

Frontiers of the Roman Empire (Antonine Wall) World Heritage Site Supplementary Planning Guidance

Consultation Report & SEA Statement

North Lanarkshire Council (on behalf of the Antonine Wall Protection Group)

March 2012

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1.1 Background to the consultation

A consultative draft of the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site Supplementary Planning Guidance was issued for public consultation on 20 June 2011 to Friday 5 August (just over 6 weeks). The draft version can be found on this [webpage](#)¹.

The draft SPG was prepared jointly by the five local authorities running across central Scotland: Falkirk, North Lanarkshire, East Dunbartonshire, Glasgow and West Dunbartonshire; with supporting technical advice from Historic Scotland. In summary it:

- explains the significance of the Antonine Wall and its status as a World Heritage Site;
- encourages developers to engage in early and effective consultation with Councils and Historic Scotland;
- outlines the approach and procedures for assessing development affecting the World Heritage Site;
- sets out criteria to be applied in determining planning applications along the line and within the setting of the World Heritage Site; and
- provides guidance for decisions on planning appeals and enforcement.

Now adopted, the SPG is considered a material consideration in the determination of planning applications on or within the setting of the Antonine Wall.

1.2 The consultation

The consultation invited views on the draft Guidance which had been prepared by the Partners – North Lanarkshire Council, Falkirk Council, West Dunbartonshire Council, Glasgow City Council, West Dunbartonshire Council and Historic Scotland.

A 'strategic environmental assessment' (SEA) was undertaken on the guidance during its preparation to meet the requirements of the Environmental Assessment (Scotland) Act 2005. The findings of the environmental assessment were set out in the Environmental Report that accompanied the draft Guidance for consultation.

The consultation closed on 5 August 2011. 12 written responses were received, including seven from national/strategic organisations. A summary of the written responses are contained in section **2.3** and **Annex A**. Hard copies of all representations and documents relating to the SPG can be consulted at any of the Council offices as set out in **Annex B**.

¹ <http://www.glasgow.gov.uk/councillorsandcommittees/submissiondocuments.asp?submissionid=53385>

1.3 Report objectives

This report outlines what has been taken forward into the final Guidance and why. It sets out the substantive changes to the consultative draft made in the light of the consultation responses, public meeting discussion and any other relevant information. Factual errors that were raised have been corrected.

This report also sets out the information required for the post adoption stage in the SEA process. It explains how the findings of the environmental assessment have informed the finalised Guidance, how the opinions expressed on the environmental assessment have been taken into account, and identifies the measures proposed to monitor the likely environmental effects. This report therefore incorporates the statutory requirements of section 18 of the Environmental Assessment (Scotland) Act 2005 and, for clarity, the following table identifies where the information required at the post adoption stage is included in the report:

Table 1: SEA Post Adoption Statement

Information required by the SEA Act	Section
How environmental considerations have been integrated into the guidance	Section 2
How the environmental report has been taken into account	Section 2.2
How the opinions expressed during the consultation period have been taken into account	Section 2.3 and Annex A
Transboundary consultations	Not applicable (the Guidance will not affect other EU Member States).
Reasons for adopting the finalised plan	2.4
Monitoring	2.6

To aid interpretation of the statement, the following questions provide the structure for this part of the report:

- What options were considered within the SEA, and how were they identified?
- What environmental effects were predicted by the SEA and what did consultees say about them?
- What were the views on the Guidance as a whole and its SEA?
- What are the reasons for choosing the Guidance as adopted?
- What monitoring will be undertaken?

1.4 The approach to consultation

The draft Guidance was widely publicised by all five local authorities at the same time and in the same format. The consultation was advertised extensively using various local newspapers, including at least one within each Council Area².

² Including: Edinburgh Gazette, Bishopbriggs Herald, Kirkintilloch Herald, Milngavie Herald, Bearsden Herald, Falkirk Herald and Bo'ness Journal, Cumbernauld news, Kilsyth Chronicle, Airdrie and Coatbridge Advertiser, Motherwell Times, Bellshill Speaker.

The overall consultation programme comprised:

- A 6-week consultation period across the 5 Local Authority areas (8 weeks in Falkirk)
- Formal notices in local newspapers;
- Press releases;
- Direct mailing/emails to over 800 stakeholders, covering those included in promoting or commenting on developments, private housing developers, planning consultancies, land agents, housing associations, community councils, government departments, statutory consultees and other potential interested parties;
- Web publicity and consultation, with all documents available to view and comment electronically on each of the Council’s websites and also on the official Antonine Wall web page hosted by the Hunterian, Glasgow; and
- Availability of the draft SPG and Environmental Report in local libraries, One Stop Shops and Council Offices.

