

SEA Post-Adoption Statement: PART 1

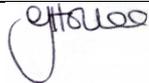
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SEA Post-Adoption Statement: PART 2

An SEA Post-Adoption Statement is attached for:	Local Transport Strategy
The Responsible Authority is:	East Dunbartonshire Council

SEA Post-Adoption Statement: PART 3

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Date	12 th June 2020

STRATEGIC ENVIRONMENTAL ASSESSMENT

POST-ADOPTION STATEMENT

East Dunbartonshire Council's Local Transport Strategy

Introduction

The Council has recently prepared a Local Transport Strategy (LTS). It defines the proposed actions to improve the existing transport network within East Dunbartonshire taking into account options relating to the road, public transport, parking and active travel networks.

Strategic Environmental Assessment

The LTS 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 Strategy. In accordance with the Environmental Assessment (Scotland) Act 2005, the Post-Adoption Statement will demonstrate:

- The integration of environmental considerations into the LTS;
- 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 LTS as adopted in light of other reasonable alternatives; and,
- The measures to be taken to monitor the significant effects of the implementation of the LTS.

Summary of Contents

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Section 1 details the LTS remit and the enabling legislation

Section 2: Environmental Considerations

Section 2 details how environmental considerations have been integrated into the LTS and notes how the environmental problems identified in the Scoping and Environmental Reports have been addressed.

Section 3: Consideration of Alternatives

Section 3 details the methods adopted to develop the LTS.

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.

Section 5: Monitoring

Section 5 details the monitoring required to ensure compliance with the LTS.

Section 6: Conclusion

Section 6 summarises how the SEA process has informed the development of the LTS.

Appendix 1: Consultation Responses to the Draft Environmental Report

Consultation responses received from SNH, SEPA and Historic Environment Scotland in response to the draft Environmental Report.

Section 1: Key Facts

Key Facts Relating to the Local Transport Strategy	
Responsible Authority	East Dunbartonshire Council
Title of PPS	Local Transport Strategy
Purpose of PPS	<p>The purpose of the Strategy is to provide a document that is consistent with national, regional and local aspirations and addresses multiple policy objectives, agreed and evaluated by stakeholders and the public.</p> <p>The Strategy will:</p> <ul style="list-style-type: none"> • Be consistent with existing and emerging EDC policies such as the Active Travel Strategy, Green Network Strategy, Economic Development Strategy, Local Biodiversity Action Plan, Open Space Strategy and Air Quality Strategy, • Support the delivery of East Dunbartonshire's Local Development Plan, and; <p>Present a range of policies and actions that set out the Council's general approach to sustainable transport issues, improving general transport conditions and providing residents with enhanced transport options that are not reliant on private vehicle use.</p>
What prompted the PPS	<p>Local authorities are expected to maintain an up to date Local Transport Strategy in order to ensure that the evidence base and framework for transport projects is up to date and reflects current trends and national and regional issues.</p> <p>The Council recently published Route Corridor Studies (multi modal transport appraisal) on the A81 and A803, which serve as evidence base for planning transport interventions. These studies will require to be reflected in the next iteration of the study in order to ensure consistency with recent evidence and this is a requirement of public sector transport funders such as Transport Scotland and SPT.</p>
Subject	Transport
Period covered	2020 – 2025
Frequency of updates	The Strategy will be updated every five years, with biennial monitoring reports.
Area covered by PPS	The geographical area of East Dunbartonshire Council plus Mugdock Country Park (geographically contained within Stirling Council but managed by EDC), and potential

Key Facts Relating to the Local Transport Strategy	
	<p>linkages, where appropriate, to surrounding Council areas, namely Glasgow, West Dunbartonshire, Stirling and North Lanarkshire.</p>
<p>Summary of nature/ Content of the PPS</p>	<p>In summary the East Dunbartonshire LTS will:</p> <ul style="list-style-type: none"> • set out the strategy for the Council's roads and transportation plans • provide a transport objectives link between the Council's Local Outcomes Improvement Plan Community Planning, Local Development Plan and other policies • focus the Council's transport budget towards making sure that transport investment contributes positively to regeneration and sustainable development • maintain and improve, where possible, the quality and safety of roads and transportation • aim to improve health by encouraging walking and cycling • improve public transport services and accessibility to services, where possible <p>The new LTS is structured around the following chapters:</p> <ul style="list-style-type: none"> • Introduction • A shift to Sustainable Transport • Current network and evidence • Transport Planning Objectives • Roles and Responsibilities • Consulting on the Local Transport Strategy 2020-2025 • Action Plan – Area Wide and for the four community areas <p>Monitoring</p>
<p>Proposed/draft outcomes</p>	<p>The Local Transport Strategy will update the Local Transport Strategy 2013 – 2017 and respond to updated local demands for enhanced transport networks.</p>

Section 2: Environmental Considerations

2.1. Integration of Environmental Considerations in the Local Transport Strategy

2.1.1. This chapter highlights how environmental considerations have been integrated into the final Local Transport Strategy (LTS). **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 new actions or the alteration of existing actions within the LTS.

