

Consultation Authority: Historic Environment Scotland

Contact: Andrew Stevenson andrew.stevenson2@hes.scot

Scoping Report Reference	Comment(s) Received.	Action Taken
<p>General comment: It is our understanding that the Perth and Kinross Mobility Strategy will contain the vision and objectives for managing and developing the transport and active travel network over the next 10 years. We also note that it will cover all transport modes for the movement of goods and people. We note that the historic environment has been scoped into 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. For ease of reference these comments have followed the questions set out in the scoping report. We note that a consultation period of 6 weeks is proposed for the strategy and environmental report, and we are content to agree 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>		
<p>Question 1: Are there any further plans, programmes, strategies, legislation, or policy guidance of relevance to the Perth and Kinross Mobility Strategy, that you consider should be added to the list in Appendix A for consideration?</p>	<p>We welcome the inclusion here of Scotland's newly published strategy for the historic environment Our Place, Our Future (OPOF). As the scoping report notes, one of the strategy's 3 priorities is Delivering the Transition to Net Zero and the role that the historic environment can play in this journey. This ranges across a number of areas including the use, adaptation and retrofit our existing historic environment assets as well as working to reduce emissions associated with the visit to sites. The recognition of connections between tourism and transport network use in the scoping report is therefore welcomed. OPOF also recognises this through the identification of an action for the heritage sector to work to reduce emissions from heritage tourism visits.</p>	<p><u>Add to PPS for strategic context:</u></p> <ul style="list-style-type: none">a. Our Past, Our Futureb. Infrastructure Investment Plan for Scotland 2021/22 – 2025/26

	<p>While the Infrastructure Investment Plan for Scotland 2021-22 to 2025-26 sets out the investments which the Scottish Government itself makes, it does recognise the importance of a collective approach to infrastructure. A number of projects referenced within the plan relate to the Perth and Kinross area (such as the A9 dualling programme). The plan also presents the new Sustainable Investment Hierarchy which prioritises the adaptation, maintenance and repair of existing infrastructure assets over new build which aligns well with the priority aims of the new historic environment strategy for Scotland noted above.</p>	
<p>Question 2: Do you agree that the baseline data collected is appropriate to the Mobility Strategy?</p>	<p>We agree that the baseline data presented within the Table 7 of the scoping report under Cultural Heritage is appropriate. In considering how this baseline interacts with the aims and outcomes of the strategy it is worth noting the relationship that the historic environment has with a number of those associated key facts listed under Material Assets – Transport and Active Travel. For example, much of our existing active travel network (such as the National Cycle Network, core paths and former rail branch networks) is of historic interest as well as specific transport infrastructure assets such as rail stations and bridges. In light of this it is worth noting that the protection and investment into such sites may have benefits for the historic environment as well as the specific objectives of the strategy.</p>	<p>Note the relationship that the historic environment has with a number of those associated key facts listed under Material Assets – Transport and Active Travel. In light of this it is worth noting that the protection and investment into such sites may have benefits for the historic environment as well as the specific objectives of the strategy. No specific action is required but this theme will run through the assessment.</p>
<p>Question 3: Are you aware of any additional baseline evidence that could help inform the assessment process?</p>	<p>We would only add that factual and locational information on a number of the designation types listed can be found at Historic Environment Scotland's Portal.</p>	<p>Consult Portal for data where required. This will be an on-going exercise.</p>

