

| | |
|-----------------|---|
| For Decision | ✓ |
| For Information | |

ITEM 6 – STRATEGIC ENVIRONMENTAL ASSESSMENT (ENVIRONMENTAL REPORT), HABITATS REGULATIONS APPRAISAL AND STRATEGIC FLOOD RISK ASSESSMENT

Report by: Ian Angus, SDP Manager

Purpose

This report presents an update on the **Strategic Environmental Assessment (Environmental Report)** and an explanation of the proposed approach to ensuring that the plan complies with the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), a process known as the '**Habitats Regulations Appraisal**'. The report also sets out the approach to Strategic Flood Risk Assessment.

Recommendations

It is recommended that the Joint Committee:

- a) Notes the Addendum to the Environmental Report attached as Appendix 1 to this report;
- b) Notes the proposed approach to the completion of the Habitats Regulations Appraisal (HRA) process, as it applies to Natura sites, set out in paragraphs 3.1-3.6 of this report;
- c) Delegates authority to the SESplan Project Board to approve the publication of a Revised Environmental Report and a Habitats Regulation Appraisal alongside the Proposed Plan; and
- d) Notes the approach to Strategic Flood Risk Assessment.

Resource Implications

None.

Legal and Risk Implications

Risks detailed below have been recorded in the SESplan Risk Register. The Risk Register is reported to the Joint Committee on an annual basis.

Policy and Impact Assessment

No separate impact assessment is required.

1. Background

1.1. The Strategic Development Plan is subject to the The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) and falls within the scope of the Environmental Assessment (Scotland) Act 2005. This means that it requires a 'Habitats Regulations Appraisal' and a 'Strategic Environmental Assessment' (SEA). A Strategic Flood Risk Assessment (SFRA) has also been prepared to demonstrate that the plan has had regard to flood risk, in line with the Flood Risk Management (Scotland) Act 2009.

2. Strategic Environmental Assessment (SEA)

2.1 A SEA Environmental Report, named the 'Interim Environmental Report' (IER) was published alongside the Main Issues Report (MIR). This assessed the preferred spatial strategy option (Growth Corridors) and two alternative options.

2.2 The Core Team has considered whether there is any new material or policy approach in the Proposed Plan that is not covered by the IER. Although the Proposed Plan does not introduce any new issues not considered in the IER, it does provide more detail on the preferred approach that is considered to warrant a revised and updated assessment. It is recommended therefore that a revised or supplementary Environmental Report should be published for consultation at the same time as the Proposed Plan and that the Joint Committee give the Project Board delegated authority to approve a revised Environmental Report. The revised Environmental Report will be made available to the Joint Committee members before the Proposed Plan is published and further revised Environmental Reports will be prepared, if necessary, prior to adoption/ approval of the plan.

2.3 There is no statutory requirement for the Joint Committee to approve the revised Environmental Report prior to publication of the Proposed Plan. However an addendum to the IER (Appendix 1 to this report) is presented to the Joint Committee to inform its consideration of the Proposed Plan. This addendum is considered to address all of the additional issues raised by the Proposed Plan and the findings will be incorporated into the revised Environmental Report. Table 1 of the addendum sets out how the potential mitigation measures, identified in the IER, have been taken account of in the preparation of the Proposed Plan. Table 2 of the addendum presents a revised assessment of the Growth Corridor option in light of the additional information on Housing Supply Targets and the commitment to Supplementary Guidance on Green Networks set out in the Proposed Plan. In line with the IER findings, this additional assessment concludes that, of the MIR options, the Growth Corridor option remains the option with the fewest negative environmental impacts.

3. The Habitats Regulations Appraisal

3.1 A Habitats Regulations Appraisal (HRA) is an appraisal of the impact of the plan on 'Natura sites'. Natura sites are nature conservation designations of European importance. Article 6(3) of the EC Habitats Directive requires that *"any plan (or project), which is not directly connected with or necessary to the management of a European site, but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, shall be subject to an 'appropriate assessment' of its implications for the European site. The plan-making body shall agree to the plan only after having ascertained that it will not adversely affect the integrity of the site concerned, unless in exceptional circumstances the provisions of Article 6(4) are met."* This procedure is applied in Scotland through the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), and is known as a 'Habitats Regulations Appraisal'.

