

APPENDIX D – CONSULTATION AUTHORITIES COMMENTS ON ENVIRONMENTAL REPORT - PKC RESPONSES

Issue/Concern	Individual/ Organisation	Comments	PKC Response
General Comments			
	Scottish Environment Protection Agency	The Environmental Report (ER) provides a satisfactory general assessment of the likely significant environmental effects of the Perth and Kinross Main Issues Report (MIR).	Noted.
	Scottish Environment Protection Agency	We are satisfied that most of our comments on the scoping report have been taken into account and welcome the summary of the actions taken by the Council in Appendix D. There are however some points that have not been taken into account that we would like to be considered. We have provided reference to these in the relevant sections below.	Noted.
	Scottish Environment Protection Agency	We have responded to the MIR ER consultation questions in part B of this response. We have also added extra comments in parts A and C below. Please also note that for the purpose of brevity and proportionality, we have largely focussed our comments on issues which require action.	Noted.
	Scottish Environment Protection Agency	We are content with the fact that the site assessments are a work in progress and will be finalised in the addendum ER to be published with the proposed plan which will also include assessment of the policies of the LDP.	Noted.
	Scottish Environment Protection Agency	We are content that where no changes are proposed to the previous adopted LDP, and changes to the environment do not lead to different effects from the previous ER, this has been adopted and reported in the current ER to ensure that the ER is proportionate and focuses on areas of change.	Noted.
	Scottish Environment Protection Agency	While we acknowledge the intention to bring forward the previous assessment where no change has occurred, in the assessment of the Vision, given that the SEA objectives have been updated and amended at scoping stage to reflect the current sensitivity of the environment, we recommend that the assessment should reflect that. It could be misleading reproducing in the ER the previous objectives and your authority may want to consider re-wording them to reflect the updated version and clarify whether this alters the assessment.	Noted.
	Scottish Environment Protection Agency	Indeed we note that the revised objectives have not been replicated within the mitigation and enhancement section either. While the significance of effects may not have changed considerably we recommend that the objectives are updated for clarity. A note to explain this approach would make things even clearer.	The objectives have been amended in the mitigation and enhancement section.
	Scottish Environment Protection Agency	With regards to objective SEA12 we recommended at the scoping stage that the wording be amended to read meet Zero Waste Plan (ZWP) objectives, however the wording contained in the ER incorporates the more limited previous wording. Given that the ZWP applies to all waste we recommend that the wording of the objective is reduced to only “meet zero waste plan objectives”.	The Environmental Report has been amended accordingly.

	Scottish Environment Protection Agency	We note that, although Appendix D states that the ER has been amended accordingly with regards to our recommendation at scoping that a relevant indicator with regards to air quality be included under SEA4 to make the link between air quality and human health, there is no such indicator in the ER. We therefore continue to recommend the inclusion of an air quality indicator for SEA4.	Table 5 (page 21) within the Environmental Report highlights the SEA objectives. Here it states that an assessment objective in relation to SEA4 is “Will it reduce health problems relating to environmental pollution (in particular air quality)?” We believe this highlights the link between human health and air quality.
	Scottish Natural Heritage	We particularly support your approach of combining the Local Development Plan (LDP) and SEA site assessments. It would be helpful for us to understand how this process has worked for you so we can develop our good practice advice. We would welcome the opportunity to discuss this once the SEA is finalised, along with further ways to streamline your SEA and HRA processes with the LDP.	Noted. PKC happy to engage with future discussions on this approach.
	Scottish Natural Heritage	The baseline information provided is comprehensive and we have only a few detailed recommendations. We agree with you that the green network mapping is indicative, and this lack of specific mapping may have resulted in opportunities to mitigate or enhance green networks being overlooked. We continue to recommend that baseline data includes the specific locations of green networks with accompanying objectives/indicators, and would be pleased to help with this process.	Noted.
	Scottish Natural Heritage	We are generally content with the assessment findings subject to some specific sites and main issue assessment findings/omissions being rectified. The comprehensive site assessments in Appendix E are welcomed, but there are some cases where adverse environmental effects are subsequently under-recorded in the ER analysis. In particular we have recommended amendments to the assessments for the Pitlochry sites, Scone H29 and Dunkeld sites, including mitigation and enhancement measures. We have also suggested amending under-recording of some negative environmental effects for the main issues of settlement envelopes and green belt.	Noted. Further detail on our response to these comments can be found alongside the detailed comments.
	Scottish Natural Heritage	We support the intention to produce the Environmental Report addendum alongside the Proposed Plan which will provide greater detail including updated site assessments and an assessment of the policies (page 22, ER).	Noted.
	Scottish Natural Heritage	Please note that if the Proposed Plan contains any new material not previously assessed and consulted upon in the Main Issues Report (MIR) and likely to have significant environmental effects, then the revised ER may also need to consider these with additional consultation.	Noted.
	Scottish Natural Heritage	The inclusion of the mitigation highlighted through TAYplan’s SEA is welcomed.	Noted.
HRA	Scottish Natural Heritage	Please refer to our MIR response. Please note that the SEA addendum should be updated to reflect the findings once the HRA has been completed.	Noted.
Do you agree with our understanding of the baseline environment in the Perth and Kinross Area?			
	Scottish Environment Protection Agency	We are generally content as our scoping comments have been taken into account, however it would be useful if the percentage of waterbodies at each status was included, as the aim is to improve the status of all waterbodies to good status.	Noted.
	Scottish Environment Protection Agency	In addition it has come to our attention that a number of other local authorities (e.g. Falkirk Council) are including information on the number of wind farms in their areas, you therefore may want to update the baseline information for material assets with this information.	This information is provided within the SEA of the renewables supplementary guidance.