Table 1: Implementing Environmental Considerations in the Local Transport Strategy

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
Biodiversity, Flora and Fauna	East Dunbartonshire has a wide range of designated and non-designated sites, including those of ecological importance and protected species. This is seen through a number of Local Nature Conservation Sites and Important Wildlife Corridors, Tree Preservation Orders and Local Nature Reserves. East Dunbartonshire also has 6 Sites of Special Scientific Interest (SSSI). The management and protection of these assets is essential through the LTS.	✓	Through the assessment of the Strategy's Transport Planning Objectives and actions, these biodiversity and habitat designations have been taken into account and appropriate commentary included in each assessment. This directly informed the final TPO or action in the LTS including the insertion of mitigation measures in the final Strategy.
Biodiversity, Flora and Fauna	Invasive Non-Native Species in East Dunbartonshire have been identified in East Dunbartonshire. Their location and management should be recognised within the Strategy.	✓	Through the assessment of the Strategy's Transport Planning Objectives and actions, these biodiversity and habitat designations have been taken into account and appropriate commentary included in each assessment. This directly informed the final TPO or action in the LTS including the insertion of mitigation measures in the final Strategy.

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
Biodiversity, Flora and Fauna	There are a number of protected species and habitats within East Dunbartonshire which will need to be considered as part of the LTS. The LTS offers the scope to ensure that benefits for biodiversity is considered as a vital part of the wider active travel network in East Dunbartonshire and will play a contributing role for continued enhancement and protection of such species to avoid any loss. These concerns should be considered alongside the Councils LBAP, Open Space Strategy and Green Network Strategy.	✓	Through the assessment of the Strategy's Transport Planning Objectives and actions, these biodiversity and habitat designations have been taken into account and appropriate commentary included in each assessment. This directly informed the final TPO or action in the LTS including the insertion of mitigation measures in the final Strategy.
Biodiversity, Flora and Fauna	Habitat connectivity within East Dunbartonshire is fragmented. In particular, river and canal corridors are, to varying extents, below their potential in terms of habitat connectivity as a result of confinement and the presence of Invasive Non-Native Species. There is scope to reduce habitat fragmentation through improvements to access routes across the council area, with additional benefits anticipated in relation to biodiversity.		Through the assessment of the Strategy's Transport Planning Objectives and actions, these biodiversity and habitat designations have been taken into account and appropriate commentary included in each assessment. This directly informed the final TPO or action in the LTS including the insertion of mitigation measures in the final Strategy.
Population and Human Health	Eight datazones within East Dunbartonshire fall into the top 25% most deprived areas in Scotland; these are located in Hillhead, Lennoxton, Auchinairn and Milngavie. In particular, some areas in Hillhead remain within the 5% most deprived areas in Scotland according to the Scottish Index of Multiple Deprivation.	✓	The actions within the LTS include opportunities to enhance the existing transport network in areas of deprivation within East Dunbartonshire.

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
Population and Human Health	With areas of deprivation in East Dunbartonshire and an increasingly ageing population, there is a significant reliance on public transport and access to primary facilities such as town centres, retail parks, healthcare and leisure. To reduce this need and pressure, there is significant evidence that enhancement and promotion of green and active travel networks can be integrated with interventions and provide further health benefits to deprived or vulnerable members of the community.		
Population and Human Health	Local pollution such as vehicle fumes can aggravate asthma and cause / exacerbate other health issues. Respiratory and heart disease can be linked to transport emissions; reducing emissions can improve public health and reduce levels of respiratory disease within East Dunbartonshire.	✓	<p>The LTS carried forward actions as set out in East Dunbartonshire's Active Travel Strategy aimed at reducing the number of vehicles on the road and, as a result, improving air quality. This aims to help improve a range of health issues.</p> <p>Furthermore, the LTS sets an action to 'Work with stakeholders to improve the accessibility of healthcare services'.</p>
Population and Human Health	East Dunbartonshire should aim to improve levels of safety and security on the transport network, especially for pedestrians, cyclists and those on public transport. This will improve the perception of public transport and encourage greater usage.	✓	The LTS incorporates actions that will improve safety for users along the network, for example Actions 4, 21, 23 and 25.
Population and Human Health	Conflicts may arise between increasing public access within East Dunbartonshire and the need to conserve the natural environment. This will be a vital consideration for the LTS to address and prevent such conflicts.		The actions set out within the Strategy aim to improve connectivity across the authority-wide area. As a result, the LTS will encourage local communities to

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			<p>have more frequent and accessible options to visit their local areas, whether in the vicinity or involving onward travel. Assessments of these actions considers the impact on the natural environment and any proposed mitigation has been taken forward into the final Strategy.</p>
Population and Human Health	<p>Current use and awareness of East Dunbartonshire’s active travel network has scope to be improved. Increasing the awareness, understanding of the role of the active travel alternatives amongst the population of East Dunbartonshire, as well as how local communities can gain benefits from accessing local and regional facilities using the network alongside the upgrade of the network should be a significant factor for consideration in the LTS. This should include the promotion of the active travel network for educational purposes in partnership with local schools.</p>	✓	<p>The LTS sets out actions to promote the different aspects of the transport network locally. For example action 20 aims to promote the car share scheme through an annual awareness programme. Similarly, actions 23 and those set out in the Active Travel Strategy will signpost opportunities to promote safe use of the network, for examples.</p>
Population and Human Health	<p>Encouraging the involvement of the community in projects linked to the enhancement of East Dunbartonshire’s sustainable travel network has the potential to further benefit health and wellbeing. This is likely to improve the appreciation of the environment as well as achieve the renewal of run down areas, particularly those in urban contexts, and increase economic value and investment to the area. There is scope for this to be promoted through the LTS.</p>	✓	<p>Where possible, community input into projects and deliverables will be carried out. For example, action 7 to produce a new Active Transport Strategy will require significant community consultation; action 11 will require community input through workshops; action 25 will also include periods of statutory consultation; action 26 to produce a Parking Management</p>

