SEA Post-Adoption Statement: PART 1			
To:	SEA.gateway@gov.scot		
	Or		
	SEA Gateway Scottish Government		
	Area 2-J (South)		
	Victoria Quay		
	Edinburgh		
	EH6 6QQ		

SEA Post-Adoption Statement: PART 2		
An SEA Post-Adoption Statement is attached for:	Local Biodiversity Action Plan 2017 - 2021	
The Responsible Authority is:	East Dunbartonshire Council	

SEA Post-Adoption Statement: PART 3			
Contact Details			
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Signature (electronic signature is acceptable)	Alternoo		
Date	25 April 2018		

# STRATEGIC ENVIRONMENTAL ASSESSMENT POST-ADOPTION STATEMENT

East Dunbartonshire Council's Local Biodiversity Action Plan 2017 - 2021



# SEA Post-Adoption Statement: PART 4 Introduction

The Council has recently prepared a Local Biodiversity Action Plan (LBAP) as an update to the joint Dunbartonshire Biodiversity Action Plan between East Dunbartonshire and West Dunbartonshire Council for East Dunbartonshire online. It plans to guide and support biodiversity action in East Dunbartonshire with involvement from local government, national organisations, non-government organisations, conservation interest groups, local communities and individuals as part of the East Dunbartonshire Biodiversity Partnership.

## **Strategic Environmental Assessment**

The LBAP 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 ensue 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 Local Biodiversity Action Plan (LBAP). In accordance with the Environmental Assessment (Scotland) Act 2005, the Post-Adoption Statement will demonstrate:

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

Section 1: Key Facts	Section 1 details of the Local Biodiversity Action Plan (LBAP) remit and the enabling legislation.
Section 2: Environmental Considerations	Section 2 details how environmental considerations have been integrated into the LBAP 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 LBAP.
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 LBAP.
Section 6: Conclusion	Section 6 summarises how the SEA process has informed the development of the Open Space Strategy.
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.
Appendix 2: Local Biodiversity Action Plan Post-consultation actions screening	Screening Process that was undertaken to determine significance of post-consultation actions.

### Section 1: Key Facts Relating to the Local Biodiversity Action Plan

Responsible Authority:

East Dunbartonshire Council

**Authority:** Title of PPS:

Local Biodiversity Action Plan

What prompted the GNS?

Although the LBAP is not a statutory requirement it was prompted by the UK Biodiversity Action Plan commitment, the Scottish Biodiversity Strategy and the Nature Conservation (Scotland) Act 2004. The Act places a duty on all local authorities and public bodies to further the conservation of biodiversity in carrying out their

functions.

Subject: Period covered: Biodiversity 2017 - 2021

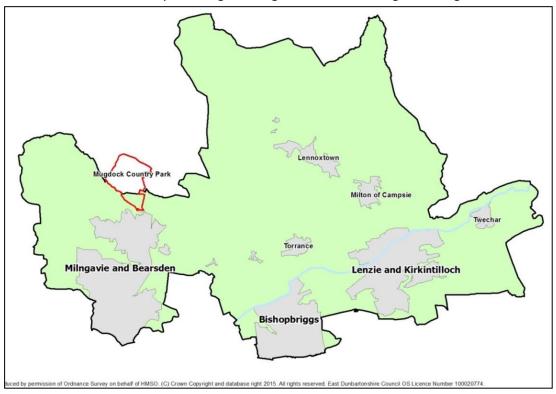
Frequency of updates:

The Strategy will be reviewed annually and updated in 2021

Area covered by

the GNS:

East Dunbartonshire Council and Mugdock Country Park (which lies within the Stirling Council area; in collaboration with Stirling Council). Cross-boundary issues for biodiversity into neighbouring authorities will be given recognition.



Purpose of the GNS:

In response to the requirements for Scotland to contribute to meeting the targets set by the Scottish Biodiversity Strategy, the Local Biodiversity Action Plan for East Dunbartonshire intends to:

- Contribute to the (relevant) objectives and targets of the Scottish Biodiversity Strategy through effective, co-ordinated local action
- Identify nature conservation priorities for East Dunbartonshire, and targeted actions for the conservation and enhancement of habitats and species that are important at the local level
- Contribute to a forum for the Biodiversity Partnership to work together on preparation of the LBAP, share ideas and collaborate on projects/actions which can be developed and maintained over the long term
- Raise awareness of biodiversity/ecosystem services and its importance in the local context and encourages local communities to get involved in the actions in their area
- Ensure opportunities to conserve and enhance biodiversity are promoted and

- embedded in local policies and decision making processes
- Identify opportunities for and facilitates strategic, landscape scale, cross boundary initiatives for nature conservation
- Encourage greater biological recording in the area
- Realise the social and economic benefits of biodiversity through education and action
- Provide a framework for the monitoring and evaluation of local biodiversity actions/activity against both local and national targets and objectives/priorities.

