

SEA Post-Adoption Statement: PART 1

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Or

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SEA Post-Adoption Statement: PART 2

An SEA Post-Adoption Statement is attached for:

Green Network Strategy

The Responsible Authority is:

East Dunbartonshire Council

SEA Post-Adoption Statement: PART 3

Contact Details

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Signature (electronic signature is acceptable)	
Date	24 th January 2019

**STRATEGIC ENVIRONMENTAL ASSESSMENT
POST-ADOPTION STATEMENT**

**East Dunbartonshire Council's
Green Network Strategy**



sustainable thriving achieving

East Dunbartonshire Council

www.eastdunbarton.gov.uk

SEA Post-Adoption Statement: PART 4

Introduction

The Council has recently prepared a Green Network Strategy (GNS). It defines the existing green network in East Dunbartonshire and proposes improvements to enhance the network over the life of the Strategy and beyond.

Strategic Environmental Assessment

The GNS has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included:

- Taking into account the views of the Consultation Authorities regarding the scope and level of detail that was appropriate for the Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft Plan which included consideration of:
 - The baseline data relating to the current state of the environment;
 - Links between the strategic action with other relevant policies, plans, programmes, strategies and environmental objectives;
 - Existing environmental problems affecting the strategic action;
 - The strategic action’s likely significant effects on the environment (positive and negative);
 - The mitigation measures envisaged;
 - An outline of the reasons for selecting the alternatives chosen;
 - Monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report.
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the strategic action.
- Committing to monitoring the significant environmental effects of the implementation of the plan to identify any unforeseen adverse significant environmental effects and to taking appropriate remedial action. The key findings are incorporated into the following sections.

Post-Adoption Statement

The Post-Adoption Statement demonstrates how the findings of the SEA have been taken into account in the adopted GNS. In accordance with the Environmental Assessment (Scotland) Act 2005, the Post-Adoption Statement will demonstrate:

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

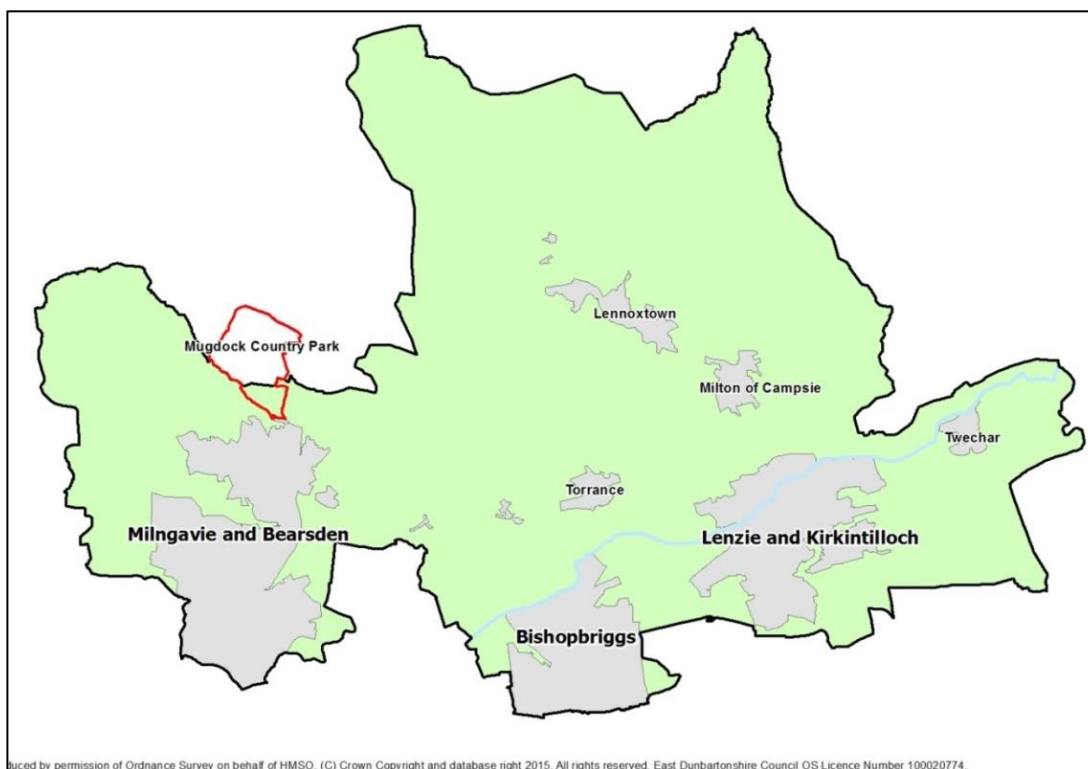
Section 1: Key Facts	Section 1 details of the GNS remit and the enabling legislation.
Section 2: Environmental Considerations	Section 2 details how environmental considerations have been integrated into the GNS and notes how the environmental problems identified in the Scoping and Environmental Reports have been addressed.

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Section 3: Consideration of Alternatives	Section 3 details the methods adopted to develop the GNS.
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 GNS.
Section 6: Conclusion	Section 6 summarises how the SEA process has informed the development of the GNS.
Appendix 1: Consultation Responses to the Draft Environmental Report	Consultation responses received from SNH, SEPA and Historic Environment Scotland in response to the draft Environmental Report.

