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THE ANTONINE WALL

Management Plan 2014-19

CONSULTATION REPORT & SEA STATEMENT

THE ANTONINE WALL
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CONSULTATION REPORT
& SEA STATEMENT

THE ANTONINE WALL

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1. INTRODUCTION

1.1 Background to the consultation

A consultative draft of the Antonine Wall Management Plan 2014-19 was issued for public consultation on 1 April 2013, remaining open for 12 weeks, until 28 June 2013. Both the consultation draft and the final Management Plan can be found on this webpage: www.historic-scotland.gov.uk

The draft Management Plan was developed jointly by the six Partners: East Dunbartonshire Council, Falkirk Council, Glasgow City Council, Historic Scotland, North Lanarkshire Council, and West Dunbartonshire Council.

It sets out the long-term (30-year) vision for the management of the Antonine Wall which is then refined into a series of key objectives for a five-year period. These objectives seek to both build on the achievements of the first five-year Management Plan (2008-12) and to lay the foundations for further development in the one that will follow.

COVER: Rough Castle

1.2 The consultation

A four-phase approach to consultation was undertaken. Phase one was a visioning exercise attended by members of the Management Plan Steering Group (which comprises members from each of the Partner organisations) in summer 2012. This established a draft vision and outline objectives which were then taken to phase two. This was a series of meetings in autumn 2012 with key agencies and stakeholders where the Vision was refined and agreed, and the objectives fleshed out further. Phase three saw a series of public workshops, also in autumn 2012, held across central Scotland – one in each of the Partner local authorities. These were advertised widely in the local and national press and invitations were also sent to known local groups and societies with an interest in the Antonine Wall. The events were well attended and participants were given the opportunity to comment on the draft objectives and to refine these further.

All phases detailed above were facilitated by an external consultant and a report produced on the results. This report was included in the consultation draft of the Management Plan which was publicised for the 12-week period in spring/summer 2013. This final consultation on the draft Plan formed phase four, the final phase of the consultation approach.

A 'strategic environmental assessment' (SEA) was undertaken on the Management Plan during its preparation to meet the requirements of the Environmental Assessment (Scotland) Act 2005. The SEA process involved a number of stages prior to the publication of the Environmental Report which required formal consultation with the Consultation Authorities – Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA). In November 2012 we sought their views on the proposed scope and level of detail of the environmental assessment. Both SEPA and SNH were in agreement with our suggested approach and the proposed scope and level of detail of assessment. The findings of the environmental assessment were set out in the Environmental Report that accompanied the draft Management Plan for consultation.

The consultation closed on 28 June 2013 and 14 written responses were received. A summary of the written responses are contained in section 2.3 and Annex A.

1.3 Report objectives

This report outlines what has been taken forward from the consultation responses into the final Management Plan and why. It sets out the changes to the consultative draft made in the light of the consultation responses and any other relevant information. Factual errors that were raised have been corrected.

This report also sets out the information required for the post adoption stage in the SEA process. It explains how the findings of the environmental assessment have informed the finalised Management Plan, how the opinions expressed on the environmental assessment have been taken into account, and identifies the measures proposed to monitor the likely environmental effects. This report therefore incorporates the statutory requirements of section 18 of the Environmental Assessment (Scotland) Act 2005 and, for clarity, the following table identifies where the information required at the post adoption stage is included in the report:

Table 1: SEA Post Adoption Statement

Information required by the SEA Act	Section
How environmental considerations have been integrated into the Management Plan	Section 2
How the environmental report has been taken into account	Section 2.2 and 2.3
How the opinions expressed during the consultation period have been taken into account	Section 2.4 and Annex A
Trans-boundary consultations	Not applicable
Reasons for adopting the finalised Management Plan	2.5
Monitoring	2.7

To aid interpretation of the statement, the following questions provide the structure for this part of the report:

- What options were considered within the SEA, and how were they identified?
- What environmental effects were predicted by the SEA?
- What were the views on the Management Plan as a whole and its SEA?
- What are the reasons for choosing the Management Plan as adopted?
- What monitoring will be undertaken?

1.4 The approach to consultation

The draft Management Plan and the associated Environmental Report was widely publicised by all six Partners at the same time and in the same way. The document was made available in hard copy at each of the Partners' offices, and digitally on each of their websites. Formal notices were placed in local and national newspapers notifying people of the locations where the draft Plan was available for view or download. Additional press releases were also used as the deadline for responses approached.

Direct mailing/email was used to send the same information on the consultation draft to all those who had taken part in the earlier consultation workshops of autumn 2012. Where specifically requested, hard copies were sent by Partners to individuals/ organisations.

1.5 Analysis of consultation responses

After the 12- week consultation period, 14 responses were received from the following individuals/ organisations:

Archaeology Scotland	Ramblers' Association Scotland – Glasgow Group
C Kelly	Scottish Canals
Friends of Kelvin Valley	Scottish Environmental Protection Agency
Friends of Kelvin Valley Park	Scottish Natural Heritage
G Morrison	S Smith
Lennox Heritage Society	Strathclyde Geoconservation Group
National Trust for Scotland	The Friends of Kinneil

Overall, the response to the consultation has been positive and the proposed changes are considered to be of a relatively minor nature.

A breakdown of the responses by interest group/sector is provided in table 2 below:

Table 2: Responses by Interest Group/Sector

Respondent type	Number	Percentage of all respondent types
Private Individual	3	21
Heritage Interest Group	4	29
Environmental Interest Group	4	29
Amenity Group	0	0
Private Sector	0	0
Public Body	3	21
Total	**14**	**100**

2. HOW HAVE VIEWS AND INFORMATION BEEN TAKEN INTO ACCOUNT?

2.1 Introduction

This section identifies the key issues raised and explains how they have been taken into account. In this, the issues are those which called for substantial changes or additions to the Management Plan.