	Scottish Environment Protection Agency	It is noted that you are still awaiting updated RBMP pressures and measures data from us. We have been advised that the updated information should be available from end March 2016, and therefore we recommend further liaison with us during spring.	Noted.
	Scottish Environment Protection Agency	We acknowledge the fact that your authority is awaiting feedback from SNH regarding how to display the carbon rich soils (CRS) information. We recommend that the key fact regarding carbon rich soils is expanded to include category X soil from the forthcoming SNH maps as it represents a carbon store although not peatland habitat. Furthermore we continue to recommend that an indicator is included in reference to SEA 10 to identify how much CRS has been disturbed by development.	Noted.
	Scottish Environment Protection Agency	We note that a Strategic Flood Risk Assessment (SFRA) has not been published at this stage in the process however we are satisfied that the site assessment process has been informed by current information available with regards to flood risk. As we have recommended previously to your authority, if the data which has been used to inform the site assessment were compiled into an SFRA it would provide a tool to inform development management decisions throughout the life of the plan, and to provide the basis for the SFRA for LDP 3 in due course.	PKC did not carry out a SFRA as there is no legal requirement to, with priority being on ensuring that flood risk information is used appropriately to inform the LDP review. There was a SFRA carried out for the higher level plan - TAYplan, and PKC assessed flood risk through the individual SEA site assessments, and we are using this information to inform the LDP review. Our development management colleagues will refer to these SEA site assessments so we think this is the easiest way for them to refer to the flood risk along with the other assessment information relating to that site. Therefore in terms of resources it is considered that separating and repackaging flood risk information into the SFRA format is not a priority.
	Historic Environment Scotland	Yes. The assessment has identified an appropriate historic environment baseline against which to test the Main Issues Report and spatial strategy. The extensive use of mapping to illustrate this is welcomed, particularly in the manner in which cultural service provision has been explored and depicted.	Noted.
	Scottish Natural Heritage	Human Health: recommend Include the number of km of green networks in Perth and Kinross as baseline information.	The green network mapping is currently indicative. Green networks are not currently measured in number of km in Perth and Kinross.
	Scottish Natural Heritage	We welcome the comprehensive baseline information and mapping for Perth and Kinross.	Noted.
	Scottish Natural Heritage	ER (p.15) - move reference to Special Landscape Areas from Biodiversity section to under 'Landscape'.	The Environmental Report has been amended accordingly.
	Scottish Natural Heritage	Appendix B "Provisioning services – materials; Ancient and Semi-natural woodland" - map and statement referring to 1970's information gathering: We are concerned that some Ancient Woodland Inventory (AWI) sites may not be shown on this map. Although woodland cover may have been removed or lost on AWI sites, restoration of these sites including Planted Ancient Woodland Sites (PAWS) is a priority so it is important that the map shows the full AWI dataset.	Noted
	Scottish Natural Heritage	We suggest the use of FCS's up to date Native Woodland of Scotland Survey (NWSS) to inform woodland baseline data but please note that this survey only maps current woodland over 20% canopy cover so should be used in conjunction with the AWI. Please see: http://scotland.forestry.gov.uk/images/corporate/pdf/fcs-nwss-perth-kinross.pdf	Noted.
	Scottish Natural Heritage	Carbon rich deep peat and priority peatland map: the inclusion of baseline data and mapping of carbon rich soils is welcomed.	Noted.
	Scottish Natural Heritage	Strategic green networks map: we recommend the inclusion of a baseline on green networks.	Noted.

Do you think that there are any other plans, policies (in addition to those listed in this report) or wider environmental objectives that should be taken into account?			
	Scottish Environment Protection Agency	As per our scoping response we recommend that The Loch Leven Catchment Management Plan could be included in the Water section of Appendix A.	This has been amended.
	Scottish Environment Protection Agency	The second River Basin Management Plan has now been published, it can be found through the following link and should be referred to in Appendix A The river basin management plan for the Scotland river basin district 2015 - 2027 and Appendices to the river basin management plan for the Scotland river basin district 2015 - 2027	This has been amended.
	Scottish Environment Protection Agency	The Flood Risk Management (FRM) Strategies have also now been published and should be included in Appendix A with the information available from our website through the following link http://apps.sepa.org.uk/FRMStrategies/	
	Scottish Environment Protection Agency	It is noted that the cumulative assessment of other policies, programmes and strategies does not include FRM strategies as we suggested in our scoping response. We continue to recommend that the FRM strategies are included in the assessment and note that the local flood risk management plans are due out in June 2016 and therefore will be in place in advance of the Proposed Plan being published.	Noted.
	Historic Environment Scotland	We are content that the relevant plans, policies and wider environmental objectives have been taken into account.	Noted.
	Scottish Natural Heritage	Thank you for including our recommendations for additional PPS. The list is thorough and we have no further comments.	Noted.
In your opinion have we identified the most important or significant environmental problems affecting the Perth and Kinross area?			
	Scottish Environment Protection Agency	We note in page 19 in the soil topic that the loss of carbon stores provided by carbon rich soils is not identified as a problem within the soil section, as we recommended in our scoping response.	The Environmental Report has been amended accordingly.
	Scottish Environment Protection Agency	With regards to the problems defined in the water boxes we recommend that the first point in the water quantity box may be more relevant to the water quality section and vice versa with the last point in the water quality box.	The Environmental Report has been amended accordingly.
	Scottish Environment Protection Agency	Our advice to the previous ER included the identification of an environmental problem with regards to waste due to potential growth in waste with the predicted population increase. We would recommend that this is included in the current assessment.	This has been included within the Environmental Report.
	Historic Environment Scotland	We agree with the identified issue of inappropriate development putting pressure on the historic environment resource of the area.	Noted.
Do you disagree with any of our assessment questions? If so please identify which ones and why.			
	Scottish Environment Protection Agency	We did not have sight of the assessment questions at the scoping stage as the scoping report only presented the SEA objectives but not the sub-objectives (i.e. the assessment questions).	Noted.