Section 1: Key Facts Relating to the Green Network Strategy

Responsible Authority:	East Dunbartonshire Council
Title of PPS:	Green Network Strategy
What prompted the GNS?	Ensuring support for and contribution to Central Scotland Green Network National Development (National Planning Framework 3), Central Scotland Green Network Vision and Glasgow and Clyde Valley Strategic Development Plan (Glasgow and Clyde Valley Green Network).
Subject:	Green networks – biodiversity and access.
Period covered:	2016 - 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).



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Purpose of the GNS: The purpose of the Green Network Strategy for East Dunbartonshire is to define and, as far as possible, map the existing green network in East Dunbartonshire and to propose improvements necessary to enhance the network over the next five years to 2021 and beyond. It is hoped the Strategy provides a platform for which aspirations and priorities for improving the quality and the connectivity of the green network can be taken forward both on a strategic East Dunbartonshire-wide level and on an individual settlement scale.

Strategy Aims and Objectives:

Aims:

- To contribute to the delivery of the vision and outcomes of the Central Scotland Green Network and Clyde Valley Green Network Partnership.
- To identify, protect, enhance and expand the existing green network to realise a range of benefits including improved habitat connectivity, enhanced

biodiversity value, improved access to the outdoors and provision for walking and cycling, enhanced health and wellbeing, and adaptation to the effects of climate change.

- A functioning, productive and well-connected green network is seen as vital to society and the environment, and measures to achieve this are incorporated into Council policies and strategic. The value of the green network is considered in all decision-making.

Objectives:

Safeguarding Biodiversity

- Improve the quality and quantity of habitat connections and prevent further fragmentation
- Support the delivery of the East Dunbartonshire Local Biodiversity Action Plan and take into account the priorities and actions within neighbouring Local Biodiversity Action Plans, where appropriate
- Promote sustainable land and natural resource management practices that support and enhance biodiversity
- Promote an understanding of the importance of biodiversity for ecosystem services and to society's health and wellbeing through improved communication and education, and champion it to be accounted for at all levels of Council decision-making processes

Mitigating and Adapting to a Changing Climate

- Protect, enhance, create and, where necessary, restore our natural environment to store carbon
- Support measures within the East Dunbartonshire Active Travel Strategy and emerging Sustainability and Climate Change Framework, and devise new measures, in order to reduce greenhouse gas emissions
- Ensure new developments enhance the existing green network and promote the introduction of green infrastructure
- Realise opportunities for natural flood management to adapt to the effects of climate change

Supporting Sustainable Communities

- Improve safe access to high quality open space and the wider countryside by delivering a more connected network of maintained routes and infrastructure
- Support development of Long Distance Routes and access to them to help connect East Dunbartonshire to the wider Glasgow and Clyde Valley and Central Scotland Green Network area and to provide connections between communities
- Support mental and physical health agendas and reduce health inequalities by encouraging outdoor exercise and developing positive associations with nature
- Build community capacity and an appreciation of the green network by supporting opportunities for participation through volunteering, environmental education, training and skills development

Supporting Sustainable Economic Growth

- Provide attractive surroundings for business, including exploring the potential for green infrastructure and biodiversity-friendly management of open spaces, for businesses in order to stimulate economic growth, inward investment and jobs

Post-Adoption Statement

- Promote an image of East Dunbartonshire as a place with excellent green assets that together represent a unique destination for tourism and recreational day trips
- Support the development of local businesses and social enterprise to diversify the economy in line with the forthcoming Economic Development Strategy

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Section 2: Environmental Considerations

2.1. Integration of Environmental Considerations in the Green Network Strategy

2.1.1. This chapter highlights how environmental considerations have been integrated into the final Green Network Strategy (GNS). **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 GNS.

Table 1: Implementing Environmental Considerations

Green Network Strategy			
Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
Biodiversity, Flora and Fauna	The management and protection of designated and non-designated sites is essential through the GNS.	✓	The Strategy's ambition and Aim 2 directly relate to the protection and management of designation and non-designated sites and species.
	The location and management of INNS should be recognised within the Strategy.	✓	Actions LGN4 and LGN5 specifically relate to the management of INNS.
	The GNS should ensure that benefits for biodiversity is considered as a vital part of the wider green network in East Dunbartonshire and will play a contributing role for continued enhancement and protection of such species to avoid any loss. These concerns should be considered alongside the LBAP.	✓	The 'Safeguarding Biodiversity' objective specifically reflects the need to integrate biodiversity benefits and reduce habitat fragmentation into the GNS and are reflected through the actions.
	There is scope to reduce habitat fragmentation through the role of biodiversity in the Strategy, with additional benefits to improving access routes across the council area.		
Population and Human Health	To reduce the need and pressure on services and facilities, particularly in areas of deprivation, there is significant evidence that green networks can be integrated with interventions that will encourage and promote active travel. This will provide further health benefits to deprived or vulnerable members of the community.	✓	The 'Supporting Sustainable Communities' objective directly relates to the links between the natural environment and open space with access to the wider community. It also explores how the Strategy will support community capacity building

