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Our ref: AMA/50/56
Our Case ID: 201001373

2 July 2010

Dear Ms Hilder

**Environmental Assessment (Scotland) Act 2005
Glasgow City Council – Core Paths Plan
Scoping Report**

Thank you for consulting Historic Scotland on the scoping report for the environmental assessment of Glasgow City Council's core paths plan which was received by the Scottish Government's SEA Gateway on 4 June 2010. I have reviewed the scoping report on behalf of Historic Scotland in its role as a Consultation Authority under the above Act (section 15). This letter contains the views of Historic Scotland on the scope and level of detail of the information to be included in the Environmental Report (part 1), and the duration of the proposed consultation period (part 2).

1. Scope of assessment and level of detail

My understanding is that the plan will set out a framework of paths throughout the Local Authority area as required by the Land Reform (Scotland) Act 2003. As you will be aware, Historic Scotland provided comments during the previous consultation exercise and we welcome this further opportunity to feed into the plan preparation process.

As you have noted in the report, depending upon the location and management of core paths there is the potential for adverse effects through the creation of new paths or works to maintain existing paths. Increased access to historic environment features, while beneficial for the public and positive for enhancing access to and the understanding of heritage sites, can also introduce the potential for negative effects e.g. damage from erosion. I therefore agree with the reasoning for scoping this topic in and welcome that these issues will be explored through the assessment. Given that many of the paths are already in existence I agree that the assessment should focus on those areas where new paths, or upgrades to existing paths, are proposed.

In addition to the consideration of designated sites, it would be helpful if the assessment also gave consideration to any implications for non-designated sites (such as unscheduled archaeology), particularly through the creation of any new paths that may require excavations or related construction works.

Overall, I found the scoping report to be very clear and I would be happy to provide advice on specific paths as your assessment progresses.

Simply for information, the [Scottish Historic Environment Policy](#) (SHEP) has now been consolidated into a single document and now includes a new policy regarding historic battlefields. In terms of baseline data, Historic Scotland can provide GIS datasets under licence for scheduled monuments, listed buildings and gardens and designed landscapes (contact hsgismanager@scotland.gsi.gov.uk). Alternatively, you can obtain these GIS datasets from our [GIS Downloader](#).

2. Consultation period for the Environmental Report

I note that the consultation for the plan and its environmental report is due to commence in July 2010 although no consultation period is specified. The consultation period should be agreed with the Consultation Authorities through the scoping process. A consultation period of 4 to 6 weeks is preferred.

I hope this is helpful. None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA. Please do not hesitate to contact me on 0131 668 8924 should you wish to discuss this response.

Yours sincerely



Alasdair M^cKenzie
Strategic Environmental Assessment Team Leader

Our Ref: PCS /107961 /SB
SG Ref: SEA00214

Sue Hilder
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By email: sea.gateway@scotland.gsi.gov.uk

8 July 2010

Dear Ms Hilder

**Environmental Assessment (Scotland) Act 2005
Glasgow Core Paths Plan– Scoping consultation**

Thank you for your Scoping consultation submitted under the above Act in respect of the Glasgow Core Paths Plan. This was received by SEPA via the Scottish Government SEA Gateway on 4 June 2010. As required under Section 15(2) of the Act, we have considered the document submitted and comment as follows in respect of the scope and level of detail to be included in the Environmental Report.

Generally, the scoping report provides a clear outline of the proposed scope and level of detail of the assessment and covers most of the aspects that we would wish to see addressed at this stage. We are generally content with the scope and level of detail proposed for the Environmental Report.

The Scottish SEA Toolkit (available for download at: www.scotland.gov.uk/Publications/2006/09/13104943/0) provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA stage. SEPA has used the toolkit to inform this scoping response which is attached as Annex 1.

On completion, the Environmental Report and the plan to which it relates should be submitted to the Scottish Government SEA Gateway (sea.gateway@scotland.gsi.gov.uk) which will forward it to the Consultation Authorities.

If you wish to discuss any of the content of this response, please do not hesitate to contact me on 0131 2737333 or via our SEA Gateway at sea.gateway@sepa.org.uk .

Yours sincerely



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Senior Planning Officer (SEA)
Planning Service - Edinburgh
Encs

Chairman
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Annex 1: Comments on the Scoping Report

General comments

1. Generally, the scoping report provides a clear outline of the proposed scope and level of detail of the assessment and covers most of the aspects that we would wish to see addressed at this stage.
2. We note that the environmental receptors within our remit (air, water, soil and climatic factors) have been scoped out of the assessment. This is supported by adequate justification and we are content with the proposed scope of the assessment.
3. We provide some comments below in relation to the proposed approach to the assessment that we hope you find useful. For ease of reference we have used the same structure as that of the scoping report for the detailed comments below.

