

FRONTIERS OF THE ROMAN EMPIRE WORLD HERITAGE SITE

# THE ANTONINE WALL

Interpretation Plan and Access Strategy

CONSULTATION REPORT & SEA STATEMENT



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# 1. INTRODUCTION

## 1.1 Background to the consultation

A consultative draft of the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site Interpretation and Access Strategy was issued for public consultation between May and June 2012 (just over 5 weeks). Both the draft and the final versions can be found on this webpage:

[www.historic-scotland.gov.uk/index/about/consultations/closedconsultations.htm](http://www.historic-scotland.gov.uk/index/about/consultations/closedconsultations.htm)

The Antonine Wall is an internationally important monument which forms part of the Frontiers of the Roman Empire World Heritage Site. In accordance with UNESCO guidelines, a Management Plan was prepared for the site by a partnership involving representatives from the five local authorities along the line of the wall: East Dunbartonshire; Falkirk; Glasgow City; North Lanarkshire and West Dunbartonshire, along with Historic Scotland and the Royal Commission on Ancient and Historical Monuments of Scotland. The Management Plan sets out a range of objectives, including some focused on the development of interpretation and access provision for the Antonine Wall.

Within the governance structure for the World Heritage Site, the Antonine Wall Access and Interpretation Group is responsible for overseeing the delivery of certain of the Management Plan's objectives. The Group includes representatives from the partnership bodies noted above, along with organisations and government agencies including Scottish Natural Heritage, Visit Scotland, Hunterian Museum, Forestry Commission Scotland and Scottish Canals.

The group was responsible for commissioning the preparation of a draft Interpretation Plan and Access Strategy for the Antonine Wall. This draft document, focused on improving access to and understanding of the Antonine Wall, sets out who the Group consider to be the current audiences, highlights key barriers to access, and sets out future projects to improve both interpretation and access. The document highlights the potential of the Antonine Wall as a visitor attraction, helping increase knowledge and appreciation of the country's history, and as a learning resource.

## 1.2 The consultation

The consultation document sought the views of local residents and the wider community, including businesses, organisations and other parties with an interest in the Antonine Wall, on the issues of access and interpretation.

A 'strategic environmental assessment' (SEA) was undertaken on the document during its preparation to meet the requirements of the Environmental Assessment (Scotland) Act 2005. The findings of the environmental assessment were set out in the Environmental Report that accompanied the draft Interpretation Plan and Access Strategy for consultation.

The consultation closed on 29 June 2012. Thirteen written responses were received. A summary of the written responses are contained in section 2.3 and **Annex B**.

## 1.3 Report objectives

This report outlines what has been taken forward into the final Interpretation Plan and Access Strategy and why. It sets out any substantive 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 Interpretation Plan and Access Strategy, 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 Strategy	Section 2
How the environmental report has been taken into account	Section 2.2
How the opinions expressed during the consultation period have been taken into account	Section 2.3 and Annex A
Transboundary consultations	Not applicable (the Strategy will not affect other EU Member States)
Reasons for adopting the finalised Strategy	2.4
Monitoring	2.6

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 and what did consultees say about them?
- What were the views on the Strategy as a whole and its SEA?
- What are the reasons for choosing the Strategy as adopted?
- What monitoring will be undertaken?

#### 1.4 The approach to consultation

The draft Interpretation Plan and Access Strategy was widely publicised at the time of consultation. The consultation document was made available digitally on Historic Scotland’s website and formal notices were placed in local and national newspapers notifying people that it was available to download.

The overall consultation programme comprised a formal 5-week consultation period, which followed on from informal research and consultation approaches undertaken by the consultant who prepared the draft document.

#### 1.5 Analysis of consultation responses

After the formal consultation period, thirteen responses were received from the following individuals/organisations:

- Croy Historical Society**
- Cumbernauld Historical Society**
- Forestry Commission Scotland**
- Friends of Kelvin Valley Park**
- Georgia State University**
- D Grieg**
- Kilsyth Community Council**
- Kilsyth & Village Community Forum**
- J Lancaster**
- National Trust for Scotland**
- Scottish Natural Heritage**
- Scottish Environment Protection Agency**
- T Watson**

Overall, the response to the consultation has been broadly supportive. Key themes emerging from comments include: support for a visitor/interpretation centre (possibly in association with a section of reconstructed wall); a need for clear and consistent directional signage along with the development of a bold brand identity; and a strong sense of ownership of the Wall expressed by local heritage bodies and third sector organisations.

