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Planning Officer
The Environment Service
Perth and Kinross Council
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22 July 2014

Our ref: CNS/SEA/00927

Dear Julie

Environmental Assessment (Scotland) Act 2005
00927 Perth and Kinross Council Placemaking Guide

I refer to your scoping report, sent to the Scottish Government SEA Gateway on 24 June 2014. In accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, Scottish Natural Heritage has considered the report in its role as a Consultation Authority under the above Act. Our comments on the scope and level of detail to be included in the Environmental Report (ER) and on the duration of the proposed consultation period are set out below, and our detailed comments are appended in the Annex to this letter.

Scope of assessment and level of detail

Subject to the specific comments set out in the Annex, SNH is content with the scope and level of detail proposed for the Environmental Report.

Consultation period for the Environmental Report

I note that the Environmental Report is proposed to be submitted in late August and that a 6 week consultation period is proposed. I confirm we are content with this timescale.

I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. I understand that SNH will be separately consulted on our views regarding the Environmental Report and the Placemaking Guide itself.

Should you wish to discuss this scoping response, please contact Carolyn Deasley on 01738 458583 or via SNH's SEA Gateway at sea.gateway@snh.gov.uk

Yours sincerely



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Annex: Detailed comments from SNH in relation to 00927 SEA Scoping report: Perth and Kinross Placemaking Guide

Environmental Assessment (Scotland) Act 2005
22 July 2014

Section 1 - Relationship with other Plans, Programmes and Strategies (PPS)

Thank you for providing a detailed assessment of PPS thought to have an influence on or be influenced by the Placemaking Guide in Appendix 1, and summarising the key documents in the scoping report. We note that plans or programmes above the Scottish level have in most cases been excluded from the analysis.

Section 2 - Environmental Baseline

Biodiversity, flora and fauna:

Map - Area of strategic conservation designations: recommend add National Nature Reserves (NNRS).

Green infrastructure can make a key contribution to better places. We recommend a baseline position is provided for green networks in the Council area. This is also consistent with their reference in Policy PM1 of the LDP.

Map: Distribution of existing woodland: we suggest baseline information on proposed increases in woodland cover and recommend these are broken down into the type of woodland cover which is being created (i.e. ha/ % coniferous, ha/ % broadleaved).

We recommend adding baseline data for access paths and key recreational assets which contribute to quality of place making.

Environmental problems in Perth and Kinross: The table lists the environmental issues for each SEA topic and we have made some recommendations below:

Biodiversity, flora and fauna: Suggest revise this to make explicit that the intention is to protect and enhance all biodiversity (habitats and species), and not just nationally important sites and species.

Population and human health: "Ease of access to..." - add access/use of green space – this contributes to mental and physical wellbeing.

Soil: Add protection of carbon rich soil.

Section 3: SEA objectives and indicators

Proposed SEA objectives: The provision of specific SEA objectives is welcomed.

Indicators: Some of the indicators are less relevant to the placemaking guide and we suggest indicators are refined/limited to those of most relevance. We recommend the use of the following indicators in terms of the natural environment's contribution to placemaking:

Add: We encourage the creation of green networks as part of better placemaking; "Produce a green network map of the Council area. Implement its findings to improve ecological resilience and connectivity of green infrastructure and its contribution to better places"

Add: 'Area of new green networks created or enhanced as part of new development or linking to existing green networks.'

Add: 'Area of new planting of broadleaved native woodland achieved through new development.'

Add: 'Length of new cycleways created or links to existing routes.'

Section 4: Alternatives and Assessment Methodology

We are generally content with the assessment method proposed.

SEA assessment criteria: We suggest more positive, enhancement related criteria as the placemaking guide aims to positively improve the quality of the environment. For example, 'Biodiversity, flora and fauna' first criterion could be amended to "Will the placemaking policy promote the conservation, connectivity and enhancement of native habitats and species?"

Proposed Assessment methodology: We suggest that the thresholds for assessing impacts should be in the context of Perth and Kinross so they provide more meaningful assessment for the guide. For example, the extinction of a species/habitat will be extremely unlikely, and this should be reworded so that locally important habitat loss would be assessed as 'minor negative', regional/nationally habitat loss would be evaluated as 'major negative' etc.

Cumulative and synergistic effects: We support the approach outlined for the assessment of these effects.

Mitigation measures: We welcome the intent to include mitigation measures and suggest the presentation of mitigation/enhancement measures as a separate column in the assessment matrix. This will provide a clear link between any adverse effects identified through the assessment and the mitigation/enhancement measures required. We recommend this includes descriptions of the measures to mitigate significant adverse effects identified by the assessment, explanation of the reasons for it and identifying who will implement it and when.

Any residual effects should also be identified following mitigation, and enhancement measures included.