# Plan Aims and Objectives:

#### Aims:

- Protect, restore and expand East Dunbartonshire's natural and semi-natural habitats to create a robust and connected natural environment
- Avoid local extinctions by increasing the range and population health of our most vulnerable species
- Connect people to the natural environment, raise awareness of the importance of biodiversity and increase the involvement of local communities in conservation projects
- Integrate the conservation of biodiversity into decision making processes and all aspects of land management
- Increase the knowledge of East Dunbartonshire's biodiversity through data collection, collation and sharing

#### **Objectives:**

## **Rural Ecosystem**

- Improve knowledge of priority species and habitats found within rural areas
- Maintain and, where possible, increase the quality and extent of grassland habitats
- Encourage sustainable management of rural land and promote biodiversity friendly working practices on farmland
- Protect and where possible enhance areas of blanket bog
- Retain and enhance boundary features to increase functional connectivity across the landscape

#### **Urban Ecosystem**

- Protect biodiversity features on designated sites and encourage the inclusion of biodiversity friendly practices in the management of parks and other open spaces
- Raise awareness and improve knowledge of biodiversity through environmental education, events, targeted surveys and training
- Promote the importance of biodiversity throughout Council Services and incorporate biodiversity projects into work programmes to aid delivery of the statutory biodiversity duty
- Ensure good design and placemaking within new developments and encourage the inclusion of biodiversity enhancements in open space provision and within the built environment
- Increase participation in environmental community projects and volunteering activities including citizen science

## Freshwater Ecosystem

- Restore lowland raised bog condition and function on a further 5ha
- Contribute to the delivery of the Scotland River Basin Management Plan ecological water quality objectives
- Improve the function of river valleys as wildlife corridors
- Improve quality and extent of the pond resource and knowledge of associated priority species
- Ensure sustainable management of the water environment

## **Woodland Ecosystem**

- Protect and prevent loss of ancient and long established woodland
- Encourage the sensitive management of the woodland resource, including scrub, to improve the long term ecological value of all woodland habitat
- Ensure woodlands, especially those close to urban areas, are accessible and promote awareness of their value to local communities
- Encourage natural regeneration, new natural colonisation and native tree
  planting at new sites to increase the extent of priority woodland habitat,
  ensuring minimal conflict with other priority habitat types.

# Section 2: Environmental Considerations

## 2.1. Integration of Environmental Considerations in the Local Biodiversity Action Plan

2.1.1. This chapter highlights how environmental considerations have been integrated into the final Local Biodiversity Action Plan (LBAP). **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 actions or the alteration of existing actions within the LBAP.

**Table 1: Implementing Environmental Considerations** 

Local Biodiversity Action Plan				
Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations	
	Deliver benefits to habitats through an active approach to enhancing and/or creating new wetland, grassland and woodland habitats.	Yes	The Plan identifies farmland (including the floodplain), semi-natural grassland, freshwater ecosystems and relevant habitats and woodland habitats as priority habitats for action in East Dunbartonshire. Therefore the Plan will enable opportunities to develop for these priority habitats over the life of the Plan.	
Biodiversity, Flora and Fauna <i>and</i> Material Assets	Protect important and valued natural designations such as Local Nature Reserves (LNRs), Local Nature Conservation Sites (LNCS) and Sites of Special Scientific Interest (SSSI).	Yes	Actions 14, 15 and 28 for urban ecosystems, freshwater action 31 and urban actions 14, 15 and 28 directly relate to conservation projects in relation to LNRs as well as designations of new sites with the intention to protect them from external impacts. In addition, a number of rural and freshwater actions relate to the management of LNCS in the local area as well as new designations. Similarly there are several opportunities to manage and improve the value of SSSI in rural and woodland habitats.	
	Encourage safe use of existing core paths and active travel routes in East Dunbartonshire due to improved setting and visual amenity of the wider environment without compromise to biodiversity value.	Yes	Rural action 2 aims to deliver biodiversity improvements through work to upgrade or create rural paths and travels in order to maximise biodiversity potential.	
	The LBAP should promote and link active travel and the aims of the Green Network Strategy.	Yes	The LBAP demonstrates links between the Green Network Strategy through various actions and the nature of the outcomes for the Plan align with those of the Strategy. In	

	The Plan should encourage greater consideration of the protection and sustainable use of natural resources.	Yes	addition, actions to encourage biodiversity management and enhancement, especially in urban areas and near open space, will encourage local communities to increase active travel participation.  Whilst there are no direct actions specifically outlined to deliver sustainable use of natural resources, each of the actions for the priority habitats focus on biodiversity enhancement, management and/or protection with a specific aim (Aim 3) dedicated to biodiversity conservation into decision making and land management. Furthermore, there are actions to promote biodiversity protection and the responsibilities of the Biodiversity Duty on Council Services as well as ownership of practical biodiversity and natural resource conservation at community level.
	The role of local biodiversity and ecosystem services should be promoted to improve understanding and knowledge locally.	Yes	As above.
Population and Human Health	Ensure that there are opportunities to enhance recreational and cultural provision within communities including improved open space and access to the local environment.  Improve the understanding of the current local species and habitat value in East Dunbartonshire.  Seek opportunities to involve local communities in biodiversity and conservation projects, as well as environmental education projects.	Yes	The LBAP outlines two objectives, specifically focused on urban ecosystems, to protect biodiversity features on both designated and non-designated sites through good practice and management of parks and open spaces as well as ensuring that good design and placemaking principles are employed within new developments to enhance urban open space provision. In addition the aims of the Plan further emphasise the importance of integrating biodiversity conservation into all aspects of decision making, from planning decisions to land management as well as increasing knowledge and understanding of local biodiversity and habitat value. To support these aims, a number of actions have been outlined including Urban ecosystem action 3, 4 and 5 which focus on park and open space management, contributions to delivering the actions of EDC's Open Space Strategy and improvements on Fields in Trust designated sites, respectively.