	Scottish Environment Protection Agency	We disagree with the question with regards to flood risk under SEA 7 as it is limited by reference to the functional floodplain (FFP) to only fluvial flood risk and therefore does not account for all sources of flooding as required by the Flood Risk Management (Scotland) 2009 Act and guidance in SPP para 255. Furthermore with regards to the specific wording of this question and that under SEA 11 regarding reducing flood risk, development is unlikely to be able to reduce development on the FFP unless demolition of buildings at risk of flood is proposed. Suggested alternative wording would be “Will it avoid development on the FFP or areas at medium to high risk of flooding?” or “Will the PPS increase the number of people or properties at risk of flooding?” Guidance on potential assessment question wording can be found in our Guidance on consideration of water in SEA.	The Environmental Report has been amended accordingly.
	Scottish Environment Protection Agency	Under SEA 5 we recommend that an additional question could be included such as “Will the PPS contribute to conserving, or reducing loss of, functionality of soils?” further information with regards to the issues relating to soils can be found in our Guidance on consideration of soils in SEA .	This has been included within the Environmental Report.
	Historic Environment Scotland	We agree with the assessment questions utilised within the assessment and particularly welcome the combination of site and environmental assessment. Overall we welcome the robust and comprehensive assessment that has been provided regarding the range of issues covered by the MIR and Spatial Strategy at this stage.	Noted.
	Scottish Natural Heritage	We support the use of the TAYplan’s SEA assessment questions which should ensure continuity of approach.	Noted.
	Scottish Natural Heritage	We refer to our previous recommendation for an additional objective and indicator: add green networks objective; “Enhance existing green networks and improve connectivity/function, and create new links where needed.” We agree with your comment (Appendix D , ER p.1 and 7) that “the green network mapping is currently indicative” and continue to recommend that green networks are mapped on an O.S. base so they are location specific. The lack of this mapping may have resulted in opportunities to create/ enhance green networks being missed.	The green network mapping is currently indicative. Green networks are not currently measured in number of km in Perth and Kinross. It has not been included as an objective as there is no clear monitoring indicator.
Do you have concerns about significant or cumulative environmental effects on particular parts of the Perth and Kinross area or on particular environmental features?			
Buffer strips for Watercourses	Scottish Environment Protection Agency	The absence of the identification of the requirement for buffer strips adjacent to watercourses within the plan area, and commitment to the retention of open watercourses within development requirements of relevant sites within the site assessments, could have a cumulative detrimental impact on the water environment within the PKC area. The inclusion of an undeveloped buffer strip and retention of open watercourses or naturalising of channels accords with the objectives of the Water Framework Directive (WFD) and your associated duties as a responsible authority under the Water Environment and Water Services (Scotland) Act 2003 to ensure compliance with the WFD and River Basin Planning process in carrying out your statutory functions.	This requirement has been incorporated into the site assessments and where appropriate have been considered as a developer requirement.
Assessment findings	Historic Environment Scotland	As noted above, we welcome the comprehensive assessment that has been carried out of the MIR and its spatial strategy. For the most part we are content to agree with the findings of the assessment and proposed mitigation measures for identified effects.	Noted.
Do you think that there are further, relevant positive aims and aspirations for the environment that the second Local Development Plan could deliver in the long term? (If yes please provide details).			
	Scottish Environment Protection Agency	No comments at this time	Noted.

Assessment Methodology			
Consideration of Alternatives	Scottish Natural Heritage	We are generally content with the approach to assessing the preferred option and alternatives, subject to our specific comments for individual site assessments.	Noted.
Ecosystems services approach	Scottish Natural Heritage	We support the use of this approach where possible in the ER (p22).	Noted.
Combined SEA/Site assessment template	Scottish Natural Heritage	<p>We strongly support the approach taken of integrating the site assessment and the SEA assessment template. We would welcome the opportunity to discuss the merits of this combined assessment approach, and also ways to streamline the relationship between the SEA and HRA processes as part of improving our good practice recommendations.</p> <p>We understand that all sites submitted during the pre-MIR period have been evaluated through the combined SEA/site assessment, and that this assessment has informed officers' choice of the alternatives within each settlement. The ER however has assessed the preferred and alternatives options presented in the MIR. We are content with this approach but it would be helpful if the SEA briefly explained the steps between these.</p>	Noted.
Combined SEA/Site assessment template	Scottish Natural Heritage	For each settlement assessment of alternatives, the ER summarises "key environmental issues, derived from SEA1". We support the approach of carrying forward the analysis of the previous SEA where appropriate.	Noted.
Combined SEA/Site assessment template	Scottish Natural Heritage	<p>Appendix C 'information available' column:</p> <ul style="list-style-type: none"> - 'Biodiversity, flora and fauna'; we support the inclusion of the Loch Leven, Lunan Valley and River Tay SAC catchment data. The Ancient Woodland Inventory (AWI) and Native Woodland Survey of Scotland datasets (NWSS) should also be added. - 'Service infrastructure'; the inclusion of a link to the Council's green infrastructure supplementary guidance (SG) would help with identification of indicative connectivity with green networks. - 'Soils'; we welcome the GIS layer for carbon rich soils. - Scoring columns for mitigation and enhancement (both pre-and post-mitigation) are welcomed. 	<p>Noted.</p> <p>Site template amended accordingly.</p> <p>Noted.</p> <p>Noted.</p>
Individual site assessments	Scottish Natural Heritage	Although we are generally content with the assessment findings, we have provided some examples of assessments below where we feel environmental effects have been omitted or where the findings of the site assessments in Appendix E are under-recorded in the ER's analysis.	Noted. Further detail on our response to these comments can be found alongside the detailed comments
Policy assessment	Scottish Natural Heritage	The inclusion of mitigation and enhancement measures is welcomed. It is not clear whether policies rolling forward from the previous plan are proposed to be included. We recommend these are re-assessed by including a screening exercise to assess their effects and then show any mitigation measures if necessary.	All policies both new and existing have been reassessed to ensure a consistent approach is taken to the policy assessment.
What will not be assessed in the Assessment of LDP2	Scottish Natural Heritage	<p>We support the approach to assess plans and projects such as the Perth City Plan and Tay Valley Eco Project.</p> <p>It would be helpful to include SEA findings/cross reference to links for the Cross Tay Link Road SEA for the preferred route corridor in this SEA given this is a significant proposal in the MIR. This is also helpful when considering in-combination effects.</p>	The SEA of the LDP will not assess the Perth City Plan or the Tay Eco Valley Project as that would not be proportionate. Instead the SEA will assess any proposals or projects highlighted within these plans that could be delivered through LDP2.