<p>Question 4: Does your organisation think that the issues listed in Table 9 are all of the significant environmental issues of relevance to the Mobility Strategy?</p>	<p>We welcome the recognition of the importance of protecting and enhancing the historic environment. In noting that no data gaps have been identified in Table 8 in relation to cultural heritage it would be beneficial to consider which elements of infrastructure are of historic environment value when carrying out the proposed infrastructure audit under Material Assets.</p>	<p>Consider which elements of infrastructure are of historic environment value [determine historic environmental value consultee] when carrying out the proposed infrastructure audit under Material Assets.</p>
<p>Question 5: Do you agree with the proposed scope for the SEA?</p>	<p>Yes, we agree with the sources of potential effects on the historic environment that are presented in Table 10. While noting the potential for positive enhancement effects through sensitive design we would also note that positive outcomes for the historic environment may also occur through the maintenance, use and adaptation of existing historic environment assets as part of the strategy.</p>	<p>Note that positive outcomes for the historic environment may also occur through the maintenance, use, and adaptation of existing historic environment assets as part of the strategy. This is to be noted as part of the Mobility Strategy's actions. No immediate action required.</p>
<p>Question 6: Do the indicators provided in Table 11 provide a relevant measure for the associated objective? If not, please suggest additional indicators you feel are appropriate.</p>	<p>It is important that indicators reflect the effects of the strategy. In this regard the proposed indicators (such as the % change of listed buildings and scheduled monuments at risk and the number of planning approvals impacting on the historic environment) will need to focus on where the objectives and actions of the strategy have interacted with this.</p> <p>For example, the number of listed buildings at risk across the area covered by the strategy will be influenced by wide range of factors beyond the effects of the strategy and therefore would not give an accurate reflection of its performance.</p>	<p>Proposed indicators must focus on where the objectives and actions of the strategy have interacted. No immediate action required.</p>

	Likewise, the “number of planning approvals impacting on the historic environment” indicator will need to focus on planning applications associated with the strategy. Again, the infrastructure audit proposed under material assets may help to give a baseline for historic environment features that are part of the transport/active travel infrastructure of Perth and Kinross that can be used to identify interactions between the strategy and this element of the historic environment.	
Question 7: Do you agree that the SEA Objectives set out in Table 11 cover the breadth of environmental issues appropriate for the Strategy area?	We agree that the SEA Objective (SEA 22) identified for the historic environment is appropriate and also welcome the inclusion of SEA criteria to aid the assessment.	No action required.
Question 8: Do you think the proposed approach to dealing with ‘alternatives’ is appropriate?	The approach to alternatives outlined in the scoping report is unclear and we look to the environment report to offer further clarity on this. The objectives and actions of the mobility strategy may have a number of alternate approaches that could be tested here, and we would suggest that this is borne in mind in strategy development.	The Environmental Assessment (Scotland) Act 2005 requires the identification of reasonable alternatives to the proposals presented in the Draft Mobility Strategies and, meaningful comparisons made of the environmental implications of each. It is envisaged that in the context of the Mobility Strategy delivering the policies and proposals already identified in the Scottish Government’s NTS2, it can be assumed that the only real reasonable

		<p>alternative to the proposals within the emerging Mobility Strategy is the Do-Nothing strategy. On this basis, Perth and Kinross Council does not propose to manufacture alternatives simply for comparison in this Environmental Report but to consider the below two scenarios for the purposes of this assessment:</p> <ul style="list-style-type: none"> i. With Mobility Strategy, [preferred option]; and ii. Without Mobility Strategy
Question 9: Is the suggested approach to dealing with cumulative effects appropriate?	We welcome that the assessment will present a text summary of cumulative and synergistic effects of the strategy components against the environmental topics.	No action required.
Question 10: Is the suggested approach to dealing with identifying mitigation and enhancement, and monitoring the implementation of the Strategy appropriate?	We agree with the approach outlined for mitigation/ enhancement and monitoring. We note that a monitoring framework will be developed and we look forward to this being set out. To a large degree monitoring requirements will be driven by the identification of significant effects through the assessment.	No action required.
Question 11: Is the time proposed for, and means of consultation adequate?	We note that a period of 6 weeks is proposed for the strategy and environmental report, and we are content to agree with this timescale as well as the proposed approach to the consultation.	No action required.

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Consultation Authority: NatureScot [Scottish Natural Heritage]