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			Plan will require consultation; and action 49 will require significant input from the local community.
Water Quality	There are a number of good/moderate quality watercourses in East Dunbartonshire including the Forth and Clyde Canal which is also a Scheduled Monument. These assets require protection to which the LTS can contribute to in order to reduce, prevent or offset any adverse impacts to water quality.	✓	Through the assessment of the Strategy's Transport Planning Objectives and actions, these designations have been taken into account and appropriate commentary included in each assessment. This directly informed the final TPO or action in the LTS including the insertion of mitigation measures in the final Strategy.
Water Quality	There are a number of sites within East Dunbartonshire's landscape which are classified as wetland. Wetlands provide vital habitats for a number of species and ecosystem services but their quality is under pressure from external influences such as flooding, developments and access. The Strategy should account for this priority habitat in the development of its action plan as well as consider its role in reducing pressures on this resource to maintain a high level of water quality.	✓	Where wetland habitats are identified through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
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 temperatures and rainfall patterns, and increased incidences of extreme weather events. Where appropriate, the interventions proposed as part of the LTS should consider its role in mitigating or adapting to the effects of climate change.	✓	Two of the Transport Planning Objectives – 'Increase modal shift towards more sustainable modes of travel for both travel to work/study and leisure trips' and 'Reduce emissions through reduced vehicle mileage in East Dunbartonshire' - focusses the delivery of the Strategy on the protection and enhancement of

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			the environment in response to the effects of climate change. Furthermore, mitigation measures have been relayed to the Strategy from the environmental assessments where negative impacts to air quality and climatic factors have been identified.
Climatic Factors	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 a significant impact on habitats and the value of East Dunbartonshire's environment.	✓	Two of the Transport Planning Objectives – 'Increase modal shift towards more sustainable modes of travel for both travel to work/study and leisure trips' and 'Reduce emissions through reduced vehicle mileage in East Dunbartonshire' - focusses the delivery of the Strategy on the protection and enhancement of the environment in response to the effects of climate change. Furthermore, mitigation measures have been relayed to the Strategy from the environmental assessments where negative impacts to air quality and climatic factors have been identified.
Landscape	East Dunbartonshire has a number of Local Landscape Areas with high/moderate scenic value as well as varied landscape character and setting across the Council area, including the Campsie Fells and Kilpatrick Hills. The LTS should take into account the specific landscape features to ensure that there	✓	Where impacts to landscape are identified through the assessment, appropriate mitigation measures have been

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
	are no specific conflicts these areas and access issues, and are sensitive to, the local landscape and retain East Dunbartonshire's local distinctiveness.		suggested and relayed into the Strategy.
Landscape	The cumulative effects of projects that will enhance or extend the active travel network that may be established through the Strategy should be accounted for at a local, EDC-wide and regional level.	✓	Where impacts to landscape are identified through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
Landscape	The cumulative effects of projects that will enhance or extend the active travel network that may be established through the Strategy should be accounted for at a local, EDC-wide and regional level.	✓	Where impacts to landscape are identified through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
Air Quality	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 and the emerging Air Quality Strategy, the requirements of which should be taken into account within the LTS.	✓	The benefits of a high quality transport network for improving localised air quality is explored in the Strategy including a number of opportunities to promote a sustainable network. Furthermore a specific Objective is set out at in the Strategy to reduce emissions that result from vehicle mileage.
Air Quality	Changes to air quality can have a significant impact on ecosystem services, which can affect biodiversity value and environmental assets.	✓	The benefits of a high quality transport network for improving localised air quality is explored in the Strategy including a number of opportunities to promote a sustainable network. Furthermore a specific Objective is set out at in the Strategy to

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			reduce emissions that result from vehicle mileage.
Soil and Geology	There are several sites in East Dunbartonshire that have been identified as peatland. Any action as part of the Strategy that may result in the disturbance of such sites for the release of carbon should be avoided. This includes conflicts between the transport network improvements and peatland protection.	✓	Where impacts to soil and geology, including assets with wider ecosystem and carbon storage functions, are identified through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
Soil and Geology	There is scope within the LTS to consider the role of enhanced biodiversity in managing ecosystem services including carbon storage, drainage and to alleviate flooding.	✓	Where impacts to soil and geology, including assets with wider ecosystem and carbon storage functions, are identified through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
Soil and Geology	There are 36 sites identified as being geologically diverse, of which 34 have been assigned as Local Geodiversity Sites (LGS). The area also hosts 1 RIGS (Regionally Important Geological or Geomorphological Site) and 1 SSSI of geological importance. The LTS should consider these designations in the development of the opportunities and actions within the Strategy to ensure their protection and enhancement where possible.	✓	Where impacts to soil and geology, including assets with wider ecosystem and carbon storage functions, are identified through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
Cultural Heritage	There are a number of cultural heritage assets in East Dunbartonshire including the Antonine Wall (UNESCO World Heritage Site) and the Forth and Clyde Canal which require protection and management.	✓	Each of the recognised historical assets, such as the Antonine Wall and Forth and Clyde Canal, have been considered in each of the assessments through the SEA process. Where impacts to cultural heritage are identified

