

Appendix E: 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>	
<p>It is my understanding that East Dunbartonshire Council's Leisure and Culture Strategy 2015 will set out co-ordinated approach to the provision of assets, facilities and opportunities for culture, sport and leisure, and will result in the production of an action plan intended to provide fit for purpose facilities. 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 satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments provided in the attached annex.</p>	<p>Comments noted and scoping in of Cultural Heritage confirmed.</p>
<i>Consultation period for the Environmental Report</i>	
<p><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.</p>	<p>Comments noted and consultation period timescales and procedures confirmed within ER.</p>
<i>Environmental issues relevant to the culture, leisure and sport strategy and the scoping in / out of environmental issues</i>	
<p>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. On the basis of the information provided in relation to the Strategy, I welcome that the historic environment has been scoped into the assessment.</p>	<p>Comments noted and scoping in of Cultural Heritage confirmed.</p>
<i>Assessment Framework</i>	
<p>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.</p>	<p>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.</p>

SEA Objectives and Sub-criteria / questions

<p>I am content with the proposed SEA objective. However, the draft questions and indicators focus solely on visitor access to heritage assets, and therefore do not fully relate to the key elements of the objective. Consequently I do not consider that these questions alone will enable the 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. 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>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 throughout East Dunbartonshire, with a particular emphasis on direct (physical) or indirect (setting) effects.</p>
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Scottish Environment Protection Agency

SEPA Comments	EDC Response and Action Taken
Alternatives	
<p>It is noted that no alternatives to the CLS will be considered as it is an administrative requirement to update the existing strategy however alternatives within the strategy will be considered. We are satisfied with this approach.</p>	<p>After further consideration reasonable alternatives to the CLS Strategy were considered and assessed within the ER, along with reasonable alternatives within the Strategy in terms of the Ambition, Objectives and Actions.</p>
Scoping In / Out of Environmental Topics	
<p>It is noted that population and human health, cultural heritage, and biodiversity, flora and fauna will be scoped into the assessment we are happy with this approach.</p>	<p>Comment noted and scoping factors confirmed.</p>
Methodology for assessing environmental effects	
<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) for the Strategy along with summaries of each assessment within the main body of the ER.</p>

Mitigation and Enhancement	
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 to follow the mitigation hierarchy (avoid, reduce, remedy or compensate).	Comments noted all mitigation measures including those which result in a modification to the Strategy are clearly illustrated within the assessment appendices B and D.
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	
We would query the scope of the proposed Environmental Report with regard to the following. Please note, these aspects are largely dependent on scale of proposals arising from the plan. This may therefore require clarification prior to the Environmental Assessment.	With regards to the scoping factors being included within the assessment of the CLS Strategy, each factor was fully considered for the likely significant effects. During the initial steering group meeting to discuss the content of the Strategy and its delivery it became apparent that the scope of the Strategy was less than first envisaged predominantly due to the fact that all the improved or increased provision of services, facilities, assets or infrastructure changes within each of the three areas within the Strategy (culture, leisure and sport) would be delivered and implemented through other Council documents. Some of the projects noted within the Strategy have also progressed through the planning application process or have been granted permission. Therefore, the main driver
Soils and Geology - the scoping report only highlights accessibility to the natural and historic environment. Soils and geology are scoped out based on this rationale. It does not include development of "quality facilities and services", one of the four strategic objectives of the strategy. The rationale should therefore include development of new and improved facilities and whether this may impact on sensitive soils. Local geodiversity assets may also be considered within the Environmental Assessment. Conversely, the presence of, and impacts on,	

<p>vacant and derelict land should be considered within the scope of the upcoming Environmental Assessment. Particularly where there is potential for contamination at sites and overall positive environmental effects of bringing these areas back into active use.</p>	<p>and delivery method for these projects is beyond the scope of SEA in this case and these will be assessed either at project level or within the SEA of other individual Council documents, namely the next round of the Corporate Asset Management Plan (or individual Service Plans) and the Local Development Plan.</p>
<p>Landscape - The rationale for ‘scoping out’ landscape is on the basis that “the anticipated impacts regarding landscape character, scenic value and local distinctiveness is likely to minimal”. We do not consider this assessment sufficient as it does not consider the potential impacts arising from development of new or improved facilities and services. The Environmental Assessment should therefore consider potential landscape impacts arising as a result of this.</p>	<p>As a result of this, the decision was taken to carry out an initial screening on the list of actions being proposed for this Strategy. The actions which have been screened out have been highlighted within the ER along with the specific reasoning. The justification for these elements of the Strategy being screened out was mainly due to the fact that the Council are confident that the CLS Strategy would not have a significant impact on these actions.</p>
<p>Material Assets - The scoping report considers any impacts on the areas’ material assets as unlikely. This aspect has therefore been ‘scoped out’. It would appear however that open space and the existing path network are linked with the wider objectives of improving accessibility to facilities and services, as well as enabling more active forms of travel and opportunities for recreation. The development of new and improved facilities may have positive significant effect on east Dunbartonshire’s material assets. Conversely, inappropriate siting of new facilities, poor accessibility or missed opportunities (i.e. those identified within related council strategies) may adversely impact material assets. We therefore advise that the Environmental Assessment consider potential impacts on material asset arising from the plan.</p>	
<p>Consultation Period for the Environmental Report</p>	
<p>We note a minimum period of 6 to 8 weeks for consultation on the Environmental Report and are content with this proposed period.</p>	<p>Comment noted and consultation period confirmed within the ER.</p>
<p>Alternatives</p>	
<p>We are content with the alternatives considered within the Scoping Report and have no further comments to make with regard to this.</p>	<p>Comment noted and alternatives to the CLS Strategy and within the Strategy have been identified and assessed within the corresponding ER.</p>
<p>SEA Objectives</p>	
<p>We note the current SEA objectives and these generally appear satisfactory. We suggest the following:</p> <p>Soil and Geology: If the Council are minded to ‘scope in’ soils and geology, we would</p>	<p>As noted above in the Councils response to the scope and level of detail to be incorporated into the assessment of the CLS Strategy, the inclusion of additional environmental factors and corresponding objectives were not considered to</p>

<p>recommend that proposed SEA objectives seek to:</p> <ul style="list-style-type: none"> - To protect and, where appropriate, use high quality and sensitive soils in a sustainable manner while protecting geodiversity assets. Please note sensitive soils include agricultural land, peatland and carbon rich soils. - Seek to bring vacant and derelict land into active use and to reduce the number of contaminated sites in the area. <p>Landscape: If the council are minded to ‘scope in’ landscape, we would recommend that proposed SEA objectives seek to:</p> <ul style="list-style-type: none"> - To protect, enhance and, where appropriate, restore landscape character, local distinctiveness and scenic value. <p>Material Assets: If the council are minded to ‘scope in’ material assets, we would recommend that proposed SEA objectives seek to:</p> <ul style="list-style-type: none"> - To promote the sustainable use of community assets in East Dunbartonshire, seeking to utilise the areas’ network of paths and public open spaces. <p>We are broadly of the view that potential vision/objectives/actions for the above SEA objectives can be aligned with the adopted Open Space and the emerging Green network strategies.</p>	<p>be appropriate or necessary regarding the scope of the Strategy itself.</p>
Draft Assessment Matrix	
<p>We would recommend that the Draft Assessment Matrix presented in Appendix 2 includes mitigation where potential negative environmental effects or other conflicts are likely.</p>	<p>Comments noted all mitigation measures including those which result in a modification to the Strategy are clearly illustrated within the ER.</p>