Contact: Louise Clark Louise.Clark@nature.scot

Scoping Report Reference	Comment(s) Received	Action Taken
<p>Question 1: Are there any further plans, programmes, strategies, legislation, or policy guidance of relevance to the Perth and Kinross Mobility Strategy, that you consider should be added to the list in Appendix A for consideration?</p>	<p>Within Table A.2 Biodiversity, Flora and Fauna, the European Habitats Directive has been referenced. In Scotland, the Habitats Directive is translated into specific legal obligations by the Conservation (Natural Habitats, &c.) Regulations 1994. This piece of legislation is usually known as the <i>Habitats Regulations</i>. You may wish to consider opportunities to combine the earlier stages of SEA and Habitats Regulations Appraisal (HRA), where appropriate, even though the differing requirements mean that the two assessments cannot be fully integrated. If the HRA is undertaken in parallel with SEA, it is important that the findings of both appraisals are separately and clearly documented and that the record of the HRA uses the correct terminology.</p> <p>NatureScot are pleased to note the inclusion of the <i>Scottish Biodiversity Strategy</i> within Appendix A, should any other PPS, legislation or policy guidance become available we would be happy to provide advice on whether they should be included.</p>	<p>Consider the <i>Habitats Regulations Appraisal</i> (HRA) where appropriate in parallel with the SEA.</p> <p>Habitat Regulations (specific legal obligations by the Conservation (Natural Habitats, &c.) Regulations 1994). As the projects in the action plan progress to technical specification and site selection, the need for the HRA will be determined accordingly, using the HRA flowchart.</p>

<p>Question 2: Do you agree that the baseline data collected is appropriate to the Mobility Strategy?</p>	<p>The baseline data would appear appropriate to the Mobility Strategy. Other sources of data within NatureScot's remit can be found on our website: https://www.nature.scot/doc/strategic-environmental-assessment</p>	<p>Consult NatureScot website for data sources. This will be an on-going action throughout the development of the MS and the SEA.</p>
<p>Question 3: Are you aware of any additional baseline evidence that could help inform the assessment process?</p>	<p>The baseline evidence would appear to be appropriate.</p>	<p>No action required.</p>
<p>Question 4: Does your organisation think that the issues listed in Table 9 are all of the significant environmental issues of relevance to the Mobility Strategy?</p>	<p>NatureScot would suggest that invasive non-native species (INNS) should be given consideration within the Biodiversity, Flora and Fauna topic area. Measures to reduce the potential for the introduction or spread of existing INNS populations should be considered within the Mobility Strategy and indicators should include their management/control.</p> <p>We would also suggest opportunities for biodiversity enhancement could be considered within active travel routes under the Population and Human Health topic. We recommend the potential for nature-based solutions should be considered throughout the Strategy.</p>	<p>Include <i>invasive non-native species (INNS)</i> within the Biodiversity, Flora and Fauna topic area.</p> <p>Include <i>opportunities for biodiversity enhancement</i> within active travel routes under the Population and Human Health topic.</p>
<p>Question 5: Do you agree with the proposed scope for the SEA?</p>	<p>NatureScot are content with the scope for the SEA which falls within our remit, namely Biodiversity, Flora and Fauna; Soils and Landscape.</p>	<p>No action required.</p>
<p>Question 6: Do the indicators provided in Table 11 provide a relevant measure for the associated objective? If not, please suggest</p>	<p>You may wish to consider the reduction in number of recorded sightings of INNS as an indicator under the Biodiversity, Flora and Fauna topic, data could be sourced from Scottish Invasive Species Initiative.</p>	<p>Include 'reduction in number of recorded sightings of INNS' as an indicator under the Biodiversity, Flora and Fauna topic.</p>

additional indicators you feel are appropriate.		
Question 7: Do you agree that the SEA Objectives set out in Table 11 cover the breadth of environmental issues appropriate for the Strategy area?	The SEA Objectives set out in Table 11 are sufficient to cover environmental issues within NatureScot's remit for comment and are relevant to the Strategy.	No action required.
Question 8: Do you think the proposed approach to dealing with 'alternatives' is appropriate?	We agree with the comments made by SEPA regarding alternatives and support the suggestion of identifying reasonable alternatives.	No action required.
Question 9: Is the suggested approach to dealing with cumulative effects appropriate?	The approach and inclusion of mitigation/enhancement appears appropriate.	No action required.
Question 10: Is the suggested approach to dealing with identifying mitigation and enhancement, and monitoring the implementation of the Strategy appropriate?	We are content with the approach to mitigation, enhancement, and monitoring.	No action required.
Question 11: Is the time proposed for, and means of consultation adequate?	NatureScot agree that the timing and means of consultation appear to be adequate. We note that a period of 6 weeks is proposed for consultation on the Environmental Report and are content with this proposed period.	No action required.

