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*Please quote our reference number on all correspondence*

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Renfrewshire Council  
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Cotton Street  
Paisley  
Renfrewshire  
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Your Ref:

Our Ref: 00229

13 October 2008

Dear Ms Lambert,

**ENVIRONMENTAL ASSESSMENT (SCOTLAND) ACT 2005:  
SEA ENVIRONMENTAL REPORT – RENFREWSHIRE COUNCIL CORE PATHS  
PLAN**

I refer to your draft Environmental Report sent to the Scottish Government SEA Gateway on 22 August 2008. I have reviewed the report on behalf of Scottish Natural Heritage in its role as a Consultation Authority under the Act and in the context of comments made at the scoping stage. The report headings have been used as appropriate to introduce the following comments.

**5.0 Assessment of Environmental Effects**

Section 5.6 in the report covers the Inner Clyde Estuary designations. Our comments on the effects of the Core Paths Plan (the Plan) in this location are included under the Appendix C heading below. The reference to a western extension should be clarified as this does not appear on the Plan but is described as an opportunity.

The discussion in *Table 12 – Regional Assessment* needs to be reorganised for some of the topics in support of the selected impact symbol.

**7.0 Mitigation**

We suggest that this section could be expanded to deal with the issues highlighted under Appendix C below. Although promotion of the network might encourage more use, it should not necessarily lead to increased disturbance of wildlife or land management. This is because there would be information on responsible use associated with the promotion of these paths, which could help to reduce such impacts even if the number of users increases.

## **8.0 Monitoring**

This section could mention the organisations that will be involved in carrying out the monitoring. From the Council's perspective a range of existing staff could monitor the effects of the Plan and probably as part of existing arrangements. With the emphasis on promotion of core paths there is the potential for increased wear and tear on soft surfaces which may lead to some physical improvements. This may be noticeable very quickly close to settlements and these paths could be a priority for future monitoring or pre-emptive action.

## **Appendix C Area Assessment Tables**

We support the method of assessing the effects of the Plan on an area by area basis as it encourages more dialogue on combined effects. However, the effect of core paths on water (an element of LOCH30) and the water access points has not been covered in the tables and the area based approach is well suited to dealing with these. Similarly, the aspirational routes have not been given consistent coverage although their inclusion on the Plan is a clear message of intent. We suggest they should be mentioned if new routes are planned as they could have a significant influence on biodiversity (positive or negative) e.g. REN21.

### Erskine and Inchinnan Area Assessment

#### Inner Clyde SPA

The Inner Clyde is designated a Special Protection Area (SPA) for its internationally important population of wintering redshank. It is also a Site of Special Scientific Interest (SSSI) for its nationally important coastal habitats and wintering populations of eight bird species. We note that routes close to the boundary of the Inner Clyde (BIS2a, BIS4, E11, E15 and E19) are already established and well used, and therefore the bird populations in adjacent sites are already habituated to regular movements on these paths (for information, route E11 appears to lie within the SPA for part of its length). The discussion about the potential effects close to this designated area is noted but requires further clarification. The table shows slightly negative for the diversity sub-objective although the text describes a neutral score. We support an integrated approach to the management of paths and use of the known water access points that reduces or avoids additional disturbance of wintering birds. There should be more detail on the approach to monitoring and mitigation. For example, provision of information about the sensitive nature of the area and advice on responsible behaviour could help to mitigate the effects of any increase in numbers. Provided that appropriate mitigation is in place, SNH consider it unlikely that the inclusion of these paths in the Plan will have a significant effect on the wintering redshank of the SPA and therefore advise that an appropriate assessment is not required as part of this environmental report.

The same considerations apply to the two known water access points (Maps 2 and 4). Although these are not formal components of the Plan they are part of the wider network and could be affected by any promotion. Both locations are already well used by people but in different ways. At West Ferry there is an informal car park where access to the shore is limited and not easy or inviting whereas at Erskine Beach the sandy foreshore is an obvious attraction and is well used by people including dog walkers. Recent surveys of wintering wildfowl on the Inner Clyde have highlighted an increase in the presence of dog walkers on the mudflats (in various

places) and the disturbance they can cause to birds, especially when the dog is not under proper control. Monitoring and mitigation in this area is therefore an important component of the assessment and the report should cover it in more detail. Given the background of existing activity, and providing that monitoring and mitigation is in place, SNH does not consider that the identification of these points in the Plan will have a significant effect on the wintering redshank of the SPA and therefore advise that an appropriate assessment is not required as part of this Environmental Report.

However, we advise the local authority that if improvement works at these locations are planned in the future, outwith the scope of this plan, then in our view these works would have a likely significant effect and we would advise the local authority that an appropriate assessment would be required.

#### Inner Clyde SSSI

The potential impacts on the qualifying interests of the SSSI are very similar to those discussed above for the SPA. With regard to the paths near the shore and the two water access points, we agree with the rating of potential impact described in the report. The locations and the fact that they are established and well used, means that their identification is unlikely to result in additional or significant impacts on the habitats and birds notified within the SSSI.

#### Renfrew Area Assessment

##### Black Cart SPA

The Black Cart is designated an SPA for its internationally important population of wintering whooper swan. The assessment covers one path, REN17, but a water access point is also shown on Map 13. Given the background of previous environmental mitigation and improvements and a low level of recreational activity, SNH agrees with the overall assessment that there is no likely significant effect of the plan on the SPA but we recommend that the approach to monitoring and mitigation should be clarified for this sensitive location.

##### Black Cart SSSI

The Black Cart SSSI is notified for the same wintering whooper swan interest as the SPA so SNH agrees that there is unlikely to be any effect arising from the Plan on the SSSI.

If you wish to discuss any aspect of this response please do not hesitate to contact Geoff Atkins on [geoff.atkins@snh.gov.uk](mailto:geoff.atkins@snh.gov.uk) or via SNH's SEA Gateway at [sea.gateway@snh.gov.uk](mailto:sea.gateway@snh.gov.uk)

Yours sincerely,

A black rectangular redaction box covers the signature of Arthur Keller.

Arthur Keller  
Operations Manager

Strathclyde & Ayrshire

cc

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