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	<p>The GNS should address and prevent conflicts between increased public access and conservation of the natural environment.</p>		<p>in relation to opportunities for volunteering, environmental education, training and skills development. This is further explored through the action programme.</p>
<p>Increasing the awareness and understanding of the role of green networks amongst the population of East Dunbartonshire, as well as how local communities can gain benefits from accessing local and regional green networks alongside the upgrade of the network should be factor for consideration in the GNS. This should include the promotion of the green network for educational purposes in partnership with local schools.</p>			
<p>Encouraging the involvement of the community in projects linked to the enhancement of East Dunbartonshire’s green network has the potential to benefit health and wellbeing. This is likely to improve the appreciation of the environment as well as achieve the renewal of run down areas, particularly those in urban contexts, and increase economic value and investment to the area. There is scope for this to be promoted through the GNS.</p>			
<p>Water Quality</p>	<p>There are a number of good/moderate quality watercourses in East Dunbartonshire including the Forth and Clyde Canal which is also a Scheduled Monument. These assets require protection to which the GNS can contribute to in order to reduce, prevent or offset any adverse impacts to water quality.</p>	<p>✓</p>	<p>There are a number of different water environments in East Dunbartonshire that are recognised within the content of the Strategy, including recognition of strategic green network assets such as the River Kelvin, Forth and Clyde Canal and Glazert Water.</p>
	<p>There are a number of sites within East Dunbartonshire’s landscape which are classified as wetland. Wetlands provide vital habitats for a number of species and ecosystem services but their quality is under pressure from external influences such as flooding, developments and access. The Strategy should account for this priority habitat in the development of its action plan as well as consider its role in reducing pressures on this resource to maintain a high level of water quality.</p>	<p>✓</p>	<p>There are a number of actions including LGN11, LGN23, LGN42, LGN46, LGN56 and LGN60, for example, supporting the creation and enhancement of wetland habitats.</p>

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Climatic Factors	Domestic emissions account for the largest proportion of carbon dioxide in East Dunbartonshire, although emissions from transport account for the largest proportion of NO ₂ and PM10 emissions. This contributes to the effects of climate change which include changing temperatures and rainfall patterns, and increased incidences of extreme weather events. Where appropriate, the actions proposed as part of the GNS should consider its role in mitigating or adapting to the effects of climate change.	✓	The 'Mitigating and Adapting to a Changing Climate' objective focusses the delivery of the Strategy on the protection and enhancement of the environment in response to the effects of climate change including flood risk management. There are a number of actions supporting this including LGN5, LGN10 and LGN11, for example.
	Climate change has a direct link to flood risk. The SEPA Flood Risk Map has identified several locations within the East Dunbartonshire Council area which could have a significant impact on habitats and the value of East Dunbartonshire's environment.		
Landscape	East Dunbartonshire has varying degree of landscapes including the green belt, the Campsie Fells/Kilpatrick Hills and agricultural land. Ensuring that the landscapes are well-connected throughout East Dunbartonshire is a vital consideration for the GNS.	✓	The purpose of the Strategy is to improve green networks and connectivity in East Dunbartonshire. These environmental considerations have been considered through the wider Strategy and actions.
	East Dunbartonshire has a number of Local Landscape Areas with high/moderate scenic value as well as varied landscape character and setting across the Council area, including the Campsie Fells and Kilpatrick Hills. The GNS should take into account the specific landscape features to ensure that biodiversity and access issues do not conflict with, and are sensitive to, the local landscape and retain East Dunbartonshire's local distinctiveness.		
	The cumulative effects of projects that will enhance or extend the green network that may be established through the Strategy should be accounted for at a local, EDC-wide and regional level.		
Air Quality	Unacceptably high levels of air pollution can be harmful to the environment and human health. East Dunbartonshire currently has two designated Air Quality Management Areas (Bishopbriggs and	✓	The benefits of a high quality green network for improving localised air quality is explored in the Strategy.

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	<p>Bearsden Cross). These are managed through Air Quality Management Plans and the emerging Air Quality Strategy, the requirements of which should be taken into account in the GNS.</p> <p>Changes to air quality can have a significant impact on ecosystem services, which can affect biodiversity value and environmental assets.</p>		
Soil and Geology	<p>Many sites within East Dunbartonshire are underperforming in terms of their environmental quality and potential for a range of uses. This includes 25 sites classified as Vacant and Derelict Land (VDL) and 626 potentially contaminated sites. The Strategy should consider opportunities to enhance, remediate and upgrade these sites where appropriate.</p>	✓	<p>The role of the green network to enhance VDL through naturalisation as part of the wider network is recognised in the Strategy. Action LGN31 specifically relates to this.</p>
	<p>There are several sites in East Dunbartonshire that have been identified as peatland. Any action as part of the Strategy that may result in the disturbance of such sites for the release of carbon should be avoided. This includes conflicts between access to the green network and peatland protection.</p>	✓	<p>The conflicts of access to the green network, such as the Campsie Fells, with peatland protection are outlined in the Strategy (pg. 39).</p>
	<p>There is scope within the GNS to consider the role of enhanced biodiversity in managing ecosystem services including carbon storage, drainage and to alleviate flooding.</p>	✓	<p>The 'Mitigating and Adapting to a Changing Climate' objective focusses the delivery of the Strategy on the protection and enhancement of the environment in response to the effects of climate change including flood risk management. There are a number of actions supporting this including LGN5, LGN10 and LGN11, for example.</p>
	<p>There are 36 sites identified as being geologically diverse, of which 34 have been assigned as Local Geodiversity Sites (LGS). The area also hosts 1 RIGS (Regionally Important Geological or Geomorphological Site) and 1 SSSI of geological importance. The GNS should consider these designations in the development of the opportunities in the Strategy to ensure their protection and enhancement.</p>	✓	<p>The geological features in the area, such as those within the Glazert Valley, are recognised in the Strategy.</p>
Cultural Heritage	<p>East Dunbartonshire has a varied and valued natural and historic cultural heritage. In the development of the GNS, the opportunities that will be identified should address how they can contribute to enhancing and protecting the historic environment.</p>	✓	<p>Each of the recognised local and strategic green networks are outlined in the Strategy and where appropriate the impact to cultural heritage assets is referenced.</p>

