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Our ref: AMN/23/235 AM  
Your ref:

4 July 2008

Dear Ms Lambert

**Environmental Assessment (Scotland) Act 2005  
Renfrewshire Council Core Paths Plan  
Scoping Report**

Thank you for consulting Historic Scotland on the scoping report prepared for the environmental assessment of Renfrewshire Council's Core Paths Plan, received by the Scottish Government's SEA Gateway on 30 May 2008.

I have reviewed the scoping report on behalf of Historic Scotland in its role as a Consultation Authority under the above Act (section 15). This letter contains the views of Historic Scotland on the scope and level of detail of the information to be included in the Environmental Report (part 1), and the duration of the proposed consultation period (part 2). I have also provided detailed comments to the scoping report in the annex to this letter.

Please note that this response is solely in the context of the SEA Act and our role as a Consultation Authority. Historic Scotland will respond separately to consultations on the Core Paths Plan and, for information, these should be addressed to Miriam McIver, Development Assessment Team, Room E3, Longmore House, Salisbury Place, Edinburgh EH9 1SH.

**1. Scope of assessment and level of detail**

- 1.1 The scoping report provides a clear outline of the proposed approach to the environmental assessment of the plan, and subject to the specific comments set out

below and in the annex, I am content with the scope and level of detail proposed for the SEA.

- 1.2 I note that the historic environment is scoped in to the environmental assessment. Simply for information, SHEP 1 (Section 2)<sup>1</sup> provides a useful definition of the historic environment. It defines that the historic environment encompasses built heritage features (ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes, as well as marine heritage) and the context or setting in which they sit, and the patterns of past use, in landscapes and within the soil, and also in our towns, villages and streets. It also recognises that the historic environment has less tangible aspects including the historical, artistic, literary, linguistic and scenic associations of places and landscapes.

I expect the environmental assessment to take cognisance of these features, both in the collection of baseline data and in considering the likely impact of the plan on the historic environment.

## 2. Consultation period for the Environmental Report

- 2.1 Section 8 of the scoping report notes that the formal consultation on the Core Paths Plan and Environmental Report will take place for at least eight weeks and I am content with this. Please note that, for administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.
- 2.2 At the Environmental Report stage, I would prefer to receive paper copies of the report and the draft Core Paths Plan, both of which should be sent via the Scottish Government Gateway in line with the procedures set out in the SEA Tool Kit (available at [www.scotland.gov.uk/Publications/2006/09/13104943/45](http://www.scotland.gov.uk/Publications/2006/09/13104943/45)).

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

Yours sincerely

Jennifer Craig  
Acting Strategic Environmental Assessment Team Leader

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<sup>1</sup> Historic Scotland are developing a new series of policy documents (Scottish Historic Environment Policy (SHEP)) that both sets out Scottish Ministers' vision and strategic policies for the wider historic environment, and provides greater policy direction for Historic Scotland. SHEP 1 was published in 2007 and is the overarching policy statement for the historic environment (<http://www.historic-scotland.gov.uk/shep1-6.pdf>).

## Annex: Detailed comments on the Scoping Report

For ease of reference the comments in this annex follow the same order as the scoping report.

### *Baseline Information*

1. This section and Appendix C set out the baseline data that will be used to inform the environmental assessment. I am content that this will include information on scheduled ancient monuments, listed buildings, gardens and designed landscapes, conservation areas and archaeological trigger sites. For information, responsibility for the identification and protection of gardens and designed landscapes now lies with Historic Scotland. Additionally, Historic Scotland can provide GIS datasets under licence for listed buildings (contact [hsgismanager@scotland.gsi.gov.uk](mailto:hsgismanager@scotland.gsi.gov.uk). This information is also available to download from <http://hsewsf.sedsh.gov.uk/pls/htmldb/f?p=500:1:8448412299472048421>).

### *Alternatives*

2. My understanding from the information provided in this section is that assessment will be focused on considering the environmental impacts of the candidate core paths within the plan. I note that there are no alternatives to the plan itself. I welcome that where there is a risk of significant effects, alternative routes will be investigated prior to the consideration mitigation measures.

### *Assessment Methodology*

3. Table 6 in section 7 sets out the SEA objectives that will be used in the assessment. I welcome the three objectives for the historic environment, however I would also expect the assessment to consider the potential for impact on gardens and designed landscapes and regionally and locally important historic environment features and their setting. It would be helpful to clarify the distinction between the first two objectives, stating which aspects of the cultural heritage will be considered in each.
4. I am content with the assessment matrices set out in appendices D, E and F and welcome the inclusion of a commentary to explain the results of the environmental assessment. When documenting the assessment of the core paths it would also be helpful to identify in assessment matrix F the particular historic environment feature likely to be affected by the path.
5. As you will be aware, mitigation may involve making changes to the plan (e.g. modifying path routes) and/or developing more detailed mitigation proposals to be implemented as the plan is delivered. It would be helpful in the Environmental Report to describe any changes made to the plan as a result of the environmental assessment, and to clearly set out any recommendations or expectations for lower level plans, projects or activities. It would also be helpful to identify in the report who

will be responsible for ensuring that the mitigation measures are taken forward as the plan is implemented.

6. I note that the Environmental Report will contain information on your proposed monitoring strategy. Indicators chosen for the historic environment should reflect both the actions to be taken within the plan and the potential impacts identified in the course of the SEA. I would be happy to discuss this further with you should you find it helpful.

*Appendix B: Main Plans, Programmes, Strategies and Guidance Used in the preparation of the Renfrewshire Draft Core Paths Plan*

7. Appendix 1 sets out the relationship of the Core Paths Plan to other plans, programmes, and environmental objectives. I note that NPPG 5 and NPPG 18 are included in the table. You may also wish to consider the following documents that include environmental protection objectives for the historic environment:
  - *Scottish Historic Environment Policy 1. Scotland's Historic Environment* (available at <http://www.historic-scotland.gov.uk/shep1-6.pdf>). Please note that SHEP 1 supersedes the policy elements of *Passed to the Future*.
  - *Scottish Historic Environment Policy 2. Scheduling: protecting Scotland's nationally important monuments* (available at <http://www.historic-scotland.gov.uk/shep2.pdf>).
8. Simply for information, the Scottish Government is in the process of reviewing NPPG 5 and NPPG 18 and a revised version (SPP 23) has been published for consultation (see <http://www.scotland.gsi.gov.uk/Publications/2008/02/13134354/0>).