



## **Post-Adoption SEA Statement**

**Title: Perth and Kinross Waste Management Plan**

**Date: 21 April 2011**

Submit Completed Report To:

sea.gateway@scotland.gsi.gov.uk  
**SEA Gateway**  
ScottishGovernment  
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## Section 1: Cover Note

- 1.1 Name of Responsible Authority** Perth & Kinross Council
- 1.2 Title of Plan, Programme or Strategy** Perth and Kinross Waste Management Plan
- 1.3 Contact Name** Erin Scott
- 1.4 Job Title** Waste Awareness Co-ordinator
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**Signature**

Erin Scott

**Date**

21 April 2011.

## Section 2: Key Facts

3.1	<b>Responsible Authority</b>	Perth & Kinross Council
3.2	<b>Title of PPS</b>	Perth and Kinross Waste Management Plan
3.3	<b>Purpose of PPS</b>	To promote and implement sustainable municipal solid waste (MSW) management policies for Perth and Kinross while minimising the overall environmental impact of waste by managing it in the most environmentally acceptable and economically efficient way through the provision and co-ordination of appropriate wastes management facilities and services.
3.4	<b>What prompted the PPS?</b> <i>(e.g., a legislative, regulatory or administrative provision)</i>	<ul style="list-style-type: none"><li>- Legislative changes</li><li>- Previous strategies and plans out of date</li><li>- New funding arrangements</li><li>- New national recycling and composting targets – Vision for a Zero Waste Scotland</li></ul>
3.5	<b>Subject</b> <i>(e.g., Transport or Tourism)</i>	Waste
3.6	<b>Period Covered by PPS</b>	2010/11 – 2025/26
3.7	<b>Frequency of Updates</b>	Annually
3.8	<b>Area covered by PPS (km<sup>2</sup>)</b>	5285.81
3.9	<b>Map Included?</b>	No
3.10	<b>Summary of nature/content of PPS</b>	Future planning for Waste Management in Perth and Kinross to 2025/26
3.11	<b>Date Adopted</b>	24 November 2010

## **Section 3: Post-Adoption SEA Statement**

This document (referred to as the post-adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

### ***Introduction***

The Perth and Kinross Waste Management Plan has been subject to a process of strategic environmental assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft plan, which included consideration of:
  - the baseline data relating to the current state of the environment;
  - links between the plan, programme or strategy (PPS) and other relevant strategies, policies, plans, programmes and environmental protection objectives;
  - existing environmental problems affecting the PPS;
  - the plan's likely significant effects on the environment, both positive and negative;
  - the mitigation measures envisaged for the protection, reduction and offsetting of any significant adverse effects;
  - an outline of the reasons for selecting the alternatives chosen;
  - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the environmental report.
- Taking into account the environmental report and the results of consultation in making final decisions regarding the PPS.
- Committing to monitoring the significant environmental effects of the implementation of the PPS. This will also identify any unforeseen adverse significant environmental effects and to enable taking appropriate remedial action.

### ***Availability of SEA Documents***

The full PPS as adopted, along with the Environmental Report and Post-Adoption SEA Statement may also be inspected free of charge at Perth & Kinross Council or on the website (a paper copy can be made available on request for a reasonable charge) during normal hours of operation:

Perth & Kinross Council  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

<http://www.pkc.gov.uk/recycling>

Consultation on the Environmental Report was undertaken in parallel with a 7 week consultation period on the content of the draft Perth and Kinross Waste Management Plan. Both the Perth and Kinross Waste Management Plan and the accompanying Environmental Report were made available online and at the premises of Perth & Kinross Council. The consultation period ran from 14 December 2009 to 29<sup>th</sup> January 2010.

Following the consultation period, the Environmental Report and the results of consultation on it were taken into account and used to guide the final decisions regarding the content and scope of the Perth and Kinross Waste Management Plan.

The consultation responses on the draft Perth and Kinross Waste Management Plan are available to view online at [www.pkc.gov.uk/wasteplan](http://www.pkc.gov.uk/wasteplan)

