



**Scottish Natural Heritage**

All of nature for all of Scotland

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**ENVIRONMENTAL ASSESSMENT (SCOTLAND) ACT 2005:  
CLACKMANNANSHIRE COUNCIL, LOCAL TRANSPORT STRATEGY  
00453 – ENVIRONMENTAL REPORT**

Dear Ms Deans

Thank you for the Clackmannanshire Council Local Transport Strategy Environmental Report, submitted under the above Act. This was received by SNH from the SEA Gateway on 17 November 2010.

In our response to the scoping report (ref. our letter of 10 August 2007) we indicated that we were generally content with the scope and level of detail proposed. The specific comments we made on the scope and level of detail have generally been addressed and the Environmental Report provides a satisfactory assessment of potential significant effects. We have the following specific comments:

**Environmental baseline data**

Table 1: the “high profile native species” should perhaps also include bats (European Protected Species), badgers (protected by the Badger Act) & wolverines (protected by the Wildlife & Countryside Act).

**Mitigation and modification of the LTS**

Table 6: we welcome recognition of the opportunity to work with Central Scotland Green Network. There should be many opportunities to integrate the enhanced provision of off-road transport routes with measures to enhance biodiversity and to provide opportunities for people to come into contact with and appreciate wildlife and wild places, and to ensure that green networks connect with those of neighbouring local authorities.

**Proposed Monitoring Framework**

Table 7: the monitoring proposed under Biodiversity and Landscape does not really relate to the Transport Strategy and the measures are likely to be too crude to be of much value. Measures need to be more closely linked to direct impacts or benefits that the strategy may have e.g. creation or loss of habitats as a result of transport projects, number or length of new green corridors, enhancement or damage to local landscape designations.

Monitoring of the impacts on Human Health should include “number of people engaged in active travel or outdoor activities”.



INVESTOR IN PEOPLE

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## **Appendix D: Option 4 Objective 1**

The reference to Ramsar Site with respect to potential impacts from river based transport (and elsewhere in the document) should more clearly be a specific reference to the Firth of Forth Special Protection Area (SPA)/Ramsar Site and should also refer to the possible impact of extending networks in proximity to the shoreline of the site.

You may also need to undertake a Habitats Regulations Appraisal with respect to impacts of the strategy on the Firth of Forth SPA/Ramsar Site, unless this has already been covered as part of the assessment of other plans or strategies. For further advice see following link to guidance on our website [http://www.snh.gov.uk/policy-and-guidance/guidance-documents/document/?category\\_code=Guidance&topic\\_id=1472](http://www.snh.gov.uk/policy-and-guidance/guidance-documents/document/?category_code=Guidance&topic_id=1472).

### **Concluding remarks**

I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be consulted separately on our views regarding the Local Transport Strategy itself.

Yours sincerely

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Operations Manager  
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