

Appendix A Summary of Consultation

Table of Contents

A.1	Introduction	1
A.2	Summary of SEA Scoping Consultation.....	1

List of Tables

Table A.1	SEA Scoping Report Consultation Feedback	2
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A.1 Introduction

This appendix sets out the scoping consultation undertaken as part of the SEA process with the Consultation Authorities. As set out in Section 4 (Consultation and Stakeholder Engagement), the SEA scoping report was issued for consultation in January 2022 for review and comment. Responses to the scoping exercise were received from the following bodies:

- Historic Environment Scotland (HES);
- NatureScot; and,
- The Scottish Environment Protection Agency (SEPA).

A.2 Summary of SEA Scoping Consultation

Table A.1 sets out the correspondence received as a result of the scoping exercise. And how these have been responded to/considered in the Environmental Report.

Table A.1 SEA Scoping Report Consultation Feedback

Comments Received	Response in Environmental Report
Historic Environment Scotland (HES) – 08 February 2022	
<p>Scope and level of detail</p> <p>It is our understanding that the East Airdrie Link Road (EALR) project is intended to provide the transport links needed to unlock commercial and housing development across the North Lanarkshire council area. We note from the SEA Scoping Report that it is proposed to undertake an environmental assessment of the different Stage 2 route options currently under consideration for the EALR and we are broadly content with this.</p> <p>We note that the route options under consideration may potentially impact on heritage assets and their settings, and therefore welcome that the cultural heritage topic area will be scoped into the environmental assessment. In line with this, we are content that relevant policy for the historic environment has been identified within the analysis of plans, policies and strategies included at Appendix B, and that appropriate environmental requirements for the cultural heritage topic area have been identified within table 3-2.</p> <p>We understand that the Stage 2 route options will be assessed against an objective to 'protect and enhance the significance of the historic environment, heritage assets and their settings' and consider this to be appropriate. We are also broadly content with the supporting assessment questions included at Tables 5-19 and 6-2, however would recommend that an additional question is included here to ensure the conservation of undesignated archaeological sites and their settings.</p> <p>We confirm that we are content with the approach set out in the SEA Scoping Report and are satisfied with the scope and level of detail proposed for the assessment.</p>	<p>An additional 'Assessment Question' has been added for the 'Cultural Heritage' theme: <i>"Conserve, and where possible, enhance non-designated heritage assets?"</i></p>
<p>Consultation period for the Environmental Report</p> <p>We understand from Chapter 7 (Next Steps) of the SEA scoping report that it is proposed to undertake consultation on a draft Environmental Report for the EALR in April 2022 for a period of six weeks. We confirm we are content with this. Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.</p> <p>We also recommend, however, that an opportunity is provided to offer comments on the Stage 2 route options directly. We therefore suggest that an additional consultation paper is prepared detailing the route options under consideration and that comments should be invited on this at the same time as the draft Environmental Report.</p>	<p>Consulting on DMRB Stage 2 (Phase 2) along with SEA Environmental Report is considered to be sufficient to meet SEA consultation requirements.</p>
NatureScot – 09 February 2022	
<p>Scope of assessment and level of detail</p> <p>Subject to the specific comments set out below and in the annex to this letter, NatureScot is content with the scope and level of detail proposed for the environmental report.</p> <p><i>Set out below:</i></p>	<p>No response required.</p>
<p>Setting the Context</p> <p>We are satisfied that the Scoping Report clearly sets out the context for the scheme, including the areas covered by the five options, and the scheme objectives.</p> <p>We are generally satisfied that the relationship between other plans, policies and strategies, and the environmental objectives which should be taken on board from these, have been identified.</p> <p>However, we also recommend that:</p> <ul style="list-style-type: none"> Given the potential impacts on woodland habitats, including semi-natural ancient woodland, the relationship between the options and the Scottish Government's Control and Woodland Removal policy is fully considered in the Environmental Report (ER). 	<p>The Scottish Government's Control and Woodland Removal policy and Scotland's National Peatland Plan have been considered in Section C.1 'Biodiversity, Flora and Fauna' in Appendix C 'Baseline Information' of the SEA Environmental Report.</p>

- Given the potential impacts on peatland habitat, the relationship between the options and Scotland's National Peatland Plan is fully considered in the ER.