3.2 In simple terms, the HRA consists of two main questions (or stages). The first is *'could the plan have a likely significant effect on a Natura site?'*. If the answer to this is yes, then we have to ask a second question (the second stage) *'will the plan have an adverse effect on a Natura site?'*

3.3 The statutory requirement is that a HRA is carried out before the plan is agreed. This plan will not be agreed until Scottish Ministers approve it in 2018. The regulations do not concern themselves with the detailed plan-making process of particular types of plan. There is therefore no statutory requirement that a plan-making body carries out an HRA prior to committee approval of a proposed plan, nor is there even a statutory requirement that one is carried out before publication of a proposed plan.

3.4 In the context of a development plan, it is good practice to carry out an HRA before committee approval. This is because there is a theoretical risk that a committee could approve a plan for publication which, because of the findings of the HRA, could not later be approved/adopted in its current form. However, in terms of this particular plan, the risk of this is extremely small because it is very unlikely that this plan could be judged to have a significant effect on a Natura site. In line with SNH guidance (Habitats Regulations Appraisal of Plans – Guidance for Plan-making Bodies in Scotland version 3, 2015), we consider that the content of this plan would be 'screened out' of the need for further assessment at the first stage of HRA because :

- The majority of the infrastructure projects referred to in the plan are not proposed by the plan and have already been subject to HRA at a 'lower' tier of plan; and/or
- The effects of the plan on any particular European site cannot be identified, because the policies and spatial framework are too general (strategic) in nature or the location of a proposal, for example the exact route of a new strategic cycleway, is not defined in detail.

3.5 A record of HRA will be prepared for consideration by the SESplan Project Board prior to publication. If it is found that changes do need to be made to the plan for it to comply with the regulations, publication of the Proposed Plan would be postponed and the Plan, including any amendments which are required, will be presented to the

Joint Committee for its consideration. If necessary, a special meeting of the Joint Committee on or around 22 August 2016 will be recommended for this purpose. Allowing for a subsequent programme of ratification, it is expected that, in this scenario, the Proposed Plan would be published in October. This change to the programme would impact on later stages in the process, but the Proposed Plan and supporting documents will still be brought to a Joint Committee for approval for submission to the Scottish Ministers in March 2017.

3.6 Figure 1. Recommended approach to Habitats Regulations Appraisal



4. Strategic Flood Risk Assessment

- 4.1 To demonstrate that the plan meets statutory requirements with regard to managing flood risk, an interim Strategic Flood Risk Assessment (SFRA) was carried out at the MIR stage. The Core Team has reviewed the interim SFRA and incorporated its recommendations in the Proposed Plan. It is considered that the conclusions of the interim SFRA regarding the assessment of the 'Growth Corridor' option, the option taken forward in the Proposed Plan, remain valid. The Core Team will however update the interim SFRA to better reflect the content of the Proposed Plan and publish as part of the Proposed Plan consultation.
- 4.2 The existing IER assessed the 'Growth Corridor' option as having an overall positive impact on flood risk. On the advice of SEPA, the level of flood risk has been reassessed as having a neutral impact on flood risk, see Appendix 1 Environmental Report and Addendum.

5. Next Steps

A revised Environmental Report, a record of Habitats Regulation Appraisal and an updated Strategic Flood Risk Assessment will be prepared as proposed in this paper and published alongside the Proposed Plan.

Appendices

Appendix 1 Environmental Report and Addendum

Report Contact: 01506 282879

Report Agreed By: Ian Angus, SDP Manager

Author Name: Ivan Clark, Lead Officer

APPENDIX 1 – ENVIRONMENTAL REPORT AND ADDENDUM

The SESplan [Interim Environmental Report](#) identified a range of potential mitigation measures to be incorporated as appropriate into the SDP. Table 1 sets out this mitigation against the section of the Proposed Plan into which the mitigation has been incorporated.

