

Our ref: PCS/131245
SG ref: SEA00815/er

Graham Esson
Perth & Kinross Council
Planning and Regeneration
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

If telephoning ask for:
Silvia Cagnoni-Watt

7 March 2014

By email only to: sea.gateway@scotland.gsi.gov.uk

Dear Graham Esson

Environmental Assessment (Scotland) Act 2005
Perth and Kinross Council - Forest and Woodland Strategy - Environmental Report

Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Perth and Kinross Council (PKC) - Forest and Woodland Strategy (FWS). This was received by SEPA via the Scottish Government SEA Gateway on 22 January 2014.

We have used our scoping consultation response to consider the adequacy of the ER and this is used as the framework for detailed comments which can be found in Appendix 1. For convenience, these comments have been structured to reflect that of the ER. Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the FWS itself will be provided separately.

As the FWS is finalised, Perth and Kinross Council 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 Guidance available at: www.scotland.gov.uk/Publications/2013/08/3355. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this environmental report consultation, please do not hesitate to contact me on 01786 452430 or via our SEA Gateway at sea.gateway@sepa.org.uk

Yours sincerely

Silvia Cagnoni-Watt
Senior Planning Officer

Ecopy: hssea.gateway@scotland.gsi.gov.uk ; sea_gateway@snh.gov.uk



Chairman
David Sigsworth

Chief Executive
James Curran

Strathearn House
Broxden Business Park,
Lamberkine Drive, Perth, PH1 1RX
tel 01738 627989 fax 01738 630997
www.sepa.org.uk

Appendix 1: Comments on the Environmental Report

General comments

We consider that the Environmental Report (ER) provides a succinct and clear assessment of the potential significant environmental effects of the Perth & Kinross Council (PKC) Forest and Woodland Strategy (FWS).

We are pleased to see that the comments provided in our scoping response have largely been taken into account in the preparation of the ER. We welcome the inclusion of Appendix D showing if and how the comments from the scoping consultation have been addressed and making reference to sections of the ER where changes have taken place.

We understand that, following the submission of the Scoping Report to the SEA Gateway, the FWS would no longer meet the timetable to be a pilot project for SEWeb. Instead PKC will carry out its own analysis of the data for the scenario testing stage in the process and consider an alternative project to work with SEPA on as part of the pilot for the SEWeb project.

We are generally satisfied with the ER and welcome the environmental assessment and its findings. Please find detailed comments below.

Detailed comments

1. Non- Technical Summary

- 1.1 We consider the Non-Technical Summary (NTS) to be clear and comprehensive, providing a succinct summary of the contents of the ER.

2. Environmental Report

- 2.1 We are satisfied with the methodology used in the assessment and welcome the use of the spatial baseline as well as narrative in the consideration of the significant environmental effects.
- 2.2 Please find below some comments in relation to specific SEA topics and also refer to our comments to the FWS, sent separately, for further information.
- 2.3 We welcome the list of mitigation and enhancement measures in Table 10. The use of codes makes it easier to understand the references in the assessment tables. We note that almost all of the measures have the condition 'where appropriate' added at the beginning of the description. We understand the reasons for adding such wording to highlight that in some cases it may not be possible to apply the mitigation/enhancement, however we would strongly recommend that the measures are implemented as much as possible and that the strategy show a commitment towards mitigation and opportunities for enhancement.
- 2.4 We understand that the monitoring framework will be reported in the SEA Post Adoption Statement which will follow the adoption of the Strategy. We would have welcomed at least a basic framework with the proposed indicators to be included as part of the ER.

Flooding

- 2.5 Please note that SEPA published new flood maps for Scotland on its website on 15 January 2014. The new maps are the most comprehensive national source of data on flood hazard and risk. They will support the development of Flood Risk Management Strategies and are replacing the Indicative River and Coastal Flood Map (Scotland) (IRCFM(S)).
- 2.6 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess, flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit http://www.sepa.org.uk/flooding/flood_maps.aspx.
- 2.7 We note the reference to the role of forestry in terms of protection from flooding. In our response to the FWS we have made further comments regarding the relation between forestry and flood protection which are relevant for the assessment.