The sections below incorporate both the comments provided on the draft Management Plan and on the Environmental Report. Information is also provided on how environmental considerations and the recommendations of the Environmental Report have been taken into account.

2.2 What options were considered and how were they identified?

In the course of developing the Management Plan, options were considered at three principal levels. At the highest level, we did not consider the 'do nothing' alternative (i.e. not to have a Management Plan) to be reasonable in this case. This is because the UK has obligations under the World Heritage Convention 1972 in relation to effective management of World Heritage Sites which require that every site has an appropriate management structure in place. It is UK policy that every World Heritage Site should have an up-to-date Management Plan.

The SEA therefore assessed all reasonable alternatives which were identified in the course of developing the vision, aims and objectives which will be set out in the plan. At the highest level, different options for the wording of the vision statement which underpins the subsequent aims and objectives were considered.

At the next level, two alternative approaches (retention of current management aims or development of amended aims) to establishing the overarching aims of the Plan were considered. At the more detailed level of objectives,alternatives were generated through consideration of the key issues relating to each overarching aim, in conjunction with the relevant environmental baseline and issues, and options considered predominantly took the form of alternative wording or phrasing of objectives which were identified during the iteration of the Management Plan.

At an early stage we also scoped the environmental assessment of the Management Plan to give early consideration to how the various alternatives would affect the environment. For example, we considered the relationship of the guidance to other relevant policies, plans, strategies and environmental objectives. This allowed key environmental issues to be identified early during the process of preparing the guidance. We went on to consider the plans and strategies that will influence the guidance and those that will be influenced by its application. This also involved a review of the legislation, policies, plans and strategies of most direct relevance to the draft guidance. This was an important part of the SEA and plan preparation process, as it allowed the SEA to focus on areas where there were opportunities for enhancement and identify ways in which any negative effects could be mitigated.

To help consider the environmental effects of the draft plan, information about relevant aspects of the environmental baseline, incorporating aspects of the five relevant Local Authorities, was also gathered and reviewed. This included information on biodiversity, flora and fauna, landscape and geodiversity, material assets, and historic environment; topics which were considered likely to be affected by the Management Plan.

Our review of the baseline and the relevant legislation, policies, plans and strategies allowed us to determine that some SEA topics (population and human health, air, soil, water and climatic factors) could be scoped out of the assessment; this is described in further detail in **Table 2** of the Environmental Report. The review also enabled us to develop assessment questions, based on SEA topic objectives and criteria, which we used to assess likely effects of the Management Plan. The assessment questions are provided in **Table 3** of the Environmental Report.

The conclusions of this detailed assessment were presented as a score with accompanying narrative summary under each relevant environmental topic. These findings can be found in **Annex A** of the Environmental Report.

2.3 What environmental effects were predicted by the SEA?

The environmental assessment found that the Management Plan positively addresses many environmental challenges associated with managing the Antonine Wall. As might be expected, it was found that the Management Plan would have significant positive effects for cultural heritage, largely centred on the World Heritage Site and its immediate environs. Whilst the majority of significant positive effects were on cultural heritage objectives, the assessment found that there were some positive effects for other environmental factors. Changes to the emphasis and wording of the Plan during its iteration enabled or enhanced likely positive effects for other environmental topics, particularly biodiversity, flora and fauna, and landscape and geodiversity. In many cases, the assessment found that there was the potential to increase these benefits through consideration of wider environmental factors in the delivery of objectives and the actions which stem from them. No significant negative effects were predicted during the course of the assessment which would require specific mitigation measures to be identified. However, a key recommendation was the development and use of a Sustainability Checklist which could be used to ensure that environmental objectives are embedded effectively within lower levels of the Management Plan, particularly the delivery of objectives and related actions and projects detailed within the Action Plan (see Appendix E of the final Management Plan). The Sustainability Checklist, which will also form part of the strategy for monitoring the effects of the Plan, can be seen at Appendix C of the finalised Management Plan.

The content and format of the Sustainability Checklist has been developed from the SEA objectives used in the assessment of the Management Plan. It is intended to be flexible enough to be used with the wide range of projects and actions, from higher-level down to site-specific, which are expected to stem from the Management Plan and its Action Plan. Relevant site-specific actions relating to the Antonine Wall Interpretation and Access Strategy (www.historic-scotland.gov.uk/antoninewallstrategy.pdf) may also use the detailed checklist developed for that Strategy.

2.4 What were the views on the Management Plan as a whole and its SEA?

Overall, the response to the consultation has been positive and the changes suggested were mostly of a minor nature. The majority of respondents felt that the draft Plan covered all the main issues and that the objectives captured the main areas of development for the next five years. Some respondents felt there was scope for certain areas of the Plan to more detailed, for example in the areas of education and museums, but for this Plan period, other priorities preclude intensive work in these areas. Most respondents acknowledged that interpretation and access issues were a high priority and that that there was a need during the Plan period to widen engagement with stakeholders who could contribute to the delivery of these goals. There was also recognition from the respondents that different sections of the Wall had differing needs and that approaches would need to be adapted to suit this.

Archaeology Scotland – *"More should be made of linking the Wall to the collections held by museums, especially those which are not part of the delivery partners' organisations."*

Scottish Canals – *"Scottish Canals supports the utilisation of sustainability checklists for environmental actions arising from the objectives. This is a simple and effective way to ensure that environmental issues remain a significant part of the agenda."*

National Trust for Scotland – *"Raising awareness about the importance of the WHS site within Partner organisations, building capacity and committing resources will also be crucial, as will the ongoing role of a dedicated WHS co-ordinator, to ensure implementation of the plan is driven forward."*

Scottish Natural Heritage – *"The Environmental Report has correctly identified the key environmental issues and trends; you have satisfactorily carried out an assessment of the likely significant effects on the environment."*

Friends of Kelvin Valley – *"Need to bring the Wall experience alive for schoolchildren and adults alike."*

Lennox Heritage Society – *"The west end of the Antonine Wall is the least visible and therefore the most challenging in terms of promotion."*

One recurring element in many of the responses was the desire to see some of the objectives 'fleshed out' into precise actions, with clear timescales and commitment of resourcing. The final version of the Management Plan does include a five-year action plan which sets out in more detail the suite of actions that will be required to deliver many of the objectives. It cannot, however, offer a long-term commitment on definitive resourcing as this extends beyond the immediate control of the Partners.