Table 1: Mitigation Measures from Environmental Report of Main Issues Report

| SEA Theme | Potential Mitigation Measures | How mitigation has been applied in Proposed Plan where appropriate |
|------------------|---|---|
| Air | Encourage higher densities of development, where appropriate, to support public transport and active travel and a mix of uses to reduce the need to travel | Covered in 'A Better Connected Place' and 'Placemaking Principles' sections |
| | SDP transport policy to require new development to incorporate public transport services and active travel | Covered in SDP 'A Better Connected Place' and 'Placemaking Principles' sections |
| | SDP transport policy to require location of development near existing public transport services and provide direct access to interchanges and stops where possible. | Covered in SDP 'A Better Connected Place' and 'Placemaking Principles' sections |
| | SDP and LDP policies to direct development that generates significant travel demand to centres and areas show to be highly accessible by sustainable modes. | Covered in 'A Place to do Business' and 'Placemaking Principles' |
| | SDP to set out regional active travel network priorities with direct links between new and existing development and generators of travel. | Covered in 'A Better Connected Place Section. Individual routes specified in Action Programme |
| | Encourage sustainable mixed mode travel by provide direct active travel access to stations with suitable bike storage | Covered in 'Placemaking Principles' section |
| | Development to incorporate green networks to support active travel | Covered in 'Placemaking Principles' section |
| | Decisions on transport investment should prioritise sustainable transport and active travel infrastructure | Reflected in the approach set out in 'Better Connected Place' section |
| Bio | LDPs will require development to be located away from local, regional and international designated sites and locations | Covered in 'Placemaking Principles' section |
| | LDPs will direct development to avoid sites which provide supporting off-site habitats for qualifying species of protected sites, particularly within coastal zones | LDPs directed to give appropriate level of protection to all international, national and locally designated areas . |
| | SDP and LDP policies will require development to incorporate green networks and SUDS which support increasing biodiversity | Covered in 'Placemaking Principles' and Green Networks section. |

| | | |
|---------------------------|---|--|
| Climatic Factors | Air theme measures relating to transport and accessibility | Covered in 'Better Connected Place' section |
| | SDP and LDP policies will look to increase the generation of renewable energy where shown to be appropriate. This will be directed through spatial frameworks, LDP criteria policies and environmental studies, including landscape | Spatial framework for renewables included in Low Carbon Economy section and LDPs directed to include additional assessment criteria. Cross-boundary Windfarm Working Group proposed. |
| | Development to incorporate green networks to support recreational and commuting walking and cycling. SDP to set out regional walking and cycling network. | Green Network section. |
| | LDPs will require new development should use building forms which increase energy efficiency and incorporate renewable technologies | Covered by 'Placemaking Principles' section |
| | Where possible new development should look to make use of decentralised energy including district heating networks | Covered by 'Placemaking Principles' section |
| | LDPs will identify development opportunities to re-use wasted heat energy | Covered by 'Placemaking Principles' |
| | As appropriate LDPs will require development to accommodate climate change adaptation measures | Covered by 'Placemaking Principles' section |
| Cultural heritage | Development should use placemaking principles and guidance on design and siting to protect and enhance (where appropriate) historic/cultural assets and their settings. For development allocated in LDPs these will be set out in LDPs and, where appropriate, development briefs. | Covered by 'Placemaking Principles' section |
| Landscape & Townscape | Development should use good placemaking principles and guidance on design and siting to enhance landscapes and townscapes. For development allocated in LDPs these will be set out in LDPs and, where appropriate, development briefs. | Covered by 'Placemaking Principles' section |
| Material assets | SDP and LDP spatial strategies and allocations should, where possible, avoid development being located on prime quality agricultural land | Covered by 'Placemaking Principles' section |
| | Higher densities (where appropriate) and appropriate house types to meet identified need should be used to reduce the level of prime quality agricultural land required for development | Covered by 'Placemaking Principles' section |
| | Increase the provision of energy from waste facilities to increase sustainable resource use | Zero Waste section requires LDPs to support this |
| | LDPs will be required to safeguard mineral resources | Covered in 'Responsible Resource Extraction' |
| Population & Human Health | Development should be required to incorporate green space and link to green networks to support recreation and active travel | Green Networks section |
| | Development should meet affordable housing requirements. Affordable housing supply targets will | Increasing Housing Delivery section |

| | | |
|-------|---|---|
| | be set out in the SDP. LDPs will contain identify land to meet these. | |
| | Development should incorporate appropriate levels of, and good access to essential services | Covered by 'Placemaking Principles' section |
| Soil | Delivery policy should look to phase development where appropriate to prioritise brownfield development | Covered in relation to Spatial Strategy and 'Placemaking Principles' section |
| | Actions should look at how to unblock stalled development of brownfield sites | Joint Actions with HfS in Action Programme |
| | Development should look to accommodate a high level of greenspace and not rely on hard surfacing | Covered by 'Placemaking Principles' section |
| Water | New development should not look to exacerbate coastal erosion | Reflected in Spatial Strategy |
| | New development should not be located in the 1:200 flood risk area | Covered by 'Placemaking Principles' section |
| | Redevelopment of areas in the 1:200 flood risk area should comply with the Flood Risk Management (Scotland) Act 2009 and Scottish Planning Policy | Flood risk covered in Place-making principles section, but no specific requirement in the SDP to comply with this specific legislation. This doesn't add value to the plan. |
| | The Proposed Plan for SDP2 will build on the Strategic Flood Risk Assessment by mapping flood risk of potential areas of development arising from SDP2 requirements | Strategic Growth not mapped at a scale at which it would be sensible to map Flood Risk Areas. LDPs given direction to avoid flood risk areas in 'Placemaking Principle' section |
| | SDP and LDP strategy should require land for natural drainage to be left undeveloped | Covered by Place-making Principles section |
| | SDP and LDP policy will require SUDS schemes should be incorporated into new developments, where deemed appropriate | Covered by Place-making Principles section |
| | Green field development should include permeable surfaces where possible | Covered by Place-making Principles section |
| | Development should not impact on the water quality of watercourses | Covered by Place-making Principles section |

