

**Frontiers of the Roman Empire (Antonine Wall) World Heritage Site – comments received on draft version and Council’s proposed response**

<b>Respondent</b>	<b>Comment</b>	<b>WDC response</b>
<p>Historic Environment Scotland</p> <p>The comments submitted by HES reflect comments already submitted when the Antonine Wall Supplementary Guidance was consulted on by other partner authorities. As the document had been reformatted for publication by West Dunbartonshire Council, the section references in the HES response do not reflect the paragraph numbers in the WDC version. Most of the changes requested had already been made in the version published by WDC</p>	<p>The comments in the attached annex reflect comments that we have already given in response to consultation on the draft Supplementary Guidance from other partner authorities (e.g. East Dunbartonshire). We have also included some notes where the wording of the document should be altered to use appropriate and up to date terminology.</p> <p><b>Annex</b></p> <p><b>Section 1.6</b> The wording could be improved in this paragraph. It suggests initially that the Wall only survives where it is visible above ground. Potential alternative wording: ‘Today, around one third of the Antonine Wall is visible above ground, at places such as... open spaces within urban areas and, though not visible above ground, survives below ground’</p> <p><b>Section 1.8</b> The last sentence needs amended from should read ‘not only identifies the reasons for the Wall’s inscription as a World Heritage Site, but provides the basis for its effective protection and management.</p>	<p>The HES comments mostly relate to an earlier version of the SG, published by other partner authorities, and have largely already been incorporated into the version of the document published by the Council. As a result, the section references used by HES do not always match up with the current version. Any outstanding changes are considered below.</p> <p>Accepted, change made at section 1.3.4.</p> <p>Changes already incorporated at paragraph 1.4.2.</p>