## ***Environmental Considerations & Findings of the Environmental Report***

**Table 1. Identified Environmental Problems**

Potential Problem	Supporting Data (where available)	Implications for the PPS	Has this issue been addressed in WMP?
Rising population and subsequently rising waste arisings	Single Outcome Agreement  SEPA Waste Data Digest	The volume of waste produced in Perth and Kinross and its subsequent treatment is central to reducing the local and global environmental impact of consumption and production. As the area's population increases, waste arisings follow the same trend. Since 2003/04 the total municipal waste arisings has increased from 95,977 tonnes to 105,910 tonnes in 2007/08 (Waste Data Digest <a href="http://www.sepa.org.uk/waste/waste_data_1/waste_data_digest.aspx">http://www.sepa.org.uk/waste/waste_data_1/waste_data_digest.aspx</a> )  The WMP should provide flexibility to deal with population growth and changes	Action 4 Waste data forecast to be monitored with updates based on verified tonnages and used to guide decisions making in future arrangements for the management of waste (page 21 WMP)
Changing composition of waste	National and PKC waste analysis results. Tayside Strategic Waste Management Review (SEPA)	It is imperative that when collecting and processing waste that not only is the quantity understood but the composition is also identified. As consumption patterns change this has an impact on the composition of waste that households and businesses produce. In order to keep abreast of these changing patterns the Council undertakes regular waste analysis of general waste and recycling streams.  Changes in the composition of waste impact the plan as it therefore needs to be able to provide flexibility to deal with changes in waste composition	Action 4 Waste data forecast to be monitored with updates based on verified tonnages and used to guide decisions regarding future arrangements for the management of waste (page 21 WMP) Action 5 PKC to carry put annual waste analysis on household waste (page 21 WMP)
Air quality, Perth city centre	Air Quality Management Plan Draft	Currently, there are high emissions from road traffic and levels of air pollution in two hot spots in Perth. This plan needs to recognise this current state and work within the Perth & Kinross Council Air Quality Report Draft and final report when it is in place.	Section 7. Transportation of waste (Page 41)

		Need to recognise potential trans-boundary effects should the WMP see waste being moved out of Perth and Kinross.	
Contaminated land and soil	<p>Scottish Soil Framework</p> <p>PPC</p> <p>Waste Management Licensing</p>	<p>Contaminated land is land which appears to the enforcing authority to be in such a condition that there is a significant risk of harm to human health or the wider environment. The main objective of the Contaminated Land Regime is to provide an improved system for the identification and remediation of land where contamination is causing, or is likely to cause, such risks, assessed in the context of the current use and circumstances of the land. In this way the regime plays an important role in cleaning up historically contaminated soils. There is also a range of measures specifically aimed at preventing new contamination, most significantly Pollution Prevention and Control (PPC) and Waste Management Licensing, which are regulated by SEPA (<a href="http://www.scotland.gov.uk/Publications/2009/05/20145602/10">http://www.scotland.gov.uk/Publications/2009/05/20145602/10</a>)</p> <p>The use of land for agriculture in Perth and Kinross is still prevalent. The impacts of waste management activities, if not controlled correctly may impact upon the quality of soils. It is noted that peat rich soils are also at risk of being adversely impacted by waste management activities. While this WMP is not site specific, it is proposed that any future developments will address the risks to soils.</p>	Not directly addressed in the WMP but the Council is required to take into account Scotland's Zero Waste Plan and current Scottish Planning Policy during the development of Local and Strategic Development Plans.

## Mitigation & Enhancement Measures

Throughout the SEA process, options of how to enhance positive impacts as well as mitigating any negative impacts were considered.

The main themes incorporated into the Waste Management Plan are -

- Promoting the SEA objectives by utilising the objectives when developing assessment criteria for the residual waste treatment procurement exercise.
- Assumed mitigation through meeting modern regulatory standards and ensuring operator competency.

- Provide education and awareness to reassure residents about impacts of any waste management facilities that may be used in the future by PKC. By providing up-to-date, relevant and researched information to residents would allow them to make informed opinions.
- In terms of enhancement, Perth & Kinross Council will strive to continue to improve on existing good practice such as keeping Perth and Kinross litter free and utilising Sustainable Urban Drainage Systems and re-using rainwater.

**Table 2: Mitigations and Enhancements**

<b>Environmental Considerations</b>	<b>Incorporated into Plan</b>	<b>Who</b>	<b>When</b>
<b>General Mitigation &amp; Enhancement</b>			
Promoting the SEA objectives by utilising the objectives when developing assessment criteria for the residual waste treatment procurement exercise.	No – This is not specifically incorporated into the WMP but will be considered in the actions connected to Residual Waste Treatment and Disposal Procurement (covered under section 7.2 of the WMP).	Waste Services  (Procurement Officer, Waste Services Manager, Waste Plan Co-ordinator)	Ongoing
Assumed mitigation through meeting modern regulatory standards and ensuring operator competency.	No - This is not specifically incorporated into the WMP but will be considered in the actions connected to Residual Waste Treatment and Disposal Procurement (covered under section 7.2 of the WMP).	SEPA for licence regulations  Direct Services and Waste Services	Ongoing  Upon contract award/renewal
Provide education and awareness to properly inform residents about impacts of any waste management facilities that may be used in the future by PKC. By providing up-to-date, relevant and researched information to residents would allow them to make informed opinions.	Yes - Section 9.2 of the Waste Management Plan provides a commitment to increase public awareness of wider environmental, social and financial issues relating to waste.  Action 47 is to Develop a Waste Awareness Communications Plan and this will be incorporated into this	Waste Awareness Co-ordinator	Ongoing  Plan to be completed spring 2011
In terms of enhancement, Perth & Kinross Council will strive to continue to improve on existing good practice such as keeping Perth	Yes - Section 8 of the Waste management Plan includes an	Direct Services Waste Services	Ongoing