Re-Assessment of Growth Corridor Option

1. The SESplan [Interim Environmental Report](#) identified the impact of the three spatial strategy options in the MIR against an assessment framework. The assessment found that none of the spatial strategy options had an overall positive impact on the environmental objectives. Whilst development can deliver and support beneficial environmental improvement, all options involve a level of greenfield land loss. Through mitigation and enhancement measures, the growth corridors option and the consequent distribution of growth amongst the SESplan member authority areas was assessed to have the lowest level of negative impacts and the most positive impacts of the three options.

2. The SESplan Proposed Plan has continued with preferred strategy of Growth Corridors. The strategy reflects the outputs of the process to calculate Housing Supply Targets carried out subsequent to the MIR. The results of this process is that for five of the six SESplan member authorities no additional land (additional to that already in existing LDPs) is required. CEC is likely to face a shortfall in housing land supply and may need to identify additional land . On this basis the assessment has been refined and can now be considered alongside agreed housing supply targets to give greater certainty as to the level of additional development land required over the 12 year period 2018 to 2030. Therefore it is appropriate to re-assesses the final strategy, including the mitigation measures in the SDP, to assess the cumulative impact of the SDP as a whole, in addition to assessing the impact of the additional development required above what is already permitted or included in LDPs.

3. The assessment matrix uses a text based, qualitative analysis which identifies the potential positive and negative impacts on each objective. The assessment for each objective factors in the mitigation and enhancement measures in the SDP and what impact that has on the objectives. A traffic light system indicates what the overall impact of the strategy will be for each objective. To ensure consistency, this is the same assessment framework used for the Interim Environmental Report.

| |
|-------------------------------------|
| Significant Overall Positive Impact |
| Overall Positive Impact |
| Neutral Impact |
| Overall Negative Impact |
| Significant Overall negative Impact |

Table 2. Reassessment of Growth Corridor Option in light of Proposed Plan approach.

| SEA Objective | Assessment of Proposed Plan Strategy |
|--|---|
| Maintain and improve on current air quality levels | <p>Poor air quality is a significant issue in the SESplan area, with 8 air quality management areas (AQMAS) in the region. They are in congested road corridors and five of them are in Edinburgh.</p> <p>Additional population and subsequent development without mitigation will cause an increase in journeys, many of which will be made by car. This will increase carbon and nitrogen oxide emissions and worsen air quality in parts of the region.</p> <p>The SESplan strategy seeks the focus a higher proportion of development nearer to job locations and along public transport corridors. The impact of this will be to shorten the length of journeys and support greater proportion of journeys by walking, cycling and public transport.</p> <p>With a higher concentration of development in Edinburgh this could impact on the 5 AQMAS there. However, journeys in Edinburgh have a much higher modal share by public transport, walking and cycling than in other SESplan authorities reflecting the shorter journey lengths in urban areas and the quality of public transport. Car ownership levels are also much lower in Edinburgh and reduced between the 2011</p> |