Baseline information

In respect of the current baseline, we make the following comments:

Designated sites (Table 5-2):

- Brownsburn Local Nature Reserve now appears to be approx. 2km from the nearest route option under consideration.
- Black Loch Moss is also an SSSI, but is not a National Nature Reserve.
- North Shotts Moss SAC is also part of the Hassockrigg & North Shotts Mosses SSSI.
- Blawhorn Moss SAC is also an SSSI and is a National Nature Reserve.
- Clyde Valley Woods SAC is underpinned by a number of individual SSSIs. Part of the site is also a National Nature Reserve.

Full details of designated sites are available from the Sitelink section of our website at

<https://sitelink.nature.scot/home>.

Habitats:

Part of Drumshangie Moss is identified as Class 1 on the Carbon & Peatland Map 2016. Class 1 areas are nationally important carbon-rich soils, deep peat and priority peatland habitat and are likely to be of high conservation value.

Protected species:

As is noted, Drumshangie Moss is known to support a population of Great-crested newt, a European protected species. Water vole, a nationally protected species, are also present on the site. A number of recent development proposals have been submitted to North Lanarkshire Council for the area, and recent survey data for these species should therefore be available from the planning authority.

We are generally satisfied with the broad description of the likely evolution of the environment without the scheme, but recommend that ER makes use of specific data on trends relating to sites and species where available (such as through Site Condition Monitoring results for designated sites, or survey information for protected species).

The updated baseline and recommendations have been included in the SEA Environmental Report.

Significant issues

We generally agree with the 'key sustainability' issues identified in the Scoping Report, and therefore that significant issues to be considered in the ER will include:

- Impacts on internationally, nationally and locally protected areas.
- Impacts on protected species.
- Impacts on woodland habitats, particularly those areas identified in the Ancient Woodland Inventory
- Impacts on peatland habitats, particularly Class 1 areas.
- Impacts on landscape character
- Impacts on existing active travel routes, including core paths and National Cycling route 75.

In addition:

- Given the linear nature of the proposals and the potential for severance, impacts on existing habitat networks should also be considered.
- Opportunities for nature-based solutions and green infrastructure to be employed in the mitigation of effects or general route management requirements should be identified.

The impact of the proposed scheme on existing habitat networks is considered to be covered by the Biodiversity, Flora and Fauna 'Assessment Question' *"Will the option/proposal protect, or minimise impacts of new transport infrastructure on, wider biodiversity interests, including ecological networks?"*.

The opportunities for the proposed scheme to provide nature-based solution and green infrastructure is considered to be covered by the Biodiversity, Flora and Fauna 'Assessment Question' *"Deliver net gains for biodiversity, including restored or improved biodiversity networks?"*.

As such, we agree with the topics to be scoped in to the Environmental Report, as set out in Section 6 of the Scoping Report.	
<p>Effects on European Natura sites</p> <p>We note that it is proposed to produce Habitats Regulations Appraisal (HRA) reports independently of the SEA. Where appropriate, the HRA should be set out in a separate record, and a cross-reference provided to it in the Environmental Report.</p> <p>We would be pleased to advise further on the preparation of the HRA. Please note that SPAs and SACs should now be collectively referred to as 'European sites', rather than 'Natura 2000 sites'.</p>	No response required.
<p>SEA objectives</p> <p>While we are generally in agreement with the SEA objectives, we suggest that more targeted assessment questions may help provide a more transparent assessment. For example:</p> <p><i>Biodiversity, Flora and Fauna</i></p> <ul style="list-style-type: none"> • Will the option/proposal have a likely significant effect on any European site? As well as informing the SEA, this will help identify the scope of any HRA required. • Will the option/proposal protect, or minimise impacts on, nationally important habitats in the wider countryside, such as ancient woodland and Class 1 peatland? • Will the option/proposal lead to licensable impacts on known populations of protected species? • Will the option/proposal protect, or minimise impacts of new transport infrastructure on, wider biodiversity interests, including ecological networks? • Does the option/proposal have the potential to deliver net gains for biodiversity, including restored or improved biodiversity networks? <p><i>Population and human health</i></p> <ul style="list-style-type: none"> • Will the option/proposal protect, or minimise impacts on, existing green infrastructure and access to it? • Does the option/proposal have the potential to deliver enhanced green network provision and access to it? <p><i>Soils</i></p> <ul style="list-style-type: none"> • Does the option/proposal protect, or minimise impacts on, carbon-rich soils, in particular peat? <p><i>Landscape</i></p> <ul style="list-style-type: none"> • Will the option/proposal significantly impact the existing landscape or townscape character? • Does the option/proposal have the potential to deliver measures which would enhance or restore the character of the existing landscape or townscape? 	The SEA objectives have been updated to align with the examples set out in the NatureScot response letter.
<p>Report structure</p> <p>The Environmental Report should include the information set out in Schedule 3 of the Environmental Assessment (Scotland) Act 2005.</p>	As set out in Section 7 'SEA Approach and Methodology' this SEA is compliant with Schedule 3 of the Environmental Assessment (Scotland) Act 2005.
<p>Consultation period for the environmental report</p> <p>NatureScot notes that a period of 6 weeks is proposed for consultation on the Environmental Report and is content with this proposed period.</p>	No response required.
Scottish Environment Protection Agency (SEPA) – 07 February 2022	