<p>and Kinross litter free and utilising Sustainable Urban Drainage Systems and re-using rainwater.</p>	<p>action to undertake a review of the street cleaning specification</p> <p>No - SUDS are not specifically incorporated into the WMP but will be considered in the Recycling Centre Redevelopments mentioned in section 6.5.</p>		<p>2011 - 2013</p>	
SEA Topic	Mitigation/Enhancement Measure		Who	When
<p><b>Biodiversity - To protect and where possible, enhance biodiversity, flora and fauna from the impact of waste management activities we will ...</b></p>	<ul style="list-style-type: none"> <li>• Ensure any facilities used by Perth &amp; Kinross Council are run by competent operators and meet all regulatory standards.</li> <li>• Waste Management hazards relevant to landfill sites which can affect biodiversity (in relation to protected sites) – Landfill gas, Landfill gas flare emissions, leachate, surface water, dust, litter, physical access, noise and intrusion, gulls, corvids and rats - can be addressed through a combination of Landfill (Scotland) Regulations 2003, PPC permitting and Conservation (Natural Habitats &amp; c) Regulations 1994.</li> </ul> <p>Note - Under the Habitats Regulations, SEPA has a duty to ensure that all activities it regulates have no adverse effect on the integrity of any European Sites. Regulation 48 of the Habitats Regulations provide that all applications for new permits, including PPC permits for landfills, are screened for potential impacts</p>	<p>No - This is not specifically incorporated into the WMP but will be considered in the actions connected to Residual Waste Treatment and Disposal Procurement (covered under section 7.2 of the WMP).</p> <p>PKC is currently remediating two closed landfill sites. They have been returned to agricultural grazing standards. At one site, wetland restoration and a reed bed system are being considered.</p>	<p>SEPA have responsibility for monitoring waste management operators.</p> <p>Direct Services, Waste Services</p>	<p>Ongoing</p> <p>Ongoing</p>

	<p>on European sites. Permit applications for proposals that are likely to have a significant effect on a European site must undergo an appropriate assessment to ensure no adverse effect is caused to the integrity of these European sites as a result of the activities linked to the landfill site. Applications for PPC permits for existing landfill sites will be treated as new applications and undergo a Regulation 48 assessment as required by the Habitats Regulations.</p>			
<p><b>Human Health - To protect the living conditions, amenities and health of residents from detrimental effects of waste management activities e.g. noise, traffic, dust, littering, odour and particulates and to protect employee, community safety and wellbeing from waste activities and related anti-social behaviour – littering and fly-tipping we will...</b></p>	<ul style="list-style-type: none"> <li>• Provide education and awareness to properly inform residents about impacts of any waste management facilities that may be used in the future by PKC. By providing up-to-date, relevant and researched information to residents will allow them to make informed opinions.</li> <li>• Take account of Health and Safety standards.</li> <li>• As an enhancement measure, maintain Perth and Kinross's national reputation as a clean and litter free area.</li> </ul>	<p>Yes - Section 9.2 of the Waste Management Plan provides a commitment to increase public awareness of wider environmental, social and financial issues relating to waste.</p> <p>Action 47 is to Develop a Waste Awareness Communications Plan and this will be incorporated into this Actions 41-45</p>	<p>Waste Services Waste Awareness Co-ordinators</p> <p>Waste Services Waste Awareness Co-ordinators</p> <p>Direct Services, Waste Services</p>	<p>Ongoing</p> <p>Spring 2011</p> <p>2011 – 2025</p>
<p><b>Soil - To ensure soil</b></p>	<ul style="list-style-type: none"> <li>• Ensure that any residues produced</li> </ul>	Inherent in strategy	Waste Services	Ongoing

