

Appendix D: Consultation Authority Scoping Responses and Council Actions

Historic Scotland

<i>HS Comments</i>	<i>EDC Response and Action Taken</i>
<i>Scope and Level of Detail</i>	
It is my understanding that East Dunbartonshire Council's Active Travel Strategy 2015 will aim to promote active travel and deliver a connected network of active routes. I note that the historic environment (under cultural heritage) has been scoped 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, subject to the detailed comments provided in the attached annex.	Comments noted and scoping in of Cultural Heritage confirmed.
<i>Consultation period for the Environmental Report</i>	
<i>Section 4: Next Steps</i> indicates that there will be a minimum consultation period of six to eight weeks for the draft Environmental Report, and I am content with this timescale. Please note that, for administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.	Comments noted and consultation period timescales and procedures confirmed within ER.
<i>Environmental issues relevant to the active travel strategy and the scoping in / out of environmental issues</i>	
I note that you have identified the potential for both negative and positive effects for the historic environment through increased access to heritage assets, and that consequently you propose to scope cultural heritage into the assessment.	Comments noted and scoping in of Cultural Heritage confirmed.
<i>Assessment Framework</i>	
Table 4 is very helpful in setting out which elements of the Strategy will be assessed, and the methods that will be used, and I am content with the approach which is outlined. I am also broadly content with the draft assessment matrix provided at appendix 2, although I suggest that you could consider also using the matrix to record / discuss mitigation measures.	Comments noted and a further integration of mitigation measures have been included within the assessment process for the CLS Strategy from modifications to actions, to avoidance, reduction or enhancement mitigation measures.
<i>SEA Objectives and Sub-criteria / questions</i>	
I am content with the proposed SEA objective. However, the draft questions and indicators focus predominantly on visitor access to heritage assets. Consequently I do not consider that these questions alone will enable the	Assessment criteria and questions were amended to take into consideration a wider scope of effects on the historic environment and cultural heritage assets and their setting

<p>assessment process to identify potential direct (physical) or indirect (setting) effects on heritage assets themselves. As you have identified the potential for such effects to occur, I recommend that you consider refining the draft questions and indicators to ensure that any such effects (and appropriate mitigation) can be identified. There is also scope to consolidate the existing draft questions, as there is considerable overlap between several of them. This would help to streamline and simplify the assessment. If you would like further advice on this, or would like to seek comments on a revised set of questions / indicators, please do not hesitate to contact me.</p>	<p>throughout East Dunbartonshire, with a particular emphasis on direct (physical) or indirect (setting) effects.</p>
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Scottish Environment Protection Agency

<i>SEPA Comments</i>	<i>EDC Response and Action Taken</i>
<i>Alternatives</i>	
<p>We are satisfied with the alternatives outlined. These 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.</p>	<p>All reasonable alternatives to the CLS Strategy were considered and assessed within the ER, along with reasonable alternatives within the Strategy in terms of the Aspiration, Aims and Actions.</p>
<i>Scoping In / Out of Environmental Topics</i>	
<p>It is noted that all environmental factors will be scoped into the assessment we agree with this approach.</p>	<p>Comment noted and scoping factors confirmed.</p>
<i>Methodology for assessing environmental effects</i>	
<p>We would expect all aspects of the PPS which could have significant effects to be assessed.</p>	<p>Comment noted and assessments within the ER ensure significant environmental effects have been identified and assessed.</p>
<p>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. We are content with the proposed SEA objectives to be used in the assessment.</p>	<p>Comment noted and assessment methodology and objectives confirmed.</p>
<p>When it comes to setting out the results of the assessment in the Environmental Report enough information should be provided to clearly justify the reasons for each of the assessments presented.</p>	<p>Comment noted and assessment reasoning and justification clearly provided within each level of the assessment process (appendices) and elements brought forward into the main body of the ER.</p>
<i>Mitigation and Enhancement</i>	
<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. It is noted that the Council propose</p>	<p>Comments noted all mitigation measures including those which result in a modification to the Strategy are clearly illustrated within the</p>

to follow the mitigation hierarchy (avoid, reduce, remedy or compensate).	assessment appendices.
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.	
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 if the Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan.	Comment confirmed and monitoring framework included with the corresponding ER.
Consultation Period	
We are satisfied with the proposal for a six to eight week consultation period for the Environmental Report.	Comment noted and consultation period confirmed.