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
Cultural Heritage	East Dunbartonshire has a varied and valued natural and historic cultural heritage. In the development of the LTS, the interventions, proposals and opportunities that will be identified should address how they can contribute to enhancing and protecting the historic environment.	✓	Each of the recognised historical assets, such as the Antonine Wall and Forth and Clyde Canal, have been considered in each of the assessments through the SEA process. Where impacts to cultural heritage are identified through the assessment, appropriate mitigation measures have been suggested and relayed into the Strategy.
Cultural Heritage	East Dunbartonshire is host to tourist attractors across the whole of the council-wide area such as the Antonine Wall Heritage Site, the Campsie Fells, West Highland Way and Mugdock Country Park. The LTS is likely to improve access to these assets. However, increased footfall to the main attractors can result in both positive impacts, such as stimulating the local economy, and negative impacts, such as path erosion and the degradation of sites/buildings and their setting.	✓	There are a number of actions within the LTS that will improve access to tourist attractors. However negative impacts identified through the SEA process have been accompanied by mitigation measures; in such instances the measures have been fed into the Strategy's delivery plan.
Material Assets	As a result of the spatial strategy of the impending Local Development Plan there is potential for a rise in developments in East Dunbartonshire over the life of the Plan. New developments are likely to require new or improved transport infrastructure which have the potential to result in further fragmentation of habitats and requirements for access routes which should be accounted for within the LTS.	✓	The LTS sets out an action to 'Ensure that transport and travel planning carried out by the Council is in line with the Local Transport Strategy's Transport Planning Objectives'. This includes the Local Development Plan and will help to encourage

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			new developments to provide enhanced travel networks within and linking to the sites.
Material Assets	There are currently a series of Core Path Networks, Rights of Way and open spaces in East Dunbartonshire which create recreational opportunities, promote active travel and provide a sense of community. The opportunities that will be identified through the Strategy should consider its role in enhancing existing networks as well as integrating with the new green network across the council-wide area. The sites identified in the Open Space Strategy should also be accounted for.	✓	The Local Transport Strategy integrates the actions explored in EDC's Active Travel Strategy, and are reflected in the Delivery Plan. Active Travel actions, including those that integrate with the local public transport network, support a number of the Strategy's Transport Planning Objectives including: <ul style="list-style-type: none"> - Increase modal shift towards more sustainable modes of travel for both travel to work/study and leisure trips - Reduce inequality by providing high quality access for all - Reduce emissions through reduced vehicle mileage in East Dunbartonshire - Improve health by increasing walking and cycling rates
Material Assets	There is currently a lack of good quality active travel routes and options across the Council area which link certain towns, villages and community areas. Specific areas which could be improved, and additional active travel infrastructure provided include: <ul style="list-style-type: none"> • Bishopbriggs to Lenzie • Bearsden/Milngavie to Kirkintilloch/Lenzie • Torrance to Kirkintilloch Bearsden and Milngavie (local)	✓	The Local Transport Strategy integrates the actions explored in EDC's Active Travel Strategy, and are reflected in the Delivery Plan. Active Travel actions, including those that integrate with the local public transport network, support a number of the Strategy's

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			<p>Transport Planning Objectives including:</p> <ul style="list-style-type: none"> - Increase modal shift towards more sustainable modes of travel for both travel to work/study and leisure trips - Reduce inequality by providing high quality access for all - Reduce emissions through reduced vehicle mileage in East Dunbartonshire - Improve health by increasing walking and cycling rates
<p>Material Assets</p>	<p>The current transport network has a limited amount of on-road active travel provision. Additional provision of such improvements has the potential to significantly increase the active travel participation throughout East Dunbartonshire.</p>	<p>✓</p>	<p>The Local Transport Strategy integrates the actions explored in EDC's Active Travel Strategy, and are reflected in the Delivery Plan. Active Travel actions, including those that integrate with the local public transport network, support a number of the Strategy's Transport Planning Objectives including:</p> <ul style="list-style-type: none"> - Increase modal shift towards more sustainable modes of travel for both travel to work/study and leisure trips - Reduce inequality by providing high quality access for all - Reduce emissions through reduced vehicle mileage in East Dunbartonshire

Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
			<ul style="list-style-type: none"> - Improve health by increasing walking and cycling rates
<p>Material Assets</p>	<p>Integration of our active travel network with public transport will be an essential part of the LTS. Improving the link between these forms of transport has the potential to significantly increase sustainable travel participation, subsequently reducing car journeys and associated emissions levels throughout East Dunbartonshire.</p>	<p>✓</p>	<p>The Local Transport Strategy integrates the actions explored in EDC's Active Travel Strategy, and are reflected in the Delivery Plan. Active Travel actions, including those that integrate with the local public transport network, support a number of the Strategy's Transport Planning Objectives including:</p> <ul style="list-style-type: none"> - Increase modal shift towards more sustainable modes of travel for both travel to work/study and leisure trips - Reduce inequality by providing high quality access for all - Reduce emissions through reduced vehicle mileage in East Dunbartonshire - Improve health by increasing walking and cycling rates

Section 3: Consideration of Alternatives

3.1. Consideration of Alternatives in the Local Transport Strategy

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’. This section shall describe the process that East Dunbartonshire applied for developing the Local Transport Strategy (LTS).