<p><b>protection is taken into account with regard to waste management activities and as far as is practicable, prevent contamination of land we will...</b></p>	<p>via residual waste treatment are further treated and recovered or disposed of to the correct landfill facility.</p> <p>Our enhancement measures for soil include:</p> <ul style="list-style-type: none"> <li>• By continuing to compost as much organic waste as possible, and producing good quality PAS 100/110 compost/digestate</li> </ul>	<p>While this is not specifically incorporated into the WMP it will be considered in the actions connected to Residual Waste Treatment and Disposal Procurement (covered under section 7.2 of the WMP).</p>	<p>Waste Services (Procurement Officer, Waste Services Manager, Waste Plan Co-ordinator)</p>	
<p><b>Water - To protect water courses from, reduce adverse effects of waste management activities and to improve the quality of water and wastewater discharges resulting from waste management activities we will utilise the following enhancement measures –</b></p>	<ul style="list-style-type: none"> <li>• Further roll out of sustainable urban drainage systems to additional sites.</li> <li>• Reuse of rainwater for vehicle cleaning.</li> </ul>	<p>No - SUDS are not specifically incorporated into the WMP but will be considered in the Recycling Centre Redevelopments mentioned in section 6.5.</p> <p>Reuse of rainwater ongoing operation</p>	<p>Waste Services, Direct Services</p> <p>Direct Services</p>	<p>2011-2013</p> <p>Ongoing</p>
<p><b>Air - To minimise adverse impacts of waste management activities on the air quality and public health we will...</b></p>	<ul style="list-style-type: none"> <li>• Streamline vehicle movements and/or using more efficient engines and fuels. Further develop travel staff plans.</li> </ul>	<p>Not specifically incorporated in the plan but Direct Services looking into fuel efficient vehicles at present.</p> <p>No - This is not specifically incorporated into the WMP but will be considered in the actions connected to Residual Waste Treatment and Disposal</p>	<p>Direct Services</p> <p>Waste Services (Procurement Officer, Waste Services Manager, Waste Plan</p>	<p>Ongoing</p> <p>Ongoing</p>

	<ul style="list-style-type: none"> <li>Ensure any facilities employed to treat waste from Perth and Kinross are run by competent operators who are able to undertake these duties and comply with all regulatory standards.</li> </ul>	Procurement (covered under section 7.2 of the WMP).	Co-ordinator)	
<b>Climatic Factors - To reduce GHG emissions from waste production and disposal we will...</b>	<ul style="list-style-type: none"> <li>Continue to support and provide opportunities to households and businesses in Perth and Kinross to reduce their waste, thereby lessening the volume of waste going to landfill.</li> <li>Ensure landfill operators used by Perth and Kinross are competent and meet all regulatory standards.</li> <li>The procurement process and service delivery plans will be developed to allow them to be flexible enough to take account of climate adaptation.</li> </ul>	<p>Yes – integrated into strategy Section 5 , Waste Prevention and Resource Efficiency (page 22 – 25)</p> <p>No - This is not specifically incorporated into the WMP but will be considered in the actions connected to Residual Waste Treatment and Disposal Procurement (covered under section 7.2 of the WMP).</p>	<p>Waste Services</p> <p>Waste Services, Direct Services</p>	<p>Ongoing</p> <p>Ongoing</p>
	<ul style="list-style-type: none"> <li>Monitoring of waste operations will be carried out to identify whether extreme weather events are causing operational difficulties.</li> </ul>	PKC to develop Climate Changes Mitigation and Adaptations Strategy and Risk Framework in 2011.	Strategic Policy and Sustainable Development team to lead	2011
<b>Material Assets -To maximise waste prevention, reuse, recycling and recovery rates by viewing waste as a resource and to collect and/or treat</b>	Continue to support and promote waste prevention and reuse activities such as Real Nappies, bicycle reuse and re-sell through the Bike Station, WRAP home composting initiatives and local furniture reuse projects.	<p>Yes -</p> <ul style="list-style-type: none"> <li>Waste Prevention &amp; Resource Efficiency is covered in section 5 of the WMP</li> <li>Waste recycling and composting is covered in</li> </ul>	Waste Services	Ongoing