Detailed comments

1. Introduction

2. Key Facts

3. Description of Plan Contents

4. Plan, Programme & Strategy Context

4. We found the information provided in these sections useful in relation to the background to the Glasgow City Core Paths Plan. It is noted that the plan will identify a system of core paths sufficient for the purpose of giving the public reasonable access throughout the Glasgow area.
5. A list of other key legislation, plans, programmes, policies and strategies is provided in Table 2 with the full detail on how it affects, or is affected by the plan, provided in Appendix 2. The relevant aspects of the state of the environment are provided in Section 4.2 and Appendix 3 and the likely evolution of the environment without the plan is described in Section 4.3.

5. Environmental Issues

6. Scope and level of detail proposed for SEA

6. We note the proposed approach in relation to the consideration of reasonable alternatives and we are content with the approach.
7. We note that the environmental receptors air, water, soil and climatic factors have been scoped out of the assessment. This is supported by adequate justification and we are content with the proposed scope of the assessment.

8. The framework proposed for assessing environmental effects is provided in the Scoping Report. It is noted that the assessment will be undertaken using the draft SEA criteria. It is usually good practice to provide a worked example of the proposed approach to the assessment. This is to allow the Consultation Authorities to get an idea of the intended approach to the assessment in order to inform their comments on the scope and level of detail. Enough information and justification should be provided in the Environmental Report to allow the Consultation Authorities to understand how the results of the assessment were reached.
9. Please note that the assessment should include the potential cumulative and synergistic effects and the potential short, medium, long-term, temporary or permanent nature of the effects.
10. We note that measures required for mitigation of significant environmental effects will be proposed if significant environmental effects are identified. We consider that mitigation is a crucial part of SEA in that it offers an opportunity to not only address potential adverse effects of a plan, but also to make a plan even more positive than it already may be. Where significant environmental effects are identified as a result of the assessment the Environmental Report should clearly set out mitigation measures which are proposed. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate). Enhancement measures should be considered where appropriate.
11. It is helpful to set out all 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 Environmental Report should also describe any changes made to the plan as a result of the environmental assessment.

7. Next Steps

12. It is not clear in the scoping report the specific time period proposed for consultation on the Environmental Report. This period should be agreed with the Consultation Authorities at the scoping stage. Typical consultation periods range from 6-12 weeks.
13. 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 any significant environmental effects of the plan identified through the assessment.



Scottish Natural Heritage

All of nature for all of Scotland

Ms Sue Hilder
Outdoor Access Officer
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7 July 2010
Our ref: 00214

Dear Sue

ENVIRONMENTAL ASSESSMENT (SCOTLAND) ACT 2005: GLASGOW CITY COUNCIL CORE PATH PLAN SCOPING REPORT

I refer to your scoping report, sent to the Scottish Government SEA Gateway on 4 June 2010. In our role as a Consultation Authority, in accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, we have reviewed the above report. Our comments on the scope and level of detail to be included in the Environmental Report and on the duration of the proposed consultation period are set out below.

Scope of assessment and level of detail

Subject to the detailed comments set out in the annex to this letter, SNH is content with the scope and level of detail proposed for the environmental report. Our comments cover the current status of the Core Paths Plan (the Plan), the scoping of environmental topics, details of the methodology for the assessment and the relationship with other plans, programmes and strategies.

Consultation period for the environmental report

SNH notes the comment in the report and confirms that a period of not less than 6 weeks for the consultation on the Environmental Report would be appropriate.

.../2

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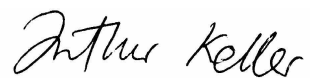


Scottish Natural Heritage, Strathclyde & Ayrshire Area, Caspian House, Clydebank Business Park,
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I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the Environmental Report.

Yours sincerely

A handwritten signature in black ink that reads "Arthur Keller". The signature is written in a cursive, slightly slanted style.

ARTHUR KELLER
Operations Manager

Encs

SNH RESPONSE TO SEA SCOPING REPORT FOR THE GLASGOW CORE PATHS PLAN

Section 4

Table 2 requires updating as described below under Appendix 2.

Section 5

In view of the comments made in para. 4.3, Table 3 could deal with the traffic issues facing the City. The Plan will facilitate a modal shift from motorised transport to active transport such as walking and cycling. This could reduce local air pollution as well as greenhouse gas emissions.