Assessment Findings	Historic Environment Scotland	The approach to the assessment for cumulative effects is well considered and presented and we would offer the following comments on the findings.	Noted.
Assessment Findings			
Small Sites Contributions	Scottish Environment Protection Agency	The climatic factors section of the assessment with regards small sites contribution on page 110 refers to a negative impact on air quality, however we query if this should instead refer to an increase in greenhouse gas emissions (with the negative impact on air quality recognised in the air section). Road traffic is one of the leading and fastest-growing sources of greenhouse gas emissions in the UK. Figures published by Transport Scotland show that the estimated total volume of traffic in Scotland increased from 35.2 billion miles in 1993 to 43 billion in 2012 (peaking at 44.7 billion miles in 2007). Greenhouse gas emissions from road traffic is expressed as grams of CO2 equivalent emitted (CO2e) per kilometre, therefore every additional km travelled by car will increase Scotland's contribution to climate change.	Noted.
Greenbelt	Scottish Environment Protection Agency	We recommend that the assessment for the alteration of the greenbelt policy is reviewed as it does not acknowledge that development on greenfield land may result in a loss of stored carbon and reduced soil functionality, and similarly that alternative 2 as it is more permissive of development may have an associated larger loss. The application of the Spatial Planning Assessment of Climate Emissions (SPACE) tool would be beneficial in quantifying the differences in the options with regards carbon emissions.	The greenbelt boundary has been reassessed and, where appropriate, amended in line with consultation authorities comments.
District Heating	Scottish Environment Protection Agency	There is a need to differentiate in this assessment between atmospheric pollution and greenhouse gas emissions. Emissions from biomass installations could have a detrimental impact on local air quality (and human health) whilst reducing greenhouse emissions. The impact will depend on what type of heating has been replaced in favour of a district heating scheme. Biomass will have a negative impact if it replaces LPG or electric heating. Further relevant information on the issue of air quality and climate change is available in: Section 7 of Environmental Protection UK 2011 guidance entitled AQ and Climate Change Integrating policy within local authorities http://www.iaqm.co.uk/text/guidance/epuk/aq_and_cc_guidance.pdf and DEFRA 2010 Air Pollution: Action in a Changing Climate paper https://www.gov.uk/government/publications/air-pollution-action-in-a-changing-climate Cleaner Air for Scotland – The Road to a Healthier Future http://www.gov.scot/Resource/0048/00488493.pdf	Noted.
Site Assessments General	Scottish Environment Protection Agency	We would welcome your authority updating the site assessments to take account of the relevant information we have submitted in the PKC MIR sites spreadsheet, following our review of the proposed and carried forward sites (see our response with reference PCS/144324). The following list highlights the relevant columns, the first is the identifying column and the second provides relevant site specific detail, if available: Columns Issue CT and CU Co-location with regulated processes	Changes, where appropriate, have been made accordingly.

		<p>CC and CM Capacity issues at sewage treatment works</p> <p>BV and BR Flood Risk Assessment (FRA) required</p> <p>CQ and CM Retention of open watercourse required</p> <p>CQ and CM Opportunities for de-culverting</p> <p>BW and BR DIA recommended due to identified surface water hazard</p> <p>CQ and CM Buffer strip recommended</p> <p>We have required the removal of 4 sites E1, E3, E14 and E35, with detailed reports regarding each site contained in the MIR response PCS/144324 and recommend that the site assessments for these sites are updated to reflect this.</p>	
Site Assessments General	Scottish Environment Protection Agency	We recommend that the assessment wording for the carried forward sites is standardised with regards FRA requirements. The terminology that was used in the previous assessment is now outdated and it would be more accurate to request a FRA carried out, in accordance with our Technical Flood Risk Guidance for Stakeholders and your Council's Flood Risk and Flood Risk Assessments guidance. These documents acknowledge that the detail and technical complexity of an FRA will vary and that an FRA can range from topographic information to complex 2D modelling depending on specific site requirements.	Noted.
Site Assessments General	Scottish Environment Protection Agency	In order that the site assessment identifies the potential environmental impact of developments on the water environment the site assessment could identify sites where open or culverted watercourses are located. This could help to identify specific opportunities for de-culverting of watercourses and other enhancement opportunities to improve the water environment.	The site assessment has been updated where appropriate.
Site Assessments General	Scottish Environment Protection Agency	We wish to see the SEA amended to identify these issues with mitigation in the development plan. We recommend that appropriate mitigation for these issues could include the inclusion of relevant development requirements that open watercourses be retained and not culverted, that de-culverting/ removal of redundant engineering structures occurs with consideration given to flood risk, and that an appropriate buffer strip of a minimum of 6 metres is required adjacent to any watercourses within development sites within the plan. Please refer to our MIR response where we also recommended that the policy wording is reviewed to take account of these issues.	The site assessment has been updated where appropriate.
Cumulative Assessments	Scottish Environment Protection Agency	We recommend that the assessment is reviewed with regards to the collation of information into the cumulative assessments. For example in the cumulative site assessment for Alyth it states in the water section that H59 and Annfield Place have a significant adverse impact for water and that most sites are likely to require DIA/ FRA. However our review of sites has identified that we have no information with regards flooding at H59 and we recommend that the site requirement for a FRA is discussed with your Flood Prevention colleagues.	Noted and cumulative assessment changed accordingly.
Cumulative Assessment – Alyth	Scottish Environment Protection Agency	With regards site E30 in Alyth the 2015 update of the site assessment recommends an FRA and DIA for the surface water FR at the site and that the site may risk removal due to flood risk. However in the cumulative assessment this site is identified as only having an adverse impact in terms of water, which is less significant than that assigned to H59 and Annfield Place, but removal due to flood risk is being considered for E30. Furthermore in the conclusions and recommendations section it is recommended that a FRA is required as a developer requirement for sites within Alyth when it may not be required at H59.	Noted and cumulative assessment changed accordingly.
Cumulative	Scottish	It is noted that the Lesser South Inch is referred to on page 63 of the ER however we refer your	This site has been removed and will be removed from the SEA. It is no longer