1.5 Analysis of consultation responses

After the extensive consultation 12 responses were received from the following individuals/organisations:

- | | |
|---|--|
| Bearsden North Community Council | Scottish Natural Heritage |
| British Waterways Scotland | Scottish Rights of Way and Access Society (Scotways) |
| Clydebank Seniors Forum | Scottish Environment Protection Agency |
| John & Lonwen Edwards | Strathclyde Passenger Transport (SPT) |
| The National Trust for Scotland | The Coal Authority |
| Parkhall, North Kilbowie and Central Community Council | Scottish Government – Directorate for the Built Environment |

Overall, the response to the consultation has been positive and the proposed changes are considered to be of a relatively minor nature i.e. updating the Guidance in relation to recent legislative changes and the publication of a new Planning Advice Note on Archaeology, referring more directly to landscape character consideration, and various other miscellaneous textual changes. A breakdown of responses by interest group/sector is provided in table 2 below.

Table 2: Responses by interest group/sector

Respondent Type	Number	% of all respondent types
Private individual	1	8.3%
Heritage Interest Group	1	8.3%
Environmental Interest Group	0	0%
Amenity Group	4	33.3%
Private sector	2	16.7%
Public body	4	33.3%
Total	12	100% (99.9%)

2.1 Introduction

This section identifies the key issues raised and explains how they have been taken into account. In this, the issues are those which called for substantial changes or additions to the guidance.

The sections below incorporate both the comments provided on the draft Guidance and on the Environmental Report as many of the consultees raised very similar issues. Information on how environmental considerations and the recommendations of the Environmental Report have been taken into account is also provided.

2.2 What options were considered and how were they identified?

At the outset we considered various ways in which the guidance could be prepared. These are set out in **table 3** below. At an early stage we also scoped the environmental assessment of the Guidance to give early consideration to how the various alternatives would affect the environment. For example, we considered the relationship of the guidance to other relevant policies, plans, strategies and environmental objectives. This allowed key environmental issues to be identified early during the process of preparing the guidance. We went on to consider the plans and strategies that will influence the guidance and those that will be influenced by its application. This also involved a review of the legislation, policies, plans and strategies of most direct relevance to the draft guidance. This was an important part of the SEA and guidance preparation process, as it allowed the SEA to focus on areas where there were opportunities for enhancement and ways in which any negative effects could be mitigated.

To help consider the environmental effects of the draft guidance, information about relevant aspects of the environmental baseline was also gathered and reviewed. Because the guidance provides advice relating to sections of the Antonine Wall across the width of Scotland, a baseline incorporating aspects of the five relevant Local Authorities was established. This included information on landscape, historic environment, soil, human health and population as the topics considered likely to be affected by the guidance.

The development of the draft Guidance was initially informed by a two stage approach. Firstly, we considered the *way* in which the guidance could be prepared. This looked at the overall approach of implementing the commitment set out in the overarching protection policy for the Antonine Wall. This included:

Table 3: Alternatives considered during the planning/SEA process

Alternative 1	A high level document which provides strategic guidance.
Alternative 2	A more detailed and prescriptive approach tailored to each buffer zone and focusing on heritage protection.
Alternative 3	The individual local authorities preparing guidance, instead of the co-ordinated approach across the local authorities.
Alternative 4	Guidance which, in addition to providing protection for the Antonine Wall and its setting, aimed to derive planning gains from development in the form of improvements in access, interpretation, landscape enhancement and restoration of derelict land.
Alternative 5	Different combinations of the above.

The outcome of these considerations is documented in **section 6.1** of the Environmental Report.

Secondly, we assessed alternative ways of implementing the guidance in terms of *how* we explain the overarching policy for the protection of the (FRE) Antonine Wall WHS and its Buffer Zone. We considered this to be the sections relating to assessing the impact of development (3) and design and mitigating impacts (4). We therefore tested the key principles contained in each of these sections. This broadly reflected the approach we had set out during the scoping process, although slightly refocused to allow us to concentrate our analysis upon the environmental issues of most relevance to the guidance.