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	<p>East Dunbartonshire is host to tourist attractors across the whole of the council-wide area such as the Antonine Wall Heritage Site, the Campsie Fells, West Highland Way and Mugdock Country Park. The GNS is likely to improve access to these assets. However, increased footfall to the main attractors can result in both positive impacts, such as stimulating the local economy, and negative impacts, such as path erosion and the degradation of sites/buildings.</p>		
<p>Material Assets</p>	<p>As a result of the spatial strategy of the impending Local Development Plan there is potential for a rise in developments in East Dunbartonshire over the life of the Plan. New developments are likely to require infrastructure improvements which have the potential to result in further fragmentation of habitats and requirements for access routes which should be accounted for.</p> <p>It is important that natural resources in East Dunbartonshire are managed sustainably.</p> <p>There are currently a series of Core Path Networks, Rights of Way and open spaces in East Dunbartonshire which create recreational opportunities, promote active travel and provide a sense of community. The opportunities that will be identified through the Strategy should consider its role in enhancing existing networks as well as integrating new green networks across the EDC-wide area. The sites identified in the Open Space Strategy should also be accounted for.</p>	<p>✓</p>	<p>There are a number of actions that relate to individual development sites and open spaces set out within East Dunbartonshire's Open Space Strategy with biodiversity and green network improvements within the Strategy.</p>

Section 3: Consideration of Alternatives

3.1. Consideration of Alternatives in the Green Network Strategy

3.1.1. The Environmental Assessment (Scotland) Act 2005 requires the effects of ‘reasonable alternatives’ to be identified, described and evaluated. The Act states that the Responsible Authority shall give ‘the reasons for choosing the plan, or programme as adopted, in the light of the other reasonable alternatives considered’. This section shall describe the process that East Dunbartonshire applied for developing the GNS.

3.2. Reasonable Alternatives to the GNS

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

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

Table 2: Strategic Alternatives

Alternative Approach	Implications of the Strategic Direction
STRATEGIC DIRECTION 1	
A stand-alone Strategy for East Dunbartonshire focussing on green network opportunities in the urban and rural environment.	This alternative requires East Dunbartonshire Council and partners to develop a Strategy solely focussed on the enhancement of the green network across the whole of the East Dunbartonshire Council area, including notable assets such as Mugdock Country Park and links with neighbouring authorities such as Stirling, North Lanarkshire, Glasgow and West Dunbartonshire. This approach to the Strategy will present opportunities using the Opportunities Mapping methodology for both rural and urban contexts to focus on both of the main components of the green network; biodiversity and access. This will give a more extensive scope to the development of a Green Network Strategy and potentially wider benefits across the whole of the Council-wide area.
STRATEGIC DIRECTION 2	
Integrate green network priorities with the emerging Active Travel Strategy.	This approach to delivering a Green Network Strategy for East Dunbartonshire would result in a wide-ranging Strategy that would combine the priorities in enhancing the green network as well as the priorities for improving active travel and access to travel connections and trip attractors across the Council-wide area with potential opportunities to link with neighbouring authorities such as Stirling, North Lanarkshire, Glasgow and West Dunbartonshire. It is likely that integrating the two strategies, which share commonalities in terms of access, it is possible that the scope will be wider with greater benefits throughout the whole of the East Dunbartonshire Council area.
STRATEGIC DIRECTION 3	
Integrate green network priorities with the Local Biodiversity Action Plan.	Biodiversity has been identified as the other main component, in addition to active travel, that will contribute to the enhancements of the wider green network within East Dunbartonshire. A Local Biodiversity Action Plan for East Dunbartonshire are currently in the development stage, and as such, there is scope to include issues related to the improvement of East Dunbartonshire’s green network within this document. However, this approach to enhancing the green network will limit the scope for integration between the two factors of

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biodiversity and access, although there is potential to improve the green network to some extent.

