

Appendix 1- Analysis of Scoping Report Comments

Environmental Report

Renewable and Low Carbon Energy Supplementary Guidance

August 2019

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
<b>GENERAL COMMENTS</b>			
<b>HES</b>	<p>It is our understanding that this supplementary guidance will support Policy 31 of the proposed Perth &amp; Kinross Local Development Plan. We note that the supplementary guidance will aim to offer advice on how to comply with the policy and support delivery of a diverse range of renewable energy technologies as well as including a spatial framework for wind as required by Scottish Planning Policy.</p> <p>We note that the historic environment has been scoped in to the assessment. On the basis of the information provided, we are content with this approach and are satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments provided in the attached annex.</p>	Comments noted and welcomed.	N/A
<b>HES</b>	<p>We note that a consultation period of a minimum of 6 weeks is proposed for the draft guidance and environmental report. We can confirm that we are content with this timescale. Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.</p>	Comments noted and welcomed.	N/A

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
SEPA	<p>As required under Section 15(2) of the Act, we have considered the document submitted and comment as follows in respect of the scope and level of detail to be included in the Environmental Report (ER). Generally, we are satisfied that the scoping report for the Perth and Kinross Council (PKC) - Renewable and Low Carbon Energy Supplementary Guidance (SG) provides sufficient information on the proposed scope and level of detail for the assessment. We do however have some issues to raise and would welcome further discussion, which could involve a meeting, after the end of the scoping consultation. The <a href="#">Scottish Government SEA Guidance</a> provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA stage; we have also produced <a href="#">SEA topic guidance</a> for those issues which fall within our remit. We have used the guidance to inform our detailed scoping response which is attached as an appendix.</p>	<p>Comments noted and welcomed.</p> <p>PKC to arrange meeting with consultation authorities if required.</p>	<p>PKC to arrange meeting with consultation authorities if required.</p>
SEPA	<p>Subject to the comments below, we are generally satisfied that the scoping report for the PKC Renewable and Low Carbon Energy Supplementary Guidance (SG) provides sufficient information on the proposed scope and level of detail for the assessment.</p>	<p>Comments noted and welcomed.</p>	<p>N/A</p>

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<b>SEPA</b>	We are satisfied with the proposal for a minimum of six weeks consultation period for the Environmental Report.	Comments noted and welcomed.	N/A
<b>SEPA</b>	<p>We would find it helpful if the Environmental Report included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account.</p> <p>We welcome proposals for the inclusion of a summary of how the comments provided by the Consultation Authorities at the Scoping stage have been taken into account in the preparation of the Environmental Report.</p>	<p>Comments noted and welcomed.</p> <p>As noted in the Scoping Report, comments received as part of the scoping process will be considered by PKC and responses to these will be appended to the Env Report for transparency and ease of understanding.</p>	Comments analysis appended to Env Report.
<b>SNH</b>	We are generally content with the scope and level of detail proposed, but we seek further clarification of the spatial assessment process. We would be pleased to discuss this further with you prior to the commencement of the ER.	<p>Comments noted and welcomed.</p> <p>Concerns previously raised during the previous consultation on the 2017 Draft SG and associated Environmental Report have been considered further and in detail as part of our response spreadsheet which will be circulated to consultation authorities for consideration.</p> <p>PKC to arrange meeting with</p>	PKC to arrange meeting with consultation authorities if required.

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
		consultation authorities if required.	
<b>SNH</b>	We note that a period of 6 weeks is proposed for consultation on the ER and we are content with this proposed period.	Comments noted and welcomed.	N/A
<b>PREVIOUS CONSULTATION (2017)</b>			
<b>SEPA</b>	<p>We understand that this scoping report was submitted to the SEA Gateway in order to take into consideration changes made to the Perth and Kinross Council (PKC) Local Development Plan (LDP).</p> <p>We responded to a previous consultation on the SEA of the Renewable and Low Carbon Energy Supplementary guidance (SEA/01122) in the past: to the scoping report on the 5 November 2015 (our ref: PCS/142929) and to the Environmental Report on 29 September 2017 (our ref: PCS/154043).</p> <p>We are pleased to see that the Council has considered our previous comments in the preparation of this new version. We would however recommend that PKC arranges another meeting to discuss the details of the proposed ER (before or after a draft version is available) in order to better understand</p>	<p>Comments noted and welcomed As noted in the Scoping Report, responses received to the previous Environmental Assessment work will be used to inform the preparation of the Environmental Report. Updates have been made to the Environmental Report (and associated Appendices) and the draft SG to provide further clarification on the assessment methodology applied.</p> <p>PKC to arrange meeting with consultation authorities if required.</p>	PKC to arrange meeting with consultation authorities if required.