We took the view that the assessment should focus on four key questions. These were:

- **Historic Environment:** Will the principles provide for protection of the Outstanding Universal Value of the site?
- **Landscape:** Will the principles help to protect and enhance landscape character and scenic value?
- **Population and Human Health:** Will the principles promote access to the cultural and natural environment for recreation or education?
- **Soil:** Will the principles provide for the protection of soil resources (and function)?

The conclusions of this detailed assessment were presented as a narrative summary under each relevant environmental topic. These findings can be found in **section 6.3** of the Environmental Report.

2.3 What environmental effects were predicted by the SEA and what did consultees say about them?

Overall, we found that the guidance will provide valuable advice relating to preparation of an appropriate design statement and the document also advocates discussion at an early stage between planners, Historic Scotland and prospective developers. The guidance will also provide, for both planners and prospective developers, a greater level of clarity on the procedures to be followed in determining an application.

The environmental assessment found that the guidance positively addresses many environmental challenges associated with managing development along the Antonine Wall. In particular, we expect that it will offer a strong level of protection for the historic environment. This is likely to lead to **significant positive effects** over the long term. We also expect that there will be win-wins for other environmental topics including the wider landscape, population and soils. No significant negative effects were predicted during the course of the assessment which would require specific mitigation measures to be identified. However it was possible to make a number of recommendations to further improve the clarity and coverage of the draft guidance to enhance the positive effects identified. These recommendations are explained in section 6 of Environmental Report and can be summarised as follows:

- **[Approach]** Prepare a single guidance document adopted by each authority which contains a high level of protection for the Outstanding Universal Value of the property.
- **[Key principles]** Consider whether the key principles can be amended to encourage landscape enhancement that restore important elements of the wall to increase our understanding and appreciation of the landscape.
- **[Key principles]** Consider whether the guidance should include a caveat that enhancement measures should not negatively affect landscape character and scenic value.
- **[Key principles]** Consider whether the key principles can be amended to encourage developers to consider at an early stage opportunities which promote access to and interpretation of the Antonine Wall.
- **[Monitoring]** Consider standardised approach to monitoring the performance of the guidance and its environmental effects across all five Councils.

In addition to these recommendations, some mitigation measures have been built into the guidance document, such as the potential requirement for *'detailed archaeological investigations... to accompany any proposals for development within the boundaries of the WHS'*. The assessment findings were discussed by the Antonine Wall Protection Group throughout the drafting stages and was submitted to Local Authority committees during the approval process. Following public consultation, all respondents agreed with the findings of the assessment and supported the recommendations. Some concerns were raised regarding landscape character and monitoring and these are set out below in **section 2.3** and **Annex A**.

2.4 What were the views on the Guidance as a whole and its SEA?

Overall, the response to the consultation has been positive and the changes suggested were mostly of a minor nature (e.g. clarifications on wording, updating of references). The majority of consultees felt that it clearly sets out the issues to consider in managing change along the Antonine Wall and that it will be helpful to a wide range of parties. Comments included:

Scottish Natural Heritage – *“...we are content that the Environmental Report provides an accurate assessment of the potential significant effects of the Supplementary Planning Guidance”.*

British Waterways Scotland – *“...welcomes this approach to managing development which could impact on the WHS. The partner authorities should be congratulated for producing a concise and well written planning document which offers a standard approach across the central belt”.*

Strathclyde Partnership for Transport – *“...request that consideration is given to making the Antonine Wall fully accessible by public transport at appropriate locations. This will help minimise the impact of private cars on the landscape and environment surrounding the monument and will be consistent with our shared objectives for reducing reliance on the private car and reducing emissions from transport”.*

Bearsden North Community Council – *“...we welcome the guidance which if adopted by all five Councils will protect and enhance the Wall and the immediate environment”.*

In terms of specific views on the detail of the guidance, some concerns were raised regarding the consideration of landscape character (and how landscape impacts were expected to be considered). In particular, SNH suggested that the guidance placed insufficient emphasis on the importance of the wider landscape character of the setting of the Antonine Wall. They suggested that could helpful to provide a link to Landscape Character Assessments and encourage planners and developers to refer to them. SNH also suggested that ‘Site characteristics and setting’ is sub-divided and that an additional factor is created entitled ‘Landscape character and visual impacts’. We have addressed this through the addition of an additional landscape criteria. Comments included:

National Trust for Scotland – *“an adverse impact could also be any development that interrupts key views to, from or within the WHS”.*