waste at the nearest and appropriate stations we will...		section 6 of the WMP		

## Consultation Comments

**Table 3: Summary of comments from public consultation and response of Perth & Kinross Council.**

Consultation Response Table for the Environment Report on the Perth and Kinross Waste Management Plan		
Consultee/ Respondent	Comments/Key Points Raised	Perth & Kinross Council's Response
Scottish Natural Heritage	Noted that the River Tay is the longest river in Scotland	Noted
	<p>Technical Evaluation, P25</p> <p>While "it is not possible for this report to provide further assessment of these options as a procurement process will determine the best option for the treatment of residual waste produced in Perth and Kinross", we note that "the SEA objectives will be utilised when developing assessment criteria for the residual waste treatment procurement exercise." The first stages in the procurement process should be to identify what is to be achieved by the process then identify the criteria which bids will be assessed.</p>	<p>What is to be achieved by the procurement process is the suitability of the final treatments to fulfil PKCs legal obligations in diverting waste from landfill and meeting recycling targets, both from the EU Landfill Directive and the National Zero Waste targets.</p> <p>The use of the SEA objectives will be part of a much larger criterion that will be determined and used at the time of the procurement process.</p>
	<p>Vast reduction in landfill</p> <p>The most recent data for Scotland indicates that residual Municipal Solid Waste accounts for 30% of total waste going to landfill</p> <p>The plan refers</p> <ul style="list-style-type: none"> <li>• in Table 9, Section 5.2 to the effects of Options 2 and 3 on Biodiversity include a, "vast reduction in the need and use of landfill in Perth and Kinross." It is not clear whether any of the existing landfill capacity or potential new landfill capacity is actually within the Perth and Kinross area. What landfill capacity is there and what are the projections for its "life"? There would still be a need for new landfill at some point, though perhaps not within the period of the plan.</li> <li>• under Climatic Factors the Comments for these Options the phrasing used is different a, "significant reduction in waste to landfill."</li> </ul>	<p>Noted.</p> <p>There has been no work undertaken as yet as to any land planning issues for the location of a new landfill site with in Perth and Kinross. This is a land planning issue and will be dealt with by the Planning Department. The current landfill site is privately owned, with PKC acting as customer only. The current estimated life span for this landfill is up to 2013 (Tayside Area Waste Plan 2003).</p> <p>Noted.</p>

	<p>Section 5.4 page 31 The question is whether the overall effect of Option 1 is greater or less than Options 2 and 3. The options are:</p> <ul style="list-style-type: none"> <li>• Option 1 - producing landfill gas,</li> <li>• Option 2 - producing less landfill gas, plus whatever other gases are generated by other treatment processes,</li> <li>• Option 3 - producing less landfill gas, plus whatever other gases are generated by other treatment processes</li> </ul> <p>And there should be some analysis of the relative impacts of the three options, taking into account;</p> <ol style="list-style-type: none"> <li>1 the volume of the different gases produced,</li> <li>2 the timescale over which they are produced and</li> <li>3 the impact that each gas would have.</li> </ol>	<p>At this stage, the relative impacts of technologies cannot be calculated under each broad technology heading. Under each of these headings sits a suite of options i.e. for Anaerobic Digestion there are over 80 companies offering AD technology. (The Anaerobic-Digestion.Com List of Anaerobic Digestion Plant Technology Suppliers, 2010) The undertaking of such in-depth analysis would be undertaken during procurement phase within EIA parameters to ensure an in-depth level of study.</p>
	<p>Mitigation or Enhancement On Page 34, in Table 11, Section 5.6 ensuring that, “any facilities used by Perth &amp; Kinross Council are run by competent operators and meet all regulatory standards” is insufficient mitigation or enhancement measure “to protect and where possible, enhance biodiversity, flora and fauna from the impact of waste management activities”, since the definition of competent operators and regulatory standards does not encompass biodiversity enhancement. The planning process carries the major responsibility for protection of the natural heritage and landscape.</p>	<p>That section will remain however the addition of use of the planning process to protect the natural heritage and landscape will be included.</p> <p>In addition, the P+K Local Development Plan and Main Issues Report states, “The preferred approach is a simple all encompassing policy echoing the provisions of the Nature Conservation (Scotland) Act 2004 by seeking to protect and enhance biodiversity throughout the Plan Area. The Proposed Plan would identify only major designated sites and green corridors leaving the others to be protected by the general policy which would be expanded upon in Supplementary Guidance giving detailed advice on subjects such as:</p> <ul style="list-style-type: none"> <li>• When an ecological survey is required</li> <li>• Timing of development to minimise impact on wildlife</li> <li>• Mitigation measures and enhancement opportunities</li> </ul>