2.5 What are the reasons for choosing the Management Plan as adopted?

One of the key changes to be made to the adopted Plan is the decision to push it back from 2013-18, to 2014-19. This was because the process of consultation, gaining consensus, and ensuring all representations were addressed, has taken longer than expected and it was decided not to rush adoption of the new Plan. Instead, the 2008-12 Plan has continued in use for an additional year. As several items within it were still in delivery, this has not posed any major problems to the Partners or key stakeholders.

After the formal consultation period closed, the consultee responses were considered in some detail to consider whether or not recommendations or suggestions made therein could be delivered within the scope of the five-year Management Plan period. Those that were achievable have been included within the final version of the Management Plan. This includes the addition of the five-year action plan as part of the final document; and the inclusion of some greater detail around work with museums.

Some responses sought changes/actions which, while important in the long-term management and development of the World Heritage Site, will not be achievable within this Plan period. This may be because of financial constraints, because the infrastructure required to deliver them is not yet developed, or because other priorities are more urgently required and thus assume precedence in developing the site. To cover these representations and other similar issues raised during the 2012 consultation workshops, and ensure that they are not overlooked, a commitment has been made by the Partners to include a Future Issues section in this Management Plan. This captures issues for consideration in the next draft Plan: items that will flow from the work delivered in this Plan period; actions that will form the next phase of focused activity along the Wall; partnerships and projects that should be developed once key infrastructure is in place. This is intended to ensure that these issues are kept visible both for Partners and the public, and that they will then be automatically drawn forward into the next plan period should they still be relevant and unfulfilled.

The SEA process involved a number of stages prior to the publication of the Environmental Report which required formal consultation with the Consultation Authorities – Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA). In November 2012 we sought their views on the proposed scope and level of detail of the environmental assessment.Both SEPA and SNH were in agreement with our suggested approach and the proposed scope and level of detail of assessment.

2.6 Environmental mitigation

No significant negative impacts were predicted during the course of the assessment and therefore no specific mitigation measures have been identified. We will however monitor the implementation of the Management Plan and anticipate that any unforeseen environmental issues will be identified through this process.

2.7 What monitoring will be undertaken?

The final stage of the SEA process is to monitor the environmental effects of the Management Plan. Although no significant effects were predicted through the assessment it will still be important to understand how the Management Plan is affecting the environment once it is being implemented. This will help identify any effects arising which were not predicted through the assessment, and allow appropriate mitigation to be sought. Monitoring of the environmental effects of the plan will be principally achieved in two ways.

Sustainability Checklist

The mitigation and monitoring of the identified effects of the Management Plan will be delivered through the completion of the Sustainability Checklist process for each relevant objective or action undertaken. The checklist requires the identification and inclusion of mitigation measures where appropriate. This method allows the effects of the Management Plan, and the actions which stem from it, to be both mitigated at the appropriate level and to be monitored continuously throughout its lifetime. The environmental information documented by the checklists can then be collated into a Monitoring Report that will inform the development of future iterations of the Management Plan.

Joint monitoring and evaluation framework

Objective 1.10 of the Management Plan, and Action 1.10.1 of the Action Plan, focus on the establishment of a joint monitoring and evaluation framework for the Management Plan, to include monitoring indicators that will allow meaningful comparison with international FREWHS Partners. It is anticipated that the monitoring and evaluation framework will incorporate environmental indicators which will enable the environmental effects of the Management Plan to be monitored and unexpected effects to be identified. As this framework will be developed collaboratively with international partners, it is not yet possible to define the environmental indicators which will be used, but the Environmental Report and Sustainability Checklist will be factors taken into account during their development.

ANNEX A. DETAILED OPINIONS EXPRESSED ON THE MANAGEMENT PLAN AND ENVIRONMENTAL REPORT AND HOW THEY HAVE BEEN TAKEN INTO ACCOUNT

The findings set out within this annex are specific to the consultation exercise and do not necessarily reflect the weight or range of views within the population as a whole.

Consultation respondent	Opinion expressed	Response
Archaeology Scotland	Q1 The list of stakeholders is comprehensive but we would question whether the term landowners is sufficiently inclusive to cover all who have a role in managing areas of the Antonine Wall both in public and private ownership. Tenant farmers, contractors, staff of public organisations owning/managing areas of the World Heritage Site (WHS) can all have significant impact on the monument, either beneficial or destructive. It is important that the monument and the obligations towards protecting it are recognised by all who have a role in managing it or working in its environs.	Noted Tenants will be added to the list for liaison along with landowners. Due to the size and extent of the Wall, it is impossible to reach all of those working along it, but under Objective 1.4 re Capacity Building, an item for CPD/training sessions to staff in key organisations has been added to the five-year action plan that accompanies the Management Plan.
	Q2 The Antonine Wall Management Group has done excellent work in encouraging the relevant local authorities to become engaged in this project and in particular, in getting Supplementary Planning Guidance and an interpretation strategy adopted by all six of these authorities. We also welcome the setting up of the Education and Learning Group and are happy to contribute to producing an Education Strategy for the WHS.	Noted
	Q2 We have been disappointed that the Landscape Group has not met since Archaeology Scotland has been represented on the Stakeholder Group and welcome the proposed setting up of a Landscape and Conservation Group.	Noted
	Q3 We feel the Vision as stated under paragraph 10.1 is fine and there is nothing we would argue against, but it is not really visionary in the sense of achieving targets of improving its condition and status 30 years hence.	Noted
	Q4 We note that the primary aim only refers to enhancing the 'Outstanding Universal Value' of the monument and does not commit to enhancing the condition of the monument itself. We feel that there is much that could be done to enhance the monument itself and its relationship to the wider occupation of Scotland. Objective 1.7 gets closest to this but is not committed to improving the condition merely 'development of an agreed conservation framework, to assist in the management of change in the landscape of the Antonine Wall WHS'.	Objectives 1.7-1.9 are all intended to improve conservation and management of the WHS. Condition and presentation will also be sustainably enhanced through many of the objectives in the Interpretation Plan and Access Strategy, to be implemented under Objective 2.1.