Assessment – Perth	Environment Protection Agency	authority to our response to the pre MIR consultation, (ref PCS/142954 dated 29 October 2015) where we required that the site was removed from being an allocation due to the fact it was on greenfield land on a natural flood plain behind a Flood Protection Scheme. We therefore recommend that the assessment is updated to take account of this issue.	considered to be a reasonable alternative, at this stage.
Site Assessments General	Scottish Environment Protection Agency	The site assessments state that the FPS removes the flood risk from fluvial sources at relevant sites. However paragraph 21 of Scottish Government’s online planning advice on flood risk identifies that flood protection schemes can reduce the flood risk but that they cannot eliminate it entirely. Flood protection schemes can still fail or be breached and subsequent flooding can be more hazardous in nature due to the speed and velocity of inundation. We therefore recommend that you update your assessment accordingly to account of this issue. Further information on this issue is included in our response to the MIR (PCS/144324).	Noted.
Assessment of Alternatives for Blairgowrie and Rattray	Historic Environment Scotland	We are content to agree with the assessment of the potential impact of the preferred option on the historic environment. As the assessment notes, a number of the sites around Blairgowrie (including those previously allocated) have the potential for significant adverse effects on scheduled monuments within the sites and in the immediate surroundings. In terms of the preferred option which includes the Eastern Expansion we would note that, while we consider that there is potential to mitigate this impact to an acceptable degree we would expect a robust mitigation strategy in place for this site. We have offered more detailed comments on this specific Expansion site below under Blairgowrie 2 in our comments on the site assessments.	The request for a mitigation strategy has now been included in the site assessment. Historic Environment Scotland have fed into the draft Development Brief for this site which has incorporated detailed mitigation requirements.
Assessment of Alternatives for Dunkeld and Birnam	Historic Environment Scotland	We welcome the recognition within this assessment of both the proximity of both the Dunkeld House Inventory Designed Landscape and the Battle of Dunkeld Inventory Battlefield site. However, we note that the assessment does not consider the potential effects of the alteration of the settlement boundary which will take in a larger section of the battlefield designation.	Comments noted. These have been taken into account in the settlement boundary assessment.
Assessment of Alternatives for Perth	Historic Environment Scotland	<p>We note that the cultural heritage conclusions presented for the preferred option of the Perth Cumulative Assessment (Page 63) discuss potential development of the Lesser South Inch parklands and suggest potential mitigation strategies for identified effects. We are unclear as to the reasoning for the inclusion of this assessment in the preferred option assessment as the MIR states that the opportunity is not being explored further in the MIR.</p> <p>However, as noted in the Environmental Report, the South Inch site contains the scheduled monument known as ‘SM 8970 Perth, Cromwell's Citadel’. The monument comprises the site of an artillery fort and barrack built for Cromwell's troops in Scotland, which was started in 1652. It took the form of a rectangular enclosure enclosed by revetted earthen ramparts, with angle bastions, and surrounded by a ditch. It was located on the south side of Perth, on the west bank of the River Tay. Following the restoration of the monarchy, the site was granted to the Magistrates of the city of Perth, though it was briefly re-fortified in the Rising of 1715, when a canal was dug from its south-west angle in order to fill the ditch with water. No visible traces remain of the citadel, and the northern end of the monument has been built over by the terraces of Marshall Place while the site is now bisected by the Edinburgh Road. Nevertheless, the greater part of the site remains undisturbed under the northern end of the South Inch of Perth, and a recent archaeological watching brief has demonstrated that the site has significant potential.</p> <p>Development within the scheduled area would require Scheduled Monument Consent, and without prejudicing an application it is unlikely that this would be consented. Development within the vicinity</p>	This site has been removed from the site assessments and from the cumulative SEA. It is no longer considered to be a reasonable alternative, at this stage.

		of the scheduled area would need to take into account national policy safeguarding the setting of scheduled monuments. Given the function of the monument, its setting is one that demonstrates power and authority outside the city walls, and therefore long term retention of the citadel being sited in open space adjacent to the town proper is key.	
Assessment of Alternatives for Scone	Historic Environment Scotland	We are content to agree with the findings of the assessment here regarding H29 and the potential increase of the site to the west. As the assessment notes within the mitigation, in order to lessen the impact of the proposal on the designed landscape careful consideration should be given to the design, layout and landscaping of the proposal in this sensitive area.	Noted.
Assessment of Alternatives for Crieff	Historic Environment Scotland	We welcome the recognition of the potential significant effect on the scheduled monument Broich, cursus, ring-ditch, barrow & palisade 600m SE of Duchlage (Index no. 9135) from a significant increase in density of housing putting further pressure on the setting of the monument. A mitigation strategy has been agreed for proposals relating to the existing housing figures and we would expect any increase in density brought forward to respect the parameters of the agreed mitigation.	Noted.
Assessment of Main Issue – The Green Belt	Historic Environment Scotland	We consider that the spatial depiction of the green belt as adopted should be considered as the current baseline and as such the retention of this (alternative 1) is a continuation of the existing positive effects of its original designation. In light of this the level of change from the adopted plan would be neutral. It therefore goes to follow that the reduction of this area within historic environment assets would be likely to produce a negative effect on the historic environment against the current green belt baseline. Furthermore, in noting the mitigation put forward in terms of national and local policy for the protection of the historic environment it should be noted that negative effects are predicted after mitigation for two of the areas to be removed from the green belt (the extensions to Perth West and H29). In terms of the removal of the northern half of the Scone Palace Designed Landscape from the green belt, as the assessment notes the current extent of the green belt allows for greater protection covering a larger area and therefore currently complements the Inventory designation, of which it currently partly shares a border. We therefore consider that the removal of this area from the green belt should have been reported as a potential adverse effect on the historic environment.	The greenbelt boundary has been reassessed and, where appropriate, amended in line with consultation authorities comments.
Assessment of Main Issue – Perth City Plan	Historic Environment Scotland	As the assessment notes the potential for significant effects of the alternatives considered here would be dependent on the location of proposals. In light of this we consider a more appropriate assessment at this stage would be either uncertain or +/-.	Noted.
Almond Valley (appendix E site assessment update)	Historic Environment Scotland	Perth West: The assessment here should be updated to note the Inventory Battlefield designation and the need for mitigation through the proposed Battlefield Conservation Plan.	Noted and updated.
Binn	Historic Environment Scotland	The assessment here should also note that the scheduled monuments of Balvaird Castle (Index no. 90027 - also a Property in Care of Scottish Ministers) and Castle Law Fort (Index no. 2477) lie in the vicinity of the proposal and impacts on their setting will need to be considered and mitigated where appropriate. There are also a number of listed buildings close to the boundary of the expansion area.	Noted.
Bridge of Earn	Historic Environment Scotland	We note the assessment provided regarding the impacts of the proposal on the setting of the Category A Listed Kilgraston House (HB no.4527) and its associated listed structures. We are content to agree with the significant adverse finding of the assessment in relation to these historic environment assets.	Noted.