		<ul style="list-style-type: none"> <li>• Appropriate species choice</li> <li>• Where to get advice</li> <li>▪ Examples of best practice"</li> </ul>
Historic Scotland	No comments	As per HS response to the Screening and Scoping Report.
SEPA	<p>General Comments</p> <p>We consider that the Environmental Report (ER) provides a succinct and clear assessment of the potential significant environmental effects of the options considered for the Perth &amp; Kinross Waste Management Plan. In general we are content with the contents of the ER and we agree with the chosen option (option 3) as we believe that of the three options this is the one that most promotes the waste hierarchy and sustainable waste management.</p> <p>We are satisfied that most of the comments from our Scoping Report (SR) response have been taken into account. In particular we welcome the inclusion of a table with a summary of comments in Appendix 4, the consideration of climate change adaptation and the intention to revise the monitoring programme to take into account the consultees comments. In addition we note that the approach for undertaking a technical feasibility options appraisal of residual waste treatment facilities has changed from the SR to the ER and much less information is provided in the ER from what originally anticipated. Details about the above issues are explained further in the response.</p> <p><b>Non-Technical Summary</b></p> <p>We consider that the non-technical summary provides a clear summary of the findings of the ER and the information required under paragraphs 1 to 9 of Schedule 3 of the Environmental Assessment (Scotland) Act 2005.</p>	No actions required
	<p><b>Section 1: Introduction</b></p> <p>As a minor point, please note on Table 2 (SEA activities to date) the consultation period for the Waste Management Plan and its accompanying ER started on the 14<sup>th</sup> December and will terminate on the 29<sup>th</sup> January.</p>	Noted and changed for final ER.
	<p><b>Section 2: The Perth and Kinross Waste Management Plan Context</b></p> <p>We found the background information about the Plan very helpful, in particular the reference to the history of its development. We note that the list of relevant Plans,</p>	No action required

	<p>Programmes and Strategies (PPS) has been updated with the suggestions from our SR response.</p>	
	<p><b>Section 3: Perth and Kinross Environmental Baseline</b>  We found the background information provided in this section useful and comprehensive. We therefore consider that the relevant context, baseline and environmental problems have been identified in the ER. We have some comments about the information provided for some of the SEA topics, as outlined below:</p> <p><b>Water</b>  We are satisfied with the level of information reported about the Tay River Basin District, including the reference to water body status and the inclusion of web-links for reference to further details. We note that our suggestion to include a reference to the interactive flood map has been taken into account. Please note that the Scotland River Basin District Management Plan was published in 22 December 2009.</p> <p>Please note that there is an error in the title of the Water section in page 15 as it refers to the Air Quality Management Plan.</p> <p><b>Waste</b>  We welcome the amendment of Table 5 with more up-to-date information, following recent publication of municipal waste data for 2008/2009.</p>	<p>No action required. PKC acknowledges the information for the completed River Basin District Management Plan publication date which followed after the release of the ER report.</p> <p>The information from that section was taken mainly from the Air Quality Management Plan for PKC.</p> <p>No action required</p>
	<p><b>Section 4: State of the Environment without the Waste Management Plan</b>  We have no comments on this section.</p>	<p>No action required</p>
	<p><b>Section 5: Selecting the Preferred Option</b>  In general we are satisfied that the assessment has been carried out comprehensively and informed the selection of options. We welcome the reference to a more detailed assessment in Appendix 3.</p>	
	<p><b>Table 7</b>  Soil – Although the assessment makes reference to the fact that all the options would require land take, there is no specific mention to the type of land. We understand that as the Plan does not identify specific locations for waste management facilities it is more difficult to consider the effects on soil. In addition to the general statement included in the assessment, we would therefore welcome further consideration to the</p>	<p>Further consideration to the impact on different soil types would be undertaken as procurement stage.</p>

	<p>impact on different types of land that may be taken, in particular on prime agricultural land and peatlands, as suggested in our SR response. This could be done at procurement stage for the waste management facilities locations.</p> <p>Climatic factors – We note that you have not included climate change adaptation as a sub-objective but we note that consideration has been given to climate change adaptation in the proposed mitigation measures and this is welcome. As stated in our SR response the options proposed in the Plan should be as far as possible “climate proofed” and should be robust and viable to the predicted changing climate conditions (such as increased flooding and extreme weather events).</p>	<p>LDP Main Issues Report states ‘Scottish Planning Policy requires that Local Development Plans should identify areas of carbon rich soils, particularly areas of deep peat, and ensure that future developments do not cause irreversible damage to these areas which are already facing potential increased pressures from climate change. New development including roads should take account of the potential increased risk of soil erosion that they may cause or be subject to. The preferred option is to develop a policy which:</p> <ul style="list-style-type: none"> <li>• Protects carbon rich soils from development</li> <li>• Ensures the optimal use of agricultural land required to implement the strategy</li> </ul> <p>This is not specifically incorporated into the WMP but will be considered in the actions connected to Residual Waste Treatment and Disposal Procurement (covered under section 7.2 of the WMP).</p>
	<p><b>Options</b></p> <p>We note that a third option has been added following suggestions from our SR response and we welcome this. In particular we welcome the reference to the zero waste targets as the ZWP will become the main driver for all waste management plans in Scotland once adopted.</p> <p>It is noted that the alternatives are developed by adding ‘layers’ for diversion from landfill. This approach follows the same process for alternatives developed for the ZWP.</p>	<p>No action required</p>
	<p>Technical Evaluation. There seems to have been a change of plan from the SR on how the technical and financial options appraisal of residual waste treatment technologies have been undertaken and a clear difference in the approach and level of detail provided in the ER. The process mentioned in the SR seems to have been superseded with a different approach carried out by Halcrow and very little information has been provided on this in the ER compared to what envisaged in the SR. Some information</p>	<p>The changes were made due to the change in options. Originally it had been envisaged that each technology would be assessed, however on further study the decision was made not to select a preferred treatment technology, rather the preferred outcome to be gained from the Waste</p>