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	<p>the proposal given the relation to the ecosystem services approach.</p>		
<p><b>SEPA</b></p>	<p>We note that the format of the scoping report has been changed from the one we have seen in 2015 to follow more the structure of the SEA, rather than the one of the ecosystem services. We welcome this however it would be useful to discuss this in more detail during a meeting. One of our concerns was the presentation of the spatial strategy as it was not clear, and still is not, how we could separate the environmental effects from the socio-economic effects. We would like to see more evidence of this at an early stage.</p> <p>Subject to the comments below, we are generally satisfied that the scoping report for the PKC Renewable and Low Carbon Energy Supplementary Guidance (SG) provides sufficient information on the proposed scope and level of detail for the assessment.</p>	<p>Comments noted.</p> <p>Concerns previously raised during the previous consultation on the 2017 Draft SG and associated Environmental Report have been considered further and in detail as part of our response spreadsheet which will be circulated to consultation authorities for consideration.</p> <p>Further clarification from SEPA required regarding effects considered to be non-environmental. PKC consider that all environmental considerations included within the spatial assessment are clearly linked to relevant SEA topics/objectives. Please refer to section 5.3 and Figure 5.1 of the Env Report.</p> <p>PKC to arrange meeting with consultation authorities if required.</p>	<p>PKC to arrange meeting with consultation authorities if required.</p>

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
SNH	<p>We note that the draft Supplementary Guidance (SG) on Renewable and Low Carbon Energy (summer 2017) and its accompanying ER will be used to inform this new SG. We also note the intent to embed an ecosystem services approach which we welcome (2.2) and the reference to Scottish Government guidance on Integrating an Ecosystems Approach into Strategic Environmental Assessment. However please refer to our response of 28 September 2017 to the previous ER in relation to the spatial assessment and the ecosystems services approach in particular.</p>	<p>Comments noted.</p> <p>Concerns previously raised during the previous consultation on the 2017 Draft SG and associated Environmental Report have been considered further and in detail as part of our response spreadsheet which will be circulated to consultation authorities for consideration. Updates have been made to the Environmental Report (and associated Appendices) and the draft SG to provide further clarification on the assessment methodology applied.</p> <p>The assessment approach has embedded the Ecosystems Approach included in the Scottish Government's SEA Guidance on Integrating Ecosystem Services to define limited criteria (e.g. timber production using Landscape Capacity for Forestry dataset) alongside other SEA assessment datasets (e.g. Flood risk) Incorporating ES, alongside matrix</p>	<p>PKC to arrange meeting with consultation authorities if required.</p>

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		<p>and Mapping/GIS approaches in SEA assessment follows <a href="#">SEA Guidance issued by SG</a>. Refer to Technical Appendix for full details.</p> <p>PKC to arrange meeting with consultation authorities if required.</p>	
<b>PPS</b>			
<b>SEPA</b>	<p>We are generally content with the list of PPS provided in the scoping report and the appendices and note that Appendix B concentrates on those PPS which are thought to be particularly relevant to renewable and low carbon energy generation. We welcome this proportionate approach, however for the purpose of completeness we recommend that PKC considers the recent updates on our SEA guidance by topic available at</p> <p><a href="https://www.sepa.org.uk/environment/land/planning/strategic-environmental-assessment/">https://www.sepa.org.uk/environment/land/planning/strategic-environmental-assessment/</a></p> <p>each document has a section on relevant PPS (Section 5), for example, for AIR we recommend that the following is included: Cleaner Air for Scotland – The Road to a Healthier Future</p>	<p>Comments noted and welcomed.</p> <p>PPS updated in line with SEPA Topic Guidance (Air, Soil, Water, Climatic Factors, Material Assets, and Human Health) to include key PPS.</p>	<p>PPS (Appendix 2) updated.</p>

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	(2015).		
<b>SEPA</b>	Some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the Supplementary Guidance. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.	Comments noted and welcomed.	N/A
<b>SNH</b>	We welcome a focused approach to PPS for this SEA.	Comments noted and welcomed.	N/A
<b>ENVIRONMENTAL BASELINE</b>			
<b>HES</b>	We are content that an appropriate baseline has been identified for the assessment of effects of the guidance on the historic environment.	Comments noted and welcomed.	N/A
<b>SEPA</b>	We welcome the use of the State of the Environment Report (SoE) for the PKC area. We understand that, although the original dates to 2007, the SoE is updated regularly. We also welcome the use of the Scotland's Environment website, as mentioned in section 3.3 of the scoping report.	Comments noted and welcomed.  References in Table 3.1 updated. Review of SEPA SEA topic guidance notes on air, soil, water, material	Table 3.1 updated in Env Report.