Consultation respondent	Opinion expressed	Response
	Q4 The Antonine Wall is the only linear and the largest WHS in Scotland. Given that large stretches are no longer visible either under urban development or farmland, it would be good to develop a spatial strategy that would identify areas of the wall line that could emphasise the linearity and extent of the monument beyond the upstanding stretches. This could then lead to encouraging appropriate management of these areas to lead to both the conservation of surviving remains (eg by converting arable areas to permanent pasture) and emphasis of the linearity by planting or removal of trees on the wall line (and of associated features like the Military Way where known). This could be done and is perhaps already being in part done through the work of the Central Scotland Green Network and Central Scotland Forest. The illustration of Duntocher Fort on p19 is a good example of what can be done.	Noted
	Q4 While recognising that it is difficult for local authorities and central government to control permitted developments such as agriculture and forestry on private land, Archaeology Scotland believes a more proactive approach to land forming part of this monument. This is particularly true of areas that are Scheduled Monuments, such as Mumrills Fort, where significant remains are permanent risk of damage from deep ploughing, drainage, erosion and even subsoiling, reducing the outstanding value of this monument. We are not suggesting that individual class consents are necessarily being breached here, but instead that the system is biased against the long-term conservation of the monuments in areas of active farming. A more robust system of protection should be adopted and the introduction of a new Scottish Rural Development Programme 2014-2020 should be seen as a mechanism to achieve this by setting it as a strategic priority.	Noted SRDP related actions have been included in the action plan.

Consultation respondent	Opinion expressed	Response
	Q4 We also feel that a strategic, long-term aim should be to see and develop the Antonine Wall WHS in relation to the other Roman monuments surviving from their campaign in Scotland. The Antonine Wall did not survive in isolation from the roads and forts both north and south of the wall line and it should be an objective of Historic Scotland/Scottish Government to promote the better conservation and presentation of these monuments so that visitors can follow these in a thematic way. There is an opportunity to develop this as a potential national development linking with the work of Heritage paths and the National Planning Framework 3 proposals to present long distance routes and tourism infrastructure across significant areas of Scotland beyond the wall line itself. We welcome the integration of the new John Muir Way route along part of Antonine Wall and it is itself an exemplar of a wider vision that is being achieved.	Noted The Partners recognise that the WHS does not exist in isolation. However, the immediate pressures on site management and presentation set out here for the next five years mean that such wider infrastructure and project work is unlikely to take place until the next plan period.
	Q5 See our answer to question 4 above. We do not feel it is enough, for example, to 'encourage farmers and landowners to enter into schemes that benefit the conservation and sustainability of the Antonine Wall WHS' and a more targeted approach should be adopted with key targets and a timeframe to achieve these.	Noted
	Q5 A previous draft of the strategy had the objective 'to have increased awareness and use of TAWWHS by formal learning groups'. This aim must be a key plank in achieving the long-term objectives 2 and 3 and, whilst aware that we are just setting out, it is important for the strategy to make a commitment now to overcoming the physical and intellectual barriers which prevent learners of all ages, abilities and backgrounds from engaging with the Wall.	Noted Objectives 3.1 to 3.4 deal specifically with formal learning.
	Q6 We welcome the commitments under this objective and as stated previously believe the production of an agreed interpretation strategy is one of the achievements of the current management. We note, for example, the commitment under objective 2.1 'to implement key recommendations in the approved interpretation plan and access strategy'.	Noted
	Q7 Welcomes and is fully committed to assisting in achieving objective 3.1. The other objectives will flow from this and we understand that this strategy is already well developed.	Noted

Consultation respondent	Opinion expressed	Response
	Q8 We believe references to most of the international, national, local government and community partners have been listed under the key objectives. However, we think land and property owners and managers and contractors working for them should also be specifically identified. It is important that anyone working on or near the monument should be aware of its extent and significance so that their actions will enhance rather than hurt the monument.	Noted Tenants have been included alongside landowners. At present there is no sustainable way to engage with contractors.
	Q8 More should be made of linking the Wall to the collections held by museums, especially those which are not part of the delivery partners' organisations. Without this, there is a real risk of the objects being divorced from the sites where they were found. The fact that some collections from Hadrian's Wall are held on site improves it immeasurably and this is an important connection which must not be lost.	Noted
	Q9 The environmental issues raised here seem fairly comprehensive and the development of a more ecosystems approach should mean better protection of associated natural environment features and species, as well as reducing climate change impacts. As part of an ecosystem approach, it should be recognised that protecting the integrity of the monument and retaining its outstanding universal value, may well override other interests.	Noted
	Q10 We welcome the establishment of a Research Strategy group building on existing expertise and research questions, including SCARF and work done at Hadrian's Wall.	Noted
	Q10 It is important to welcome the widest possible dissemination of research. We have here an opportunity to make the latest research available more widely than just academic circles and universities and to include dissemination to special interest groups, communities, schools and FE colleges all of which would benefit hugely as access to this is normally restricted or does not filter through.	Noted
	Q 11 We are happy with Environmental Assessment and agree the main environmental implications of the draft Plan have been addressed.	Noted
C. Kelly	I just want to say as an East Dunbartonshire resident I greatly enjoy the Antonine Wall and fully appreciate all efforts to maintain it as fully as possible for future generations.	Noted