Waste

- 2.8 We note that in response to our suggestion to include an objective in relation to waste Appendix D reads:
- 2.9 *'In terms of the new suggested objective related to waste and resources, as highlighted previously, the Zero Waste Plan (ZWP) only deals with municipal solid waste and construction waste in terms of timber/wood. The SEA could include an objective related to the ZWP, and could promote the waste hierarchy as a criterion but it is difficult to see how PKC could monitor/measure the implementation of this, and it is unsure how relevant this would be to the actual Strategy. It is considered that the suggested criterion relating to promoting the reduction in flytipping and litter is too detailed for the scale and scope at which the Strategy will be operating, and would perhaps be better raised through individual forest management plans'.*
- 2.10 We would like to remind you that the Zero Waste Plan 2010 deals with all waste and therefore the FWS has a role to play in achieving the ZWP objectives. <http://www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/wastestrategy>. This is also mentioned in Appendix A when presenting the Perth & Kinross Waste Management Plan 2010-2025 as part of the list of plans, programmes and strategies (PPS).
- 2.11 We are in agreement that the dataset we proposed at scoping stage may be too high level for the strategy and understand that the PKC Local Development Plan (LDP) and relative SEA have already addressed the waste issue for the area, however we would find it appropriate that the FWS acknowledged its role in meeting the ZWP objectives.
- 2.12 Where forest operations or activities produce waste then appropriate waste management options require consideration and adoption. The Waste (Scotland) Regulations 2011 emphasises the relevance and importance of the waste hierarchy and it being applied in a way which delivers the best overall environmental outcome.
- 2.13 There are a number of forestry activities which may require a waste management exemption, or possibly license, from SEPA. These include the treatment of land for

ecological improvement, composting, the chipping of waste plant matter, the burning of plant tissue waste and the temporary storage of waste. Further information on this is available from our [Activities exempt from Waste Management Licensing page](#). We also have guidance on the [Management of Forestry Waste](#).

- 2.14 We would welcome reference to the fact that waste and litter issues could be dealt with at a more local level in the body of the ER.
- 2.15 We would also highlight that there is a link between meeting objective 10 in terms of renewable energy from wood and meeting the objectives of the ZWP.

Water

- 2.16 We welcome the fact that the water objective considers not only preventing further deterioration of, and promoting protection but also promoting the enhancement of the ecological status of the water environment.
- 2.17 In the ER however there is often reference to water quality rather than the quality of the water environment. In addition to information on water quality and the traditional water chemistry measurements, the Water Framework Directive requires the use of tools which assess the impact of other aspects of the environment's quality, including water quantity (changes to levels and flows), the forms and processes which affect the structure/shape of our waters (morphology) and the impact of non-native species. We are satisfied that not only water quality in strict terms has been considered in the assessment, however the terminology used could have been clearer.
- 2.18 We welcome the inclusion of the table on baseline rivers/lochs in forested catchments with good or high status 2010 in Appendix B.2 environmental quality. We would have however welcomed reference to waterbodies with moderate, poor and bad status as well as good status. In addition we note that the data refers to 2010. Please note that more recent data is available for 2012 in http://www.sepa.org.uk/water/monitoring_and_classification/classification/classification_results.aspx

3. Appendices

Appendix C

We are satisfied with the assessment table in this appendix and are generally content with the results of the assessment. Please note our general comments by SEA topic in section 2.

Appendix D

- 3.1 We welcome the inclusion of Appendix D outlining the actions taken in response to the scoping consultation comments. In particular we welcome the reference to where the changes have taken place in the ER.
- 3.2 We note that in response to your comments in relation to the inclusion of waste information, reference is made to the fact that the ZWP 2010 only deals with municipal solid waste and construction waste in terms of timber/ wood. As mentioned in paragraph 2.6 the objectives of the ZWP are related to all waste.

- 3.3 We understand that some of our suggestions have not been taken into account because considered inappropriate for the scale of the strategy and would be better raised through individual forest management plans. We are content with this approach and we would therefore welcome a reference to this in the strategy.