3.2. Reasonable Alternatives to the Local Transport Strategy

3.2.1. In order to determine the SEA preferred option for the delivery of the LTS, 3 different strategic alternatives were assessed against the SEA objectives. Consequently, **the SEA preferred alternative was adopted for the development of the final LTS.**

3.2.2. **Table 2** provides an overview of the strategic alternatives considered for the LTS.

Table 2: Strategic Alternatives

Alternative Approach	Implications of the Strategic Direction
Strategic Direction 1: Do minimum approach	This alternative requires East Dunbartonshire Council and partners to update the existing Local Transport Strategy to ensure that essential maintenance of the existing road and active travel networks are carried out. However it would not present an opportunity to review and update priorities and commitments.
Strategic Direction 2: Sustainable transport approach (active travel and public transport focus)	This alternative strategic direction would involve a commitment to improving the sustainable transport network in East Dunbartonshire with a focus on improvements to public transport infrastructure and active travel routes. Whilst this could present potential minor positive impacts to Population and Human Health, Air Quality, Climatic Factors and Material Assets in terms of a shift towards a more sustainable transport network locally which can help to reduce emissions associated with vehicular transport, thus potentially improving air quality and the negative effects associated with climate change. This could also result in local health improvements and give people greater opportunities to engage in active travel and access their local environment. However this approach would limit opportunities to improve and maintain the local road network and other transport options and therefore the effects to the above mentioned environmental factors might also be limited to neutral only.
Strategic Direction 3: Private vehicle approach	Although this approach to an updated LTS will improve the existing road network which in turn will help traffic flow and improve public safety, resulting in potential positive impacts to Population and Human Health and Material Assets in terms of a more efficient network with less opportunity for traffic related health and safety incidences. However, an investment in the road network has the potential to increase overall vehicle use and therefore result in minor negative impacts to Air Quality and Climatic Factors in terms of increased numbers of cars on the roads, potential idling, and increased emissions. In

Alternative Approach	Implications of the Strategic Direction
	vulnerable areas, such as town centres, near schools and designated Air Quality Management Areas (AQMA) the impacts could be significant. As a result, this could lead to emissions-associated health issues.
Strategic Direction 4: Integrated approach – combination of all modes of transport	This mixed approach to improving the overall transport network in East Dunbartonshire including the sustainable transport and active travel network. This approach would ensure that the local transport network is well-maintained and improvements are made where necessary, resulting in a network that will accommodate improved journey times, traffic flow, reduce congestion and encourage a change in behaviour towards more sustainable modes of transport in order to improve air quality and reduce the transport-related effects of climate change. Therefore it is anticipated that there would be minor positive impacts on Population and Human Health, Air Quality, Climatic Factors and Material Assets, with the potential for significant positive effects.

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 Local Transport Strategy (LTS), was published for consultation with the SEA Consultation Authorities from 17th September – 12th November 2019. The consultation on the Environmental Report provided an opportunity to respond to the findings of the report and influence the finalised Strategy.
- 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 from the Consultation Authorities.

Table 3: Historic Environment Scotland Consultation Responses

Issue	Comment	How has this been addressed in the Environmental Report?
Scope of Assessment and Level of Detail	It is my understanding that the Local Transport Strategy 2017-2021 will set out East Dunbartonshire Council's approach to travel issues, including sustainable travel, and will set out policies and actions to support this approach. The scoping report sets out your proposed approach to the assessment clearly and concisely. I note that you have scoped the historic environment into the assessment. On the basis of the information provided, I am content with this approach and am satisfied with the scope and level of detail proposed for the assessment.	Noted
Consultation Period for the Environmental Report	I am content with the minimum 6-8 week consultation period that you have proposed. Please note that, for administrative purposes, Historic Environment Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.	Noted

Table 4: SNH Consultation Responses

Issue	Comment	How has this been addressed in the Environmental Report?
Scope of Assessment and Level of Detail	Subject to the specific comments below, we are content with the scope and level of detail proposed for the environmental report.	Noted
Biodiversity, Flora and Fauna – Draft indicators – Page 49 Scoping report	To encourage the enhancement of biodiversity and landscape when developing new routes/upgrading existing routes, we recommend that the “ <i>Number of transport related projects incorporating native planning</i> ” draft indicator is refined as follows - “ <i>Number of transport related projects incorporating habitat and landscape enhancement work</i> ”. This will hopefully result in a more multi-disciplinary approach to developing new routes/upgrading existing routes and contribute to the Scottish Biodiversity Strategy route map.	Noted. However the monitoring framework set out in the ER is now aligned to the monitoring framework for the LTS itself and incorporates specific indicators that will be applied by the Transport and Policy Officers.
Further guidance	<p>We have published a number of guidance documents that you might find useful in your preparation of the ER. The following SEA guidance is available on our website:</p> <ul style="list-style-type: none"> • General SEA webpage page including links to guidance on specific topics and environmental data - http://www.snh.gov.uk/planning-and-development/environmental-assessment/sea/; <ul style="list-style-type: none"> ○ Biodiversity and Geodiversity Considerations in Strategic Environmental Assessment - http://www.snh.gov.uk/docs/A1015717.pdf ○ Landscape Considerations in Strategic Environmental Assessment - http://www.snh.gov.uk/docs/B710441.pdf 	Noted

Environmental baseline

Please see Annex 1 for our advice on potential additional sources of environmental baseline information.