Responses to individual questions were as follows:

**Question 1 – Have we identified the key barriers to access?**

Six respondents answered this question, five respondents agreeing that the Strategy had identified the key barriers:

- *“One of the foremost strengths of your plan is its thorough consideration of potential barriers to access those who plan to visit the site may experience. Not only does your plan take into account potential challenges regarding general awareness and perception, but also physical and intellectual barriers to the site.”*

**Question 2 – Do you agree with the overarching objectives?**

Seven respondents answered this question. All agreed with the objectives in the Strategy, however, a heritage organisation proposed an additional overarching objective concerning the long-term conservation of the Antonine Wall and its setting and that any new interpretation, facilities and infrastructure to promote access, should not adversely impact on key attributes. The desirability of establishing a visitor centre was emphasised by a number of respondents:

- *“The single biggest omission is the lack of a visitor centre....the Antonine Wall only has a number of minor, more locally focused museums at Kinneil, a small part of the Hunterian Museum and Auld Kirk. As a tourist wanting to spend money on guides, souvenirs and enjoy exhibits it was disappointing.”*

**Question 3 – Do you agree with the methods for overcoming barriers to access?**

Eight respondents answered this question, all agreed with the methods outlined in the Strategy, only two provided further information:

- *“The Access Strategy does a great job of offering suggestions on how to address access and to make improvements to the site which would lead to enjoyable experiences for visitors.”*
- *“We agree with the methods set out. However we would also like to see improved public transport links included. This will benefit not only the visitors, but also local communities along the length of the wall or at least sections of it.”*

**Question 4 – Are there any other methods for overcoming barriers to access that we should consider?**

Of the two respondents that answered this question, one asked that consideration be given to staffing Rough Castle:

- *“This is a Crown Jewel of the Antonine Wall but, currently unmanned..... During my visit I was surrounded by a pack of four Bulldogs who were allowed to run free off the leash by their owner.”*

**Question 5 – Do you have any comments on the proposed actions?**

Of the respondents, ten made comments on the actions proposed in the Strategy. Five made specific reference to the need for a visitor centre:

- *“A dedicated Visitor Centre could provide a useful focal point to the interpretation and visitor facilities on offer. We support the varied interpretation to be provided at each of the 18 potential sites and believe that together they will interpret well the different strands of life and activities that marked out the Roman soldier’s life and existence in Scotland and that of the civilians that supported the Roman encampments. However we also believe that the one central place where all these threads can be drawn together and where they can be put in context would be beneficial.”*
- *“The single biggest omission is the lack of a visitor centre.”*

A need for enhanced interpretation and improved, co-ordinated signage was noted by four respondents:

- *“..support the idea of using clear and consistent directional signage, waymarking, logo and interpretation boards to help create a brand and thus provide cohesion and identity to the WH site and its disparate elements.”*

Two respondents referred to the need to consolidate and improve the existing infrastructure and pathways:

- *“Consider implementing a study that pulls together existing information on public transport, local roads and traffic in the area covered by the Antonine Wall. Council local transport strategies will be a useful starting point. The study could help to confirm the need for car parks and the best locations for a visitor centre or other information nodes, establish a need for additional bus services (perhaps even seasonally dedicated to Antonine Wall visitors) and form the basis of guidance for visits to parts of the wall.”*

- *“Identifying and exploiting existing routes and pathways is a very important first step in making the Antonine Wall more accessible and providing some measure of cohesion. Where routes overlap, how will branding/signage be managed to ensure that visitors appreciate the links to the Antonine Wall, where branding/signage may already exist to highlight links to the Forth-Clyde Canal etc.”*
- *“The Antonine Wall’s long term conservation should not be compromised in the desire to make the site more accessible. In this we include not just the key attributes that make up the world heritage site, but also the natural heritage within the world heritage site and its setting. On this point we are concerned about the level of baseline information that has been gathered on protected species and question whether the information gathered is sufficient to make a good assessment of the impact of these proposals.”*

**Question 6 – Do you have further suggestions that should be considered?**

Five respondents answered this question. Two heritage bodies and a third sector organisation expressed support for the establishment of a visitor centre, in association with a section of reconstructed wall. A need to ensure the continuing conservation of the natural environment was raised by a heritage body:

**Table 2: Responses by interest group/sector**

Respondent Type	Number	% of all respondent types
Private individual	3	23.1%
Heritage Interest Group	3	23.1%
Environmental Interest Group	0	0%
Amenity Group	3	23.1%
Education	1	7.6%
Public body	3	23.1%
<b>Total</b>	<b>13</b>	<b>100%</b>

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

### 2.1 Introduction

This section identifies the key issues raised during the consultation and explains how they have been taken into account. The sections also indicate how environmental considerations and the recommendations of the Environmental Report have been taken into account in the finalised Strategy.