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 GNS, was published for consultation with the SEA Consultation Authorities from 1st August 2016 – 12th 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 GNS.
- 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
SNH	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.	The assessment tables in future SEA reports will incorporate this suggestion to ensure better clarity.
	Table 9: Proposed SEA monitoring framework for the Green Network Strategy – Biodiversity, Flora and Fauna	
	We recommend that the proposed ' <i>Number of housing and business/employment development sites listed as opportunities in the GNS with measures to incorporate access routes to the wider green network</i> ' indicator is broadened to include any opportunities identified in the GNS not just access routes.	Noted and amended in the final Environmental Report.
	Mitigation Measures identified in Appendix D/E/F	
	The translation of the mitigation measures identified in Appendix D/E/F of the Environmental Report into the Green Network Strategy is unclear at present. Unless incorporated into the text of the Green Network Strategy, the mechanism for delivering these mitigation measures should be clarified.	The mitigation measures identified in Appendices D, E and F have been extracted and fed back to the Strategy developer. SEA suggested alterations have been taken into account through the development of the Strategy.
Biodiversity, Flora and Fauna (continued) – Page 20		

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Consultee	Consultation Response	Incorporating Consultation Response
	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).	Noted and amended.
SEPA	General Comments	
	We are satisfied that an adequate assessment of the strategy has been undertaken and overall would agree with the findings of the Environmental Report. We note that our comments provided at scoping stage have been taken into account.	Noted
	The assessment has concluded that the strategy is likely to have positive environmental effects on a range of SEA factors. Whilst we welcome this finding we note that these conclusions are partly predicated on the implementation of the opportunities identified by the mapping exercise; East Dunbartonshire Council may therefore wish to consider how best to deliver these opportunities to ensure that these enhancements are realised.	Noted
Historic Environment Scotland	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 strategy we note that no such impacts have been predicted. We note that a number of minor positive and negative effects have been identified for the historic environment, particularly in relation to potential increases in access to sensitive sites. We are content to agree with these findings and welcome the mitigation and enhancement suggestions that are provided in relation to these, as well as the clear manner in which the influence of the environmental assessment have been documented in the "SEA suggested alteration" section of the assessment matrices. Finally, the identification of cultural heritage hotspots for the	Noted

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Consultee	Consultation Response	Incorporating Consultation Response
	consideration of cumulative effects is also to be welcomed and should aid in the monitoring of the effects of the strategy.	

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 GNS. 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 the monitoring framework for the GNS as adopted. It is intended that there will be several stages over the lifespan of the Strategy.
- 5.1.3. The final monitoring framework can be found in **Appendix 2**. The indicators for monitoring the GNS are expected to be provided by the Glasgow and Clyde Valley Green Network Partnership.

Section 6: Conclusion

6.1. The Influence of SEA on the Green Network Strategy

6.1.1. The Strategic Environmental Assessment process has been a useful and informative tool in assisting with the development of the Green Network Strategy (GNS) and for highlighting the environmental issues and benefits associated with the GNS. 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 Strategy, overall, will have a positive effect on the environment.

6.1.2. As part of the Consultation period for the main document and Environmental Report a number of changes, including new actions and opportunities, were proposed. Each new action was reviewed prior to the production of this Post-Adoption Statement 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 Strategy as a whole on the local environment in East Dunbartonshire. The new actions included in the final GNS are:

- LGN12
- LGN13
- LGN19
- LGN20
- LGN21
- LGN22
- LGN25
- LGN28
- LGN38
- LGN39
- LGN62
- LGN64
- LGN65
- LGN66
- LGN72
- LGN74
- LGN76
- LGN77
- LGN78

- 6.1.3. Monitoring of the significant environmental effects will be carried out in line with both the SEA and Strategy monitoring framework by the Council and any other relevant bodies in order to implement remedial action, if required, as a result of unforeseen environmental impacts over the life of the Strategy, or in line with the relevant review stages.
- 6.1.4. The views of the Consultation Authorities (**Appendix 1**) and the public have been incorporated in to the final version of the Environmental Report and Integrated into the adopted GNS.

Appendix 1: Consultation Responses to the Draft Environmental Report



Our ref: PCS/148252
SG ref: SEA/01073/ER

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If telephoning ask for:
Simon Watt

08 September 2016

By email only to: sea.gateway@scotland.gsi.gov.uk

Dear Madam

**Environmental Assessment (Scotland) Act 2005
Green Network Strategy - Environmental Report**

Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Green Network Strategy. This was received by SEPA via the Scottish Government SEA Gateway on 01 August 2016.

We are satisfied that an adequate assessment of the strategy has been undertaken and overall would agree with the findings of the Environmental Report. We note that our comments provided at scoping stage have been taken into account.

The assessment has concluded that the strategy is likely to have positive environmental effects on a range of SEA factors. Whilst we welcome this finding we note that these conclusions are partly predicated on the implementation of the opportunities identified by the mapping exercise; East Dunbartonshire Council may therefore wish to consider how best to deliver these opportunities to ensure that these enhancements are realised.

Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the strategy itself will be provided separately.

As the strategy 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 839 000 or via our SEA Gateway at sea.gateway@sepa.org.uk

Yours sincerely

Simon Watt
Senior Planning Officer

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Scottish Natural Heritage
Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

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Date: 7 September 2016
Our ref: CNS/SEA/SSEA/CEA142330 & CNS/LDP/EDU/EDLDP/PPP142538

Dear Ms Hollas

Environmental Assessment (Scotland) Act 2005
East Dunbartonshire Council
Green Network Strategy - Environmental Report

Thank you for consulting SNH on the Green Network Strategy and its Environmental Report. We have reviewed these documents in relation to our natural heritage remit and offer the following comments.