Scottish Natural Heritage – *“...we would propose a re-word to “Examples of appropriate mitigation may include landscaping proposals which are designed to reflect and strengthen local landscape character and the visual setting of the Antonine Wall. Mitigation measures in themselves should not generate adverse impacts to the wall or its setting”.*

Bearsden North Community Council – *“[the Environmental Report] ...recommendation that standardised monitoring indicators should be adopted by all 5 Council is welcomed, we would like to know what these indicators are”.*

2.5 What are the reasons for choosing the Guidance as adopted?

The SEA process involved a number of stages prior to the publication of the Environmental Report which required formal consultation with the Consultation Authorities – Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA). In July 2009 we sought their views on the proposed scope and level of detail of the environmental assessment. SNH were in agreement with our suggested approach and provided some detailed comments. SEPA were also in agreement and considered that we should include an assessment of flooding issues within the SEA, and also provided more detailed comments. **Section 2.3** and **5** of the Environmental Report explains how those comments were taken into account during the assessment.

After the formal consultation periods of the draft Guidance and the Environmental Report closed the partners met to discuss how representations would be taken into account.

As set out above, we considered alternative ways in which the guidance could be prepared. At the outset, and at the time of scoping, it was anticipated that the guidance would have a role on delivering other environmental objectives (and this was reflected at this early stages through the ‘scoping in’ of all topics identified in Schedule 3 of the SEA Act). However, as work on the guidance and its environmental assessment progressed it became clear that for the guidance to be an effective planning tool, focusing on the protection of the OUV, the opportunity for the incorporation of other environmental objectives would be limited. Likewise, the potential for the guidance to negatively impact upon other interests is also limited.

We therefore reached the view, as a result of both the SEA process and the public consultation exercise, that the Guidance should focus primarily upon historic environment matters, with the addition of some additional criteria relating to landscape impacts and positive mitigation measures.

2.6 Environmental mitigation

No significant negative impacts were predicted during the course of the assessment and therefore no specific mitigation measures have been identified. We will however monitor the implementation of the guidance and anticipate that any unforeseen environmental issues will be identified through this process.

2.7 What monitoring will be undertaken?

The final stage of the SEA process is to monitor the environmental effects of the Guidance.

The performance of the Guidance will be regularly monitored by the Local Authorities, principally through the Antonine Wall Protection Group and the Management Group which is responsible for the implementation of the Frontiers of the Roman Empire (Antonine Wall) Management Plan. The first review will take place 1 year on from adoption.

Co-ordination between the Partners and two-way communication with stakeholders are high priorities to ensure that the Guidance is implemented and that the Outstanding Universal Value values of the Site are conserved.

We anticipate that a review of data gathered will take place on an annual basis and, where relevant, will feature within Local Authority Local Development Plan Monitoring Reports during their review cycle.

The supplementary guidance at its most basic recognises that the Antonine Wall is an extremely significant heritage location and seeks to protect it via development plan policy and by very careful consideration of proposals and pre application discussion on the part of developers. The guidance recognises the potential for direct physical impact on the AWWHS and impacts on the setting, hence the buffer zone and a consideration of major developments outside this but interfering with views from the Campsie Hills etc. The guidance also recognises the cumulative nature of existing impacts in the wall and asks that it be taken into consideration if development proposals will contribute to these.

Where development could have an adverse impact on the setting of the site, proposals may still be acceptable if mitigating measures are taken to the authority's satisfaction. There is also a section regarding enforcement which is seen as particularly important regarding the special nature of the site.

Although yet to be fully defined, the Antonine Wall Protection Group will develop a method of monitoring planning applications affecting the wall and those which are brought forward in accordance with the local plan policies and the supporting guidance document, based upon the framework provided in the box below.

Monitoring Framework

Data and analysis

Year on year monitoring of apps from 01/04/12 to 31/03/13 will provide a general picture of applications across the area. This data can then be reported / analysed using GIS in a variety of ways.

A simple spreadsheet template will be used to highlight, when used alongside the GIS, the distribution of development within the Antonine Wall area. The template is flexible and can define most of the quantitative aspects of the development process in the area e.g. a column for site area etc. However, in order to effectively measure the impact of the guidance note, it is necessary to focus more on the qualitative aspects, which are more difficult to measure through these methods alone.