	<p><b>Section 1.9</b> The end of this sentence should read ‘authenticity and integrity’.</p> <p><b>Section 1.10</b> The revised wording here no longer specifically refers to the protection of the World Heritage Site. This revised wording may imply a weakening of the protections for the WHS. If the original wording has not caused problems it would be better to revert to the original wording here.</p> <p><b>Section 1.11</b> A page number for boundaries of the WHS and Buffer Zone (singular) will need to be inserted here. Furthermore, the list of relevant local plans/local development plans is listed in Appendix 4 not 3.</p> <p><b>Section 1.12</b> This section incorrectly refers to Historic Environment Scotland Policy (HESP). This should be amended to the Historic Environment Policy for Scotland (HEPS). As we noted in the earlier, SPP will be replaced by the policies within the Fourth National Planning Framework (NPF4) in the relatively near future it may be worth considering how this change can be accommodated both for this note and for the others.</p>	<p>Changes already incorporated at paragraph 1.4.3.</p> <p>Changes already incorporated at paragraph 1.5.1.</p> <p>Changes already incorporated at paragraph 1.5.2.</p> <p>Changes already incorporated at paragraph 1.6.2. The document needs to reflect the policy documents in place at the time of preparation so reference to the draft Fourth National Planning Framework is not appropriate.</p>
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	<p><b>Section 1.14</b> The first sentence of this section refers the ‘the following specific planning policies’ whereas the policies are presented on the page before this.</p> <p>Key Points (Page 5) As a point of detail, the second bullet point has a typographic error (hich instead of which).</p> <p>Site Audit (Page 6) The list of key questions for Site Characteristics and Setting should include ‘will the proposal have a direct impact on the remains of the Antonine Wall and associated archaeological features?’</p> <p><b>Section 2.9</b> The last sentence of this section states that ‘further information is provided at Section 3.8.2’. As there is no Section 3.8.2 it may be that the appropriate reference is Section 3.19 and 3.20.</p> <p><b>Section 2.12</b> As with Section 1.12 the correct reference here is HEPS not HESP.</p> <p><b>Section 3.2</b> The last line of the first paragraph of this section should read ‘Examples of what could be considered adverse include development that:’ The second of the following bullet points should read ‘interrupts views to, from, or within’.</p>	<p>Accepted, minor revision made at paragraph 1.6.4.</p> <p>Changes already incorporated in Key Points below paragraph 1.6.5.</p> <p>Changes already incorporated in Table 1.</p> <p>Noted – section reference has been corrected in paragraph 2.4.1</p> <p>Changes already incorporated at paragraph 2.5.3.</p> <p>Changes already incorporated at paragraph 3.1.2.</p>
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	<p><b>Section 3.5</b> The fourth sentence of this section should read 'The vertical buffer zone may include complex archaeological deposits, with features...'</p> <p><b>Section 3.6</b> The below text would be more appropriate terminology to use in this section. 'should avoid areas of surviving archaeological remains.' 'Avoiding the World Heritage Site and, in particular areas which are scheduled will be the best approach' '... the presence, location, depth and sensitivity of deposits cannot...' 'This may help to design proposals that avoid...' '...impacts upon archaeological deposits from other periods...'</p> <p><b>Section 3.8</b> The first sentence of this section should read 'any new development site overlying the boundaries of the WHS'.</p> <p><b>Section 3.9</b> This section is not clear on what happens if new/unknown elements are discovered during site works. We would therefore offer the following revisions to address this ambiguity.</p> <ul style="list-style-type: none"> <li>• Revise first sentence to read: 'There may be sub-surface archaeological deposits...'</li> </ul>	<p>Changes already incorporated at paragraph 3.2.2.</p> <p>Changes already incorporated at paragraph 3.2.3.</p> <p>Changes already incorporated at paragraph 3.2.5.</p> <p>Changes already incorporated at paragraph 3.2.6.</p>
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	<ul style="list-style-type: none"> <li>• Potential Alternative wording - '...Where known archaeological remains are present, investigation will be required in conjunction with new development. Where previously unknown archaeological deposits are identified during site works the Council should be informed immediately and further archaeological investigations may be required'</li> </ul> <p><b>Section 3.10</b> The quote marks around setting should be removed as they are unnecessary, potentially confusing for readers and have been used elsewhere in the guidance.</p> <p><b>Section 3.11</b> The second sentence of this section should read 'does not seek to prevent all change'.</p> <p><b>Key Points (Page 10)</b> The first bullet point does not make it clear whether this is referring to scheduled sections of the WHS or unscheduled ones although the text is similar to the scheduled monument policy in SPP. The current wording would allow for impacts in exceptional circumstances which doesn't reflect policy wording for the WHS in the Proposed LDP or SPP which presumes against development with an adverse impact. Also suggests a potential weakening of protections. It is recommended that this is changed back to previous wording or otherwise clarified. Furthermore, it would be</p>	<p>Changes already incorporated</p> <p>Accepted- wording will be revised at paragraph 3.3.2.</p> <p>Changes already incorporated at paragraph 3.2.6.</p>
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	<p>useful to include a further key point that where the extent or presence of archaeological remains is unclear, pre-determination evaluation will be required</p> <p><b>Section 3.12</b> The last two bullet points in this section are not examples of significance of setting but separate points. This may be a result of reformatting of the original guidance which separated these out. It is recommended that the formatting is adjusted to make this clear.</p> <p><b>Section 3.16</b> As a point of detail, the second bullet point of this section should read 'and the integrity of its setting'.</p> <p><b>Section 3.19</b> The link provided here for the EIA regulations is still to the 2011 regulations rather than the 2017 regulations and should be updated. The updated link would be The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (<a href="http://legislation.gov.uk">legislation.gov.uk</a>).</p> <p><b>Section 4.3</b> Bullet point 1 of this section should read 'Site selection should avoid the WHS...'. Similarly, bullet point 2 should read 'Site selection with the Buffer Zone should avoid the most sensitive areas and avoid obstructing views.</p>	<p>Changes already incorporated at paragraph 3.3.3.</p> <p>Changes already incorporated at paragraph 3.4.1.</p> <p>Changes already incorporated at paragraph 3.7.2</p> <p>Changes already incorporated at paragraph 4.2.1</p>
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	<p><b>Section 4.3 (High Quality Landscape Design)</b> The last sentence of this section should read ‘It is therefore important that the location and specification of new landscaping is considered in relation to impact on the WHS and its setting’.</p> <p><b>Section 4.4</b> The reference to the Buffer Zone in the first sentence of this section should be singular.</p> <p><b>Section 4.7</b> The final sentence of this section should read ‘Examples of suitable conditions might include landscaping and/or protective buffer zones around key in-situ sections of the wall.</p> <p><b>Section 4.9</b> The second sentence of this section should read ‘Loss or damage to upstanding archaeological remains and...’</p> <p><b>Section 4.10</b> As a point of detail there is a space missing in the first sentence between or and in. The second sentence should read ‘In all cases it will be required that ongoing...’.</p> <p><b>Section 4.8</b> (This follows 4.10 and should be amended to 4.11)</p>	<p>Changes mostly already incorporated at paragraph 4.2.1; minor correction to wording made.</p> <p>Changes already incorporated at paragraph 4.3.1</p> <p>Changes already incorporated at paragraph 4.3.4.</p> <p>Changes already incorporated at paragraph 4.4.2.</p> <p>Changes already incorporated at paragraph 4.4.3.</p> <p>Changes already incorporated at paragraph 4.4.4.</p>
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	<p>If useful a link to HES web pages on enforcement could be added here:  <a href="https://www.historicenvironment.scot/advice-and-support/applying-for-consents/scheduled-monument-consent/compliance/">https://www.historicenvironment.scot/advice-and-support/applying-for-consents/scheduled-monument-consent/compliance/</a></p> <p><b>Appendix 4: General Information, Development Plans and Useful Contacts</b>  It is welcomed the contact information here for Historic Environment Scotland. However, Heritage Management has now been changed to the Planning, Consents and Advice Service. It would be beneficial to update this contact information.</p>	<p>Noted; minor revision to wording made.</p>
<p>NatureScot</p>	<p>Broadly support the content of this Guidance which consider provides clear, useful information for those involved in development proposals affecting the wall and its setting.  It is noted that landscape effects are one of the criteria for the acceptability of development in the context of the Antonine Wall. While consideration of these effects is focused on the World Heritage Site and the protection and setting of the site, we note that the design criteria of reinforcing existing landscape features and character is likely to lead to outcomes that are generally positive.</p>	<p>Comments are noted. No changes to the document are considered necessary.</p>
<p>The Coal Authority</p>	<p>Our records indicate that within the West Dunbartonshire area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings and reported surface hazards. These</p>	<p>Comments are noted. No changes to the document are considered necessary.</p>



	<p>features may pose a potential risk to surface stability and public safety.</p> <p>The Coal Authority's records indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>It is noted however that this current consultation relates to Supplementary Guidance on the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site. The Planning team at the Coal Authority have no specific comments to make on this guidance document.</p>	
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