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Our ref: AMN/23/121/JLC  
Your ref:

19 April 2007

Dear Ms Duffy

**Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004  
Perth and Kinross Council Auchterarder Expansion – Townhead and North East  
Development Framework: Scoping Report**

Thank you for consulting Historic Scotland on the Scoping Report prepared for the environmental assessment of the above Development Framework, received by the Scottish Executive SEA Gateway on 16 March 2007.

I have reviewed the Scoping Report on behalf of Historic Scotland in its role as a Consultation Authority under the above Regulations (Regulation 17). This letter contains the views of Historic Scotland on the scope and level of detail of the information to be included in the Environmental Report (part 1), and the duration of the proposed consultation period (part 2). I have also provided detailed comments on the Scoping Report in Annex A to this letter. Simply for information, I have attached Historic Scotland's response to the draft Masterplan in Annex B.

**1. Scope of assessment and level of detail**

- 1.1 The Scoping Report provides a clear outline of the proposed approach to the environmental assessment of the Development Framework, and subject to the specific comments set out below, I am content with the scope and level of detail proposed for the SEA.
- 1.2 My understanding from the Scoping Report is that the environmental assessment will consider the environmental effects of the Development Framework at each of its three stages of implementation. The environmental effects of development at the Castlemains and Kirton sites, which are adjacent, will be considered together and the environmental effects of development at the Townhead site will be considered

separately. The cumulative effects of the overall development will also be assessed. This is an appropriate approach.

- 1.3 I note that the historic environment has been scoped into the assessment (Section 5.3.2. Simply for information, the “historic environment” is defined in Section 16(3) of the Public Appointments and Public Bodies etc. (Scotland) Act 2003 as “... any or all of the structures and places in Scotland of historical, archaeological or architectural interest or importance”. SHEP 1 (para 2.3)<sup>1</sup> builds on this definition by identifying that the historic environment encompasses built heritage features (ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes, as well as marine heritage) and the context or setting in which they sit, and the patterns of past use, in landscapes and within the soil, and also in our towns, villages and streets. The historic environment also has less tangible aspects recognised as the historical, artistic, literary, linguistic and scenic associations of places and landscapes.

I expect the environmental assessment to take cognisance of these features, both in the collection of baseline data and in considering the likely impact of the Development Framework on the historic environment.

- 1.4 Impacts on historic environment features often depend on the land-take associated with infrastructure and supporting activities, and may be avoided through appropriate locational measures. Impacts on the historic environment should be considered in terms of the following:
- direct i.e. loss and or damage to a feature of the historic environment
  - indirect e.g. effects on setting; changes to surface drainage patterns; removal of peat; etc
- 1.5 As you will be aware, when undertaking the environmental assessment, you may find that some impacts are uncertain at the strategic level. Where this is the case it is important to identify these issues and to be clear how they will be taken into account at the lower level, for example at the project level, and who will be responsible for following them through.

## 2. Consultation period for the Environmental Report

- 2.1 I am content with the six-week period proposed for consultation on the Environmental Report. Please note that, for administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.

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<sup>1</sup> Historic Scotland are developing a new series of policy documents (Scottish Historic Environment Policy (SHEP)) that both sets out Scottish Ministers’ vision and strategic policies for the wider historic environment, and provides greater policy direction for Historic Scotland. SHEP 1 is the overarching policy statement for the historic environment (<http://www.historic-scotland.gov.uk/sheps>).

2.2 At the Environmental Report stage, I would prefer to receive paper copies of the report and the draft Development Framework, both of which should be sent via the Scottish Executive Gateway in line with the procedures set out in the SEA Toolkit (available at [www.scotland.gov.uk/Publications/2006/09/13104943/45](http://www.scotland.gov.uk/Publications/2006/09/13104943/45)).

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA Regulations. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA. Should you wish to discuss this response please do not hesitate to contact Jennifer Craig on 0131 668 8832.

Yours sincerely



Amanda Chisholm  
Strategic Environmental Assessment Team Leader

## Annex A: Detailed comments on the Scoping Report

For ease of reference the comments in this annex follow the same order as the Scoping Report.

### Introduction

1. This section provides useful background information about the Development Framework and its preparation to date.

### Context of the plan

#### *Introduction*

2. I agree that the focus of the SEA should be at a relatively 'local' level given the scope of the Development Framework.

#### *Relationship with other plans, programmes and environmental objectives*

3. Appendix A, Appendix B and Table 3.1 set out the review of other plans, programmes and environmental objectives that are relevant for the Development Framework, and I note that SHEP 1, NPPG 5 and NPPG 18 are included. You may also wish to consider reviewing the following documents which also set out Scottish Ministers' policies for the protection of the historic environment:

- Scottish Historic Environment Policy 2. Scheduling: protecting Scotland's nationally important monuments (available at <http://www.historic-scotland.gov.uk/shep2.pdf>)
- *Passed to the Future* (Historic Scotland's policy for the sustainable management of the historic environment, available at <http://www.historic-scotland.gov.uk/index/policyandguidance/policypublications/operationalpolicies.htm>)

4. In summary, the key environmental protection objective of the legislation and policy framework for the historic environment is 'to protect and, where appropriate, enhance the historic environment'.