The first step might be, considering the limited spatial extent of the wall and the relatively few applications even when the buffer zone is accounted for (24 since 2008 in North Lanarkshire Council) to undertake discussions with Development Management and Major Development teams in order to gain an understanding of the issues they face in dealing with planning applications and how the SPG would be used in practice. It would also be useful to gather what the reporting procedures for enforcement are.

The data monitoring process could then be split into two aspects; data could be collected strategically on the elements of proposals relevant to the guidance, for example whether the application is on brownfield or greenfield land.

It would also be advantageous for Development Management to agree a procedure note such as those for archaeological consultations, whereby the applicable aspects of the SPG were noted on UNI-form for each application and a short note was included on how these were met, this could take the form of the note below.

Antonine Wall Policy NBE1 B1a and associated SPG

SPG 3.4 Physical Impacts – Site already developed

SPG 3.5 Impacts on Setting – Extension small and rural in design.

SPG 3.6 Cumulative Impact – No detrimental cumulative impact potential

SPG 4.4 Conditions applied to limit excavation to level of existing founds, design statement showing mitigation to landscape successfully submitted

Overall, have shown development is in line with SPG considerations, recommend for approval.

The use of a more qualitative approach would likely be more suited to a database application than a spreadsheet based method.



ANNEX A. DETAILED OPINIONS EXPRESSED ON THE GUIDANCE AND ENVIRONMENTAL REPORT AND HOW THEY HAVE BEEN TAKEN INTO ACCOUNT

The findings set out within this annex are specific to the consultation exercise and do not necessarily reflect the weight or range of views within the population as a whole.

Opinion expressed	Opinion expressed	Response
Clydebank Seniors Forum	It is imperative that the history of our area is conserved as much as possible for future generations. Perhaps you will be kind enough to keep us informed.	Noted.
The Coal Authority	No specific comments.	Noted.
SEPA	While it is noted that water has been scoped out it is considered that Water Environment (Controlled Activities) (Scotland) Regulations 2011 should be included in Table 2 as this legislation relates directly to activities which may affect the water environment.	Noted.
	It is noted that monitoring will be based on the local authority planning application data. It is recommended that consideration of frequency of this monitoring is provided in the Post Adoption Statement.	The performance of the guidance will be regularly monitored by the Antonine Wall protection group, which meets quarterly throughout the year. Although yet to be fully defined, this group will develop a method of monitoring planning applications affecting the wall and those which are brought forward in accordance with the local plan policies and the supporting guidance document. We anticipate that a review of data gathered will take place on an annual basis and where relevant will feature within Local Authority Local Development Plan Monitoring Report during their review cycle.

Strathclyde Partnership for Transport (SPT)	Request that consideration is given to making the Antonine Wall fully accessible by public transport at appropriate locations. This will help minimise the impact of private cars on the landscape and environment surrounding the monument and will be consistent with our shared objectives for reducing reliance on the private car and reducing emissions from transport.	Included new Section on after para 3.6.1: 3.7 ADDING VALUE Where development would not have an adverse impact on the Antonine Wall and its setting, proposals should seek to make a positive contribution to the conservation, management and understanding of the WHS and its setting. Appropriate development can have the potential to add value by enhancing the character of the WHS and its setting; promoting improved access, including by public transport, to and interpretation of the site; and contributing to a wider appreciation and understanding of the WHS in its landscape context. Opportunities should be identified early in the planning process. Pre-application discussions with the Council and the archaeology service will assist in drawing out suitable ideas which can be implemented through the development process.
Scottish Natural Heritage	We very much welcome this document. The draft guidance sets out, in a very clear and logical way, the main issues that developers and planning authorities need to consider. It will provide a key mechanism for ensuring that the five councils deal with development affecting the wall and its setting in a consistent way.	Noted.
	Para 1.6.2 – The FRE(AW)WHS is not protected by the Planning Act <i>per se</i> as this paragraph implies. Suggest that the paragraph is deleted or replaced by the following: “The whole of the FRE(AW)WHS and Buffer Zone are protected through the Development Plan policies of the five planning that contain parts of the site”.	Sentence deleted.