	<p>and a link to the study are made in the Plan itself (page 37). It would have been helpful to include a link to this study and to provide a summary of the information in the ER.</p> <p>This change of method and presentation makes the appraisal of residual waste treatment technologies options more separate from the SEA than originally anticipated. Although we appreciate that only at procurement stage it will be possible to determine the preferred option, we would welcome further clarification on how the outcome of the report will be used to help procurement in order to add transparency to the process. We would therefore welcome further information about the methodology used, the findings (including impact on the environment) and how they have been implemented as part of the SEA statement. Please note Appendix E (Review of Waste Technologies and Environmental Effects) of the ZWP SEA provides a good overview of the impact of waste management technologies on the environment and human health.</p>	<p>Management Plan that any treatment technologies would be required to meet.</p> <p>PKC acknowledge the change in methodology between the stages of Scoping and the ER. This change is due to inability to accurately assess the technologies in any detailed way. However, the Scottish Government Zero Waste Plan consultation provides a very generalised assessment (<a href="http://www.scotland.gov.uk/Publications/2009/08/19155137/18">http://www.scotland.gov.uk/Publications/2009/08/19155137/18</a>) of some of the technologies investigated on behalf of PKC for the Perth &amp; Kinross Council, Waste Management Plan - Residual Waste Treatment Draft Options Proposal.</p>
	<p>Energy production is often seen as a positive significant environmental effect related to Energy from Waste (EfW) plants. We note that EfW has been included in the list of technologies assessed in the technical evaluation, however the potential positive effects of this technology on energy production has not been considered in the assessment.</p>	<p>This is not specifically incorporated into the WMP but will be considered in the actions connected to Residual Waste Treatment and Disposal Procurement (covered under section 7.2 of the WMP).</p>
	<p>We are satisfied with the assessment of cumulative and synergistic effects and we welcome the intention to re-assess the analysis when site specificity becomes available, especially for Air. In addition we welcome the acknowledgement that impacts on local communities may arise out of anxiety and lack of knowledge with regards to the management of waste and the proposed mitigation measures to address these effects.</p>	<p>No action required</p>
	<p>We are content with the mitigation and enhancement measure identified and in particular we acknowledge the effort made to link such measures to the detailed assessment in Appendix 3.</p> <p>As mentioned elsewhere in this response we welcome the consideration of climate change adaptation as part of the mitigation measures.</p>	<p>No action required</p>

	<p><b>Monitoring.</b> We note the amendment of Table 12 from the SR with the inclusion of the number of localised extreme weather events and impacts on waste management activities. However you may wish to consider indicators that are more targeted to waste management activities as suggested on our SR response, such as:</p> <ul style="list-style-type: none"> <li>• Area of Brownfield land and Greenfield land developed for waste management activities;</li> <li>• Carbon emissions that result from waste management activities (rather or in addition to total emissions from P&amp;K area);</li> <li>• Ecological status of waste bodies – Based on the new monitoring and classification system for water bodies (as introduced by the Water Framework Directive).</li> </ul>	<p>PKC will consider further indicators more targeted to waste management activities for monitoring purposes.</p> <p>Little availability of brownfield land for development in P&amp;K therefore this indicator would not be useful. Will follow Scottish Government Guidelines on Carbon Metric for Waste Management when it is introduced. Also actioned in WMP (Action 18) to carry out carbon impact assessment of waste and recycling collections.</p> <p>Part of overall PKC environmental monitoring regime, as covered by the Perth and Kinross State of the Environment Report, of which WMP is only one contributor</p>
	<p>Although this may be already included under the number of localised extreme weather events under Climatic Factors, the number of flooding events could be added under Water.</p> <p>We understand that the above indicators will be incorporated in the revised monitoring programme, as mentioned in the NTS.</p>	<p>PKC will add number of flooding events under the heading of Water as part of the monitoring programme.</p>

## Section 4: Implementation & Review

### Summary of Findings

The main impact the SEA process had on the development of the WMP was to identify more realistic options for consideration at the Scoping stage.

The consultation responses to the Environment Report put forward several suggestions now incorporated into the Environment Report. These consisted mainly of additional monitoring methods.