#### *Environmental baseline*

5. Table 3.2 sets out the SEA topics, criteria from schedule 2 of the Regulations and key environmental issues. Three key environmental issues are identified for the historic environment – designated sites, archaeological sites and monuments and historic landuse/landscape. There is a degree of overlap between the first two issues, however I assume that archaeological sites have been specifically identified due to the proximity of the scheduled ancient monument (Auchterarder Castle) and other NMRS sites to the development areas. The setting of historic environment features is a key environmental issue and should be added to the first two issues i.e. designated sites and their setting, archaeological sites and monuments and their settings.
6. Appendix D provides information on the current state of the environment, and I have set out comments on the baseline information provided for the historic environment below:

- Paragraph D7.3, Table 6 and Figure D8 provide information on the scheduled ancient monuments within and in the vicinity of the development areas. Table D6 identifies that there are 15 SAMs in the vicinity of Auchterarder, however our records indicate there appears to be one SAM missing from Figure D8: the monument known as “St Bean’s Church, Kinkell” (index no. 5952, NN938162). There is also a group of SAMs not shown on Figure D8, to the south of the A9 and west of the A823 (index numbers 7590, 7591, 4961, 4073, 7593, 2252, 7592 and 4073). I agree that they will not be affected by the Development Framework, however they should be included on the map for completeness.
- Table D7 identifies the listed buildings in the vicinity of the development areas. B-listed Coll-Ear Lodge, Hunter Street (HBNUM 21359) and B-listed Mansefield, High Street (HBNUM 21344) are missing from the table.
- As a minor point historic gardens and designed landscapes should be referred to as gardens and designed landscapes.

7. Table 3.3 summarises the environmental baseline and should include the nearby garden and designed landscape at Gleneagles Hotel.

*Environmental problems*

8. I am content with the information provided in Table 3.4 and I note that no specific problems have been identified for the historic environment. Simply for information, Historic Scotland is in the process of undertaking an audit of the historic environment in Scotland (<http://www.heritageaudit.org.uk>). Although the results are not available for this assessment, the audit will likely assist in identifying trends, problems and issues in future assessments.

**Environmental assessment**

*Plan alternatives*

9. I note the approach taken to the consideration of alternatives and am content.

*Scoping of likely significant environmental effects*

10. I welcome the inclusion of the historic environment in the assessment.

*Framework for environmental assessment*

11. I note that SEA objectives and sub-objectives will be used to assess the Development Framework. I have reviewed the SEA objectives, sub-objectives and criteria provided in Table 4.3 and offer the following comments:

- I suggest that the overarching SEA objective for the historic environment should be “to protect and where appropriate enhance the historic environment” to facilitate the inclusion of all relevant features of the historic environment in the assessment.
- The first SEA sub-objective for the historic environment considers effects on designated sites. The Environmental Report should specify what is meant by “designated sites”. I would expect this to include scheduled ancient monuments,

listed buildings and gardens and designed landscapes included in the Inventory (An Inventory of Gardens and Designed Landscapes in Scotland). I note that effects on the setting of historic environment sites are captured in the third SEA sub-objective.

- The third SEA sub-objective should explicitly include archaeological sites as well as buildings and landscapes.
- The comments note that effects on the setting of historic environment features can be avoided through “good design and landscaping”. I suggest adding:
  - “siting and” after “good”, as design alone may not be enough to prevent or offset effects on setting; and
  - “appropriate” before “landscaping”, as inappropriate landscaping may adversely affect the wider historic environment.

12. For the avoidance of any doubt I would expect the assessment to consider the effects of the Development Framework on:

- scheduled ancient monuments and their setting
- listed buildings and their setting
- gardens and designed landscapes and their setting
- NMRS sites
- townscape character
- historic landscape character

#### *Approach to environmental assessment*

13. I note that the environmental assessment will consider the environmental effects at each of the three stages of phased development.

14. I am content with the appraisal framework template set out in Table 4.5. The inclusion of a commentary box in the assessment matrix to provide a short explanation of the conclusions of the assessments is welcomed.

15. Table 4.5 also includes a section for mitigation measures and I suggest that it would be useful to clearly set out the proposed mitigation measures in the Environmental Report along with who will be responsible for ensuring their delivery during the lifetime of the Development Framework. It would also be useful to describe any changes made to the Development Framework as a result of the environmental assessment.

16. Mitigation measures should follow the mitigation hierarchy i.e. avoid, reduce, remedy or compensate (for negative effects) and enhance where appropriate (for positive effects). Please note that any enhancement of the historic environment should only be undertaken where appropriate and should be discussed with Historic Scotland in the first instance when features of national interest are being considered.

17. The Environmental Report should describe how the significant environmental effects of the Development Framework will be monitored. As you will be aware, indicators should reflect the remit and actions of the Development Framework. I would be happy to discuss this further if you would find it helpful.



## Annex B: Historic Scotland's response to the draft Masterplan

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Your ref: LS3/160/1

23 May 2006

Dear Katrina

### AUCHTERADER DEVELOPMENT PROPOSAL MASTERPLAN

Thank you for consulting Historic Scotland on this Masterplan. Please accept my apologies for the delay in our response. Our comments are as follows:

The principle way in which the masterplan proposals impact on the built heritage and character of Auchterader is the loss of some of the existing green belt setting. However, the topography will minimise the impact of the proposed development on the character of the historic character of Auchterader, both as viewed within the town and from a distance. The selected sites are in discrete parcels which should link onto the historic grain rather than infiltrating and diluting it.

The emphasis on retention of field boundaries and existing vegetation is welcomed. It is hoped that this will help the new sites establish a meaningful structure, and also ensure that evidence of historic land use and ownership, as well as the aesthetic benefits, are retained as far as possible.

The planned development is in the vicinity of Auchterader Castle, which is a scheduled ancient monument. Whilst we are content that there will be no direct impact on this site, it is possible that other unscheduled archaeological remains associated with this site may be located in the vicinity. You should consult the local authority archaeologist (David Strachan, Perth and Kinross Heritage Trust, The Lodge, 4 York Place, Perth) in relation to comments on any unscheduled archaeological remains.

Yours sincerely

Virginia Sharp  
Historic Buildings Inspector