Water Quality  Climatic Factors	The role of biodiversity as a means of natural flood management, water storage and the prevention of surface water run-off should be explored where possible.  The LBAP should consider how it can play an active role to maximise carbon capture and improved ecosystem services.	Yes Yes	The benefits of biodiversity in its role towards flood management, water storage and surface water run-off prevention are peppered throughout various actions and the LBAP is likely to have a positive cumulative impact on water quality.  The Plan actively aims to protect blanket bogs in East Dunbartonshire and promotes the role of wider ecosystem services such as flood management (see
Landscape	There are concerns that external competing factors such as development has the potential to negatively impact on landscapes, including designated areas, impacting on both urban and rural landscapes. In particular, issues to consider include impacts to habitat connectivity and a reduction in fragmentation, links to and from the green belt, impacts on biodiversity due to the urban-rural divide and the role of improved biodiversity in order to improve visual impacts of the landscape setting.	Yes	above).  Maintenance, nature conservation and public awareness have each been discussed within the actions in delivering the vision of the LBAP. There are clear links to East Dunbartonshire Council's Green Network Strategy and Active Travel Strategy with actions that will contribute to reducing or preventing the effects of new development, transport, business, agriculture and industry for habitat loss and fragmentation. In terms of concerns over changes to the landscape, the Plan will work in tandem with the Green Network Strategy and Open Space Strategy which will enhance the landscape character and provision of green network hubs/corridors/links for open space provision.
Air Quality	The LBAP should seek opportunities to enhance the role of biodiversity for ecosystem services and for pollutant management and carbon sequestration, particularly where opportunities are located within or near to Air Quality Management Areas.	Yes	Cumulatively, the LBAP will promote and enhance the role of biodiversity for ecosystem services including carbon sequestration and the protection of peat and blanket bogs. This will have a local positive outcome for air quality. In addition, the delivery of urban ecosystem actions will present secondary impacts to air quality especially in terms of supporting improvements near or within Air Quality Management Areas.
Soil and Geology	Actions to promote and enhance biodiversity should not be at the detriment of soil and geological assets in East Dunbartonshire, including peatland and blanket bog areas, and should seek to contribute to	Yes	In addition to supporting the role of biodiversity for enhancing and protecting peatland and blanket bogs, urban ecosystem action 23 seeks to investigate biodiversity projects on 3 vacant and derelict sites for

	enhancements and/or management of these assets where possible.		improvement and the LBAP aims to implement the Campsie Fells Peatland Management Plan 2016 (rural ecosystem action 5).
Cultural Heritage	Opportunities to maintain and enhance, where possible, the visual setting of historic designations such as the Antonine Wall and Gardens and Designed Landscapes within the local area should be explored.	Yes	Whilst there are no direct actions to maintain and enhance historic designations in the LBAP, the LBAP monitoring framework will ensure that significant impacts on cultural assets is reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.

# Section 3: Consideration of Alternatives

### 3.1. Consideration of Alternatives in the Local Biodiversity Action Plan

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 Biodiversity Action Plan (LBAP).

### 3.2. Reasonable Alternatives to the LBAP

- 3.2.1. In order to determine the SEA preferred option for the delivery of the LBAP, 5 different strategic alternatives for the delivery of East Dunbartonshire LBAP were assessed against the SEA objectives. Consequently, the SEA preferred alternative was adopted for the development of the final LBAP.
- 3.2.2. Table 2 provides an overview of the strategic alternatives considered for the LBAP.

**Table 2: Strategic Alternatives for EDC LBAP** 

Alternative Approach	Outline and Implications of the Strategic Direction	SEA Preferred Strategic Alternative
STRATEGIC DIRECTION 1		
Replacing and updating	This option to deliver the LBAP would involve updating	
the existing LBAP to	the existing LBAP for Dunbartonshire. Although it would	
cover the same area	encourage a landscape-scale approach to managing	
(East and West	biodiversity across both WDC and EDC, the areas are	
Dunbartonshire)	distinct in character which could result in a number of	
	challenges. This approach would present opportunities	
	for larger levels of funding from external contributors,	
	particularly for joint projects. However, WDC does not	
	have the same resources as EDC in terms of a dedicated	
	officer for biodiversity, which would increase a reliance	
	on the EDC Biodiversity officer to co-ordinate and	
	manage the development and implementation of the	
	LBAP. Replacing and updating the existing LBAP will	
	ensure that the current state of the environment and	
	relevant biodiversity issues are accounted for.	
STRATEGIC DIRECTION 2		
A stand-alone LBAP	This option would be focussed solely on East	
covering East	Dunbartonshire and would be primarily co-ordinated	
Dunbartonshire Council	and managed by the EDC Biodiversity officer. Although	
only	limiting the LBAP to East Dunbartonshire can reduce the	
	scope of the LBAP compared to the existing document,	
	there is potential to work in partnership with	
	neighbouring authorities, such as Stirling Council on the	
	Campsie Fells and Mugdock Country Park, North	✓
	Lanarkshire Council on the Forth and Clyde Canal and	
	West Dunbartonshire Council on the Kilpatrick Hills.	
	Through a partnership with other local authorities,	
	environmental charities, community groups and other	
	interested bodies, there is greater potential for funding	
	opportunities. It would also encourage community	
	grants for smaller, local-level projects.	