**Annex 1
Scoping report - Biodiversity Flora and Fauna (continued) -
Page 18**

Please note that badgers and water voles are not European protected species - Badgers are protected under the Protection of Badgers Act 1992 (as amended) and water voles are protected under the Wildlife and Countryside Act 1981 (as amended).

For further information on protected species, please see our website - <http://www.snh.gov.uk/protecting-scotlands-nature/protected-species/which-and-how/>

Potential sources of environmental baseline information

Paragraph 25 and Table 3 of our guidance on *Biodiversity and Geodiversity Considerations in Strategic Environmental Assessment* - <http://www.snh.gov.uk/docs/A1015717.pdf>

list potential sources of environmental information that you may find useful. In addition, we would draw your attention to the following additional sources of information:

- Native Woodland Survey of Scotland (NWSS) - <http://scotland.forestry.gov.uk/supporting/strategy-policy-guidance/native-woodland-survey-of-scotland-nwss>. The NWSS was carried out from 2006-2013 in order to establish the first authoritative picture of Scotland's native woodlands. It provides a sound, detailed and accurate understanding of the location, condition, extent and composition of our native woodland resource. A summary report for East Dunbartonshire is also available along with the GIS data for the survey. Please see the above link for full details.

Noted. These considerations have been incorporated into the baseline data tables.

	<p>- Integrated Habitat Network (IHN) maps for the Central Scotland Green Network (CSGN) - http://www.snh.gov.uk/land-and-sea/managing-the-land/spatial-ecology/habitat-networks-and-csgn/. IHN maps are available for a number of key habitats within the CSGN. Further details of the maps, including how they can be used and interpreted, can be found at the following link - http://www.snh.gov.uk/docs/C334188.pdf.</p> <p>- Carbon and Peatland map 2016 - http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/ . This map is a predictive tool that provides an indication of the likely presence of carbon rich soils, deep peat and Priority peatland habitat. The map is now available for download as a GIS shape file from the Natural Spaces section of the SNH Information Service (renewable category).</p>	
Consultation period for the environmental report	We note that a minimum period of six to eight weeks is proposed for consultation on the Environmental Report and we are content with this proposed period.	Noted
Concluding remarks	I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the Environmental Report and on the Strategy.	Noted

Table 5: SEPA Consultation Responses

Issue	Comment	How has this been addressed in the Environmental Report?
Relationship with other Plans, Policies and Strategies (PPS)	Some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the Local Transport Strategy. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.	A review of PPS which have been subject to SEA was undertaken and lessons learned or elements taken forward into the LTS assessment
Baseline Information	SEPA holds significant amounts of environmental data which may be of interest to you in preparing the environmental baseline, identifying environmental problems, and summarising the likely changes to the environment in the absence of the PPS, all of which are required for the assessment. Many of these data are now readily available on SEPA's website.	Noted
Baseline Information	Additional local information may also be available from our Access to Information unit at our Corporate Office (Telephone 01786 457700 or email dataenquiries@sepa.org.uk).	Noted
Baseline Information	Other sources of data for issues that fall within SEPA's remit are referenced in our Standing Advice for Responsible Authorities on Strategic Environmental Assessment (SEA) Scoping Consultations .	Noted
Environmental Problems	We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.	Noted

Alternatives	We note that alternatives are still being considered. Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report. We note that further alternatives are still being considered. Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report.	Noted
Scoping In/Out of Environmental Topics	We agree that in this instance all environmental topics should be scoped into the assessment.	Noted
Methodology for Assessing Environmental Effects	Including a commentary section within the matrices in order to state, where necessary, the reasons for the effects cited and the score given helps to fully explain the rationale behind the assessment results. This allows the Responsible Authority to be transparent and also allows the reader to understand the rationale behind the scores given.	Noted
Methodology for Assessing Environmental Effects	Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects this should be clearly set out in the Environmental Report.	Noted
Methodology for Assessing Environmental Effects	We would expect all aspects of the PPS which could have significant effects to be assessed.	Noted
Methodology for Assessing Environmental Effects	We support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.	Noted

Methodology for Assessing Environmental Effects	When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered.	Noted
Methodology for Assessing Environmental Effects	It is helpful if the assessment matrix directly links the assessment result with proposed mitigation measures.	Noted – Proposed SEA suggested alterations and / or mitigation measures fed back to the Policy Officer to be incorporated into the Strategy.
Methodology for Assessing Environmental Effects	We are content with the proposed detailed assessment matrix and particularly welcome the commentary box to fully explain the rationale behind the assessment results. We also welcome the link between effects and mitigation / enhancement measures in the proposed assessment framework and the consideration of mitigation of impacts.	Noted
Methodology for Assessing Environmental Effects	<p>We would recommend that the wording of the following SEA objective(s) be revised as follows:</p> <p>Soil. ‘To maintain or improve soil quality and prevent any further degradation of soils.’ This allows for the improvement of soil quality as well as protection.</p> <p>Water. ‘To protect and enhance the state of the water environment.’ This allows for wider protection of wetland habitats and ecosystems as well as water bodies.</p> <p>Air. ‘To maintain or improve air quality and reduce emissions of key pollutants.’ This allows for the improvement of air quality not just the prevention of deterioration.</p>	These suggestions have been reflected in the wording of the SEA Objectives.