| SEA Objective | Assessment of Proposed Plan Strategy |
|--|---|
| | <p>and 2011 censuses.</p> <p>The SDP is seeking to mitigate to mitigate the impact on air quality through the design of the strategy which requires:</p> <ul style="list-style-type: none"> • Development is being delivered in areas of good public transport access. Development near public transport nosed should be developed at higher densities. • Additional growth in Edinburgh is being directed to brownfield first within urban Edinburgh. • Long term growth will be directed to along public transport corridors • Identifying and requiring functional walking and cycling routes along key corridors linking settlements, employment areas and new development to encourage a shift towards walking and cycling. <p>Therefore the SDP Strategy is considered to have a neutral impact on air quality. There are ongoing interventions not under the control of the SDP that will result in air quality improvements. These mostly involve decarbonising travel through improvements to vehicles e.g. electric cars and buses, car sharing schemes.</p> |
| <p>Protect and enhance natural heritage assets</p> | <p>There is a spread of development across the SESplan area and not an over-concentration in one place. By achieving spread of development this has given flexibility so that LDPs have the opportunity to identify sites that have the least impact on natural heritage assets.</p> <p>Other than development around the Edinburgh waterfront, the strategy locates development away from sensitive coastal areas.</p> <p>Development on greenfield land can lead to disruption of habitat networks. However, development can have positive effects on biodiversity as gardens and green space areas provide good opportunities for habitats and supporting wildlife. They can have a greater range of biodiversity than land use for intensive agriculture.</p> <p>Ongoing development of the Central Scotland Green Network and work on the green network frameworks will identify and deliver opportunities to enhance biodiversity and natural heritage assets, including the creation of new woodlands. In the longer term the development of the two Strategic Cross Boundary Frameworks will identify and safeguard areas and natural assets that provide the greatest benefits for people and biodiversity.</p> <p>Whilst the strategy may require additional housing land to be delivered in Edinburgh above that which is currently identified, the SDP requires this to be directed to brownfield first thereby seeking to protect peripheral greenfield areas and any such biodiversity value that they have.</p> <p>The SDP strategy is considered to have a positive impact on protecting and enhancing natural heritage assets.</p> |
| <p>Minimise CO₂ emissions and other causes and effects on</p> | <p>Current forms of development and additional population in the region result in CO₂ emissions. The strategy seeks to minimise these emissions whilst still reducing overall level of emissions to support Scottish Government climate change targets. The Strategy seeks to do this by focusing a higher proportion of development</p> |

| SEA Objective | Assessment of Proposed Plan Strategy |
|--|---|
| climate change | <p>nearer to job locations and along public transport corridors. The impact of this will be to shorten the length of journeys and support greater proportion of journeys by walking, cycling and public transport thereby reducing CO₂ emissions associated with vehicle movement. Long term growth will be directed to along public transport corridors.</p> <p>New development will support the delivery of better public transport services as well as new walking and cycling routes, therefore supporting modal shift away from private car use in existing communities as well as new developments.</p> <p>Green network frameworks will identify the assets to be protected and strategic enhancements. Together these could provide climate change adaptation measures.</p> <p>The place making principles requires development to be efficient and support the use of decentralised energy networks and district heating systems.</p> <p>The strategy is considered to have an overall positive impact on minimising CO₂ emissions and other causes and effects of climate change.</p> |
| Protect and enhance the built and historic environment | <p>There is a spread of development across the SESplan area and not an over-concentration in one place. By achieving spread of development this has given flexibility so that LDPs have the opportunity to identify sites that have the least impact on built and historic environment assets. However, there are some potential pressures on battlefield assets from development in proposed and emerging LDPs</p> <p>A greater proportion of development is concentrated in Edinburgh. However, this should not lead to pressure for inappropriate sites to be development and detrimental impacts on the cities heritage assets.</p> <p>LDP policies will require the siting and design of new development should protect and where appropriate enhance historic environment assets. The siting of development should not detrimentally impact on the built and historic environment. New development provides opportunities to enhance the built environment through regeneration and redevelopment of listed buildings at risk.</p> <p>The SDP strategy is considered to have a neutral impact on protecting and enhancing the built and historic environment.</p> |
| Protect and enhance the landscape and townscape | <p>There is a spread of development across the SESplan area and not an over-concentration in one place. By achieving spread of development this has given flexibility so that LDPs have the opportunity to identify sites that minimise impacts on landscapes and townscapes, and in cases can enhance it.</p> <p>In the first 12 years of the plan, the strategy does not require further land to be required outside Edinburgh therefore preventing further coalescence. In addition the greenbelt policy is retained. However, meeting the overall requirements of the plan, through development of existing allocations will result in some settlements expanding towards others. Longer term impacts will depend on where new areas of strategic growth are located (in future SDPs) along the long term growth corridors. This will be informed by further analysis including the Cross Boundary Strategic Green Network frameworks</p> |