### 2.2 What options were considered and how were they identified?

The SEA assessed the environmental effects of options that have been considered during the Plan/Strategy preparation process. Options ranged from the overall objectives of the Plan, through to specific proposals and interventions. These were assessed against the same framework and a recommendation made on the best environmental option.

### 2.3 What environmental effects were predicted by the SEA and what did consultees say about them?

The assessment of the overarching objectives of the Strategy came out favourably against the environmental objectives relating to access. While no *significant negative effects* were identified, a number of potential negative effects were highlighted. These related to the physical impact that increased visitor numbers could have on environmental parameters such as the natural and historic environment, as well as the increase in travel and emissions that would be associated with this rise in visitor activity. In terms of assessed strategic actions, those relating to the consolidation and improvement of the existing infrastructure, paths and routeways scored positively for the most part as the emphasis was on the management of access. However, the assessment noted that this was dependent on where specific interventions took place, as there was the potential for negative effects where the aspiration for access comes into conflict with environmental parameters such as the protection of biodiversity and fragile historic environment assets. In light of this, a Sustainability Checklist was developed for the assessment of individual actions and interventions. In order to assess the effectiveness of this approach, the checklist was put through a compatibility matrix with the SEA Objectives. The questions put forward for inclusion within the checklist were found to be compatible with at least two of the identified environmental objectives and therefore, taken as whole, ensured adequate environmental consideration of actions brought forward.

Responses to the consultation were generally favourable in relation to the findings of the assessment. Detail of the consultation responses can be found in Annex B to this statement.

### 2.4 What were the views on the Strategy as a whole and its SEA?

Again there was general agreement with the approach taken to assessing the environmental effects of the Strategy. As the assessment was carried out at a high level, the importance of meaningfully assessing individual actions flowing from the Strategy was highlighted. In this regard, the Sustainability Checklist approach was broadly welcomed as a means of continuous assessment and mitigation.

### 2.5 What are the reasons for choosing the Strategy as adopted?

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 July 2009 we sought their views on the proposed scope and level of detail of the environmental assessment. SNH were in agreement with our suggested approach and provided some detailed comments. SEPA were also in agreement and considered that we should include an assessment of flooding issues within the SEA, and also provided more detailed comments.

After the formal consultation periods of the draft Strategy and the Environmental Report closed we met with the partners involved in drafting the Strategy to discuss how representations would be taken into account. There were no significant unresolved issues, although there were various points raised by consultees which will be taken into account during the implementation phase.

### 2.6 Environmental mitigation and monitoring

**Mitigation:** No significant negative impacts were predicted during the course of the assessment and therefore no specific mitigation measures have been identified. However, we intend to monitor the implementation of the Strategy and anticipate that any unforeseen environmental issues will be identified through the consideration of sustainability criteria included in the Strategy (see **Box 1**) and documented within the Sustainability Checklist. The Checklist requires the inclusion of mitigation measures for each action undertaken as appropriate.

**Monitoring:** The monitoring of the identified effects of the Strategy will principally be delivered through the completion of this checklist process for each action undertaken. This will ensure effects of the Strategy are both mitigated at the appropriate level and monitored continuously throughout the lifetime of the Strategy. The information garnered from these checklists will then be collated into a Monitoring Report that will aid in the development of future iterations of plans for Interpretation and Access at the Wall.

### **Box 1: Environmental Issues**

Specific proposals should be screened by the relevant partner/promoter with reference to factors such as:

- Is the proposal identified in an existing Core Path Plan or Development Plan?
- Is the proposal a currently maintained path or route?
- Does the proposal provide linkages between existing Core Paths?
- Will the proposal help deliver an aspirational Core Path(s)?
- Is the proposal on the remains of the Antonine Wall?
- Is the proposal within the buffer zone of the Antonine Wall?
- Will the proposal impact, either directly or indirectly on any other known archaeology?
- Are there issues for the proposal in terms of land management and privacy/security implications?
- Are there any public safety implications associated with the proposal?
- Will the proposal have implications for protected habitats and species?
- Will the proposal necessitate the removal of trees?
- Is the proposal accessible from public transport services?
- Will the proposal encourage non-vehicular travel?
- Will the proposal utilise locally-sourced materials?
- Is an environmental survey (e.g. for bats) required prior to design and implementation?

The outcome of such considerations should be documented in the Sustainability Checklist.