<p>3.5.3 – The final bullet point ‘The quality of the wider landscape’ is perhaps unclear or ill-defined. Suggest delete bullet point or clarify what is meant by landscape quality in addition to the coverage afforded by the preceding bullet points.</p>	<p>Sentence deleted.</p>
<p>3.5.4 – These documents are of key importance in communicating the coverage and reasoning for the Buffer Zone. We would suggest that they should be promoted as a material consideration in decision making on the implications of proposals within the Buffer Zone. Suggest adding final sentence along the lines of “These documents and their findings will be a material consideration in the determination of proposals and their possible impacts.” We consider this point could be added to the Key Points box at the end of this section.</p>	<p>Paragraph 3.5.4 has been amended to include the following sentence: “These documents will be a material consideration in the determination of proposals and their possible impacts”.</p>
<p>Table 2.1 – There is insufficient emphasis in this table on the importance of the wider landscape character of the setting. In other words, how the key landscape components, (some of which <i>are</i> listed in Table 2.1) combine to create the landscape we experience. In this regard the suite of Landscape Character Assessments (LCAs) provide a crucial reference for any description of the landscape setting of new developments. It would be helpful to provide a link to these LCAs and encourage planners and developers to refer to them. We suggest that ‘Site characteristics and setting’ is sub-divided and that an additional factor is created entitled ‘Landscape character and visual impacts’. This new Factor would most logically follow on from/ be located after ‘Development Characteristics.’</p> <p>Within this additional category we suggest that a new structure to the Key Questions would be helpful:</p> <ul style="list-style-type: none"> • <i>What is the landscape character of the site and its setting? Refer to the relevant Landscape Character Assessment at:</i> 	<p>The following question has been added to Table 2.1 under ‘Site characteristics and setting’: “What is the landscape character of the site and its setting?”</p>

	<p>http://www.snh.gov.uk/protecting-scotlands-nature/looking-afterlandscapes/lca/"</p> <ul style="list-style-type: none"> • How will the key characteristics of the landscape and setting be affected by the proposal? • How will the proposal impact on views to/from the Antonine Wall? 	
	<p>P17 – The second bullet in the Key Points box refers to paragraph 3.9 but, in fact, no paragraph 3.9 exists. We assume this should read '3.5.3'.</p>	<p>This has been corrected.</p>
	<p>3.7.3 – This paragraph suggests that the EIA Regs, in and of themselves, provide some level of protection to certain designated sites (though not to the buffer zone). However, the purpose of the EIA Regs is to ensure proper account is taken of environmental impacts in decision making, not to put in place any particular level of protection for sensitive areas. Suggest deletion of the paragraph or replace with the following 'The Buffer Zone is not defined as a 'sensitive site' in the EIA regulations'.</p>	<p>Agreed. Paragraph 3.7.3 has been amended to read: "EIA development that falls within the Scheduled Area will also require Scheduled Monument Consent. Planning Circular 3/2011 provides further information on the EIA Regulations."</p>
	<p>4.4.1 & 4.4.2 – Promotion of well designed mitigation is of key importance for the delivery of good development and we welcome the general direction provided by the SG, however, we query the reference in para. 4.4.2 to screening of development. While appropriate in certain circumstances this approach is one of the easiest forms of mitigation, and if poorly considered, in itself may have adverse impacts on the setting of the AW by virtue of its scale or relationship with local landscape character. Effects may also develop over time as a result of the growth of any screen planting. We would propose a re-word to "Examples of appropriate mitigation may include landscaping proposals which are designed to reflect and</p>	<p>Agreed. Paragraph 4.4.2 has been amended as follows: "Examples of appropriate mitigation may include landscaping <i>proposals which are designed to reflect and strengthen local landscape character and the visual setting of the Antonine Wall</i>. Mitigation measures in themselves should not generate adverse impacts to the wall or its setting."</p>