Green Network Strategy

We strongly support the strategy and the identification of green network opportunities. We offer the following specific comments on the detail of the document for your consideration.

Relationship to the Local Development Plan and Associated Supplementary Guidance

We are unclear what relationship this Green Network Strategy has to the Local Development Plan and proposed Supplementary Guidance on Green Infrastructure and Green Network.

A number of green network opportunities identified relate to development and developer requirements. The relationship to the Local Development Plan could usefully be clarified in the document and the Green Network Strategy highlighted in relevant Supplementary Guidance so that developers and development management staff are aware of the green network context for their site, and the specific-site requirements highlighted in the strategy.

Section 4.3 Local Green Network Opportunities by Communities Areas:

'Green Network Opportunities' are set out for individual development sites in each table. We recommend that the wording used to describe these opportunities is strengthened in order to provide more robust site requirements and clearer direction for developers and development

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Bruach Chluaidh G81 2NR
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management staff. Currently many are worded as 'should' – as key opportunities, we consider that these opportunities should be identified as a 'must'. Further detail is also required to clearly set out what is needed, so that this information can usefully inform siting, design and mitigation. The addition of more detailed maps at the settlement scale, showing the 'opportunities' at a site level in relation to the wider settlement green network assets would greatly enhance understanding of the nature of the requirements set out and their contribution to the wider green network.

We have not reviewed the opportunities identified for individual development sites, but would be happy to revisit these once the relationship to the LDP and Supplementary Guidance on Green Infrastructure and Green Network has been clarified.

Climate Change Mitigation and Adaptation

The SNH Carbon and peatland 2016 map has recently been published and this predictive tool provides an indication of the likely presence of peat on each individually-mapped area, at a coarse scale. The types of peat shown on the map are:

- Carbon-rich soils
- Deep peat
- Priority peatland habitat

Although this map has primarily been produced to promote consistency and clarity in the preparation of spatial frameworks for wind energy development, it also has the potential to be used as a tool for identifying potential priority areas for peatland restoration. We recommend that it is used to protect and enhance this important element of green infrastructure. Doing so has the potential to bring multiple benefits for climate change mitigation/adaptation and biodiversity. Please see the following link for further details of the Carbon and peatland 2016 map - <http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/>

Forth and Clyde Canal and River Kelvin Strategic Areas

We recommend that opportunities are sought to link the Forth and Clyde Canal and the River Kelvin Strategic Areas as part of the process of identifying detailed projects for these areas. This would enable the formation of circular routes of varying lengths.

Kilpatrick Hills

We note that the Kilpatrick Hills have been excluded from the Strategic Green Network Action Areas and appreciate that only a small proportion of the Kilpatrick Hills lie within East Dunbartonshire. However, opportunities should be sought to link into any green network initiatives in the wider area.

Mugdock Country Park Strategic Area

We recommend that opportunities to address the current unfavourable condition of the Mesotrophic loch feature of Mugdock Wood SSSI are identified when drawing up detailed projects for this strategic area.

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.

Table 9: Proposed SEA monitoring framework for the Green Network Strategy - Biodiversity, Flora and Fauna

We recommend that the proposed '*Number of housing and business/employment development sites listed as opportunities in the GNS with measures to incorporate access*

routes to the wider green network' indicator is broadened to include any opportunities identified in the GNS not just access routes.

Mitigation Measures identified in Appendix D/E/F

The translation of the mitigation measures identified in Appendix D/E/F of the Environmental Report into the Green Network Strategy is unclear at present. Unless incorporated into the text of the Green Network Strategy, the mechanism for delivering these mitigation measures should be clarified.

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

For further information on protected species, please see our website -

<http://www.snh.gov.uk/protecting-scotlands-nature/protected-species/which-and-how/>

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
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Our ref: LDP/EDUN
Our Case ID: 201602366
Your ref: 01073 ENVIRONMENTAL
REPORT
08 September 2016

Dear Ms Hollas

**Environmental Assessment (Scotland) Act 2005
East Dunbartonshire Council – Green Network Strategy 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 strategy we note that no such impacts have been predicted. We note that a number of minor positive and negative effects have been identified for the historic environment, particularly in relation to potential increases in access to sensitive sites. We are content to agree with these findings and welcome the mitigation and enhancement suggestions that are provided in relation to these, as well as the clear manner in which the influence of the environmental assessment have been documented in the “SEA suggested alteration” section of the assessment matrices. Finally, the identification of cultural heritage hotspots for the consideration of cumulative effects is also to be welcomed and should aid in the monitoring of the effects of the strategy.

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. **SC045925** VAT No. **GB 221 8680 15**

Appendix 2: Green Network Strategy Monitoring Framework

East Dunbartonshire Green Network Strategy 2017 – 2022 Monitoring Framework

Purpose

The purpose of this framework is to:

- a. Outline how and when the monitoring and evaluation will be carried out for the Strategy's Supporting Actions, Delivery of the Local Green Network and Delivery of the Strategic Green Network
- b. Identify who is responsible for the monitoring and evaluation
- c. Set out the indicators to be used to monitor delivery of the action plan objectives

An overview of the monitoring framework is provided in Figure 2 and the proposed timeline for monitoring reports is provided in Figure 1, at the end of the document.