Perth West	Historic Environment Scotland	We note that the individual assessment of Perth West on the Inventory Battlefield of Tippermuir considers that the level of effect pre-mitigation is adverse and will be neutral post-mitigation. The mitigation provided is the preparation and implementation of a Conservation Plan for the battlefield. While we strongly welcome the preparation of this Conservation Plan and its potential for informing the detailed Masterplan for the site we consider that the proposed large scale development of the battlefield is unlikely to be mitigated to the extent that it has a neutral effect on the designation. The Conservation Plan has the potential to reduce the level of impact (as well as offer positive outcomes in terms of interpretation and promotion) but is unlikely to completely mitigate the substantial land use change involved in the development. Consequently we are of the view that the successful influence and delivery of the Conservation Plan is likely to mitigate the potential effects on the battlefield from significantly adverse to adverse.	Agreed and updated as suggested.
Perth 9	Historic Environment Scotland	We agree with the findings of the assessment in relation to this site in that there is likely to be a significant adverse effect on the setting of the scheduled monument Huntingtower Castle (Index no.90164 – also a Property in Care of Scottish Ministers). We therefore support the exclusion of this site.	Noted.
Perth 17	Historic Environment Scotland	We note the assessment findings in relation to the adverse effect of the proposal on the setting of the scheduled monument Huntingtower Castle (Index no.90164 – also a Property in Care of Scottish Ministers).	Noted.
Perth Railway Station	Historic Environment Scotland	We are content to agree with findings presented in relation to the assessment of the potential positive and negative effects of this proposal.	Noted.
Isla Road Cemetery	Historic Environment Scotland	We would suggest that the proposal has the potential for an adverse effect on the Scone Palace Inventory Designed Landscape. While we are of the view that this potential effect can be mitigated through sensitive design we consider that the potential adverse effects should have been identified here.	Noted and assessment updated accordingly.
Pickstonhill	Historic Environment Scotland	The assessment here should note that the western section of the proposal lies within the Scone Palace Inventory Designed Landscape.	Noted and updated.
Scone 2	Historic Environment Scotland	We note the assessment findings in relation to the negative effect of the proposed extension on the Scone Palace Inventory Designed Landscape. As the assessment notes within the mitigation, in order to lessen the impact of the proposal on the designed landscape careful consideration should be given to the design, layout and landscaping of the proposal in this sensitive area.	Noted and updated.
St Madoes	Historic Environment Scotland	The assessment here should have considered the potential impact of the proposal on the setting Category A listed Pitfour Castle and its associated structures.	Noted and updated.
Dunkeld 1	Historic Environment Scotland	We are content to agree with the assessment findings in relation to the negative effect of the proposal on the historic environment assets of the area.	Noted.
Dunkeld 2	Historic Environment Scotland	We welcome the recognition that this site lies within the Dunkeld Inventory Battlefield designation. While noting that this proposal is not being taken forward into the plan the settlement boundary is proposed for extension into this area. Consideration should therefore be given to the qualities of this	Comments noted. The site assessment has been updated.

		area of the Battlefield should development come forward.	
Logierait	Historic Environment Scotland	As the assessment notes, a large portion of this proposal is covered by the scheduled monument Logierait, fort, souterrains, roundhouses, pits and enclosure (Index no. 9525). The pre-mitigation score of a significant adverse effect is noted and while the post-mitigation score suggests that this could be lessened to an adverse effect it is unclear at this stage how this would be delivered. We therefore support the exclusion of this site.	Noted.
Milnathort 1 and 2	Historic Environment Scotland	We welcome the comments here regarding the importance on the setting of the scheduled monument Burleigh Castle (Index no. 90045 – also a Property in Care of Scottish Ministers).	Noted.
Gleneagles 2	Historic Environment Scotland	We note the comments here regarding the unauthorised demolition of the Category C listed Tullibardine Cottage (HB no. 4553) and will be in contact with your council regarding this issue.	Noted.
Aberuthven	Historic Environment Scotland	We are content to agree with the assessment findings here in relation to the significant adverse effect on the setting of scheduled and listed historic environment assets at St Kattan’s Chapel.	Noted.
Blairgowrie 2	Historic Environment Scotland	We agree with the identification of a potential pre-mitigation significant adverse effect on the scheduled monument Ardmuir, pit-setting 300m NNW of (Index no. 7245). We are also content to agree that the potential significant adverse effect could be mitigated to lessen the impact on the monuments site and setting. We would therefore recommend that the development requirements associated with this site are redrafted to more clearly set out parameters for the protection of the site and setting of the monument. As you will be aware, development within the scheduled area of the monument would require scheduled monument consent, and without prejudicing an application it is unlikely that this would be consented. Furthermore, development within the vicinity of the scheduled area would need to take into account of national policy safeguarding the setting of scheduled monuments. Given the likelihood of the monument having a ritual function its long term retention within an open rural landscape is likely to be key in safeguarding its setting. Therefore, any survey work undertaken should assess the setting of the monument and identify visual links to the wider landscape that can be retained throughout development of the surrounding ground. In terms of the long term management of the monument, we suggest that the monument and an area of ground around it sufficient to allow its setting to be protected, understood, and appreciated is designated as open ground and that this opportunity/constraint is built into the masterplan at an early stage for the site, and potentially conditioned as part of any planning permission. We can provide advice to a developer in due course about what form this open ground might take. In terms of the road layout of any overall masterplan for the site, cognisance should be taken of the monument within the Eastern Expansion site as well as the monuments to the north (within the existing allocation of H62).	Agreed and both site assessments updated as suggested (Blairgowrie 2 and Blairgowrie Eastern Expansion)
Coupar Angus 1	Historic Environment Scotland	We note the assessment here and agree with the consideration that development in this location is likely to effect the setting of the scheduled monument Coupar Angus Abbey (Index no. 5772).	Noted.
Meikle	Historic Environment Scotland	We agree with the identification of a potential pre-mitigation significant adverse effect on the scheduled monument Belliduff, cairn 380m NE of Belmont Castle (Index no. 7325) as well as the surrounding listed buildings. The successful mitigation of these effects would be dependent on the	Noted.

