

TAYSIDE & CLACKMANNANSHIRE

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Our ref: PF 298/0607 (CNS/SEA/Scoping reports0607)

10 April 2007

Dear Ciara

**Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004
Perth and Kinross Council – Auchterarder Expansion Development Framework SEA
scoping report**

I refer to your scoping report, sent to the Scottish Executive SEA Gateway on 16 March 2007. In accordance with Regulation 14(3) of the Environmental Assessment (Scotland) Regulations 2004, Scottish Natural Heritage has considered the report in its role as a Consultation Authority under the above Regulations. Our comments on the scope and level of detail to be included in the Environmental Report and on the duration of the proposed consultation period are set out below. Detailed comments are provided in the Annex to this letter.

Scope of assessment and level of detail

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

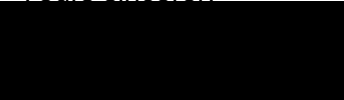
Consultation period for the environmental report

SNH notes that a period of 6 weeks is proposed for consultation on the Environmental Report and is content with this timescale.

Concluding remarks

I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Regulations 2004 and our role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the Environmental Report and on the Action Plan itself.

Yours sincerely


Denise Reed (Mrs)
Operational manager

Enc. Annex – SNH response to Perth and Kinross Council Auchterarder Expansion
Development Framework SEA Scoping Report PF 298/0607

cc SNH SEA Gateway:

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Annex – Auchterarder Expansion Development Framework SEA Scoping Report PF 298/0607

General Approach

We support the general approach which is outlined in the scoping report. This will enable SNH to comment more meaningfully on the PPS.

Relationships with other plans

We are unclear as to how the summary list of plans, programmes and strategies in Table 3.1 has been arrived at, given the wider lists provided in Appendices A & B. We suggest that the landscape guidelines for Tayside Landscape Character Assessment (LCA) (LUC 1999) are relevant, and should be included in Table 3.1. The proposed Auchterarder masterplan falls within the Broad Valley Lowlands Regional Character Area. We also suggest NPPG 14 is included in Table 3.1. A summary of how these plans/programmes/strategies can affect/influence the development framework would also be helpful.

You may also wish to consider “Designing Places: a policy statement for Scotland” (Scottish Executive) and ‘European Protected Species, Development Sites and the Planning System; interim guidance for local authorities on licensing arrangements’ (October 2001). This provides guidance where European Protected Species (including bats) are present.

Baseline information

Further details on designations and others within the area can be obtained by accessing SNH’s “Natural Spaces” system on our website. This aims to help with the provision of information for SEA and other requirements by giving access to SNH's data holdings; please see link:

http://gateway.snh.gov.uk/pls/htmldb_ddtdb1/f?p=100:1:10988302647270585183

Datasets can be searched for local authority areas, and through three broad dataset categories: Habitats and Species; Landscape, Open space and Access and Protected Areas. We also refer to our Site Link system which may be helpful:

http://gateway.snh.gov.uk/portal/page?_pageid=53,854538&_dad=portal&_schema=portal.

This aims to provide easy access to data and information about sites designated for their natural heritage value across Scotland. The information displayed about each site comes from our corporate databases.

Environmental Problems

Biodiversity: We refer to Table 3.4 and Appendix D and recommend that attention should be given to protected species, designated sites and nationally protected areas in considering specific environmental problems in relation to biodiversity. The issues of sustainable use of biodiversity, loss of existing habitat, ecosystem level diversity, loss of locally important wildlife sites, wildlife networks and corridors, threats of alien species and the importance of non-protected biodiversity should also be given attention.

We also recommend that reference is made to the Scottish Biodiversity List (as described in Section 2(4) of the Nature Conservation (Scotland) Act 2004) and to the statutory duty on all public bodies to further the conservation of biodiversity.

We recommend specific reference to European Protected Species such as bats, to maintaining links between features (in accordance with Article 10 of the Habitats Directive) and to national and local BAP species and habitats.

Effects on Natura species: The European Guidance (available at: http://europa.eu.int/comm/environment/eia/030923_sea_guidance.pdf) notes that any effects on selected species in accordance with the Habitats Directive should be part of the Environmental Report. The guidance recommends that these effects might be described in a separate chapter as the findings on such effects are binding for the decision of the competent authorities on the plan or programme.

In addition, matters relating to landscape, access, open space and informal recreational provision should also be considered. It is possible that significant effects in relation to locally valued landscapes may be identified.

Loss of quality of design and local building tradition: We refer to the Tayside LCA (Broad Valley Lowlands) regional landscape guidelines which recognises that more recent developments owe little to local building materials and tradition, and often comprise design of housing which can be found throughout the UK. We suggest this is an issue which can be raised here.

Scoping of issues

SNH supports the scoping in of biodiversity, flora and fauna issues (potential to affect habitats and species) soils and landscape, and agrees with the justifications provided.

SEA objectives

Table 4.3: We welcome the consideration of SEA objectives and indicators for assessing the potential environmental effects arising from the implementation of the plan.

Landscape – we recommend that the last sub objective is amended to ‘promote a high quality of layout and design which reflects and enhances the local distinctiveness and vernacular of the Auchterarder area.’ This objective is already reflected in the criteria.

Biodiversity – we refer to the first sub objective for “to minimise habitat loss from new housing development.” We recommend the formulation of a more positive indicator rather than ‘Area of key habitats lost,’ and suggest baseline data on habitat type is needed to help formulate a relevant indicator for protection and enhancement of semi-natural habitat.

We support the sub objective for enhancement of local biodiversity through appropriate planting and habitat creation. We suggest another indicator is developed to capture this; for example. number of integrated nesting places for swifts and hirundines in new houses/native trees planted in new gardens

A more specific objective could also be devised for European Protected Species such as “maintain and enhance the populations of European Protected Species, including protection of their resting places.”

Assessment Methodology

Subject to our comments above regarding the objectives and indicators, we are content with the approach to the environmental assessment outlined at this stage.

Alternatives and mitigation

We note the process for assessing options and alternatives within the framework of the Local Plan.

We will also be happy to comment in due course on the proposed approach for identification of mitigation measures.

Next steps

Please refer to our covering letter for comments on the consultation period for the Environmental Report.