	<p>We note that one of the draft questions for assessment under the Soil and Geology Theme refers to protection of habitats and species that have "...Protected Species status, including Invasive Non-Native Species". We consider that this question should be under the Biodiversity Theme. We are also unclear that protection of Invasive Non-Native Species is appropriate.</p>	<p>Reference to INNS has been removed from the questions as part of the SEA Objectives.</p>
Mitigation and Enhancement	<p>We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option; hence we support proposals for enhancement of positive effects as well as mitigation of negative effects.</p>	<p>Noted</p>
Mitigation and Enhancement	<p>It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.</p>	<p>Noted</p>
Mitigation and Enhancement	<p>We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).</p>	<p>Noted</p>
Mitigation and Enhancement	<p>One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA.</p>	<p>Noted</p>

Mitigation and Enhancement	Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. The inclusion of a summary table in the Environmental Report such as that presented below will help to track progress on mitigation through the monitoring process.	Noted
Monitoring	Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators. It would be helpful in the Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan.	Noted.
Consultation Period	We are satisfied with the proposal for a minimum 6 – 8 week consultation period for the Environmental Report.	Noted.
Outcomes of the Scoping Exercise	We would find it helpful if the Environmental Report included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account.	Noted – Scoping comments and ER/Strategy amendments noted within this Appendix.

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 Local Transport Strategy (LTS). 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. The proposed monitoring framework aligns with that developed directly for the Strategy.

Table 6: LTS/SEA Monitoring Framework

Mode	Theme	Indicator	Source	Baseline	Link to Transport Planning Objective(s)
Active Travel	Travel to school	Proportion of pupils who walk to school	Hands Up Scotland Survey	43.4% (2018)	1, 5
Active Travel	Travel to school	Proportion of pupils who cycle to school	Hands Up Scotland Survey	3.1% (2018)	1, 5
Active Travel	Travel to work	Proportion of East Dunbartonshire residents who walk to work	National Census	4.8% (2011)	1, 5
Active Travel	Travel to work	Proportion of East Dunbartonshire residents who cycle to work (Average 2013-2017)	Travel and Transport in Scotland	1.4% (2013-2017 average)	1, 5
Active Travel	Frequency of walking	Adults (16+) – frequency of walking as a means of transport in previous 7 days	Travel and Transport in Scotland	No days – 36.2% 6-7 days – 13.9% (2016)	1, 5
Active Travel	Training	Number of children trained in Bikeability cycle training	East Dunbartonshire Council	Level 1 – 344 Level 2 – 333 (2016/17)	5, 6
Active Travel	Training	Proportion of primary schools delivering Level 2 Bikeability cycle training	East Dunbartonshire Council	22% (2016/17)	5, 6
Active Travel	Cycle counts	Number of people passing cycle counters in EDC	East Dunbartonshire Council / Sustrans / Scottish Canals	Various levels across separate counters	1, 5

Mode	Theme	Indicator	Source	Baseline	Link to Transport Planning Objective(s)
Public transport	Bus services	Adults (16+) use of local bus services in the previous month	Travel and Transport in Scotland	Every day or almost every day – 6% Not used in the past month – 64.2% (2017)	1
Public transport	Rail patronage	Estimated entries and exits at stations	Office of Rail and Road	Bearsden – 542,322 Bishopbriggs – 772,256 Hillfoot – 317,556 Lenzie – 885596 Milngavie – 940026 Westerton – 783,084 (2017/18)	1
Public transport	Travel to work	Proportion of East Dunbartonshire residents who travel to work by bus	National Census	7.4% (2011)	1,3
Public transport	Travel to work	Proportion of East Dunbartonshire residents who travel to work by train	National Census	8.4% (2011)	1, 3
Roads	Road traffic	Vehicle kilometres travelled on EDC roads	Scottish Transport Statistics	581 million km (2017)	3
Roads	Road counts	Number of vehicles on specific roads	East Dunbartonshire Council	Various levels across separate counters	3
Roads	Road condition	Rating of EDC road conditions by traffic light systems	East Dunbartonshire Council	Red (all roads) – 6% Amber (all roads) – 29%	6
Roads	Travel to work	Proportion of East Dunbartonshire residents who travel to work by car	National Census	67.7% (2011)	3

Mode	Theme	Indicator	Source	Baseline	Link to Transport Planning Objective(s)
Roads	Frequency of driving	People aged 17+ frequency of driving	Travel and Transport in Scotland	Every day – 41.7% Less than once a month – 0.9% (2017)	3
Parking	Use of EDC Car Parks	Use and turnover of EDC Charged car parks	East Dunbartonshire Council	Various levels across town centre car parks	1
Parking	Use of EV charging points	Total number of charging events / kwh charged	East Dunbartonshire Council / Scottish Government	Various levels across individual charging points	1, 3
All modes	Inequalities	Overall SIMD ranking for EDC and geographic access ranking	Scottish Index for Multiple Deprivation	Individual results for all data zones	2
All modes	Employment	Level of employment by type in East Dunbartonshire	NOMIS	Baseline of 2019 figures for all employment types	4
All modes	Employment	Growth of employment sectors	Scottish Government	Baseline of 2018 figures for all growth sectors	4
All modes	Employment	Gross weekly pay for workers in East Dunbartonshire versus those who travel out of East Dunbartonshire	NOMIS	Baseline of 2018 figures	4