Consultation respondent	Opinion expressed	Response
Friends of Kelvin Valley	– Agree with Objectives 1.1-1.4 – Agree with Objectives 1.5-1.6. Cattle poaching is a major problem at Netherwood and Castlecary and we have received a number of complaints. – Agree with Objectives 1.7-1.9. At Castlecary 'gateway', farm access and plant yard development over the access has ruined this. At Croy the vacant derelict land beside Nethercroy Road is an eyesore and needs dealing with.	Noted
	– Agree with Objectives 1.7-1.16 and 2.1-2.4. Need to bring the Roman artefacts, or replicas, to where wall visitors can see them eg Croy Miners, Twechar HLC, Auchinstarry Basin and Kilsyth Library. It is of little use having them tucked away in the Hunterian. Also we are keen to see good use at the access for walkers, with plenty of interpretation between Castlecary. – Agree with Objectives 2.5- 2.7 and 2.8-2.9. We repeat our comments that museum collections need to be on the line of the wall, not just in Glasgow and Edinburgh. Good online interpretation important. Good diversity important at Croy Hill and Bar Hill where Roman engineers used the Whin Sill to route the wall.	Noted Security issues will determine venues for display of original materials but objectives 2.8 and 2.9 should help address local access to museum collections.
	– Agree with Objectives 2.10-2.13. Essential – Agree with Objectives 3.1-3.6. Need to bring the Wall experience alive for schoolchildren and adults alike. Particularly need a full scale replica including ditch and wall, for example overlooking Kelvin Valley just north of the Antonine Wall on the path between Croy Miners and Auchinstarry Basin, the 'Soon Cut' in FCS Nethercroy Forest. – Agree with Objectives 4.1-4.5 and 4.6-4.7. As a community group we have promoted the Antonine Wall through walks, talks, leaflets and guidebooks.	Noted Specific interpretive projects are covered separately in the Interpretation Plan and Access Strategy.
	Agree with Objectives 5.1-5.6 and 6.1-6.5. We are keen to help with dissemination of results. Will you be doing some 'people's digs'?	Noted At present there are no plans for archaeological interventions but Objectives 3.5 and 3.6 will explore other ways of engaging local communities and the general public with the Wall.
Friends of Kelvin Valley Park	Q1 Yes, in 8.11 but a database of stakeholders should be regularly reviewed.	Noted
	Q2 The plan has not recognised the difficulties encountered in 9.4. I know a project not completed due to lack of landowner permission.	Noted
	Q3 Yes, nothing else I can think of	Noted

Consultation respondent	Opinion expressed	Response
	Q4 No	Noted
	Q5 Yes	Noted
	Q6 Yes	Noted
	Q7 Yes, apart from the need to have a reconstruction of the wall at one point near to the wall.	Noted Specific interpretive projects are covered separately in the Interpretation Plan and Access Strategy.
	Q8 Mostly, but no "positive long term and sustainable" methods of community engagement is identified, merely "challenging".	Noted
	Q9 Yes	Noted
	Q10 Yes	Noted
	Q11 Yes	Noted
G Morrison	Throughout the consultation references are made to the "Kelvin Valley". Whilst not incorrect, the area has locally been known as Strathkelvin, the word strath very well describing the topography across the River Kelvin. There has been an erosion of the term strath in favour of valley by some not acquainted with the term, which describes a broad valley. I feel it appropriate to mention the point as we must preserve not only the Wall, but the local place-names.	Noted This will be considered for interpretive materials in this area and wider views sought.
Lennox Heritage Society	We generally concur with all that has been covered by the Management Plan draft. There are however some aspects that should be strengthened.	Noted
	There must be direct links to research and physical planning. ...These links need to relate to: education; research; publicity; tourism; town planning; rural planning including farm boundary treatment and forestry, some of which already affects the buffer zone.	Noted
	We are well aware and appreciative of the role of West Dunbartonshire Council on the Antonine Wall Access & Interpretation Group. Those members of staff we are in contact with are most enthusiastic. However, we feel that the Council is limited by its access to resources and finances and that greater mutual support is required to achieve the optimum level of attention here. The west end of the Antonine Wall is the least visible and therefore the most challenging in terms of promotion.	Noted

Consultation respondent	Opinion expressed	Response
	While it may not be practical to bring in every delivery group at every level, cognizance should be given to those such as for tourism and education as well to societies such as heritage and history groups (such as ours). We may not be able to contribute much, if anything financially, but we are able and willing to contribute to promoting the Wall, providing localised information, leading walks, assisting with sourcing of funds and other promotional ideas.	Noted
	Tourism with a stretch of the Wall that is almost invisible will be difficult in the normal way. However, the route along the Wall offers good potential if it is made attractive and interesting. Lateral thinking is required. This can be in the way the Wall is defined or be including it in greater regional tourist strategies, eg long-distance walking trails and as a recreational facility, eg for walking and cycling. The different attractions can be mutually supportive.	Noted
	The markers and signage in West Dunbartonshire tie in with comments at the consultation meeting here. Some signage has been installed and paths demarcated since that meeting. The liaison between the Council and the Clydebank History Society to demarcate the Golden Hill Fort with wild flowers and mowing has been the most successful. Further to this we would like to see: the branding made clearer and new signage installed; basic markers laid out along the route; replicas of the actual Roman distance stones and other features placed along the route. The Hunterian Museum houses those from this area; full size or scale replicas of sections of the wall have been suggested; life size figures along the wall. They would need to be robust to withstand abuse and weather. The idea is to convey the impression of the Wall route being inhabited and of the types of people, legionaries, auxiliary troops and locals.	Noted The branding will be rolled out as per Objective 2.13 and as new projects from the Interpretation Plan and Access Strategy are implemented under Objective 2.1. Specific interpretive projects are covered separately in the Interpretation Plan and Access Strategy.