STRATEGIC DIRECTION 3					
A LBAP prepared jointly	This option would result in similar positive and negative				
with a different	effects as option 1, but there would be differences				
adjoining local	depending on the local authority involved. This option				
authority	would need to consider a number of factors including;				
	the need for a LBAP in the adjoining authority, the				
	resources available, interest in developing a joint LBAP				
	and ease of management and deliverability.				
STRATEGIC DIRECTION 4					
Retain the existing	This option would involve continuing with the exiting				
Dunbartonshire	Plan for West Dunbartonshire and East Dunbartonshire,				
Biodiversity Action Plan	including the existing actions and monitoring. However,				
with no revision	there would be limited scope for actions and projects to				
	respond to current changes to the local environment.				
STRATEGIC DIRECTION 5	,				
Address biodiversity	This approach to managing biodiversity would involve				
issues in the emerging	addressing relevant biodiversity and habitat issues in				
Green Network	the emerging Green Network Strategy for East				
Strategy	Dunbartonshire. As the emerging Green Network				
	Strategy will focus on the two main stands considered				
	to be prevalent for a healthy and robust green network,				
	biodiversity and access, a focus on local biodiversity				
	issues might be conflicted against access priorities and				
	extensive management and action plans for biodiversity				
	will not have the opportunity to maximised.				

## 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 LBAP, was published for consultation with the SEA Consultation Authorities from 1<sup>st</sup> August 2016 12<sup>th</sup> September 2016. The consultation on the Environmental Report provided an opportunity to respond to the findings of the report and influence the finalised draft of the LBAP.
- 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: Consultation Responses** 

Consultee	Consultation Response	Incorporating Consultation Response				
	Environmental Report					
	We find the Environmental Report to be well presented and	Noted				
	the assessment rationale easy to follow.					
	We note that our comments on the scoping report have been	Noted				
	taken into account in the Environmental Report.					
	To improve the clarity of the assessment tables, it would be	The assessment tables in future SEA reports will incorporate this suggestion				
	helpful to repeat the title row with the SEA Environmental	to ensure better clarity.				
	Factors each time they are assessed to avoid the need to scroll					
	up and down the document.					
	Mitigation Mea	sures identified in Appendix F				
SNH	The translation of the mitigation measures identified in	Each of the proposed mitigation measures that have been included as part of				
	Appendix F of the Environmental Report into the LBAP isn't	the actions assessments has been compiled for the Biodiversity and				
	always clear. We recommend that the mechanism for	Greenspace Policy Officer to include, where appropriate, in the main LBAP				
	delivering these mitigation measures is confirmed.	document in order to align the SEA proposed mitigation with the mitigation				
		and monitoring framework for the Plan. Furthermore, the monitoring of the				
		Plan, as stated in this Post-Adoption Statement, will be aligned to the LBAP				
		monitoring in the main document.				
	Biodiversity, Flora and Fauna (continued) – Page 20					
	Please note that badgers and water voles are not European	Appendix B has been updated to align with the list of LBAP protected and				
	protected species - Badgers are protected under the Protection	priority species as well as indicating the key Invasive Non-Native Species in				
	of Badgers Act 1992 (as amended) and water voles are	East Dunbartonshire. This has been reflected in the Baseline Data table on				

Consultee	Consultation Response	Incorporating Consultation Response							
	protected under the Wildlife and Countryside Action 1981 (as amended).	Page 20.							
	General Comments								
	We note that Material Assets has been scoped back into the SEA of the LBAP to align it with the SEAs for the Green Network and Active Travel Strategies.	Noted							
	We note that some SEA suggested alterations have not been carried forward into the LBAP, however, these have been justified in the Environmental Report.	Noted							
	De	tailed Comments							
SEPA	We note that green infrastructure in new developments is included in the Green Network Strategy and not the LBAP. This is stated as one of the GNS objectives.	It has been determined through the development of the LBAP that including green infrastructure opportunities in the Green Network Strategy rather than the LBAP was more appropriate, although there are a number of actions that lend themselves to green infrastructure opportunities in the LBAP.							
	The Assessment Commentary of Ecosystem 3: Freshwater, Action 2 states, 'improving existing pond resources for their habitat value as well as creating new ones can improve the role of ponds for water and flood-risk management by acting as a Sustainable Drainage System (SuDS).' You should note that The CIRIA SuDS Manual C753 says 'Existing natural water bodies should not be used as a means by which to dispose of surface water runoff where this would create a risk that pollution events, poorer water quality or alternative flow regimes might disturb/damage the natural morphology and/or ecology of the system.'	On review of the CIRIA SuDS Manual C753 and advice from the Biodiversity and Greenspace Policy Officer, it has been determined that the commentary as part of the assessment for this action will be revised to remove reference to the role of the existing pond resource as a SuDS. This will be reflected in the revised and final Environmental Report.							
	Environmental Report								
Historic Scotland	We welcome the clear and concise manner in which the assessment findings have been presented. In terms of significant impacts on the historic environment as a result of the plan we note that no such impacts have been predicted. A number of minor positive and/or negative effects have been identified in relation to alternative aims, objectives and actions and we particularly welcome the discourse relating to the								

Consultee	Consultation Response	Incorporating Consultation Response
	mitigation or enhancement of these effects. We are therefore	
	content to agree with these findings and have no further	
	comments to offer.	