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
	<p>We however recommend that further checks are carried out to see if the information is as up-to-date as possible.</p> <p>For example, we note that the information related to River Basin Management Plan is still referring to 2013 data, while more recent classification information is available through the water classification hub - <a href="https://www.sepa.org.uk/data-visualisation/water-classification-hub/">https://www.sepa.org.uk/data-visualisation/water-classification-hub/</a>.</p> <p>Again, we recommend that PKC consults the other sources of data for issues that fall within SEPA's remit are referenced in our <a href="#">SEA topic guidance</a> notes for air, soil, water, material assets and human health.</p>	<p>assets, climatic factors, and human health undertaken and Table 3.1 updated with any key new or updated information.</p>	
<p><b>SEPA</b></p>	<p>With regards the reference to Class 5 soils in table 3.1 we recommend that the wording is amended to reflect the fact that soils in this class are all carbon-rich and deep peat, and that the area of land within PKC made up of this category of soil is added to Table 3.1 under the Soils heading. Further clarification on this point can be found on Scotland's Soils website <a href="https://soils.environment.gov.scot/maps/thematic-maps/carbon-and-peatland-2016-map/">https://soils.environment.gov.scot/maps/thematic-maps/carbon-and-peatland-2016-map/</a> . In addition, under the soil heading we advise that less carbon dioxide in the air would be a climate change mitigation.</p>	<p>Comments noted and welcomed.</p> <p>Updates added to Env Report (table 3.1).</p>	<p>Table 3.1 (Env Report) updated.</p>

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<b>SEPA</b>	<p>In relation to data gaps (section 3.6) we acknowledge that there is a lack of spatial information in relation to Groundwater Dependent Terrestrial Ecosystems (GWDTEs). Due to the site specific nature of this issue, the presence of GWDTEs is identified at the planning application stage following detailed survey work submitted by the applicant.</p>	<p>Comments noted and welcomed.</p> <p>Remove reference to GWDTEs as a spatial data gap.</p>	<p>Remove reference to GWDTEs.</p>
<b>SNH</b>	<p>Table 3.1: Biodiversity, flora and fauna:</p> <p>Woodland - relevance of the indicator; add the high biodiversity value of ancient/semi-natural woodland.</p> <p>Site condition - recommend review and update as required. It is possible to download a report of site condition data for protected areas from our databases via the Scotland's Environment website  <a href="https://www.environment.gov.scot/data/data-analysis/protected-nature-sites/">https://www.environment.gov.scot/data/data-analysis/protected-nature-sites/</a> The database is updated as and when new assessments have been validated.</p> <p>To download:</p> <ul style="list-style-type: none"> <li>– Click 'show details table' button on the left of the screen.</li> <li>– Users can filter for 'National Park' on the web page (Filters-</li> </ul>	<p>Comments noted and welcomed.</p> <p>Table 3.1 updated in line with SNH comments on woodland, site condition, biodiversity/flora/fauna, and landscape. It is not considered proportionate to include a full and detailed assessment of the condition of all individual designated sites as part of the SEA. This is considered to be more appropriately considered through the HRA process and site application stage, where appropriate.</p>	<p>Table 3.1 (Env Report) updated.</p>

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	<p>Location-National Park).</p> <ul style="list-style-type: none"> <li>– Right click anywhere on the table displayed on the lower right hand side, then select Export-Export Table to create a spreadsheet.</li> <li>– The spreadsheet has a row for each natural feature on SAC, SPA or Ramsar sites with the latest assessed condition and assessment visit date. Another column ‘Summary Condition’ includes whether features have been declared as ‘unfavourable but are recovering due to management’. This is where SNH have assessed a feature as unfavourable, but that corrective management is in place which we believe addresses the cause of the unfavourable condition and will eventually lead to a favourable assessment.</li> <li>– The ‘About’ page has a glossary and other background information.</li> </ul> <p>Biodiversity, flora and fauna: we recommend further information is provided in relation to importance, extent and condition of designated sites (in particular Special Areas of Conservation (SACs), Special Protection Areas (SPAs), National Nature Reserves (NNRs), Sites of Special Scientific Interest (SSSIs) and species.</p> <p>The information for landscape (e.g. National Scenic Areas</p>		