Consultation respondent	Opinion expressed	Response
	While signage would remain the primary form of information, too many can spoil the area and will themselves become targets for nuisance. Instead figures and distance stones would give a more authentic experience. Such features can be left to be weathered and, to some extent, allowed to become covered in growth. We imagine the excitement of adults and children alike searching them out and discovering them. There do not need to be many of them, but if this was done for the full length of the Wall they could become the country's largest art installation and a great attraction in its own right. Another benefit is that the figures need not be installed right on archaeologically important sites, but nearby. The distance stones and figures would enhance the concepts of the type of people involved. Dates, names and other facts would follow more naturally from this.	Noted The Interpretation Plan and Access Strategy does indeed make provision for the possibility of stone distance markers being erected along the route.
	We would also like to see a regional museum. While there is Dumbarton Castle and the Denny Tank Museum nearby as well as some display space at the Clydebank Town Hall, there is no longer a general or history museum in West Dunbartonshire. This could cover all aspects of local history including the Roman occupation. Other options include a small visitor centre eg at the warehousing on top of the Old Kilpatrick Fort or the disused library.	Noted This is covered under Objective 2.1 and the implementation of aims in the Interpretation Plan and Access Strategy where visitor centre provision is discussed. An action to undertake an options appraisal re visitor centre provision along the WHS has been included in the five-year action plan that accompanies the Management Plan.
	The most significant aspect of economic value would be from tourism. Imagine if the Wall becomes a major tourist attraction. Where the Wall is almost invisible this can only be done if something special and unusual is done-distance markers and figures. If the latter is well done, the figures can become a major attraction in their own right. They do not need to be exceptional art, but features that can be sought out as a game and a challenge.	Noted
	Good branding needed.	Noted This will be rolled out under Objective 2.13.
	In West Dunbartonshire we have the Old Kilpatrick Fort split from the rest of the wall by the A82. Signage must be very clear as to the deviation through the underpass instead of across the busy road.	Noted This will be considered in the signage work undertaken by the local authority in relation to Objective 2.1 and the recommendations in the Interpretation Plan and Access Strategy.

Consultation respondent	Opinion expressed	Response
	[Redeveloped website] is supported. Further information can be provided along the route as digital downloads for smartphones and tablets.	Noted This will form part of the Objectives in 2.5 and 2.6.
National Trust for Scotland	As owner of sections of the wall at Seabegs, Rough Castle and Watling Lodge, held under Guardianship by Scottish Ministers, and also as the wall is one of the foremost heritage sites in Scotland, the Trust has an interest in the future conservation and management of the WHS and buffer zone.	Noted
	The aspirations in the plan cover the areas the Trust would wish to see, conservation and protection of the WHS and its cultural and natural landscape setting; raising awareness and understanding of the value of the WHS; improving access to it, both physical and intellectual; realising its learning potential; building strong partnerships at all levels including strengthening engagement with local communities and other stakeholders; balancing wider environmental concerns with sustainable management of the WHS; and, increasing research opportunities and using the knowledge gained to further protect and promote the site. The Trust broadly agrees with the aims and objectives being proposed.	Noted
	In relation to the successful implementation of the plan, partnership working and strengthening engagement with local communities, will be crucial. With such a complex site and so many disparate land owning and management interests, successful implementation can only be achieved with the buy in and commitment of those most directly affect. Raising awareness about the importance of the WHS site within Partner organisations, building capacity and committing resources will also be crucial, as will the ongoing role of a dedicated WHS co-ordinator, to ensure implementation of the plan is driven forward.	Noted

Consultation respondent	Opinion expressed	Response
	With regard to the protection of the WHS and buffer zone, we recommend the Partners in producing the Supplementary Planning Guidance. However, we feel protection should be strengthened further with the creation of an Article 4 Direction, either covering the entirety of the WHS and buffer zone or just the most sensitive parts. We appreciate the wall itself and associated forts, civilian settlements etc are protected through Scheduled Monument designation and that protection is afforded the buffer zone and wider setting through the planning system. However, we still have concerns that Permitted development Rights still apply outwith the scheduled area, with the potential to seriously impact on the WHS and its surroundings.	Noted
	We welcome the holistic approach that has been taken to conservation and management of the WHS and its buffer zone, covering all features of significance, not just those inscribed on the World Heritage list.	Noted
	We are particularly pleased to see the emphasis given to the natural heritage and wider environment. Habitats and species may not be attributes considered of outstanding universal value for this particular WHS, however the natural heritage that inhabits and surrounds the wall contributes immeasurably to the enjoyment of the WHS by those who visit and live close to it. It also provides important ecosystem services and will help Partners fulfil the biodiversity duty placed upon them. We are therefore pleased to see the prominence the natural heritage and wider environment have been given in Aim 5 and also in Objectives 5.1 and 5.2.	Noted
Ramblers' Association Scotland – Glasgow Group	The draft plan does not contain a list of the key stakeholders identified. Presumably the fact that our Group (and presumably other Ramblers' Association Groups along the route of the Wall) means that you have identified walkers as key stakeholders.	Noted Walkers are considered a key group and this has been clarified in the Management Plan.
	It should be an aim to develop a long distance walking route along the length of the wall similar to that already existing along Hadrian's Wall.	Noted and this will be covered under Objective 2.2.
	Objective 2.10 should be expanded so as to include the facilitating of additional public access. In particular this should include improving access to parts of the wall not presently easily accessible, and linking together existing accessible locations, so that a continuous accessible route can be created along the length of the wall.	Noted Access to, and routes along and around, the WHS will be covered under Objectives 2.1 – 2.3.