## **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 Biodiversity Action Plan (LBAP). 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.
- 5.1.2. However, further review of Plan post-adoption has meant that it is more consistent to align the SEA monitoring framework with that of the Plan as adopted. **Tables 4 and 5** show the LBAP monitoring framework that was produced by EDC's Biodiversity and Greenspace Policy Officer and any monitoring of the LBAP will be reflected as the SEA monitoring framework for this Plan.

#### **Table 4: LBAP Monitoring of Action Delivery**

The ecosystem action plans and supporting actions will be reviewed annually (April – March) to ensure projects remain on target and to allow the partnership to take advantage of opportunities as they arise such as additional funding sources and new projects or partners.

An annual progress report will be produced in conjunction with the Biodiversity Partnership and presented to Place, Neighbourhood and Corporate Assets committee, detailing the delivery of projects. This will also be the stage where any amendments to the action plan can be made e.g. additional actions, removal of actions that are no longer feasible, alterations to timescales or delivery leads etc.

The progress report will also outline how the LBAP actions also support the delivery of national targets within the Scottish Biodiversity Strategy and other local commitments such as the geodiversity concordat and LOIP.

An excel spreadsheet of all the actions within the LBAP will be maintained by the Greenspace & Biodiversity Policy Officer and progress monitored via liaison with the Biodiversity Partnership.

Monitoring of Action Delivery

## **Table 5: Monitoring of Overall Biodiversity Health**

In addition to monitoring the actions, it is important to consider the outcomes of these and how well they are contributing to the LBAP aims and objectives. There is not a nationally agreed progress monitoring system for LBAPs and it would not be possible or meaningful to monitor all changes in local biodiversity over the lifetime of the plan.

Scottish Natural Heritage (SNH) has developed national indicators for monitoring Scotland's progress towards safeguarding biodiversity. These are:

Visits to the outdoors

• Increase people's use of Scotland's outdoors

Conditions of protected sites

• Improve the condition of protected natura sites

Breeding Birds (biodiversity)

Increase the abundance of terrestrial breeding birds

These could be adapted to the local context, ideally using existing data sets/information that is already updated regularly and at set intervals.

Visits to the outdoors

- Increase number of LNR's to provide more opportunities for people to access nature locally Conditions of protected sites
  - Improve the condition of Local Nature Conservation Sites

A local indicator similar to the Scottish Government measure for biodiversity (breeding birds) would have to be developed in conjunction with the Biodiversity Partnership, volunteers and the local records centre. National recording schemes could be utilised such as WeBS counts. Or a local context survey could be set up such as butterfly transects with local volunteers/rangers.

Butterflies are susceptible to environmental change and so can make good indicators of habitat loss/fragmentation and of the impacts of climate change. However populations are susceptible to natural fluctuations locally due to weather conditions and so it is important to establish long term trends rather than rely on annual variations. It may also be necessary to separate trends for generalist and specialist species.

Butterflies are also found on a variety of habitats in both the urban and rural setting, they are easy to identify, active during the day and engaging for the public. There is a national butterfly monitoring scheme.

#### **Section 6: Conclusion**

## 6.1. The Influence of SEA on the Local Biodiversity Action Plan

- 6.1.1. The Strategic Environmental Assessment process has been a useful and informative tool in assisting with the development of the Local Biodiversity Action Plan (LBAP) and for highlighting the environmental issues and benefits associated with the LBAP. It has been beneficial in assessing the reasonable alternatives available for the management and enhancement of biodiversity protection and enhancement in East Dunbartonshire as well as confirming that the Plan, overall, will have a positive effect on the environment.
- 6.1.2. The views of the Consultation Authorities and the public have been incorporated in to the final version of the Environmental Report and integrated into the adopted East Dnbartonshire Council Local Biodiversity Action Plan. As part of the Consultation period for the main document and Environmental Report a number of changes, including new actions, were proposed. Each new action was reviewed prior to the production of this Post-Adoption Statement and finalised Environmental Report to determine the likelihood of significant effects. The review indicated that each of the new actions, although presenting some minor positive impacts to environmental factors such as Biodiversity, Flora and Fauna and Population and Human Health, the impacts were unlikely to be significant or change the cumulative nature of the effects of the Plan as a whole on the local environment in East Dunbartonshire. The process effectively screened each new action out of requiring a full assessment as part of a revised Environmental Report consultation. Monitoring of the significant environmental effects will be carried out in line with both the SEA and Plan monitoring frameworks by East Dunbartonshire Council and any other relevant bodies in order to implement remedial action if required as a result of any unforeseen environmental impacts over the life of the Plan, or in line with the relevant review stages.
- 6.1.3. During the consultation of the draft LBAP, a number of new actions were proposed and included in the final LBAP for adoption. A Screening process was undertaken on these actions to determine their likely significance to help make a decision as to whether an Environmental Report addendum would be needed. This process confirmed that the impacts of the additional actions were unlikely to be significant and would not change the overall impact of the Plan as a whole. The screening process undertaken can be viewed in Appendix 2.