	<p>strengthen local landscape character and the visual setting of the Antonine Wall. Mitigation measures in themselves should not generate adverse impacts to the wall or its setting.”</p>	
	<p>We are content that the Environmental Report provides an accurate assessment of the potential significant effects of the Supplementary Planning Guidance and with the justification given for scoping these parameters out of the Environmental Report.</p>	<p>Noted.</p>
<p>British Waterways</p>	<p>British Waterways Scotland welcomes this approach to managing development which could impact on the WHS. The partner authorities should be congratulated for producing a concise and well written planning document which offers a standard approach across the central belt. It offers clear guidance and detailed obligations which developers will have to consider.</p>	<p>Noted.</p>
	<p>I have only noted one point which raises some concern, which is “Development Affecting the Wider Setting of the World Heritage Site”. Paragraph 3.5.5 reads “Most development beyond the buffer zone will not have an adverse effect on the setting of the WHS. However, major development in particular has the potential to detract from or damage longer distance views to and from the site”. A considerable amount of very good work has gone into defining a buffer zone with the specific objective of protecting the setting of the Wall. I believe the addition of this paragraph waters down the importance of the buffer zone. Furthermore development plan policy beyond the buffer zone sets criteria against which development should be assessed making this paragraph somewhat redundant.</p> <p>I would suggest this paragraph does not offer any benefit to the SPG and as such should be deleted.</p>	<p>The work undertaken, including by LUC in 2006, to define the Buffer Zone is acknowledged. In addition to the Buffer Zones Areas, the study undertaken by LUC identifies a number of ‘distant area views’ which have a strong visual relationship with the line of the Wall, important both as locations from which the line of the Wall can be seen and as prominent features in views from the monument. While it was considered impractical and inappropriate to extend the buffer zone to include these areas, the LUC Report states Development Plans should require proposed developments in these locations to be assessed in terms of their likely impact on views from the Antonine Wall and the potential effects on views from these areas towards the Antonine Wall.</p> <p>This paragraph of the SPG does not seek to diminish the importance of the Buffer Zone but instead recognise that</p>

		<p>development outwith the Buffer Zone, e.g. within these ‘Distant View Areas’ (including the Campsie Fells and Kilsyth Hills which have the strongest and most extensive pattern of intervisibility with the line of the Wall) should be assessed.</p> <p>No changes are therefore proposed to paragraph 3.5.5.</p>
The National Trust for Scotland	<p>This Supplementary Planning Guidance is an important driver in the ongoing protection of the Frontiers of the Roman Empire (Antonine Wall) WHS and the Trust commends Historic Scotland and the five Councils involved in producing this Guidance and in ensuring the specific planning policies which apply directly to the WHS, are contained within each of the Council’s Development Plans. Once this Guidance has been agreed, its rigorous implementation will be critical if it is to provide the protection necessary.</p>	Noted.
	<p>P12, 3rd point in key points box – ‘... SMC is required for works to <u>any</u> part of the FRE (AW) WHS designated a scheduled monument.’</p>	Agreed.
	<p>3.2 – an adverse impact could also be any development that interrupts key views to, from or <u>within</u> the WHS.</p>	Agreed.
	<p>3.5.5 – ‘Most development beyond the Buffer Zone will not have an adverse effect on <u>the WHS nor</u> the setting of the WHS.</p>	<p>Sentence has been reworded as follows:</p> <p>“Most development beyond the Buffer Zone will not have an adverse effect <i>on the WHS or its setting.</i>”</p>
	<p>p.17 – The second bullet in the Key Points box, criteria set out in paragraph 3.5.3, not 3.9 as stated.</p>	To be corrected.

	p.17 – add into the Key Points that mitigation may not always be possible.	This point is made on p.21 following the section on mitigation.
	p.21 – The first bullet in the Key Points box, ‘... appropriate building design <u>and materials</u> ; high quality ...’	Agreed.
	4.5.2 – ‘Loss or damage to archaeological remains, <u>upstanding and those buried beneath the ground</u> , will be treated as ...’	Agreed.
	The Trust would like to see a larger scale and more detailed map than that provided on page 5	A larger has been provided in the final document.
	Planning Advice Note (PAN) 2/2011 Planning and Archaeology should be included in the section on General Information.	Agreed.
Scottish Government – Directorate for the Built Environment	1.6.2 – For completeness should reflect the Planning etc. (Scotland) Act 2006, the Development Planning (Scotland) Regulations 2009 and the Archaeological Areas Act 1979.	Sentence has been deleted (see 06.02).
	In finalising the SPG you should also include a reference to the recently published PAN2/2011: Planning and Archaeology (July 2011). As a general point, there may be scope to fine tune elements of the final SPG to reflect the proportionate advice set out in that PAN.	Following sentence has been added at end of para 1.6.3. ‘Planning Advice Note (PAN) 2/2011: Planning and Archaeology and the Managing Change in the Scottish Environment Guidance Notes complete the suite of documents that together set out the Scottish Ministers’ policies for planning and the historic environment. Links to all the documents mentioned are listed in Appendix 3.’
	Section 2.4 on Environmental Impact Assessment (EIA) & 3.7.2 – Should be updated to reflect that the most up to date Regulations are	This has been updated.