Monitoring and Reporting of Supporting Actions

Supporting Actions will be monitored (April – March) by the Greenspace and Biodiversity Policy Officer and reported annually to the Place, Neighbourhood and Corporate Assets Committee together with reporting on delivery of the Local Green Network Committed Actions and Additional or Aspirational Opportunities (see below).

Monitoring and Reporting of Action Delivery – Local Green Network

The Local Green Network action plans include actions divided into three types: Opportunities from proposed development sites, Committed Actions and Additional or Aspirational Opportunities.

Opportunities from proposed development sites

These opportunities bring together the results of the Urban Opportunities Mapping exercise and key requirements for the proposed sites in the Local Development Plan.

Committed Actions and Additional or Aspirational Opportunities

Committed actions are those activities which the Council and/or partner organisations have allocated resources either for delivery or for seeking external funding. These actions have timescales and specific delivery partners. The majority of these actions are directly associated with other existing strategies and action plans including the Active Travel Strategy, Local Biodiversity Action Plan, Open Space Strategy, Local Flood Risk Management Plan and Economic Development Strategy. These other plans and strategies all have existing action monitoring processes.

Committed actions will be monitored annually (April – March) utilising existing monitoring for associated strategies and plans. Any actions unique to the Green Network will be monitored to the same timescale. Table 1 shows the officers responsible for the monitoring of the committed actions with their corresponding associated strategy or plan.

Table 1: Officers responsible for monitoring of strategies and plans associated with GNS Committed Actions

Associated Strategy/Plan	Responsible officer
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Green Network Strategy, Local Biodiversity Action Plan, Open Space Strategy	Greenspace and Biodiversity Policy Officer
Active Travel Strategy	Planning Policy Officer (Transport)
Economic Development Strategy	Planning Policy Officer (Economic Development)
Local Flood Risk Management Plan	Flood Risk Engineer

Additional or Aspirational Opportunities include those actions which would be beneficial to the delivery of the green network but for which the Council does not currently have resources allocated or for which a source for external funding has not yet been found. Progress on these actions by the potential delivery partners highlighted in the strategy will be monitored annually (April – March) by the Greenspace and Biodiversity Policy Officer.

An excel spreadsheet of all the local Committed Actions and Additional/Aspirational Opportunities will be maintained by the Greenspace & Biodiversity Policy Officer and progress monitored via liaison with delivery partners and the officers listed in Table 1.

An annual progress report on both Committed Actions and Additional/Aspirational Opportunities will be taken to the Place, Neighbourhood and Corporate Assets Committee as soon as possible after March each year. Opportunities to combine reporting on committed actions with those for reporting on associated strategies e.g. Active Travel Strategy, will be taken where possible.

The progress report will detail the status of action delivery, explain any issues with delivery, highlight any new opportunities that have arisen such as additional funding sources and outline how the actions also support the delivery of other commitments such as CSGN concordat and LOIP. The progress reports will also allow any amendments to the actions to be made e.g. additional actions, removal of actions that are no longer feasible, alterations to timescales or delivery leads etc.

Monitoring and Reporting Action Delivery - Strategic Areas

The delivery of strategic areas will be monitored as part of the mid-term and end of term reviews of the strategy. These reviews will provide the opportunity to take a strategic view of green network delivery including local action delivery, delivery of projects outside the strategy which have benefited the green network and progress made towards projects in the strategic areas.

The mid-term review will be carried out in the strategy's third year (2019 - 20) and will focus on determining how well delivery so far has help fill the gaps in the network identified on Map 3 within the strategy. Within the mid-term review report a map will show where projects have been carried out and gaps have been filled either physical gaps or issues of poor quality.

The end of term review will follow the same procedure of the mid-term review but will also include a revision of the data used to inform Map 3 such as LNCS assessment scores, open space audit, RBMP and results of stakeholder workshops. This will then be used as the starting point for an updated GNS.

Both reviews will be taken to the autumn Place, Neighbourhood and Corporate Assets committee in their respective years.