#### Appendix 1: Consultation Responses to the Draft Environmental Report



All of nature for all of Scotland

By email only to: <a href="mailto:sea.gateway@scotland.gsi.gov.uk">sea.gateway@scotland.gsi.gov.uk</a> & sustainability@eastdunbarton.gov.uk

Lauren Hollas
Strategic Environmental Assessment Technical Officer
Sustainability Policy
Place, Neighbourhood and Corporate Assets
Southbank House
Strathkelvin Place
Kirkintilloch
G66 1XU

Date: 9 September 2016

Our ref: CNS/SEA/SSEA/CEA142332

Dear Ms Hollas

Environmental Assessment (Scotland) Act 2005
East Dunbartonshire Council
Local Biodiversity Action Plan 2016 to 2020 - Environmental Report

Thank you for consulting SNH on the Local Biodiversity Action Plan 2016 – 2020 and its Environmental Report. We have reviewed these documents in relation to our natural heritage remit and offer the following comments.

## Local Biodiversity Action Plan 2016 - 2020 (LBAP)

We strongly support the revised LBAP, particularly its aims and ecosystem objectives, and offer the following minor comments on the detail of the text.

## Change from Dunbartonshire wide LBAP to East Dunbartonshire LBAP

We note the change from the current Dunbartonshire wide LBAP to an LBAP focussed solely on East Dunbartonshire. We recommend that opportunities are sought to work in collaboration with neighbouring authorities on landscape scale projects.

## Calcareous grassland (Page 22)

It appears that there is missing text on Sculliongour Limestone Quarry SSSI at the top of this page.

#### Urban Ecosystem (Page 30)

The title at the top of this page should read 'Pressures on the Urban Ecosystem'.

Scottish Natural Heritage, Caspian House, Mariner Court, Clydebank Business Park, G81 2NR Tel: 0141 9514488 Fax: 0141 9514510 www.snh.gov.uk

Dualchas Nàdair na h-Alba , Taigh Caspian, 2 Cùirt a' Mharaiche, Pàirc Gnothachais Bhruach Chluaidh, Bruach Chluaidh G81 2NR

Fòn: 0141 9514488 Facs: 0141 9514510 www.snh.gov.uk/gaelic

#### Woodland Actions - Removal of sycamore from Mugdock Wood SSSI (Page 48)

Please not that until the impacts of Chalara dieback of ash (Hymenoscyphus fraxineus) are better understood, SNH are operating a default position that sycamore is an acceptable component of woodland features. We will no longer consider its presence to contribute to unfavourable condition, nor support removal of sycamore for conservation management purposes.

## Appendix B – List of Local Biodiversity Action Plan Species

It appears that the title on page 56 should be 'Additional LBAP Species of Conservation Concern' instead of 'Priority Species'.

#### Environmental Report

Overall we find the Environmental Report to be well presented and the assessment rationale easy to follow. We also note that our comments on the scoping report have been taken into account in the Environmental Report.

To improve the clarity of the assessment tables, it would be helpful to repeat the title row with the SEA Environmental Factors each time they are assessed to avoid the need to scroll up and down the document.

#### Mitigation Measures identified in Appendix F

The translation of the mitigation measures identified in Appendix F of the Environmental Report into the LBAP isn't always clear. We recommend that the mechanism for delivering these mitigation measures is confirmed.

#### Biodiversity Flora and Fauna (continued) - Page 20

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 Action 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/

Should you wish to discuss any of the comments detailed in this response, please do not hesitate to contact Graeme Heenan on 0141 951 4488 or at Graeme.Heenan@snh.gov.uk.

Yours sincerely

Lyndsey Kinnes Operations Manager Strathclyde & Ayrshire



Buidheann Dìon Àrainneachd na h-Alba

Our ref: PCS/148253 SG ref: SEA/01060/ER

If telephoning ask for:

Nicki Dunn

8 September 2016

Strategic Environmental Assessment Officer Place, Neighbourhood and Corporate Assets East Dunbartonshire Council Southbank House Strathkelvin Place Kirkintilloch G66 1XQ

By email only to: <a href="mailto:sea.qateway@scotland.qsi.qov.uk">sea.qateway@scotland.qsi.qov.uk</a>

Dear Madam

Lauren Hollas

## Environmental Assessment (Scotland) Act 2005 Local Biodiversity Action Plan - Environmental Report

Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Local Biodiversity Action Plan. This was received by SEPA via the Scottish Government SEA Gateway on 1 August 2016.

We have used our scoping consultation response to consider the adequacy of the ER and this is used as the framework for detailed comments which can be found in Appendix 1. For convenience, these comments have been structured to reflect that of the ER. Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the LBAP itself will be provided separately.

As the LBAP is finalised, East Dunbartonshire Council as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA Guidance. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this environmental report consultation please do not hesitate to contact me on 01698 839000 or via our SEA Gateway at <a href="mailto:sea.gateway@sepa.org.uk">sea.gateway@sepa.org.uk</a>.

Yours sincerely

Nicki Dunn Senior Planning Officer

Ecopy: sea.gateway@hes.scot; sea\_gateway@snh.gov.uk





Chairman Bob Downes

Chief Executive Terry A'Hearn Angus Smith Building

6 Parklands Avenue, Eurocentral, Holytown, North Lanarkshire ML1 4WQ tel 01698 839000 fax 01698 738155

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### Appendix 1: Comments on the Environmental Report (ER)

### General comments

We note that Material Assets has been scoped back into the SEA of the LBAP to align it with the SEAs for the Green Network and Active Travel Strategies.

We note that some SEA suggested alterations have not been carried forward into the LBAP, however, these have been justified in the Environmental Report.