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	<p>(NSA) should be moved to the 'landscape' section, and reference to soils is deleted as it is already included under 'soils'. The National Park (NP) is outwith the geographical area relevant to the SG.</p> <p>Landscape: clarify the hierarchy of importance - NSAs and wild land are nationally important, but Special Landscape Areas (SLAs) are local designations.</p>		
<b>ENVIRONMENTAL PROBLEMS</b>			
<b>SEPA</b>	<p>We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.</p>	<p>Comments noted and welcomed.</p>	<p>N/A</p>
<b>ALTERNATIVES</b>			
<b>SEPA</b>	<p>We understand from pages 43-44 of the scoping report that PKC considers that there are no realistic alternatives to developing and implementing the SG. This is because it is set out as a requirement of LDP policy and reflects requirements and aspirations of national policy and guidance.</p>	<p>Comments noted and welcomed.</p> <p>Consideration of any reasonable alternatives included within Environmental Report.</p>	<p>N/A</p>

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
	Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred options. This should be documented in the ER		
<b>SCOPING / ENVIRONMENTAL TOPICS</b>			
<b>HES</b>	We note that the historic environment has been scoped in to the assessment and we are content to agree with this.	Comments noted and welcomed.	N/A
<b>SEPA</b>	<p>We agree that in this instance all environmental topics should be scoped into the assessment, and we welcome the intention to incorporate a diagram in the Environmental Report (ER) to demonstrate the links between ecosystem services and SEA Topics.</p> <p>Table 4.1- Although it is possible to identify the SEA Topics by the type of objectives, it would be useful if the SEA Topics are actually mentioned in the Ref. column, rather than being called SEA 1, SEA 2 etc.</p>	<p>Comments noted and welcomed.</p> <p>Table 4.1 updated to include relevant SEA topics for each SEA objective.</p>	Table 4.1 updated.
<b>SEA OBJECTIVES / INDICATORS</b>			

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
HES	<p>We welcome the proposed SEA Objective for the historic environment. The suggested assessment questions (SEA Criteria) are also to be welcomed.</p> <p>In considering indicators of the performance of the guidance these should reflect the actions to be taken as a result of the guidance and the potential impacts identified in the course of the SEA. We note the indicator from the 2017 assessment for the performance of the guidance in relation to the % change in historic land use types has been brought forward. However, we also note that the 2017 assessment had indicators that directly spoke to the SEA Criteria in terms of the performance against the SEA Objective in relation to historic environment assets. An example of this is <i>“Number of renewable energy development proposals environmental statements identifying where there are potential conflicts between proposals and the protection of the historic environment”</i>. It is unclear why this indicator has been dropped and you may wish to consider its inclusion again or identify another indicator that considers the impact of the guidance and its spatial framework on historic environment assets. This would help capture potential environmental effects on the historic environment not covered by an assessment of change in historic land use.</p>	<p>Comments noted and welcomed.</p> <p>Indicator added to Table 4.1.</p>	<p>Table 4.1 updated.</p>

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
<b>SEPA</b>	<p>We are content with the proposed SEA objectives to be used in the assessment.</p> <p>However we recommend that the criteria for SEA 1 with regards carbon rich soils is expanded to include the commitment to protection of areas of carbon rich soils by minimising disturbance through avoidance by development design.</p> <p>The previous SEA Report included the number of applications where enforcement action has been taken due to potential water pollution as a relevant indicator in SEA 3. We recommend that this is included in the forthcoming SEA Report.</p>	<p>Comments noted and welcomed.</p> <p>Update criteria for SEA 1 to reflect CR soils suggestion.</p> <p>Table 4.1 updated.</p>	<p>Update criteria for SEA 1.</p> <p>Table 4.1 updated.</p>
<b>SNH</b>	<p>We support the objectives and indicators provided.</p>	<p>Comments noted and welcomed.</p>	<p>N/A</p>
<b>ASSESSMENT APPROACH / METHODOLOGY</b>			
<b>HES</b>	<p>We note that the proposed assessment methodology follows closely that employed in the previous assessment work for the draft Renewable and Low Carbon Energy SG that was consulted upon in 2017. As with the previous assessment an ecosystems approach will be integrated into the assessment.</p>	<p>Comments noted.</p> <p>Text added to Section 3.7 (data gaps and problems) to highlight assessment</p>	<p>Text added to Section 3.7</p>