The Perth and Kinross Waste Management Plan will be reviewed annually. This process will include consideration of whether the WMP needs to be amended as Perth & Kinross Council's priorities change; understanding of the issues, available resources and other circumstances may have changed significantly over that period. Relevant monitoring information will be reported in the Annual Review.

Perth & Kinross Council has concluded that no significant changes were needed between the draft and finalised versions of the Perth and Kinross Waste Management Plan, that would lead to a requirement to produce a revised Environmental Report.

### Monitoring Measures

Perth & Kinross Council intends to monitor the PPS in line with the Environmental Assessment (Scotland) Act 2005 using the following measures.

**Table 4: Indicators of direct relevance to the WMP and will be included in the annual review**

What is being monitored	Proposed Indicator	Timescale and responsibility
<b>Biodiversity, Flora and Fauna</b>	Enhancement measures implemented at any closed landfill sites.	Waste Services by 2011
<b>Human Health</b>	<ul style="list-style-type: none"> <li>• Population figures from               <ul style="list-style-type: none"> <li>○ Census data</li> <li>○ General Registrar Office for Scotland (GROS)</li> </ul> </li> <li>• Cleanliness Grades in Perth and Kinross. (LEAMS)</li> <li>• SEPA flytipping statistics</li> </ul>	Annually where applicable. Census data as required.  PKC Audit Scotland SEPA
<b>Water</b>	PKC directly monitor leachate and surface water from any sites.	Direct Services, ongoing
<b>Air</b>	Number of localised extreme weather events and impacts on waste management activities.	As per weather events, PKC Reported through the Climate Adaptation Strategy.
<b>Climatic Factors</b>		
	Carbon metric	Scottish Government intends to finalise details of the carbon metric and produce guidance on how it will be applied before the

		end of 2010. The 2013 target of recycling 50% of all waste will be the first target that will be measured on the basis of the carbon metric.
<b>Material Assets (Resource efficiency)</b>	<ul style="list-style-type: none"> <li>• Waste arisings</li> <li>• Location and number of related waste management infrastructure</li> <li>• Other indicators from plan? E.g. No. Of recycling points in Perth &amp; Kinross</li> </ul>	Quarterly waste arisings. PKC and SEPA Annually for remainder, PKC

Indicators which provide context for the Perth and Kinross area but are difficult to attribute to the Waste Management Plan in isolation are -

**Table 5: Additional indicators for Perth and Kinross Area**

<b>What is being monitored</b>	<b>Proposed Indicator</b>	<b>Timescale and responsibility</b>
<b>Biodiversity, Flora and Fauna</b>	<ul style="list-style-type: none"> <li>- Tayside Local Biodiversity Action Plan Priority Species and Habitat</li> <li>- Condition of biological and mixed SSSIs</li> </ul>	Annually Local Biodiversity Action Plan - PKC
<b>Human Health</b>	<ul style="list-style-type: none"> <li>- Population figures from - Census data General Registrar Office for Scotland (GROS)</li> <li>- Housing figures from Housing &amp; Community Care.</li> <li>- Cleanliness Grades in Perth and Kinross. (LEAMS)</li> <li>- SEPA flytipping statistics</li> </ul>	Annually where applicable.  PKC Audit Scotland  PKC SEPA
<b>Water</b>	<ul style="list-style-type: none"> <li>- Surface Water Quality –SEPA</li> <li>- Groundwater Quality -SEPA</li> </ul>	As per SEPA monitoring schedule.
<b>Air</b>	<ul style="list-style-type: none"> <li>- Carbon Emissions for the PKC area</li> <li>- Mean Annual level of air pollutants</li> <li>- Number of poor air days</li> </ul>	As per air quality monitoring program – PKC
<b>Climatic Factors</b>	<ul style="list-style-type: none"> <li>- Number of localised extreme weather events and impacts on waste management activities.</li> </ul>	As per weather events, PKC
<b>Material Assets (Resource efficiency)</b>	<ul style="list-style-type: none"> <li>- Waste arisings</li> <li>- Location and number of related waste management infrastructure</li> <li>- Energy consumption (PKC)</li> <li>- Fuel usage/costs (PKC)</li> <li>- Electricity costs (PKC)</li> </ul>	Quarterly waste data reporting. PKC and SEPA Annually for remainder, PKC

## **Conclusion**

We believe that the SEA process has been of significant help in developing a balanced Perth and Kinross Council Waste Management Plan. It has in particular, helped with enhancing positive aspects of the plan.

This in turn will ensure that the management of waste in Perth and Kinross is undertaken correctly and with the highest environmental benefits possible within the limitations of the plan.