Plan required a considerable amount of greenfield land to be developed. The post-examination modifications increased this amount but not to the level sought by some representations before the examination.

			Due to the need to meet the housing requirement, it was not a reasonable alternative to allocate less housing sites than required or sites outwith those in the strategic development areas set out in the SDP.
Possible future decreases in air quality/need to encourage more sustainable forms of transport	Air and Climatic factors Population and Human Health	Address transport strategy objectives, including minimise distances people need to travel, ensure new development sites are well connected to public transport and provide a policy supporting mitigation of air quality impacts.	The LDP Spatial Strategy coordinates development with strategic public transport infrastructure investment, green network/active travel. The housing site assessment (Vol 2 of Environmental Reports) prioritised sites with better public transport accessibility.
Need to adapt to predicted climate change and its potential impacts	Air and Climatic factors	Consider the effects of climate change throughout the LDP and for the whole period of the LDP.	Primarily carried out in relation to increased flood risk.
Need to protect and improve the water status of all water bodies.	Water	Consider potential enhancements to all water bodies where new development sites are proposed.	Potential to enhance the water quality has been identified in the site briefs as appropriate e.g. Cammo – ‘improve the quality of the water environment through works to realign and improve the bank side treatment of the Bughtlin Burn.’

			<p>Policies to mitigate include Policy Des 10 Waterside Development and Des 3 Development Design and ENV 21 Flood Prevention. Proposals for water course management include GS 5 Niddrie Burn Parkland; GS 7 Gogar Burn.</p>
Possible increase in flooding as a result of new development	Water	Avoidance of flood risk is a consideration in identifying new housing sites.	<p>No sites allocated on known areas of flood risk apart from EMP 4 – safeguard of potential runway.</p> <p>A new principle was added on the Reporter’s recommendation to most of the Site Briefs requiring ‘further investigation/consultation to determine the nature of any flood risk on the site and whether further assessment and mitigation measures are required.’</p>
Loss of biodiversity and fragmentation of habitats	Biodiversity, Flora and Fauna	Consider potential enhancements to green networks to maximise connectivity and create new habitats. Consider impact on biodiversity at master planning stage for new housing sites.	<p>The spatial strategy identifies the green network and the green space proposals address gaps in network.</p> <p>Site briefs identify specific green corridor connection the green network.</p>

How opinions and the results of consultation were taken into account

Consultation with the statutory consultation authorities is a key part in the process of undertaking a SEA. The consultation authorities and the Scottish Government Environmental Assessment team provided valuable input on the methodology and content of the Environmental Report. A summary of the conversations and responses to the Environmental Report was recorded in each successive revision of the Environmental Report. These comments provide the feedback loop to ensure that the assessment was valid. The comments and responses are found in *Table 3: Summary of consultation authority comments and Council responses* with each stage shown in a different colour.

The written comments submitted by other parties can be found in relevant entries in Vol 2 of the Environmental Report and are also shown in different colours.

The majority of the comments received concerned details of the SEA assessment that resulted in a change to the assessment but had no impact on the LDP itself. The notable exceptions are the exclusion of two sites (Calder Crescent and the Drum 2) that were not progressed from the MIR stage (first Environmental Report).

SEPA at the MIR stage, requested a flood risk assessment (FRA) to mitigate certain sites. The first and Second Proposed Plans responded by considering flood risk in the site briefs. Subsequently, the Reporter's recommended modifications added a specific reference to a FRA for Moredunvale, Cammo and Gilmerton.

Comments on the 2013 Proposed Plan/revised ER stage from SEPA included a request to update policy wording and subsequently the ER. Some changes to the supporting text were made and thus the Reporter's post-examination modification to the LDP included a sentence added to Policy Env 21 regarding flood storage capacity.

Comments received following the publication of the Report of Examination and the Environmental Report Third Revision, mainly focussed on the detailed implementation of the new housing sites which is part of the development management process. This response confirmed that the individual and cumulative landscape effects of allocating the new housing sites were identified appropriately in the Environmental Report.

3. The reasons for choosing the Local Development Plan as Adopted, in light of the other reasonable alternatives considered

The detailed description of the framework for assessing the environmental effects is set out in 3.3 of the Environmental Report Third Revision.

Assessment of Proposals

The main focus for assessing reasonable alternatives to the policies/policy direction took place at the MIR stage of the LDP preparation process and the publication of the Environmental Report (ER) that accompanied the MIR. All identified alternatives were assessed. The assessment of all identified alternatives was recorded in Vol. 1 and 2 of the ER (see Table 8 for housing sites). At each stage the ER proposed recommendations for mitigation and enhancement measures to prevent, reduce or offset adverse impacts, and to enhance positive effects that were predicted to arise from the implementation of the LDP. A housing site assessment was also undertaken. This involved each area being assessed against SEA criteria, including impact on the landscape setting of the city and accessibility to public transport (see tables 6 and 7).