# ANNEX A. SUSTAINABILITY CHECKLIST

Antonine Wall WHS – sustainability checklist					
Summary of proposal/action (including relevant Objective or Action Plan number)					
Could the proposal or action...					
	Protect or enhance (where appropriate)?	Have adverse direct or indirect impacts?	Promote enjoyment and understanding?	Contribute to effective climate change adaptation?	Mitigation/enhancement measures to be implemented ( <i>what, by who, when</i> )
<b>Biodiversity, flora and fauna</b> <i>(e.g. SSSIs, protected species and habitats; Ancient Woodland and ancient/veteran species; wider biodiversity)</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	
<b>Material assets</b> <i>(e.g. the tourism resource of the WHS; forestry; foraging)</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	
<b>Cultural Heritage</b> <i>(e.g. the WHS; its buffer zone; other heritage assets)</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	
<b>Landscape</b> <i>(e.g. landscape value; geodiversity; geological value)</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	No <input type="checkbox"/> Yes <input type="checkbox"/> <i>provide details below</i>	

## ANNEX B. DETAILED OPINIONS EXPRESSED ON THE STRATEGY 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.

Respondent	Opinion expressed	Response
Croy Historical Society	Welcomed the establishment of a Visitor Centre and suggested this to be located at Croy with a satellite display at Twechar	Noted – an objective is in the Management Plan to consider Visitor Centre provision
Cumbernauld Historical Society	Welcomed the establishment of a Visitor Centre and suggested its location within North Lanarkshire (Bar Hill/Croy/Westerwood)	Noted – an objective is in the Management Plan to consider Visitor Centre provision
	Would like to see displays of original or replica artefacts associated with the Wall	Noted
	Comment was also offered regarding the use of reconstruction of elements of the wall, citing examples on Hadrian's Wall	Noted
Forestry Commission Scotland	Notes a comment in the Strategy on the implication of cattle blocking access. Highlights that the use of cattle as a management tool for keeping the Wall clear of scrub and bracken may be required	Noted
	Access information should mention the Scottish Access code to ensure appropriate use of the site	Noted – being included in certain orientation information
	While agreeing with elements of the assessment of the Strategy consider more specific detail on the type and level of negative impacts on particular habitats and species was needed	Noted
	Noted that there is a policy presumption against the removal of woodland	Noted
Friends of Kelvin Valley Park	Suggested an off line replica construction of a section of the Wall	Noted
	Suggested there is an opportunity to use local community facilities at Croy and Twechar for displays including replicas of Roman artefacts currently held elsewhere	Noted – an objective is in the Management Plan to consider Visitor Centre provision

Respondent	Opinion expressed	Response
Georgia State University	Considered the Strategy was detailed and clearly identified the barriers to access of the Wall	Noted
	Suggested consideration of access to the site by boat/from waterways	Noted
	Suggested comparative analysis against other WHS access strategies, noting such examples as a bike path at Hadrian's Wall	Noted
	Welcomed the range of options for access both physically and intellectually considered within the Strategy. However, suggested that consideration be given to improving physical access to sections of the Wall for visitors with limited mobility	Noted
	Noted the benefits in working in partnership with local groups in the delivery of the Strategy	Noted
	Welcomed the findings of the environmental assessment and the creation of the Sustainability Checklist and considered that this offered a solution to some of the knowledge gaps identified within the assessment	Noted
	Considered the report was thorough and comprehensive	Noted
	Welcomed the Sustainability Checklist as a means to identify and mitigate potential effects, particularly from increased numbers of visitors	Noted
	Suggested special interest tours and including the WHS in school curriculums	Noted – an education Strategy in development
D. Grieg	Considered the overarching questions to be restrictive in that they “deal with the ‘Wall’ as a whole”	Noted
	Made points relating to current audiences that use the Wall, emphasising local affiliation with sections of the Wall	Noted
Kilsyth Community Council	Would like to see a reconstructed section of Wall and suggested a location in Croy	Noted
Kilsyth & Village Community Forum	Would welcome the development of a Visitor Centre, particularly to display finds locally, and offered suggestions on its location in the Croy area	Noted – an objective is in the Management Plan to consider Visitor Centre provision
	Noted that a better map was needed for the whole Wall	Noted – included as an action in the Management Plan
	Expressed the wish to see a replica section of the Wall and associated features in the Croy area	Noted