#### **Detailed comments**

We note that green infrastructure in new developments is included in the Green Network Strategy and not the LBAP. This is stated as one of the GNS objectives.

The Assessment Commentary of Ecosystem 3: Freshwater, Action 2 states, '...improving existing pond resources for their habitat value as well as creating new ones can improve the role of ponds for water and flood-risk management by acting as a Sustainable Drainage System (SuDS).' You should note that The CIRIA SuDS Manual C753 says 'Existing natural water bodies should not be used as a means by which to dispose of surface water runoff where this would create a risk that pollution events, poorer water quality or alternative flow regimes might disturb/damage the natural morphology and/or ecology of the system.'



Ms Lauren Hollas Development and Regeneration East Dunbartonshire Council Southbank House Strathkelvin House KIRKINTILLOCH G66 1XQ Longmore House Salisbury Place Edinburgh EH9 1SH

Direct Line: 0131 668 8960 Switchboard: 0131 668 8600 andrew.stevenson2@hes.scot

Our ref: AMN/23/623 Our Case ID: 201602363 Your ref: 01060 ENVIRONMENTAL REPORT 8 September 2016

Dear Ms Hollas

Environmental Assessment (Scotland) Act 2005 East Dunbartonshire Council - Local Biodiversity Action Plan Environmental Report

Thank you for your consultation which we received on 01 August 2016 regarding the above Environmental Report (ER). I have reviewed the document on behalf of Historic Environment Scotland in relation to our main area of interest for the historic environment.

## **Environmental Report**

We welcome the clear and concise manner in which the assessment findings have been presented. In terms of significant impacts on the historic environment as a result of the plan we note that no such impacts have been predicted. A number of minor positive and/or negative effects have been identified in relation to alternative aims, objectives and actions and we particularly welcome the discourse relating to the mitigation or enhancement of these effects. We are therefore content to agree with these findings and have no further comments to offer.

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of Historic Environment Scotland's commitment to capacity-building in SEA.

Please feel welcome to contact me should you wish to discuss this response.

Yours sincerely

Andrew Stevenson

Senior Heritage Management Officer (SEA)

Historic Environment Scotland - Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. \$C045925 VAT No. GB 221 8680 15

## Appendix 2: Local Biodiversity Action Plan Post-consultation actions screening

## **Rural Ecosystem**

New Actions	SEA ENVIRONMETNAL FACTORS								
	Population and Human Health	Cultural Heritage	Biodiversity, Flora and Fauna	Soil and Geology	Landscape	Water Quality	Air Quality	Climatic Factors	Material Assets
Action 5									
	X	X	+	+	X	X	+	+	X
	Action: Implement the Campsie Fells Peatland Management Plan 2016 in collaboration with statutory bodies and landowners and monitor success of habitat restoration actions								

#### **Assessment Commentary:**

The aim of the Campsie Fells Peatland Management Plan 2016 is to firstly survey, through mapping, the peatland features in the EDC Campsie Fells including:

- vegetation communities;
- · drains, eroded gullies and haggs;
- the potential locations of dams, eroded gulley re-profiling and ditch re-profiling;
- bare peat areas greater than 100 square metres in extent.

The second aim is to identify restoration opportunities, of low, medium and high priority, and estimated costs for these works. It was requested in the ITT that these estimates are broken down into the following elements:

- Number of large, medium and small dams with estimated unit and total costs;
- Number of bare peat areas to be rehabilitated with estimated unit and total costs;
- Number of eroded gullies to be re-profiled with estimated unit and total costs.

Collaborative working with statutory bodies and relevant land owners to carry out the aims of the Management Plan and monitoring of how successful it has been for habitat restoration will result in potentially direct long-term positive impacts on Biodiversity, Flora and Fauna and Soil and Geology as well as secondary positive impacts to Air Quality and Climatic Factors as it will help to identify peatland in the Campsie Fells as well as focus attention for action for restoration of peatland over the life of the Plan and the LBAP. This can help to manage habitats, improve the quality of and protect peatland resources and help to reduce disturbance and the release of carbon as a result into the atmosphere.

## **Comment on significance of effects:**

The overall nature of the effects is unlikely to be significant as, although implementing the Campsies Peatland Management Plan will result in positive impacts to the local biodiversity community, peatland management and air quality, the effects are likely to be minor due to the

managerial nature of the Plan which will then help to guide the Council's progression to on-the-ground peatland management and restoration projects within the Campsie Fells area. **Action 12** X X X X X X X Action: Support monitoring of bird populations at Bridgend Marshes LNCS by local volunteers **Assessment Commentary:** Support through the LBAP to monitor the bird populations at Bridgend Marshes LNCS will positively impact Biodiversity, Flora and Fauna as this will help to manage bird populations, including Pink-Footed Geese which are present on this site, to ensure that populations remain healthy. Involving local volunteers in the management of bird populations will be beneficial to Population and Human Health by presenting opportunities for members of the local community to become involved in biodiversity-related projects. **Comment on significance of effects:** This action is unlikely to result in significant environmental impacts. **Action 13** X X X X X X X Action: Work with landowners to re-instate wetland habitat at Balmore Flood **Assessment Commentary:** It is anticipated that this action will present minor positive effects for Biodiversity, Flora and Fauna as it will ensure that the wetland habitat at Balmore Flood will be a focus for the Council to manage and protect in order to improve their value as a habitat. As the action aims to work with land owners to enable any improvements, there is likely to be greater engagement and participation with the local communities in order to facilitate improvements on privately owned land. This will present positive impacts for Population and Human Health. **Commentary on the significance of effects:** This action is unlikely to result in significant environmental impacts.