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
	<p>In light of this we welcome the references to the Scottish Government guidance notes on Integrating an Ecosystems Approach into Strategic Environmental Assessment. As this guidance states there are challenges for an ecosystem services approach in relation to the historic environment as the “language predominantly describes natural process and the benefits derived from these”. You should therefore be mindful of this in both assessing and reporting potential effects on the historic environment and clearly setting out the reasoning behind the findings presented.</p>	<p>limitations.</p> <p>Access to (proximity to historic environment features from settlements via roads and public rights of way was considered in addition to the location of historic environment features as part of the assessment to further qualify benefits of the HE.</p>	
<p><b>SEPA</b></p>	<p>Including a commentary section within the matrices in order to state, where necessary, the reasons for the effects cited and the score given helps to fully explain the rationale behind the assessment results. This allows the Responsible Authority to be transparent and also allows the reader to understand the rationale behind the scores given.</p> <p>Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects, this should be clearly set out in the Environmental Report.</p> <p>We would expect all aspects of the PPS that could have significant effects to be assessed.</p>	<p>Comments noted and welcomed.</p>	

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
	<p>We support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.</p> <p>When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered.</p>		
<p><b>SEPA</b></p>	<p>As discussed before, as we note the intention to undertake the use of Ecosystem Services approach. We would request that in presenting the findings:</p> <ul style="list-style-type: none"> <li>• it is demonstrated how the requirements of the SEA legislation have been met, in particular, the requirements of Schedule 3 of the Act; and that</li> <li>• The Environmental Report is a separate and easily identified component of the wider assessment.</li> </ul> <p>Please note that when consulted we will only comment on the environmental components of the assessment in accordance with our statutory SEA responsibilities and competencies.</p>	<p>Comments noted and welcomed.</p> <p>Concerns previously raised during the previous consultation on the 2017 Draft SG and associated Environmental Report have been considered further and in detail as part of our response spreadsheet which will be circulated to consultation authorities for consideration. Please see response above in relation to the scope of the SEA approach.</p> <p>PKC to arrange meeting with consultation authorities if required.</p>	<p>PKC to arrange meeting with consultation authorities if required.</p>

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
	<p>The scoping report meets this requirement at the moment and the proposal seems to do the same, however we would welcome the opportunity to view and discuss a draft of the ER to ensure that we are still in agreement with the PKC methodology.</p>		
<b>SEPA</b>	<p>We are content with the proposed detailed assessment matrix and particularly welcome the commentary box to fully explain the rationale behind the assessment results. We also welcome the link between effects and mitigation / enhancement measures in the proposed assessment framework and the consideration of mitigation of impacts.</p>	<p>Comments noted and welcomed.</p>	<p>N/A</p>
<b>SNH</b>	<p>Figure 5.1: we welcome explanation of scoring for significance of effects.</p>	<p>Comments noted and welcomed.</p>	<p>N/A</p>
<b>SNH</b>	<p>Table 5.1: we note that one matrix per each renewables technology is proposed. We support the use of commentary to explain the assessment further, and recommend this describes the nature and extent of potential effects and how they can be overcome. We welcome the recording of secondary, cumulative and synergistic effects and consider these are significant issues for this SEA. There should be clear links between the separate tables reporting on effects</p>	<p>Comments noted and welcomed.</p>	<p>N/A</p>

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
	<p>and the mitigation and enhancement required.</p> <p>We support the provision of all detailed scoring matrices as appendices to the ER.</p>		
<p><b>SNH</b></p>	<p>SEA Spatial Assessment</p> <p>We welcome the consideration of our response to the previous SG consultation and that our comments will feed directly in to the redrafting of the ER. We note the emphasis on strategic scale maps and it appears that it is proposed to use the outputs from the previous spatial assessment. However, we refer to our previous concerns, especially in relation to the complexity, transparency and assessment weightings, and where we disagreed with some of the findings of this assessment in relation to our natural heritage remit. There should be a clear audit trail of the process by which these maps are produced so the assessment of specific proposals can be understood in this context.</p> <p>This section would benefit from further explanation of how the spatial assessment, its use for the assessment of cumulative effects, and assessment matrix will work together. We would welcome the opportunity to discuss this further with you at scoping stage before progression to ER.</p>	<p>Comments noted.</p> <p>Concerns previously raised during the previous consultation on the 2017 Draft SG and associated Environmental Report have been considered further and in detail as part of our response spreadsheet which will be circulated to consultation authorities for consideration.</p> <p>See previous responses. During our meeting (13/09/17) it was agreed that PKC would implement various changes to the ER and relevant appendices to improve the accessibility and transparency of our methodology and findings and provide clarification regarding equal weighting. PKC have updated ER/Appendix 7 to further detail the methodology and</p>	<p>PKC to arrange meeting with consultation authorities if required.</p>