Consultation respondent	Opinion expressed	Response
	Cleddans Burn is the only part of the wall route mentioned as lying within the Glasgow City Council area. In fact there are others, including at Dobbies Garden Centre and adjacent to Balmore Road. Cleddans Burn is currently unwelcoming, with no interpretative signage. Access from Drumchapel area, using Peel Glen Road to Cleddans Burn and to Castle Hill fort is dangerous to pedestrians (Peel Glen Road is heavily used by cars, is narrow, has no pavements and has many blind corners).	Noted Cleddans is only mentioned as a site that is in the ownership of the Council – it is acknowledged that there are other sections in private ownership. Glasgow City Council is aware of the access issues in their area and this will be considered as part of the access and signage work under Objective 2.1.
Scottish Canals	We feel that the management plan has taken care to recognise all the stakeholders relevant to the management of the WHS.	Noted
	We have not reviewed the actions of the 2007-12 management plan and without greater detail in Chapter 9 or as an appendix to the consultation draft, we are unable to comment in detail about the summaries of outputs or lessons learned. Scottish Canals is a member of the Antonine Wall Access and Interpretation Group, however. Effective partnership is an area that should grow with the structure provided by the Access and Interpretation plan (which Scottish Canals co-funded) and through the new Management Plan.	Noted
	Scottish Canals supports the vision for the Antonine Wall WHS.	Noted
	We recommend splitting Aim 4 into two aims, separating partnerships and community engagement from contribution to sustainable economic growth.	Noted This has been considered both before and after consultation, but the decision has been to leave the wording as it is. This is because any economic benefit will be developed through partnership work rather than as a separate driver for the Partners to manage.
	Long-term Aim 5 – we suggest clarifying the scope of 'wider environmental concerns' here.	Noted This has been considered but it is felt that the wording of the current aim suitably encapsulates the issues to be addressed.
	Scottish Canals are keen to play a part in developing a conservation framework and management plans for sections of the Site which are close to the route of the canals.	Noted

Consultation respondent	Opinion expressed	Response
	Scottish Canals feels particularly that objective 2.4 is relevant to us given that The Falkirk Wheel is so close to the Antonine Wall at a point where it is particularly visible. We are open to the possibility of making positive changes at our visitor site at the Falkirk Wheel to provide an enhanced visitor experience for visitors to both the Antonine Wall and the lowland canals.	Noted
	We are open to the possibility of enhancing the interpretive strategy at The Falkirk Wheel to better accommodate information about the Antonine wall and strengthen the informal education and outreach opportunities for the WHS.	Noted
	We feel that a communications structure is important ensure that members of the public and stakeholders have a well-defined means of voicing aspirations or concerns. Clear direction to their first-port-of-call would strengthen the relationship between the governing body of the WHS and the public.	Noted
	We feel that the CBA community archaeology placement will help to demonstrate a positive partnership model.	Noted
	We feel that the management plan has taken care to recognise all the key objectives to increasing research opportunities, however, we would recommend that local communities are included in survey and fieldwork wherever possible. This engagement could then contribute to long-term Aims 2 and 3.	Noted
	Scottish Canals supports the utilisation of sustainability checklists for environmental actions arising from the objectives. This is a simple and effective way to ensure that environmental issues remain a significant part of the agenda.	Noted
SEPA	We consider that the ER is well laid out and easy to follow and, as a result of the environmental issues in which we have a specific interest having been scoped out of the assessment, we have no detailed comments to make in this case.	Noted

Consultation respondent	Opinion expressed	Response
	As you known, as the management plan is finalised Historic Scotland, as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at www.scotland.gov.uk/Publications/2006/09/13104943/13. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.	Noted This document contains the required post-adoption information and will be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.
Scottish Natural Heritage	Scottish Natural Heritage agrees with the conclusions you have made, based on the following points: • the Environmental Report has correctly identified the key environmental issues and trends; • you have satisfactorily carried out an assessment of the likely significant effects on the environment; • the Environment Report has clearly identified measures that could prevent, reduce or offset any significant adverse effects on the environment when implementing the Plan; and • the proposed monitoring measures are robust and acceptable. Please refer to Annex 1 for specific comments on your proposed monitoring indicators.	Noted
	On the contents page under Section 5 (Assessment Findings) you refer to Tables 5-7 but in Section 5 the tables do not appear to be there.	Noted This is due to a typographical error in the contents page, rather than tables being omitted.
	We note your intention to provide monitoring indicators (Objective 1.10) as part of the joint monitoring and evaluation framework, which will allow for meaningful comparison with international FREWHS Partners. We recommend that these are SMART and clearly linked to the SEA objectives.	Noted Further details relating to the monitoring of the Management Plan are provided at section 2.7 of this report.

Consultation respondent	Opinion expressed	Response
	We agree that the Plan is unlikely to have any significant effects on the Firth of Forth SPA, therefore an Appropriate Assessment is not required. The Plan seems to have missed out the Inner Clyde SPA at Old Kirkpatrick and recommend you include it. As with the Firth of Forth SPA it is unlikely the Plan will have any significant effects on the Inner Clyde SPA therefore we are happy that an Appropriate Assessment is not required for it.	Noted Both Firth of Forth SPA and Inner Clyde SPA have been incorporated specifically into the Sustainability Checklist.
	The baseline information is comprehensive and covers all the relevant natural heritage issues, providing an overview for each council area which is good. However, in its current format it isn't the easiest to read as the information on the different council areas all seem to merge into one. It would be useful if you could provide a short sub-section for each local authority under the different headings so it is easier to read.	Noted We will take this advice into consideration in future when developing and presenting baseline information.
	It is unusual for an Environmental Report to be included as an Annex of the Plan it refers to. We would recommend you separate the documents as it is likely the Scottish Government's SEA team would prefer to see them both as separate documents.	While this practice is non-standard, we consider that including the Environmental Report as an Annex to the Management Plan supports *Recommendation R4:Ensuring SEA has a voice in decision making* of the Scottish Strategic Environmental Assessment Review, by embedding the SEA and the proposed mitigation and enhancement measures into the Plan. We are not aware that the Scottish Government's SEA Gateway have concerns with this approach, which has also been taken with previous SEAs of Historic Scotland PPS.
S Smith	While the remains of Antonine wall are part of our heritage, I think there is far too much made of Roman Britain, which was after all an invasion and occupation. I'm not sure we should celebrate that and I personally think it is too much propaganda anyway. The Wall should definitely be reserved and looked after but the stories we tell about it need to change. Surrounding its physical presence I'd like to see a change of culture, to acknowledgement that it happened and why, but more importantly to tell of what was already here when the Romans came, and how the wall impacted on the indigenous people, Land and civilisation around it.	Noted The Research Strategy which is in development will have a focus on native sites and interaction with the Romans.