Section 6

We note your conclusions on the scoping of environmental topics but you may be losing some important benefits by leaving Population and Human Health out. The Plan will support regular exercise and a shift from motorised transport to active travel. The benefits could be significant in the context of the whole city and a useful balancing argument when dealing with potential negative aspects under other topics. Related strategies, particularly Local Transport, have common aims and objectives so the overall desire for change is very strong.

The scoping report is not entirely clear on your methodology for assessing the effects of the Plan. Assuming this is still under consideration we suggest it may be useful to examine the effects by community area rather than on a path by path basis. But care needs to be taken to avoid missing significant effects on paths close to or within sensitive areas. Also, routes that link communities or have a strategic role could have higher activity than other parts of the network.

As well as direct effects, the method of assessment must address secondary, cumulative and synergistic effects. The area approach may prove useful in looking at the effects of paths in combination.

Section 7

The text under *Next Steps* does not cover the period of the final consultation in the Spring of 2008 and any changes to the draft Plan as a result of comments received. It would be helpful for the report to make clear what the SEA is covering, either the Final Consultative Draft as published or an updated version following a review of those comments. We are aware that a summary of consultation responses was issued to the Local Access Forum in July 2009 and it was clear that a number of corrections were still needed as well as the resolution of comments from potential objectors. It would be sensible to make the Plan and the SEA compatible at this stage in the process.

The draft Plan included aspirational links and access points and a number of routes "...that could be core paths". The SEA should explain which routes have been assessed and which ones are the candidate core paths. Alternatively the assessment could cover all routes pending resolution of the plan to be adopted.

There is no definition of the duration of the consultation period for the Environmental Report other than “July 2010”. As the report is being prepared after the formal consultation on the Plan a period shorter than 12 weeks can be used. However the lack of public engagement on the Plan since June 2008 suggests there is merit in choosing a period not less than 6 weeks.

The timetable shown in Table 6 requires updating.

Appendix 2: Relationship with other plans, policies and strategies

This Appendix needs to be revised to bring it up-to-date with current planning policy. A number of documents have been added (e.g. Designing Streets) and deleted (e.g. SP11). The Scottish Government website provides the current information.

Scotland’s National Transport Strategy sets the context for regional and local actions on walking and cycling. The Plan includes sections of the National Cycle Network. The National Planning Framework includes the Central Scotland Green Network as a national development. The Plan will make an important contribution to this initiative.

The Regional Transport Strategy for the west of Scotland, *A Catalyst for Change*, prepared by the Strathclyde Partnership for Transport should be included.

The Plan contributes to the Council’s Single Outcome Agreement.

The Glasgow Outdoor Access & Walking Strategy should be included in the Local list (as presumably intended by reference to Table 2 Section 4).

Appendix 3: Population/ Environment/ Transport Figures, Trends and Targets

There may be some data relating to the use of existing paths that are proposed as core paths. This information would be a useful background to parts of the assessment and for future monitoring.

Appendix 4: Environmental Baseline

Dams to Darnley Country Park could be included under *Biodiversity* in view of joint management with East Renfrewshire who take the lead role. Commonhead Moss should be listed with the Local Nature Reserves. It may also be worth noting any sites that are proposed as Local Nature Reserves.

The comments against the Inner Clyde Estuary need a review especially as the Ramsar and Special Protection Area designations are technically outwith the Glasgow City boundary.

The Glasgow and Clyde Valley Green Network and related initiatives could be mentioned under one or more of the topics.

Directorate for the Built Environment

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Date: 9 July 2010

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00214 Scoping - Glasgow city council - Core path plan

Dear Sue

With reference to the Scoping report you submitted to the SEA Gateway on 4 June 2010.

In accordance with Section 15(2) of the **Environmental Assessment (Scotland) Act 2005** the Consultation Authorities have now considered the Scoping report you submitted. The individual responses from the Consultation Authorities to your report are attached to this letter.

As the Consultation Authorities have now expressed their views on the proposed scope and level of detail of the report, you should refer to the Act to consider what your next step should be. You should of course take into account the opinions offered by the Consultation Authorities.

Note, in accordance with Section 15(3) of the **Environmental Assessment (Scotland) Act**, (when agreed) you are required to formally write to advise the Scottish Ministers of the period of consultation you intend to specify, both for the public and the Consultation Authorities.

If you have any queries or would like me to clarify any points, please call me on 0131 244 7650.

Yours sincerely

Johnathan Whittlestone
SEA Gateway Officer