## **Freshwater Ecosystem**

	SEA ENVIRONMETNAL FACTORS									
Alternative	Population and Human Health	Cultural Heritage	Biodiversity, Flora and Fauna	Soil and Geology	Landscape	Water Quality	Air Quality	Climatic Factors	Material Assets	
Action 51	Action 51									
	X	X	+	X	X	X	X	X	X	
	Action: Extend terrestrial habitat for Great Crested Newt at Lennox Forest through planting of broadleaved trees									
	Assessment Commentary:									
	This action will primarily present benefits to Population and Human Health by aiding growth of a habitat for Great Crested Newts to reduce									

population decline. It will also contribute to reducing habitat fragmentation. **Commentary on the significance of effects:** It is unlikely that extending terrestrial habitat for GCN at Lennox Forest will result in significant effects, although it will contribute to the significant nature of the overall cumulative effects of the LBAP for Biodiversity, Flora and Fauna. **Action 52** X X X X X X X X Action: Manage vegetation in and around the existing Great Crested Newt ponds at Lennox Forest to maintain the habitat **Assessment Commentary:** As above. **Commentary on the significance of effects:** It is unlikely that managing vegetation at Lennox Forest for GCN will result in significant effects, although it will contribute to the significant nature of the overall cumulative effects of the LBAP for Biodiversity, Flora and Fauna. **Action 56** X X X X X X +/++ X Action: Naturalisation of Whitefield Pond and adjacent lade including creation of island for nesting water birds **Assessment Commentary:** The naturalisation of Whitefield Pond is anticipated to result in positive impacts on Biodiversity, Flora and Fauna as it will help to improve the population of native vegetation as well as provide a valuable nesting habitat for water birds. It is likely that this action will help to improve the quality of the pond as a habitat for frogs, toads and other wildlife, particularly in terms of spawning. This action may also present minor positive benefits to Water Quality as the establishment of some submerged vegetation can help to improve water quality by oxygenating water. **Commentary on the significance of effects:** There is likely to be the potential for significant effects in terms of improving habitat and biodiversity value, but the effects of this are likely to be more prevalent in the longer term.

## **Woodland Ecosystem**

	SEA ENVIRONMETNAL FACTORS									
Alternative	Population and Human Health	Cultural Heritage	Biodiversity, Flora and Fauna	Soil and Geology	Landscape	Water Quality	Air Quality	Climatic Factors	Material Assets	
Action 63	Action 63									
	X	X	+	X	X	X	X	X	X	
	Action: Carry out annual Black Grouse monitoring (including brood counts) at Campsie Glen									
	Assessment Commentary:									

Black Grouse monitoring at Campsie Glen has the potential to have long-term positive impacts on Biodiversity, Flora and Fauna as it will aid action for ensuring that population numbers are managed appropriately and prevention of population decline is prevented. Commentary on the significance of effects: There is likely to be the potential for minor positive effects in terms of improving population health of Black Grouse, but the effects of this are likely to be more prevalent in the longer term and unlikely to be significant. Action 64 X X X X +/++ X X X X Action: Control Rhododendron ponticum at Barhill and Lennox Forest **Assessment Commentary:** As an Invasive Non-Native Species (INNS) Rhodedendron ponticum (Rhodedendron) can often have a negative impact on other biodiversity within the area including reducing the number of earthworms and regenerative capacity of species. It can also limit the growth of ground cover plants and alter the natural regeneration and growing process of trees by out-competing native species for food, light, space and shade. Consequently, controlling the growth and presence of Rhodedendron at Barhill and Lennox Forest will help to ensure that native species are given the opportunity to grow and regenerate effectively and help to protect the site. Commentary on the significance of effects: Although there is a potential for significant positive effects for biodiversity, controlling Rhododendron will be dependent on its presence and will not result in further significant effects of the Plan overall. Action 65 X X X X X X X X Action: Restore PAWS (Plantation on Ancient Woodland Site) area of woodland at Barhill through removal of conifers and non-native broadleaves **Assessment Commentary:** The removal of conifers and non-native broadleaves at Barhill will help to allow native species thrive better without being out-competed by confiders and broadleaves. This will help to improve the range of species and the quality of this woodland as a valuable habitat. **Commentary on the significance of effects:** There is likely to be the potential for minor positive effects in terms of improving the population and growth of native species, but the effects of this are likely to be more prevalent in the longer term and unlikely to be significant. **Action 66** X X X +/-X X X X X Action: Identify and carry out a programme of planting in order to replace both veteran policy and native trees in key public open spaces as part of the Trees for the Future project. **Assessment Commentary:** This option will involve the replacement of dead trees or trees that require to be cut down and replaced. As trees will be replaced, this will have a positive impact on biodiversity, however there may be some minor negative effects in terms of young trees providing less benefits in the short

term than mature trees. Nonetheless, together with other native planting actions, this will contribute to ensuring that the woodland resource at a local level is not reducing.

# Commentary on the significance of effects:

Effects are unlikely to be significant and will only present short-term negative impacts that can be neutralised by the delivery of this action in the medium and long-term.