<p>the Town and Country Planning (EIA) (Scotland) Regulations 2011, rather than the 1999 Regulations.</p>	
<p>3.7.3 – Refers to Planning Circular 8/2007. That Circular has been superseded by Planning Circular 3/2011: EIA (Scotland) Regulations 2011.</p>	<p>This has been updated.</p>
<p>Section 2.5 relates to Scheduled Monument Consent. This section would benefit from reference to the advice on SMC held within PAN 2/2011: Planning and Archaeology.</p>	<p>Para 2.5.2 amended to add:</p> <p>“Annex 6 of the SHEP has further detail on the relationship between scheduled monument consent and planning permission. The annex to PAN 2/2011 provides a flowchart outlining the consideration of archaeology in planning decisions and will be applicable to applications affecting the Antonine Wall regardless of the need for SMC.”</p>
<p>Appendix 3 – make reference to PAN 2/2011: Planning and Archaeology.</p>	<p>PAN 2/2011 has been added to Appendix 3.</p>
<p>Appendix 3 – In addition to reference to the adopted Local Plans, appendix 3, would benefit from reference to the emerging Local Development Plans, I assume will want to include a ‘hook’ to this guidance.</p>	<p>Reference to emerging Local Development Plans has been added at paragraph 1.2.2 (see below).</p>
<p>In accordance with Regulation 27 of the Development Planning Regulations 2009, statutory supplementary guidance is limited to the provisions in respect of policies or proposals set out in a Strategic or Local Development Plan(s). There is no mechanism for statutory supplementary guidance to be adopted in connection with a Local Plan(s). As such this supplementary guidance, which I note is in</p>	<p>“The Guidance will be a material consideration in the assessment and determination of planning applications affecting the Antonine Wall and its setting. It will then be progressively adopted as statutory Supplementary Guidance alongside the emerging Local Development</p>

	<p>conjunction with Local Plans for Falkirk, North Lanarkshire, East Dunbartonshire, Glasgow City and West Dunbartonshire Councils, can only be a material consideration. The Councils can of course proceed to adopt this as statutory Supplementary Guidance in conjunction with the preparation of a Local Development Plan(s) so long as an appropriate context and 'hook' is provided for within the consultation on the Local Development Plan(s) Main Issues Report(s).</p>	<p>Plans being prepared by the five local authorities.”</p> <p>In addition the following has been added to the 'Key Points' on p.8:</p> <p>“The SPG is a material consideration in the assessment and determination of planning applications affecting the Antonine Wall and its setting and will be adopted as statutory Supplementary Guidance alongside future Local Development Plans;”</p>
<p>Scottish Rights of Way and Access Society (Scotways)</p>	<p>Welcome acknowledgement of the importance of public access. With respect to the management of access, recommend part 5 of the Scottish Outdoor Access Code.</p>	<p>Noted.</p>
<p>Parkhall, North Kilbowie and Central Community Council</p>	<p>The Buffer Zone should be extended.</p>	<p>Extending the Buffer Zone is not within the scope of the SPG, which cannot alter the relevant Local Plans/Local Development Plans.</p>
<p>Bearsden North Community Council</p>	<p>We welcome the guidance which if adopted by all five Councils will protect and enhance the Wall and the immediate environment.</p>	<p>Noted.</p>
	<p>Environmental Report – Recommendation that standardised monitoring indicators should be adopted by all 5 Councils is welcomed, we would like to know what these indicators are.</p>	<p>The performance of the guidance will be regularly monitored by the Antonine Wall protection group, which meets quarterly throughout the year. Although yet to be fully defined, this group will develop a method of monitoring planning applications affecting the wall and those which are brought forward in accordance with the local plan policies and the supporting guidance document. We anticipate that a review of data gathered will take</p>

		place on an annual basis and where relevant will feature within each local authorities Local Development Plan Monitoring Report during each review cycle.
John and Lonwen Edwards	We suggest that, as with Conservation Areas, only full applications for Planning Permission should be acceptable for development within the site or Buffer Zone of the Antonine Wall.	This is adequately covered by para. 2.3.4. To go beyond this could be open to legal challenge on the grounds of reasonableness.
	1.6.7 - 'legislation' (not legalisation).	Typo – this has been corrected.
	2.3.4 – 'or its setting' (not of).	Typo – this has been corrected.
	p.17 – The second bullet in the Key Points box, 'The Criteria set out in 3.9...' Does this mean 3.5.3?	Typo – this has been corrected.



ANNEX B. CONTACT DETAILS FOR THE RELEVANT DOCUMENTS

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