Respondent	Opinion expressed	Response
J. Lancaster	Noted the current lack of a dedicated Visitor Centre and offered suggestions on possible locations for one in the Croy area	Noted – an objective is in the Management Plan to consider Visitor Centre provision
	Welcomed the approach to new interpretation boards and noted some currently along the Wall were too generic/old	Noted
	Suggested the potential for Rough Castle to be a “manned venue” noting that this could offer a more controlled venue as well as potential income stream through the sale of maps etc	Noted – an objective is in the Management Plan to consider Visitor Centre provision
	Noted the need for clearer guidance on travelling to venues, parking etc	Noted
	Noted the problems associated with a “whole length walk” of the Wall but considered more could be done to both promote and provide information on a series of circular walks at the Wall	Noted – included in proposals for new website
National Trust for Scotland	Agreed with the overarching objectives but suggested the inclusion of a further objective relating to the long-term conservation of the Wall and its setting in consideration of the potentially increased impact from interpretation, facilities and infrastructure	Noted – conservation and protection matters are covered in the Management Plan
	Agreed with the methods for overcoming barriers to access but suggested improved transport links be included for the benefit of visitors and local communities alike	Noted – transport issues are covered in the Management Plan
	Noted that the NTS are owners of sections of the Wall and while welcoming the Strategy expressed some concerns relating to the relationship between the Strategy and the NTS’s ownership rights	Noted
	Believe the creation of a central Visitor Centre, situated at a location that had the most visible and accessible remains and good transportation links, would contextualise and draw together current interpretation across 18 potential sites. Would question whether more than one Visitor Centre would be necessary and sustainable	Noted – an objective is in the Management Plan to consider Visitor Centre provision
	Welcomed approach within the Strategy to themes for interpretation at different sites	Noted
	Supports the idea of clear and consistent signage and branding but raised a question on who would police quality of brand if used by local businesses	Noted
	Supported different forms of interpretive resources suggested for development	Noted

Respondent	Opinion expressed	Response
National Trust for Scotland	Welcomed the consideration given within the Strategy to digital media resources, highlighted the importance of the proposed website (including the importance of individual pages for individual sites)	Noted
	Suggested that the interpretation could be provided in the languages of all countries through which the FRE WHS passes through	Noted
	Questioned how branding and signage will be delivered on existing routes where this may overlap with other brands (e.g. Forth and Clyde Canal)	Noted
	In relation to the identification of new paths, routeways and parking provision – the work was commended although the importance of working with landowners and local communities as well as consideration for the natural environment was highlighted	Noted
	Linking of attractions and facilities was welcomed with additions relating to the natural environment	Noted
	Fully supportive of the use of Sustainability Checklist, particularly noting that implications for the natural environment are included in this	Noted
	In broad agreement with the results of the environmental assessment. Concerns raised regarding natural environment baseline and wished to see surveys carried out before work undertaken (badgers, bats and great crested newts)	Noted – we have added the need to consider environmental studies and/or surveys to the sustainability criteria
	Noted that the NTS would not wish to see old trees being removed to make way for paths or to cater for health and safety issues resulting from new paths	Noted
	Would like to see opportunities for more sensitive management of sections of the Wall for biodiversity, explored. Would also present new opportunities for interpretation and education	Noted – biodiversity issues are covered in the Management Plan
	Would like to have seen how the carrying capacity of the various parts of the WHS have been identified and a programme to monitor visitor numbers and impacts to ensure that remedial action could be taken, should it be necessary	Noted
	Considered there was a lack of consideration of public transport provision, other than the Sustainability Checklist	Noted – transport issues are covered in the Management Plan
Raised a question regarding both the funding required, where this will come from and the timescale for implementation of the Strategy	Noted	

Respondent	Opinion expressed	Response
Scottish Natural Heritage	Suggested the implementation of a study on current public transport provision to facilitate the consideration of infrastructure requirements as well as information centres	Noted – transport issues are covered in the Management Plan
	Requested the updating of core path referencing in line with adopted plans	Noted and updated in finalised Strategy
	Agreed with the overall conclusions of the environmental assessment	Noted
	Table 2 – text relating to Climate Change suggests that the topic is scoped out but report scopes in Notes a discrepancy relating to topics and under what they have been assessed within the report	Noted – this is an error in the Environmental Report.
	Noted that the Sustainability Checklist will require to work across all types of project including those involving no physical changes	Noted
	Raised concerns regarding the assessment in Table 6 and the omission from it of proposals for a Visitor Centre	Noted – the assessment of any Visitor Centre will be taken forward separately
Scottish Environment Protection Agency	Considered that the environmental assessment of the Strategy was clear and well written and were content that an adequate assessment of the Strategy had been undertaken	Noted
	Welcomed the recommendation of the use of the Sustainability Checklist to ensure localised environmental effects are identified and considered before choosing an option	Noted
T. Watson	What value for money would be assessed for this scheme? Has the investment been considered in monetary terms? What is the return on the investment and how is it measured? What is the budget for this and how is the detail broken down into budgets? What is an acceptable rate of return for this public investment of money?	Noted – an economic impact study is proposed within the Management Plan