Consultation Authority: Scottish Environmental Protection Agency

Contact: Sheena Jamieson - sea.gateway@sepa.org.uk

Scoping Report Reference	Comment(s) Received	Action Taken
<p>Relationship with other Plans, Policies and Strategies (PPS)</p>	<p>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 Perth and Kinross Mobility Strategy. This may assist you with data sources and environmental baseline information and ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.</p> <p>It is noted that the water related PPS referred to in Climatic factors would also be relevant to Water topic, and the Cleaner Air for Scotland 2 strategy for Human Health.</p>	<ul style="list-style-type: none"> a. Review all SEAs for all PPS. b. Add the Cleaner Air for Scotland 2 Strategy and the Water Strategy to the relevant PPS.
<p>Baseline information</p>	<ul style="list-style-type: none"> a. SEPA holds significant amounts of environmental data which may be of interest to you in preparing the environmental baseline, identifying environmental problems, and summarising the likely changes to the environment in the absence of the PPS, all of which are required for the assessment. Many of these data are now 	<ul style="list-style-type: none"> a. Review additional SEPA data on the website. This will be ongoing as the strategic action list progresses. b. Include waste baseline data.

	<p>readily available on SEPA's website. Environmental data Scottish Environment Protection Agency (SEPA).</p> <p>b. There is no baseline data referring to waste, however SEA objective 21 and associated criteria include waste minimisation and sustainable use/ re-use of material assets. Including baseline information on this issue is therefore relevant and sources of data are our website (link above) and Perth and Kinross Council.</p> <p>c. A source of data which may be of relevance is the Geomorphic Risk Buffer shapefile which is available from our website above. The layer was produced by SEPA in 2017 to support the work of the National Flood Risk Assessment 2 (NFRA2) and aimed to identify sections along the river network where channel adjustment was likely to be significant, to understand where infrastructure may be at risk due to channel mobility. A detailed explanatory note with relevant caveats is included within the metadata of the shapefile.</p> <p>d. In addition, SEPA have recently developed a data tool to explore the make-up of CO2 emissions from road transport in Scottish Local Authorities. The tool combines vehicle and road traffic statistics from Transport Scotland and GOV.UK with detailed emission factors. This enables total CO2 emissions to be attributed to road and vehicle categories. The tool calculates the proportion that each of 15 vehicle types contribute to total CO2</p>	<p>c. Consider the Geomorphic Risk Buffer shapefile. This will be on-going as the strategic action list progresses.</p> <p>d. Consider SEPA data tool for the CO2 emissions from road transport in Scottish Local Authorities. This will be on-going as the strategic action list progresses.</p> <p>e. Obtain additional local information from the Access to Information unit (foi@sepa.org.uk). This will be on-going as the strategic action list progresses.</p> <p>f. Consult SEA topic guidance notes for other sources of data. This will be on-going as the strategic action list progresses.</p>
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	<p>emissions across the Local Authority. It can be used to explore the effect of changing the make-up of the fleet or varying the distance that is travelled by different categories of vehicle, e.g., the CO2 benefit of a 30% reduction in car kilometres. Therefore, hopefully it will be of use for development of the mobility strategy and its SEA. The tool will shortly be available on SEWeb. In advance of that we will provide a link to the temporary location directly to Perth and Kinross Council.</p> <p>e. Additional local information may also be available from our Access to Information unit (foi@sepa.org.uk).</p> <p>f. Other sources of data for issues that fall within SEPA's remit are referenced in our SEA topic guidance notes for air, soil, water, material assets, climatic factors, and human health.</p>	
Environmental problems	<p>We consider that in addition to the environmental problems described the following issues are also of relevance to this assessment:</p> <p>a. The geomorphic risk buffer layer may indicate areas where infrastructure may be at risk due to channel mobility.</p> <p>b. With regards identified data gaps in 3.3.2 the Scottish Wetlands Inventory is not comprehensive but identifies known wetlands. It is available from our environmental data page.</p>	<p>Add to existing environmental problems:</p> <p>a. Where infrastructure may be at risk due to channel mobility.</p> <p>b. Consult environmental data page for wetland inventory.</p>
Scoping in / out of environmental topics	<p>We agree that in this instance all environmental topics should be scoped into the assessment.</p>	<p>No action required.</p>