The Environmental Report only assessed reasonable alternatives for sites included in the MIR stage. Those sites which were later promoted at the first and Second Proposed Plan stage as representations, were then assessed in the housing assessment (see Vol. 2 of the Environmental Report). These used site assessment criteria and a landscape and visual assessment was undertaken.

Assessment of Policy

As anticipated in the MIR, a significant number of policies were rolled forward from the previous Edinburgh City Local Plan (2010). Scottish Planning Policy and accordance with the SDP policy framework limited the options for reasonable alternatives. The environmental objectives were well reflected in the LDP policies – mainly positive or no significant or likely interaction were noted. The SEA assessment broadly confirmed that the policies are environmentally sound, and few changes to policy were made. However, the assessment did highlight some areas where the policy may constrain development that could have a positive environmental impact (such as renewable energy production). On balance these policies' potential to have a positive impact on the environmental objectives outweighs any adverse impacts (see assessment of Policies Env 10, 11, 17).

Some policies supporting development in specific locations in line with the spatial strategy (Emp 4, 5, 6) are required to accord with higher tier planning documents (for example the National Planning Framework). The assessment highlighted mitigation that was then integrated into the site briefs and development principles in the LDP.

On balance the combination, accumulation and possible synergies of effects of policies and proposals were considered more likely to result in net environmental improvements across the LDP area and over the LDP period.

Conclusion

By the final statutory stages of the LDP project in September and November 2016, the reasonable alternatives available to the Council had reduced to a statutory duty to consider the modifications recommended in the Report of Examination and accept the modifications or not. Since the Reporter's findings were largely binding, the Council had only limited scope to decide not to include any of the recommended proposals and policies. The tests at that stage can be found in a [report to Planning Committee 5 September 2016](#), (paras 3.8 - 3.10 in particular).

There were no further significant negative impacts identified in any of the revisions or additions to policies, as recommended in the Report of Examination. This assessment was recorded in the Third Revision of the Environmental Report. Since the modifications recommended in the Report of Examination did not raise any new or additional significant environmental effects, the assessment did not provide any statutory reasons for the Council to not accept the Reporter's recommendations.

4. Monitoring

Monitoring of the effects of the implementation of the plan on the SEA objectives is a key part of the SEA process. Part 3 Section 18 of the Environmental Assessment (Scotland) Act 2005 sets out the requirements for monitoring the implementation of qualifying plans: *'monitor the significant environmental effects of the implementation of the plan; these may include arrangements which enable the authority to identify any unforeseen adverse effects at an early stage and undertake appropriate remedial action.'*

Earlier iterations of proposed monitoring indicators were included in the Environmental Report and subsequent revisions (see Table 9 in Chapter 4, Environmental Report Third Revision, Vol. 1), and therefore have been subject to scrutiny and commented on. The baseline data set out in chapter 2, Volume 1 of the Environmental Report provides the basis on which any monitoring will be carried out. The effects of the LDP on the baseline data will be registered using the Council's UNIFORM system which records planning applications and the land use designations noted and categorised in GIS.

The intention is to publish a Monitoring Statement for the adopted LDP in late 2017/early 2018 (ahead of a Monitoring Statement which will accompany the MIR for LDP 2). It is intended to align the indicators of both the LDP and those for the SEA as set out in Table 2.

Table 2: Proposed Monitoring Indicators		
Environmental Objective	Indicators	Data Sources
Biodiversity <i>Protect and enhance biodiversity, flora and fauna, and habitat networks</i>	Number of planning applications for development on, or overlapping a nature conservation site approved/refused (<i>Focusing mainly on major housing and commercial developments</i>).	GIS/ UNIFORM
	Number of planning applications that affect European Protected Species (EPS)	GIS/UNIFORM

	<p>Area of open space lost to/ protected from development (i.e. number of applications granted/refused).</p> <p>Area of open space, parks and woodland delivered from allocations in the Proposed Plan.</p>	<p>UNiform / Open Space Audit</p> <p>UNiform/ Open Space Audit</p>
<p>Population and Human Health</p> <p><i>Improve the quality of life and human health for communities</i></p>	<p>Number of planning applications with “good” accessibility to convenience or healthcare facilities.</p> <p>Number of new housing units approved with “good” accessibility to good bus, train or tram services.</p> <p>Number of planning applications with “good” accessibility to open space.</p>	<p>UNiform and accessibility modelling</p> <p>UNiform and accessibility data</p> <p>UNiform and accessibility data</p>
<p>Soil</p> <p><i>Protect the quality of soil</i></p>	<p>Area of remediated brownfield sites as a result of development.</p> <p>Area of prime agricultural land lost from development (planning applications granted/refused) <i>May have to be restricted to housing and large commercial developments.</i></p>	<p>HLA and Vacant & Derelict Land Survey.</p> <p>UNiform</p>
<p>Water</p> <p><i>Prevent the deterioration and, where possible, enhance the status of the water environment and reduce/ manage flood risk in a sustainable way.</i></p>	<p>Number of new housing units/area approved and refused within area designated as a functional flood plain. <i>May have to restrict to housing and large commercial development.</i></p> <p>Number of SUDS features by type in new development (e.g. underground, over-ground or permeable paving).</p>	<p>UNiform and GIS</p> <p>UNiform/GIS/Scottish Water</p>