		extent of any proposals.	
Pitlochry sites	Scottish Natural Heritage	The ER's assessment of Alternatives for Pitlochry (p.54-57) includes the two sites comprising the MIR's preferred option - extensions to H38 Middleton of Fonab and H39 Robertson Crescent. However the MIR (p.61) states that the preferred option includes "a review of small scale windfall residential development within the settlement boundary." Although Appendix E of the ER provides the combined SEA/site assessments for Pitlochry 1, Pitlochry 2, Pitlochry 3 (Middleton of Fonab H38), Pitlochry 4, 5, 6 and 7, and Pitlochry 8 (Robertson Crescent H39). this review is omitted from the ER analysis of the preferred option and we recommend the SEA includes this.	Noted. The review of the existing allocations in the area to the south of the railway line has been incorporated into the Assessment of Proposals for Pitlochry.
Pitlochry sites H38	Scottish Natural Heritage	We have some concerns about the ER's recording of adverse effects of native woodland loss for the extension to H38 (biodiversity, flora and fauna). The MIR recognises this as "an area of woodland. Compensatory planting would therefore be required if it were to be felled" (ER p.60). This is consistent with the SEA site assessment (Appendix E) which states that "The wooded area proposed for development is included within the larger area of semi-natural broadleaf." The ER does not refer to the area of woodland proposed to be felled but states that "impacts could be mitigated via retention of important trees, planting and hedgerows and landscaping to reinforce biodiversity value" (p.55). We recommend the following changes to the ER: - Scoring: change the scoring for both the H38 extension and cumulative scoring to potential for 'significant adverse impacts.' Revise the narrative to reflect this impact. - Mitigation: the recommended mitigation in the ER and Appendix E is not sufficient and the SEA should recommend avoidance of this area – please see Scottish Government's Control of Woodland Removal Policy. Recommend revising the site assessment (Appendix E) to reflect this. The alternative option in the ER is to continue with the existing allocations in the LDP. However, for 'biodiversity, flora and fauna' we disagree with the statement that "impacts are not expected to be any greater or lesser than for the preferred option." The loss of woodland identified in the preferred option will clearly generate more significant adverse impacts than the existing allocation.	Noted. Comments have been incorporated into the Assessment of Proposals for Pitlochry and the site assessment.
Pitlochry sites H39	Scottish Natural Heritage	Landscape: the ER states that the extension to H39 is within Ben Vrackie Special Landscape Area and comments that "overall impact (of the alternative) is likely to be adverse although perhaps less so than the preferred option." However, this difference is not reflected in the scoring for landscape or cumulative effects.	Noted. Comments reflected in the Assessment of Proposals for Pitlochry.
Scone - site H29	Scottish Natural Heritage	The MIR's preferred option is an extension to H29, which includes an Ancient Woodland Inventory site. The alternative is to retain the existing allocation. We agree with Appendix E site assessment mitigation which states "Retain and enhance wooded areas in the east of the site." However, we disagree with the ER's statement that the site is "only a small portion of a much larger area of ancient woodland which may be affected this is unlikely to result in a significantly adverse overall impact." Ancient woodland is irreplaceable and this loss will result in adverse effects on woodland connectivity. We recommend that the ER summary for the alternative option (p.74) is revised to recognise that the effects of this site on biodiversity, flora and fauna are less adverse than the preferred option. Please note that the AWI site is incorrectly recorded under the 'cultural heritage' question.	Noted and updated.
Dunkeld	Scottish Natural Heritage	The ER seems to omit the full assessment of the MIR proposals for this settlement. We recommend re-checking the ER to ascertain where further assessment is required for other proposed extensions to settlement boundaries in the MIR. The MIR's preferred option (there is no alternative) is "an amendment to the northern boundary of	Noted. A Settlement Boundary Assessment for Dunkeld and Birnam has been carried out which considers the impact of the boundary extension proposed in the MIR. There is no proposed change to the settlement boundary around the allocated sites