<p>Methodology for assessing environmental effects</p>	<ul style="list-style-type: none"> a. 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. b. 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. c. We would expect all aspects of the PPS which could have significant effects to be assessed. d. 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. e. 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. f. It is helpful if the assessment matrix directly links the assessment result with proposed mitigation measures such as in the example below: 	<ul style="list-style-type: none"> a. A commentary section within the matrices will be added to state (where necessary) the reasons for the effects cited and the score given in order to explain the rationale behind the assessment results. b. Noted. No immediate action required. c. Noted. All aspects of the PPS which could have significant effects will be assessed. d. No action required. e. Noted. An informative assessment will justify reasons for each of the assessments presented. This will include all assumptions made, and difficulties and limitations that were encountered. f. Noted and agreed. The assessment matrix will directly link the assessment result with proposed mitigation measures. g. No action required. h. Noted. No immediate action required. i. The link between potential effects and proposed mitigation / enhancement measures will be shown in the assessment framework.
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SEA ISSUES - CHECKLIST QUESTION	Yes or No	Effect	COMMENT and OPPORTUNITIES TO MITIGATE OR IMPROVE
Is the allocation at risk from fluvial or coastal flooding?	Y	Negative	Part of site found to be at risk now removed from allocation.
Could the allocation have a physical impact on existing watercourses?	Y	Negative	Site dissected by watercourse. Developer Requirements includes statement "watercourse to be integrated as positive feature of the development. No culverting."
Can the allocation currently be connected to the public sewerage system?	Y	Positive	Developer Requirement includes statement "connect to public sewer"

g. **Design of the Assessment Matrices:** 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.

Mitigation and enhancement

h. We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option; hence we support proposals for enhancement of positive effects as well as mitigation of negative effects.

j. Noted and agreed. *The mitigation measures will follow the mitigation hierarchy.*
k. Noted and agreed. Where significant impacts to the environment are determined, changes and modifications to the plan as a result of the SEA will be detailed.
l. Noted and agreed. Proposed mitigation measures will clearly detail (1) the measures required, (2) when they would be required and (3) who will be required to implement them.

- i. It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.
- j. 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).
- k. 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.
- l. 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. The inclusion of a summary table in the Environmental Report such as that presented below will help to track progress on mitigation through the monitoring process:

Issue / Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale
Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate
etc	etc	etc	etc

Comments on wording of proposed SEA objectives

	<p>m. We would recommend that the wording of the following SEA objective(s) be revised as follows.</p> <p>n. SEA 6: Potential to improve mental as well as physical wellbeing from improvement of active travel is identified in Table B2 as a likely significant effect of National Transport Strategy 2. However, the wording of SEA objective 6 refers to physical health and wellbeing. The wording of this objective could be amended for clarity if the intention is to include both mental and physical wellbeing.</p> <p>o. SEA 9: The objective wording includes protect, maintain and improve the water environment and therefore the SEA criteria could be expanded to include a question relating to protection and improvement of the water environment, with a correlating indicator. It is noted that objective SEA 9 refers to quality of waterbodies. Overall status refers to a broader set of parameters than those related to water quality and may be more appropriate for the indicator.</p>	
Alternatives	<p>We question whether the alternatives outlined are an alternative as it refers to the 4 priorities of National Transport Strategy 2 which section 2.1.2 of the Scoping report indicates it is the intention of the mobility strategy to adopt. Therefore, we would encourage you to re-consider the identification of reasonable alternatives. Such alternatives may for example include alternative strategic directions, policies or proposals that are being considered as part of the plan-making process.</p>	<p>Re-consider the identification of reasonable alternatives.</p>
Monitoring	<p>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. It would be helpful if the</p>	<p>Describe measures envisaged to monitor the significant environmental effects of the plan.</p>

	Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan.	
Consultation period	We are satisfied with the proposal for a 6-week consultation period for the Environmental Report.	No action required.
Outcomes of the Scoping exercise	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.	No action required.