Consultation respondent	Opinion expressed	Response
Strathclyde Geoconservation Group	Q1 Scottish Geological Society is incorrect. It should read Scottish Geodiversity Forum.	Noted This will be changed.
	Q2 Yes, integration of natural with cultural heritage. [is missed]	Noted
	Q3 Yes, link between natural environment and human development. [is missed]	Noted The Vision covers this indirectly through its aims of sustainable management and sustainable environmental benefit – Aim 5 which is drawn directly from the Vision focuses on the wider environment.
	Q4 No	Noted
	Q5 Yes	Noted
	Q6 Not all. [objectives identified] Include influence of geodiversity. Promote geo-tourism.	Noted Given the specificity of this recommendation, it is unlikely to be achievable within the five years of the current Plan – which will see Tourism and Marketing start from scratch in year three of the Plan. However, it will be recorded as a key area for the development of the next five-year Plan.
	Q7 Include geodiversity. Essential for understanding location and building of the Wall.	Noted This will be noted for the development of the Education Strategy.
	Q8 Contacts growing via consultation. Other Geocon groups could be involved.	Noted
	Q9 Yes	Noted
	Q10 No. Need for research into choice and influence of Roman building materials.	Noted This will be noted for the development of the Research Strategy.
	Q11 No. Needs description of rock and geomorphology that influences the Wall (p81).	Noted This will be noted for the development of the Research Strategy.
The Friends of Kinneil	Generally, the draft Plan successfully identifies many relevant stakeholders.	Noted

Consultation respondent	Opinion expressed	Response
	With regard to the stakeholders in local and central government authorities, it needs to be ensured that the Plan reflects the views of senior people with strategic responsibility for commercial, tourism, and economic development, as well as those responsible for conservation, heritage and operations.	Noted
	There is an important set of stakeholders who could be added – namely the people who visit the Wall and surrounding area or would like to do so, whether from the UK or overseas. The Plan should seek to survey their views, experiences and suggestions for improvement. Such visitor research is referred to on p27 but this group could also be acknowledged among the list of stakeholders, and potentially consulted.	Noted This is indirectly assumed under the 'Tourism, Access and Local Business' heading but has been more directly referenced in the final Plan.
	We are pleased to note the recognition of the Bridgeness Slab replica project, and of the Friends of Kinneil's Big Roman Week	Noted
	We agree with 9.18: 'The Antonine wall has not yet achieved its potential.....'.	Noted
	The vision itself is excellent	Noted
	The aims should be checked against the preceding vision. For example, do they match up to providing 'a world class visitor experience'? Similarly, is 'contribute to sustainable economic growth' as powerful as 'a focus to realise sustainable benefits economically'? We feel that the aims should be more, not less, tangible and concrete than the vision.	Noted
	This section of objectives appears quite comprehensive, specific and detailed, compared to the other covering the opportunities for developing the Antonine Wall's potential.	Noted
	The headline objectives are along the right lines, but more underpinning detail is required on what specific actions will be undertaken to achieve them, by whom and by when – and the associated resource requirements.	Noted This will be covered by the five-year action plan that accompanies the final Plan.
	The Plan needs to find a way to catalyse multiple delivery partners to act more quickly together to implement some of these marketing objectives.	Noted
	Our Roman Week initiative could be further extended and developed.	Noted

Consultation respondent	Opinion expressed	Response
	The key objective of one or more world-class visitor centres for the Wall, is missing, although Appendix C shows that it was discussed at consultation workshops. The impression is given that this aim is deferred as too difficult, yet it is 'key' to achieving the Wall's world-class potential. Kinneil House/Estate offer excellent scope for such a centre, possibly as a 'gateway' to the Wall.	Noted This is covered under Objective 2.1 and the implementation of aims in the Interpretation Plan and Access Strategy where visitor centre provision is discussed. An action to undertake an options appraisal re visitor centre provision along the WHS has been included in the five-year action plan that accompanies the Management Plan.
	Consideration should be given to a state-of-the-art, modern, imaginative visitor centre which includes numerous activities and learning resources targeted at children.	See above
	The objectives are correctly identified, but as a management plan these require fleshing out with more detail on achieving them.	Noted This will be covered by the five-year action plan that accompanies the final Plan.
	A good start has been made under the existing partnership structures but for the future, the option of a designated organisation to co-ordinate the development of the Antonine wall – similar to the Hadrian's Wall Trust – should perhaps be explored.	Noted This will be covered by an appropriate action in the five-year action plan that accompanies the final Plan.
	We do have a concernthat the draft plan risks an indefinite period of missed opportunities, by not matching that stated vision of what is potentially achievable. The vision is excellent, but our reading is that its most visionary elements and several of the 'long-term aims' are then deferred rather than grasped. Instead, whilst we largely agree with the 'current issues and medium-term objectives', many of these tend to be more process-related, managerial and bureaucratic in nature.	Noted This will be covered by the five-year action plan that accompanies the final Plan.
	Generally it is surprising that the draft Plan is relatively unclear on the overall level of resourcing; nor does it make the argument for an appropriately ambitious and strategic level of investment. It gives only the briefest mention to exploring the opportunities to attract substantial external sources of funding to the Wall. These points should be covered in the final version of the Plan.	Noted This will be covered by the five-year action plan that accompanies the final Plan.


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