Scottish Natural Heritage

SNH Comments	EDC Response and Action Taken
Scope of assessment and level of detail	
Subject to the specific comments set out below and in the annex to this letter, SNH is content with the scope and level of detail proposed for the environmental report.	Comment noted and level of scope confirmed within the ER.
Consultation Period for the Environmental Report	
SNH notes that a period of 6-8 weeks is proposed for consultation on the Environmental Report. The standard consultation period for Environmental Report's is 8 weeks and SNH recommend this timescale is used.	Unfortunately due to internal Committee deadlines the consultation for the Strategy and corresponding ER will be over a 6 week period. If SNH or any of the other Consultation Authorities require clarification on this or a possible extension to provide their comments and responses then please contact the Councils SEA Technical Officer, Neil Samson on 01415788615.
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 Active Travel	Comment noted.

Strategy.	
Plans, Programmes & Strategies	
The Scottish Government's 'Fitting Landscapes' policy should be included in the Plans, Programmes & Strategies. Fitting Landscapes sets out a commitment to quality in aspects of landscape design and management in connection with transport infrastructure. Therefore this policy is highly relevant to the Active Travel Strategy.	Comment noted and 'Fitting Landscapes Policy' has been incorporated into the PPS consideration within the ER.
SPT's Regional Transport Strategy and its corresponding Walking and Cycling Action Plan will be of relevance to the Active Travel Strategy (ATS).	A Catalyst for Change: The Regional Transport Strategy for the west of Scotland 2008-2021 and SPT Walking and Cycling Action Plan have been incorporated into the PPS for consideration within the ER.
Environmental Baseline	
Under Material Assets (p26) the environmental implications shouldn't just focus on agriculture in terms of new active travel routes encroaching onto land. New active travel routes have the potential to encroach on all types of land and any potential adverse effects needs to be explored.	Comment noted and environmental implication amended within the ER.
Environmental Issues	
Material Assets (p36) needs to look at the linkages to the Green Network Strategy as well as the Open Space Strategy. SNH would encourage East Dunbartonshire Council to make sure green infrastructure opportunities are incorporated, where possible, into a new or upgraded active travel routes and the Green Network Strategy will help make this linkage.	Comments noted and amendments made within the environmental issues section of the ER and taken into consideration during the production of the ATS and corresponding ER.
Scoping In / Out of Environmental Factors	
We agree with the topics that have been scoped in.	Comment noted and scoping of environmental factors confirmed.
Proposed SEA Objectives, Assessment Questions and Indicators	
Landscape (p51) – the objective should also look at enhancing the landscape therefore we suggest the following wording: "To protect, enhance and, where appropriate, restore landscape character, local distinctiveness and scenic value." One of the landscape indicators looks at the number of actions in the ATS that are linked to the actions in the Local transport Strategy and Core Path Plan. There should also be links to actions with the emerging Green Network	Landscape objective was altered to take account of the recommended SNH modification. Comment noted - amendments have been incorporated into the indicators within the monitoring section of the ER as a result.

<p>Strategy and we recommend you include it into this section.</p>	
<p>Biodiversity, Flora & Fauna (p49) – not sure and indicator on quality and connectivity of active travel is needed in this section.</p> <p>The following indicators appear in the scoping report for the Green network Strategy and might be relevant to include in this section:</p> <ul style="list-style-type: none"> - Ecosystem specific indicators, such as area of woodland habitats improved/changes. - Loss/expansion/enhancement of woodland/forestry in East Dunbartonshire. 	<p>Comment noted and indicator removed.</p> <p>Comment noted – Additional indicators incorporated related to Biodiversity, Flora and Fauna within the monitoring section of the ER as a result.</p>
<p>Material Assets (p53) – One of the indicators looks at access and use of public transport networks. Ideally you want this indicator to include number of new paths to/from public transport interchanges and amount of cycle parking installed at key public transport interchanges.</p>	<p>Comment noted – Additional indicator incorporated related to Material Assets within the monitoring section of the ER as a result.</p>