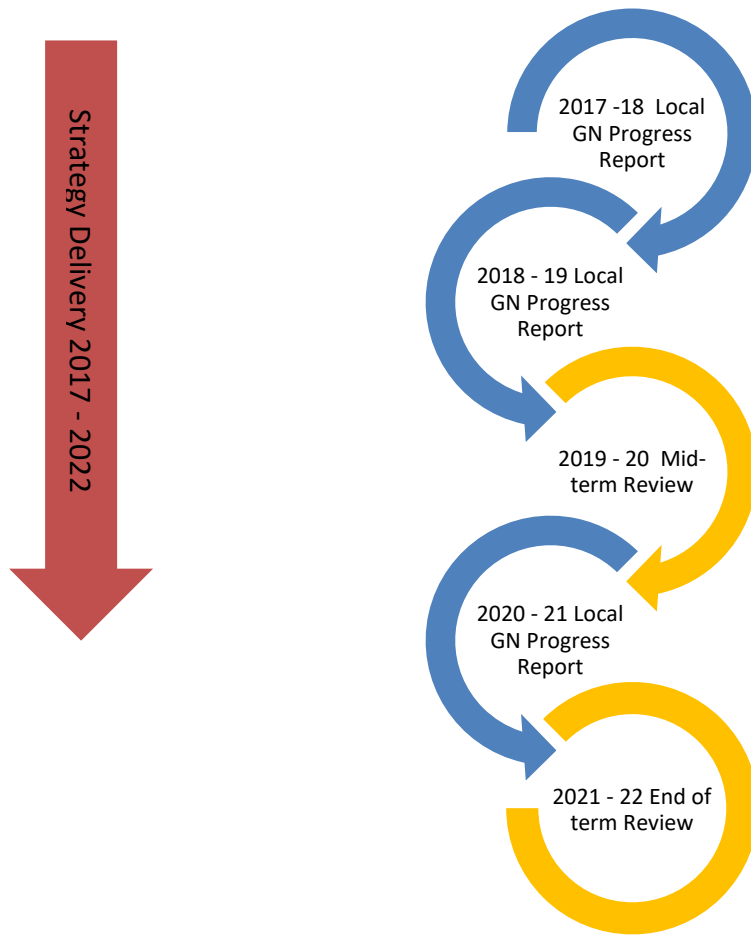


Figure 1: Monitoring reports timeline

Post-Adoption Statement

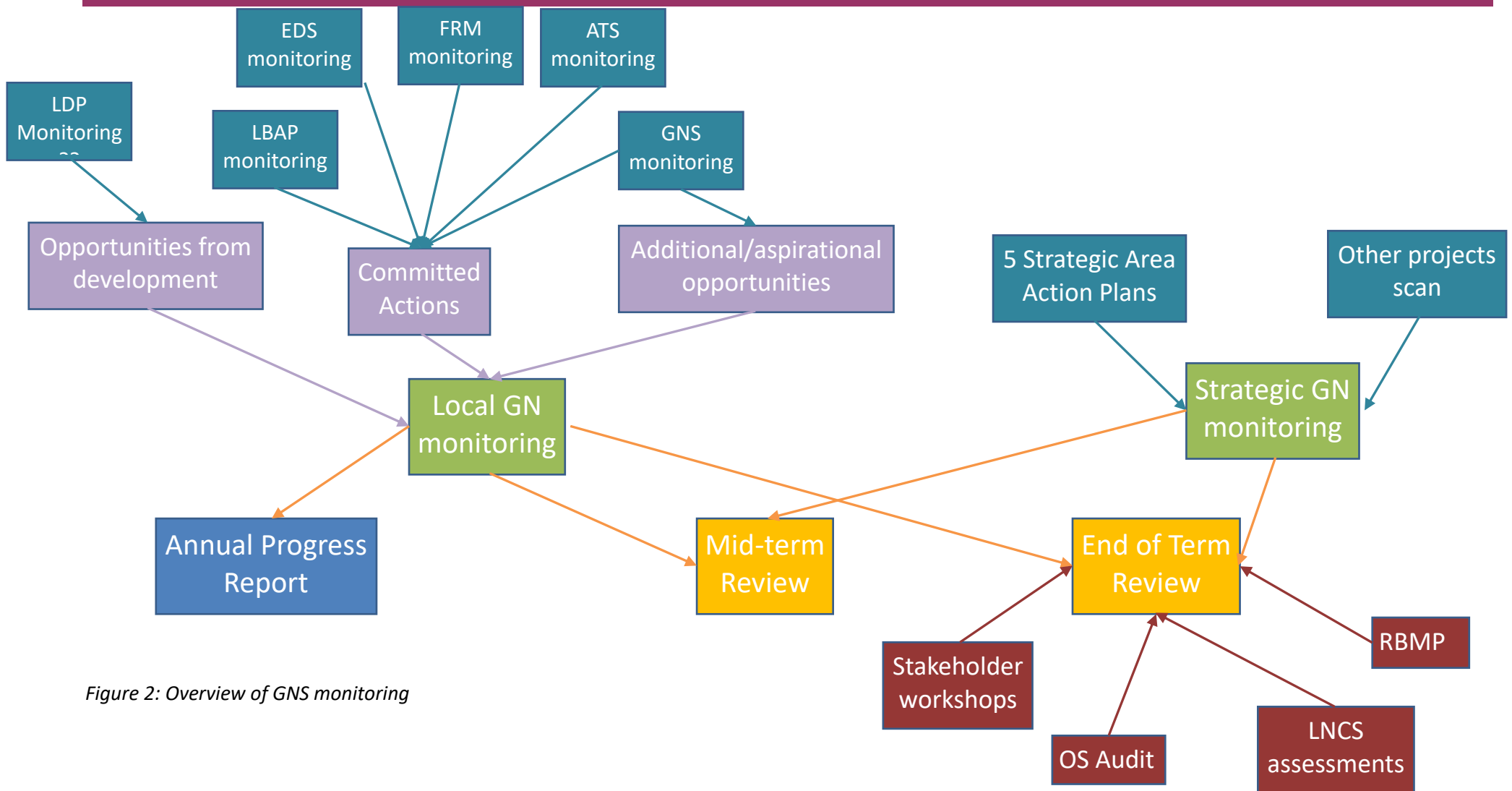


Figure 2: Overview of GNS monitoring