	Improvements to water quality and ecological status of water courses.	SEPA and River Basin Management Plan
Air and Climate <i>Maintain and improve air quality, and reduce the causes and effects of climate change</i>	<p>Number and increases to existing Air Quality Management Areas (AQMA)</p> <p>Number of applications for renewable energy generations approved/refused</p> <p>Total points scored in the Sustainability Statement for all applications complying with the Edinburgh Design Guidance (S1 form).</p>	<p>GIS</p> <p>UNiform</p> <p>UNiform, applications with sustainability statements</p>
Material Assets <i>Minimise waste and promote the sustainable use of natural resources and material assets.</i>	Number of applications for waste management facilities.	UNiform reports
Cultural Heritage <i>Protect and, where appropriate/feasible enhance the historic environment</i>	<p>Number of applications approved where adverse effects on the historic environment were anticipated.</p> <p>Number of applications refused or withdrawn due to adverse impacts on the historic environment.</p> <p>Number of listed buildings on "At Risk" register.</p> <p>Number of scheduled monuments assessed as being in unsatisfactory condition or with extensive significant problems.</p>	<p>UNiform</p> <p>UNiform</p> <p>Buildings at Risk Register</p> <p>Scottish Historic Environment Audit</p>

<p>Landscape and Townscape</p> <p><i>Protect and enhance the landscape character and setting of the city and improve access to the open space network.</i></p>	<p>Areas of Green Belt and Special Landscape Areas land lost to/protected from development (i.e. planning applications granted/refused) <i>May have to be restricted to housing and large commercial developments.</i></p> <p>Area of open space lost to/protected from development (i.e. number of applications granted/refused).</p> <p>Area of open space, parks and woodland delivered from allocations in the Proposed Plan.</p> <p>Number of applications approved that would impact on the city skyline and key views.</p>	<p>GIS and UNIFORM reports with reference to the Open Space Strategy.</p> <p>UNIFORM / Open Space Audit</p> <p>UNIFORM/ Open Space Audit</p> <p>UNIFORM</p>
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Appendix 1: Chronology of SEA Activities during the preparation of the LDP to adoption

SEA Activity	Date
Inception meetings with consultation authorities on the LDP project and timescales	November 2010
Background work on potential MIR topics and collation of baseline information for SEA	December 2010 - March 2011
Integrated Habitat Network and Central Scotland Green Network (CSGN) workshop with Forest Research	April 2011
Consultation authority meetings to discuss two methodologies being considered for assessment of policies and proposals	April 2011
Discussion with Scottish Government Environmental Assessment team regarding assessment for new housing sites and land outwith Strategic Development Areas	May 2011
Work on content of scoping report	May/June 2011
Submission of Scoping Report	June 2011
Consultation authority responses to scoping report	July 2011
Work on content of environmental report	July - September 2011
Circulation of draft MIR and Environmental Report to consultation authorities	August 2011
Consultation authority responses to draft Environmental Report and discussion with SEPA regarding their response	September 2011
Updated Environmental Report following responses	September 2011
Publication of Environmental Report	October 2011
Consultation on Environmental Report and MIR	October 2011 - January 2012
Consultation authority meetings regarding content of Environmental Report	December 2011
Consultation authority and other stakeholder responses to	January 2012

SEA Activity	Date
Environmental Report	
Summarising responses to Environmental Report	January - April 2012
Published Summary of Responses to the Main Issues Report, including comments on the Environmental Report	April 2012
Reassessment of all options set out in the Main Issues Report and those received during consultation period	April - January 2013
Consultation authority meetings to discuss updates to the Environmental Report and its structure	January 2013
Updating of Environmental Report to accompany Proposed Local Development Plan	January - March 2013
Formal publication of revised Environmental Report (Vol. 1 & 2)	May 2013
Assessment of additional housing land representations and reassessment of existing SDA assessments	August - March 2014
Updating Environmental Report following responses and relevant formal representations to Proposed Local Development Plan	August - November 2013
Consultation authority meetings regarding content of Environmental Report, Second Revision.	January - February 2014
Updating of Environmental Report to accompany Second Proposed Local Development Plan	January - March 2014
Formal reporting of Environmental Report, Second Revision (Vol 1&2)	June 2014
Consultation authority meeting regarding the content and consultation of the Plan post-examination.	June 2016
Publication of Report of Examination	End June 2016
Publication, advertisement and consultation on the Environmental Report, Third Revision (Vol. 1 only)	July 2016

SEA Activity	Date
Responses received and considered from the Consultation Authorities and other parties	August 2016
Environmental Report Third Revision informs approval of Plan as Modified following examination	September 2016
Adoption of the LDP	Nov 2016