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		<p>findings in response to this.</p> <p>PKC to arrange meeting with consultation authorities if required.</p>	
<b>MITIGATION / ENHANCEMENT</b>			
<b>HES</b>	<p>We are content to agree with the approach and format for mitigation measures and enhancement. As you will be aware, mitigation measures should be identified in the environmental assessment and should follow the mitigation hierarchy i.e. avoid, reduce, remedy or compensate (for negative effects) and enhance where appropriate (for positive effects). Mitigation measures may include making changes to the guidance, as well as proposing more detailed measures to be implemented as the objectives of the guidance are delivered.</p>	<p>Comments noted and welcomed.</p> <p>Environmental Report (section 6.7) updated to include specific text on the mitigation hierarchy.</p>	<p>Text added to section 6.7.</p>
<b>SEPA</b>	<p>We are satisfied with the mitigation and enhancement proposal in Section 5.5. We however recommend that the heading for enhancement refers to enhancement and not mitigation and that residual effects post enhancement are also presented for the purpose of completeness and transparency.</p>	<p>Comments noted and welcomed.</p> <p>Table 6.6 updated in the Environmental Report.</p>	<p>Table 6.6 updated.</p>

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<b>SEPA</b>	<p>We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).</p> <p>One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA. We note the reference to 'Key SG section' in the table and therefore we welcome this.</p>	<p>Comments noted and welcomed.</p> <p>The 'Key SG section' is intended to present how the SEA has changed the plan in relation to environmental effects and mitigation measures.</p>	N/A
<b>SEPA</b>	<p>Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. This could be presented in the mitigation/enhancement table proposed in section 5.5.</p>	<p>Comments noted and welcomed.</p> <p>PKC reviewed mitigation table to ensure any measures that will not modify the plan include suggested information.</p>	.N/A
<b>SNH</b>	<p>The proposed matrix approach is welcomed. We advocate an approach consistent with PAN 1/2010 (para 5.22) which recommends that "it is useful to define each action, explain</p>	<p>Comments noted and welcomed.</p>	N/A

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	<p>the reasons for them and identify responsible partners.” Please note that there should be a clear link in the ER between any adverse environmental effects identified and the mitigation and enhancement measures required, including proposed changes.</p> <p>If significant environmental effects are predicted, mitigation measures could include a modification to the guidance to help avoid significant adverse effects. We support the column for residual effects post mitigation, and the proposed table for enhancement measures.</p>		
<b>MONITORING</b>			
<b>HES</b>	<p>We welcome the preparation of a monitoring framework at this stage and would reiterate our comments made above in relation to indicators for the historic environment. It would be useful to review the performance of the monitoring of the previous guidance in order to inform this assessment going forward. In particular an understanding of the performance and outputs of the monitoring of land use change will be particularly valuable in determining the efficacy of this indicator.</p>	Comments noted and welcomed.	N/A

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<b>SEPA</b>	Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators.	Comments noted and welcomed.  Early consideration has been given to monitoring -draft monitoring framework was presented with the Scoping Report for consideration.	N/A
<b>SNH</b>	We welcome the proposed framework set out in Appendix D. The scoping report states that monitoring will take place as, and when, time and resources permit. While we appreciate resource pressures, we recommend annual monitoring, and at times when it can effectively inform development plan and development management reviews.	Comments noted and welcomed. PKC will continue to review monitoring procedures to help inform future Development Planning and Development Management assessment.	N/A
<b>HRA</b>			
<b>SNH</b>	5.8 - We support the intent to undertake a Habitats Regulation Appraisal for the SG in accordance with the Conservation (Natural Habitats &c) Regulations 1994 (as amended), and will be pleased to assist. Please refer to our website <a href="https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra">https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra</a> and revised HRA guidance following a recent CJEU case judgement	Comments noted and welcomed. SNH will be engaged early in the HRA process.	N/A

Consultee	Comments	Notes/PKC Response	Actions and Relevant Section
	<a href="https://www.nature.scot/habitats-regulations-appraisal-guidance-note-handling-mitigation-people-over-wind-cjeu-judgement">https://www.nature.scot/habitats-regulations-appraisal-guidance-note-handling-mitigation-people-over-wind-cjeu-judgement</a>		