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Dear Graham

**Environmental Assessment (Scotland) Act 2005
Perth and Kinross Council – TAYplan
Environmental Report**

Thank you for consulting Historic Scotland on the Environmental Report for TAYplan which was received in the Scottish Government's SEA Gateway on 16 March 2010. I have reviewed the Environmental Report on behalf of Historic Scotland and should make it clear that this response is in the context of the SEA Act and our role as a Consultation Authority. Please note that our view is based on our main area of interest for the historic environment.

General Comments

I welcome that the comments we provided on the Scoping Report on 30 October 2009 have been taken into account during the preparation of the Environmental Report. My focus in reviewing the Environmental Report is on the potential for significant environmental impacts on the historic environment that may arise from the plan.

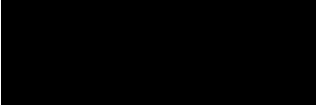
The environmental report represents a rigorous assessment of a high level plan. Consequently, its findings will be at a strategic level and I am content that these findings represent issues that will require to be mitigated not just within the SDP but at the lower level LDPs. The LDPs that lie underneath this SDP will be key in delivering the mitigation for the historic environment and therefore it is to be welcomed that the TAYplan ER points to the need for the SDP to require the underlying LDPs to comply with national policy for the historic environment.

The innovative use of diagrams representing various strands of the assessment is welcomed and I agree overall with the findings of the assessment as it relates to the historic environment. I have included detailed comments on sections of the assessment in an annex to this response.

None of the comments in this letter should be taken as constituting legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity building in SEA.

Please do not hesitate to contact me on 0131 668 8960 should you wish to discuss this response.

Yours sincerely



Andrew Stevenson
Senior Strategic Environmental Assessment Officer

Annex

Do you agree with our understanding of the baseline environment in the TAYplan area?

I am generally content with the baseline as presented in Table 3.1. You may wish to consider adding information from the various local authority's sites and monuments record to supplement this in relation to unscheduled archaeology.

Do you think there are any other plans, policies (in addition to those listed in the Environmental Report) or wider environmental objectives that should be taken into account.

I am content that plans and policies listed for the historic environment adequately cover the policy background.

In your opinion have we identified the most important or significant environmental problems affecting the TAYplan area?

I agree with the two environmental problems identified for the historic environment. In particular, the pressure of inappropriate development on historic environment sites, both individually and collectively is a key environmental issue when planning for strategic growth.

Do you disagree with any of the assessment questions? If so please identify which ones and why?

No. I welcome the wording of the SEA Objective for the historic environment and consider the assessment framework to be proportionate to the high level nature of the plan. I also welcome the addition of the two assessment questions suggested at the scoping stage.

Do you have concerns about significant or cumulative environmental effects on particular parts of the TAYplan area or on particular environmental features?

No.

Do you think there are further, relevant positive aims and aspirations for the environment that the Strategic Development Plan could deliver in the long term.

No.

Further comments

Potential Impacts of Settlement Hierarchy

I welcome the recognition given to the potential effects of the settlement hierarchy on the historic environment. The generic consideration of these impacts is in line with the strategic nature of the plan and I agree with the findings in relation to the assessments of the different strategies and welcome the combination of commentary and diagram to depict the inter-relationship of these effects.

Comparative Analysis of Strategies A and B

This section clearly lays out the assessments of the two settlement strategies, assessing each component part against the SEA Topics and presenting an overall assessment for

each. I agree with the findings in relation to the historic environment and particularly welcome the commentary section outlining the reasoning behind the best environmental option.

Mitigation and Enhancement Proposals

This section is very clear in setting out how the SEA has influenced the development of the main issues report. In particular, I welcome that the recommendation coming from the assessment to alter the objectives of the plan to cover built environment considerations has been taken on by the plan. Furthermore, clarification of the wording of the key challenge of the first challenge within the plan should offer a more strategic consideration of the historic environment.

Monitoring Proposals

The detail of the proposed monitoring indicators is such that it would be difficult for this information to be gathered and monitored at this level in any meaningful way. You may wish to consider waiting for the production of the proposed plan to allow you to better focus on the measurable environmental effects of the plan and then reporting your monitoring programme in the SEA adoption statement.

What Happens Next?

I note that you propose to prepare an SEA Adoption Statement to accompany the SDP in line with the requirements of the Environmental Assessment (Scotland) Act 2005. This approach is acceptable. However, you should be satisfied that the existing Environmental Report prepared at the Main Issues Report stage adequately covers all facets of the proposed plan.