Section 6: Conclusion

6.1. The Influence of SEA on the Local Transport Strategy

- 6.1.1. The Strategic Environmental Assessment process has been a useful and informative tool in assisting with the development of the Local Transport Strategy (LTS) and for highlighting the environmental issues and benefits associated with it. It has been beneficial in assessing the reasonable alternatives available for the enhancement of the transport network in East Dunbartonshire, including the promotion of more sustainable travel modes.
- 6.1.2. As part of the consultation period for the main document and Environmental Report 3 actions were removed and merged with other actions, and 1 new action (Action 7 in the final Strategy) was added to the final Strategy. The new action has been assessed within the Environmental Report.
- 6.1.3. Monitoring of the significant environmental effects will be carried out in line with both the SEA and Strategy 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 Strategy, or in line with the relevant review stages.
- 6.1.4. The views of the Consultation Authorities (**Appendix 1**) and the public have been incorporated in to the final version of the Environmental Report and Integrated into the adopted LTS.

Appendix 1: Consultation Responses to the Draft Environmental Report



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: sea.gateway@gov.scot

Ms Lauren Hollas
Place, Neighbourhood & Corporate Assets
East Dunbartonshire Council
Southbank House
Strathkelvin Place
Kirkintilloch
G66 1XQ

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

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

Our case ID: 300040462
Your ref: 01193 Environmental report
11 November 2019

Dear Ms Hollas

Environmental Assessment (Scotland) Act 2005
01193 Environmental report - East Dunbartonshire Council - Local Transport Strategy
2020-2025

Thank you for your consultation which we received on 17 September 2019 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 Local Transport Strategy 2020-2025 with part two focusing upon its environmental assessment.

Part 1: 01193 Environmental report - East Dunbartonshire Council - Local Transport Strategy 2020-2025

We note the proposed objectives and action plan, and do not have any comments on the draft Strategy.

Part 2: Environmental Report

We welcome the clear, accessible presentation of the Environmental Report, and we are content to agree with the findings of the assessment in relation to the historic environment.

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 Virginia Sharp who can be contacted by phone on 0131 668 8704 or by email on Virginia.Sharp@hes.scot.

Yours sincerely

Historic Environment Scotland

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH
Scottish Charity No. SC045925
VAT No. GB 221 8680 15



Scottish Natural Heritage
Dualchas Nàdair na h-Alba
nature.scot

By e-mail: sea.gateway@gov.scot
Cc'd sea.gateway@hes.scot
sea.gateway@nature.scot
sea.gateway@sepa.org.uk

Lauren Hollas
Strategic Environmental Assessment Technical Officer
Place, Neighbourhood & Corporate Assets
East Dunbartonshire Council
Broomhill Industrial Estate
Kilsyth Road
Kirkintilloch
G66 1TF

Date: 23 October 2019
Our ref: CNS/SEA/SSEA/01193/CEA156900 – A3080873
Your Ref: 01193

Dear Ms Hollas,

Environmental Assessment (Scotland) Act 2005
East Dunbartonshire Council – Local Transport Strategy 2017-2021 – Environmental Report

Thank you for consulting Scottish Natural Heritage (SNH) on the Strategic Environmental Assessment (SEA) for the above Environmental Report (ER). We have received and reviewed the SEA in our role as a Consultation Authority in accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005.

It should be noted that we are only able to offer comment on those SEA topics which relate to the natural heritage and cannot comment on the assessment of impacts in terms of those environmental receptors that lie out with our remit.

As detailed in *Appendix B – Consultation Authority Responses to the Scoping Report*, we acknowledge that the Environmental Report (ER) has incorporated the comments we offered at the SEA Scoping stage. However, there is also reference to allotments and food growing in Appendix B, which we suggest is likely to be an error.

With regards to the assessment of LTS Transport Planning Objectives we note that the SEA preferred option for Objectives 1, 2, 3, 5 and 6 have been carried forward into the Strategy but the SEA preferred option for Objective 4 has not been taken forward, which is disappointing...However, we note the reasoning for selecting the alternative option for Objective 4, which focuses on improving connections across boundaries and between communities.

Scottish Natural Heritage, Caspian House, 2 Mariner Court,
Clydebank Business Park, Clydebank G81 2NR
Tel: 0131 314 6750 www.nature.scot

Dualchas Nàdair na h-Alba, Taigh Caspian, 2 Cùirt a' Mharaiche,
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Our ref: PCS/167754
SG ref: SEA01193/ER

Contact by email:
sea.gateway@sepa.org.uk

30 October 2019

By email only to: SEA_Gateway@gov.scot

Dear Madam

**Environmental Assessment (Scotland) Act 2005
Local Transport Strategy 2020 - 2025 - Environmental Report**

SEPA acknowledges receipt of your Environmental Report submitted under the above Act in respect of the Local Transport Strategy which we received via the Scottish Government SEA Gateway on 17 September 2019.

The SEA gateway have consulted us on a Transport Strategy dated 2017 – 2021. The attached report is for a Transport Strategy dated 2020 – 2025. We have no record of having been consulted on any previous iterations of this report. Additionally the SEPA response in Appendix B is from our scoping response to the East Dunbartonshire Food Growing Strategy.

In this instance we will not be providing comment on your Environmental Report. Any comments SEPA may have on the plan itself will be submitted under separate cover.

Should you wish to discuss this please do not hesitate to contact our SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely

SEA Gateway
SEPA Planning Service

Ecopsy: sea.gateway@hes.scot; sea_gateway@snh.gov.uk



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