<p>Relationship with other Plans, Policies and Strategies (PPS) We recommend mentioning the Flood Risk Management plans for Scotland (Flood Risk Management Plans SEPA) and the River Basin Management Plan for Scotland 2021-2027.</p>	<p>The Flood Risk Management plans for Scotland (Flood Risk Management Plans SEPA) and the River Basin Management Plan for Scotland 2021-2027 have been considered in Section C.3 'Water' in Appendix C 'Baseline Information' of the SEA Environmental Report.</p>												
<p>Baseline Information Table 5.7 Water Receptors refers to data from 2018. Please note a new River Basin Management Plan was published in 2021 and more recent data (2020) is available from SEPA's water hub. Paragraph 5.7.3 refers to 6 designated AQMAs within North Lanarkshire there are now 4 AQMAs as Harthill and Moodiesburn have been revoked.</p>	<p>The updated baseline conditions, for the year 2021, of the relevant water receptors within the Study Area have been included in the SEA Environmental Report – Appendix C (Baseline information and Assessment) (Table C-12 'Water Receptors').</p>												
<p>Environmental problems We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.</p>	<p>No response required.</p>												
<p>Alternatives We are satisfied with the alternatives outlined. These should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report.</p>	<p>The assessment of alternatives considered has been included in Section 5 (Development of Options) and Section 7.3 (Alternatives Considered).</p>												
<p>Scoping in / out of environmental topics We agree that in this instance all environmental topics should be scoped into the assessment. We support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.</p>	<p>No response required.</p>												
<p>Wording of SEA objectives We would recommend that the wording of the water environment objective be expanded to include the protection and enhancement of the water environment as per North Lanarkshire Council's proposed LDP SEA. We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option. It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework. We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate). One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA. Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. The inclusion of a summary table in the Environmental Report such as that presented below will help to track progress on mitigation through the monitoring process.</p>	<p>The SEA objective for the Water theme has been expanded from: <i>"Promote the efficient and effective use of natural water resources"</i> to <i>"Promote the efficient and effective use of natural water resources and protect and enhance the water environment"</i>.</p> <p>The 'potential mitigation and enhancement and design recommendation' tables in Appendix C (Baseline Information and Assessment) have been set out to show the link between the potential effects and proposed mitigation/enhancement measures, and set out the 'Responsible Party' and 'Stage of Implementation' aligning with the template provided by SEPA.</p>												
<table border="1"> <thead> <tr> <th data-bbox="129 1198 280 1262">Issue / Impact Identified in ER</th> <th data-bbox="284 1198 479 1262">Mitigation Measure</th> <th data-bbox="483 1198 678 1262">Lead Authority</th> <th data-bbox="683 1198 869 1262">Proposed Timescale</th> </tr> </thead> <tbody> <tr> <td data-bbox="129 1265 280 1329">Insert effect recorded in ER</td> <td data-bbox="284 1265 479 1329">Insert mitigation measure to address effect</td> <td data-bbox="483 1265 678 1329">Insert as appropriate</td> <td data-bbox="683 1265 869 1329">Insert as appropriate</td> </tr> <tr> <td data-bbox="129 1332 280 1358">etc</td> <td data-bbox="284 1332 479 1358">etc</td> <td data-bbox="483 1332 678 1358">etc</td> <td data-bbox="683 1332 869 1358">etc</td> </tr> </tbody> </table>	Issue / Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale	Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate	etc	etc	etc	etc	
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Monitoring

Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators. It would be helpful if the Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan.

Any significant environmental effects predicted in the SEA will need to be monitored, according to the monitoring programme set out in the Post Adoption Statement, and remedial action taken in response to the monitoring, where required.

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