| SEA Objective | Assessment of Proposed Plan Strategy |
|--|---|
| | <p>The continued development of the Central Scotland Green Network and identification of green network priority areas will protect and enhance landscapes. Well designed and planned new development can enhance townscapes, improve settlement edges and create attractive settlement gateways. Regeneration development has the significant potential to enhance townscapes.</p> <p>The SDP strategy is considered to have a neutral impact on protecting and enhancing the landscape and townscape.</p> |
| Use resources sustainably | <p>Delivering the strategy through land identified in existing and emerging LDPs will result in the loss of some prime quality agriculture land around Edinburgh and the Lothians. However, this had been minimised by requiring LDPs to identify brownfield sites first. This will be continued and strengthened so that the potential additional housing land that may be required in Edinburgh should be identified in brownfield land first before peripheral greenfield sites are considered. This requirement is also set out in the placemaking principles so that it applies to all LDPs.</p> <p>Waste and minerals content of the SDP promotes the increased recycling of waste, its use as an energy resource and the sustainable use of minerals.</p> <p>The SDP strategy is considered to have an overall negative impact on using resources sustainably.</p> |
| Improve the quality of life and human health for communities | <p>Delivering the SDP strategy will provide new housing in sustainable locations to meet housing need and demand. The affordable housing supply targets are higher than past delivery and will help meet new and backlog need for affordable housing, therefore having a positive impact on health and quality of life.</p> <p>The delivery of Central Scotland Green Network projects, green spaces and quality green networks alongside new development will allow for greater levels of outdoor recreation, walking and cycling and help improve human health.</p> <p>Delivery of the SDP will locate housing closer to future employment. This will result in shorter journeys and support more journeys by walking, cycling and public transport. This will help minimise additional vehicle emissions that can impact on human health as well encouraging more exercise. Having shorter journeys could help reduce anxiety and stress related issues related to longer distance commuting by car. Reducing commuting times could allow for more recreation and exercise.</p> <p>The SDP strategy is considered to have a significant overall positive impact on the quality of life and human health for communities.</p> |
| Minimise the impact on soil quality and to adhere to contaminated land regulations | <p>Delivering the strategy through land identified in existing and emerging LDPs will result in development of greenfield land with associated soil sealing. However, this had been minimised by requiring LDPs to identify brownfield sites first. This will be continued so that the potential additional housing land that may be required in Edinburgh should be identified in brownfield land first before peripheral greenfield sites are considered. This requirement is also set out in the placemaking principles so that it applies to all LDPs.</p> <p>The strategy does not require development that will impact on peat and carbon</p> |

| SEA Objective | Assessment of Proposed Plan Strategy |
|--|--|
| | <p>rich soils.</p> <p>The SDP strategy is considered to have an overall negative impact on using resources sustainably.</p> |
| <p>Minimise flood risk and adverse significant effects on water bodies</p> | <p>Development will be required to avoid land at risk of flooding and retain natural flood defences. Whilst the strategy prioritises brownfield sites first, as did the previous SDP, delivering the strategy requires the continued delivery of land identified in previous plans and the subsequent greenfield soil sealing. This has the potential to reduce land required for drainage. LDPs will be required to set out policies on mitigation measures, including sustainable urban drainage systems and surface water management measures.</p> <p>The Strategic Flood Risk Assessment has identified that surface water from greenfield developments in Edinburgh needs management. The SESplan strategy is that any additional land that may be required in Edinburgh should be directed to brownfield sites first. The SDP is not identifying a preference for any further development of greenfield sites in West Edinburgh or South East Edinburgh to meet development requirements up to 2030.</p> <p>The cross boundary green network frameworks will identify blue networks that should be protected and enhanced for both minimising flood risk and protecting water bodies. The frameworks will provide a context for future planning decisions in these areas, covering both West and South East Edinburgh.</p> <p>The SDP strategy is considered to have an overall neutral impact on minimising flood risk and adverse significant effects on water bodies.</p> |

Summary of Table 2 compared to Interim Environmental Report at MIR stage

4. Delivery of the strategy will have range of impacts. We have considered the impacts of the Placemaking Principles, and the more plan-led approach to identifying specific green infrastructure assets and their benefits and concluded there will be an overall positive effect on the SEA objective to protect and enhance natural heritage assets compared to the assessment at MIR stage.
5. Taking into account recent advice from SEPA, we have reassessed the impact on the objective ‘Minimise flood risk and adverse significant effects on water bodies’ as ‘neutral’ compared to the assessment at MIR stage as ‘overall positive’.
6. Although the plan seeks to prioritise brownfield land being developed and the additional housing land required may be minimal, land identified in current and emerging LDPs will be required to meet the plans development requirements. This includes development on greenfield areas and prime quality agricultural land.
7. Of the options in the MIR, the Growth Corridor option remains the option with the least environmental impact.