		<p>Dunkeld to allow scope for a limited amount of small scale windfall residential development.” The combined SEA/site assessment in Appendix E considers two sites within Dunkeld (D1 “Dunkeld Walled garden” and D2 “land at A923/Blairgowrie Road junction.” Site D2 constitutes the allocation within proposed revised ‘settlement envelope’ for Dunkeld.</p> <p>However, the ER (p.52) states that “there are no proposals for additional land allocations in Dunkeld and Birnam.” It assesses no land in Dunkeld, but provides a cumulative assessment between existing sites E12 and E13 outwith Dunkeld. We therefore recommend re-assessment of the MIR’s settlement proposals through the ER to consider the proposed land in D2 and additional land within the revised settlement envelope around E12 and E13. Please see our MIR response where we consider development of site D2 has the potential to generate significant adverse landscape impacts.</p>	E12 and E13 – the settlement boundary in the adopted Plan already includes this area.
Assessment of Main Issue: Delivery strategy	Scottish Natural Heritage	<p>Delivery strategy states that “Alternative 1 is the preferred option however as it will ensure green infrastructure is considered to an earlier stage in development proposals” (p113). However, this will only be possible if green infrastructure is location specific. We refer to our earlier comments and in the MIR in relation to the need for this. This also applies to main issue ‘Perth City Plan’ Alternative 1 (p.120).</p>	Noted.
Assessment of Main Issue: Settlement envelopes	Scottish Natural Heritage	<p>The environmental effects of this are underestimated and we disagree with the conclusion that ‘Alternative 2 is most likely to result in significantly positive effects’ (p117). Defining wider settlement envelopes to allow for development on the edges of settlements has potential to generate greater negative landscape and soil impacts than those recorded, as the policy will allow for more unplanned growth than that within settlement defined boundaries. We recommend the assessment is revised to reflect that Alternative 1 is least likely to generate significant environmental effects.</p>	Noted.
Assessment of Main Issue: Green Belt	Scottish Natural Heritage	<p>We disagree with the statement for Alternative 2 (change Green Belt boundaries) that “the proposed change will mean areas of ancient woodland and part of a SAC will be removed from the Green Belt. However the designated areas are already protected under national legislation and so the impact will be less significant.” This statement is incorrect as the implications of the removal of the Green Belt boundary are that the Green Belt will be revised to allow for a proposed extension to allocation H29 Scone and the removal of ancient woodland in this allocation. The SEA assessment should be revised to reflect that Alternative 2 will generate significantly greater adverse impacts on biodiversity, flora and fauna than Alternative 1.</p>	The greenbelt boundary has been reassessed and, where appropriate, amended in line with consultation authorities comments.
Conclusions and recommendation	Scottish Natural Heritage	<p>We recommend the effects for the settlements of Pitlochry, Scone and Dunkeld, and main issues for settlement envelopes and green belt are revised to reflect our comments above.</p>	Noted.
Mitigation and Enhancement			
Mitigation and enhancement	Scottish Environment Protection Agency	<p>It is noted on page 140 that table 35 of mitigation and enhancement measures against SEA objectives has been carried forward from the previous SEA with minor amendments. As mentioned before in this response it could be misleading leaving the objectives as they were for LDP1 and not updating them to reflect those in the current SEA. We therefore recommend that the objectives are updated accordingly with the mitigation and enhancement measures. We have the following comments with regards the mitigation and enhancement measures:</p> <p>SEA 4 – a positive could include protection and incorporation of green network as this provides opportunities for healthy transport options such as walking and cycling, and reduction in car use would be positive with regards air quality.</p>	<p>The SEA objectives have been updated accordingly.</p> <p>This has been included within the Environmental Report.</p>

		<p>SEA 5 - should include carbon rich soils with relevant incorporation of this issue into the mitigation and enhancement sections.</p> <p>SEA 6 - we are unclear what is meant by reduction in septic tanks in rural areas within the mitigation section of this objective. We would welcome more specific measures to explain how the reduction of diffuse pollution from run off and use of septic tanks will be achieved.</p> <p>SEA 8 - mitigation could include consideration and incorporation of measures relevant to safeguarding air quality at the design stage of development.</p> <p>SEA 10 and 11 - we advise that disturbance of carbon rich soils could be included within the mitigation and enhancement sections of these objectives.</p> <p>SEA 11 - we recommend that the mitigation is strengthened to avoid development on flood plains unless it accords with the risk framework in SPP.</p>	<p>Loss of carbon rich soils is noted as a negative impact, with relevant mitigation.</p> <p>Specific polices relating to the water environment reduce the impact of diffuse pollution form septic tanks in rural areas.</p> <p>This has been included within the Environmental Report.</p> <p>This has been included within the Environmental Report.</p> <p>This has been included within the Environmental Report.</p>
Mitigation	Historic Environment Scotland	We welcome the recognition that avoidance of impact is the primary form of mitigation. As the report notes there are a large range of mitigation actions that can be considered, including the removal of sites from the plan as well as design and layout led approaches and conservation management plans. While noting that the relocation plans for Listed Buildings threatened by development does occur this is not a frequent occurrence and is unlikely to be considered an acceptable form of mitigation generally.	Noted.
Mitigations	Scottish Natural Heritage	Our scoping response recommended that if significant environmental effects are predicted, mitigation measures could include a modification to the plan to ensure significant adverse effects are avoided. For sites, we suggested this measure could be deletion of the site or amendment of site boundaries. We feel this would be an appropriate course of action through the SEA for some sites in the MIR and recommend the ER Addendum reflects this.	Section 8 of the ER considers changes to the plan as a mitigation measure. Where possible we will seek to record these changes through the post-adoption statement.
Mitigation	Scottish Natural Heritage	We support the site assessment templates' comprehensive measures for mitigation and enhancement, and the two separate columns for site assessment and post-mitigation scoring. However the mitigation measures are often not transposed into the ER assessment. While we appreciate that the level of detail in the ER does not permit all this information being shown, we suggest that it could have provided the key environmental developer requirements for each allocation to be transferred into the MIR. This would also have provided a clear audit trail between the SEA process and the plan preparation.	<p>Noted.</p> <p>We agree that it would be useful to provide this information however we feel it would be more relevant to be included with the post-adoption statement. This would provide a clear audit trail between the SEA and the adopted plan.</p>
Mitigation/Post-adoption	Scottish Natural Heritage	However, we support the ER's statement that 'full details of the proposed mitigation measures and the Council's responses will be presented in the Post-Adoption Statement' (p.139) and we suggest the link to the Proposed Plan mitigation is made explicit in this. PAN 1/2010 (para 5.22) also recommends that the ER should include descriptions of the measures to mitigate significant adverse effects identified by the assessment: "it is useful to define each action, explain the reasons for them and identify responsible partners." We recommend this is also provided in the addendum.	Noted.
Monitoring			

Monitoring	Scottish Natural Heritage	The monitoring framework (Table 36) is welcomed. We anticipate that our recommendations on objectives and indicators will be reflected in an updated table.	Noted.
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