



Our Ref: PCS108210/sco/SH  
SG Ref: SEA00500

Simon Hindson  
Planning and Development Services  
The Highland Council  
Glenurquhart Road  
Inverness  
IV3 5NX

14 July 2010

By email: [sea.gateway@scotland.gsi.gov.uk](mailto:sea.gateway@scotland.gsi.gov.uk)

Dear Mr Hindson

**Environmental Assessment (Scotland) Act 2005  
SPG green networks in highland – Scoping consultation**

Thank you for your Scoping consultation submitted under the above Act in respect of the above Guidance. This was received by SEPA via the Scottish Government SEA Gateway on 16 June 2010. As required under Section 15(2) of the Act, we have considered the document submitted and comments as follows in respect of the scope and level of detail to be included in the Environmental Report (ER).

The Scottish SEA Toolkit (available for download at: [www.scotland.gov.uk/Publications/2006/09/13104943/0](http://www.scotland.gov.uk/Publications/2006/09/13104943/0)) provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA stage. We have used the toolkit to inform this scoping response which is attached as Annex 1.

On completion, the Environmental Report and the SPG to which it relates should be submitted to the Scottish Government SEA Gateway ([sea.gateway@scotland.gsi.gov.uk](mailto:sea.gateway@scotland.gsi.gov.uk)) which will forward it to the Consultation Authorities.

Should you wish to discuss this consultation, please do not hesitate to contact me on 01349 860359 or via SEPA's SEA Gateway at [sea.gateway@sepa.org.uk](mailto:sea.gateway@sepa.org.uk).

Yours sincerely

A handwritten signature in black ink that reads 'Susan Haslam'.

Susan Haslam  
Senior Planning Officer (SEA)  
Planning Service

**Chairman**  
David Sigsworth

**Chief Executive**  
Dr Campbell Gemmell

**SEPA Corporate Office**  
Erskine Court, Castle Business Park, Stirling  
FK9 4TR  
tel 01786 457700 fax 01786 446885  
[www.sepa.org.uk](http://www.sepa.org.uk)

## **Annex 1: Comments on the Scoping Report**

### **General comments**

Generally, the scoping report provides clear and detailed information on the proposed scope and level of detail of the assessment and covers most of the aspects that we would wish to see addressed at this stage. Subject to the comments below, we are generally content with the scope and level of detail proposed for the ER.

### **Detailed comments**

For ease of reference the following comments are provided in the same order as the scoping report.

#### **1. Relationship with other Plans, Policies and Strategies (PPS)**

- 1.1 We consider that the PPS listed in Table 1 provides a comprehensive background framework to the development of the Guidance. In relation to the Water Framework Directive it would be useful and relevant to make reference to the local Management Plans which should be published shortly. They will be available from [www.sepa.org.uk/water/river\\_basin\\_planning.aspx](http://www.sepa.org.uk/water/river_basin_planning.aspx).

#### **2. Baseline information**

- 2.1 We suggest you make use of the baseline information collected for the Highland wide Local Development Plan supplemented by any additional information specifically in relation to the SPG topic, green networks.
- 2.2 Please remember that a summary of the likely changes to the environment if the Guidance is not implemented should be provided in the ER.

#### **3. Environmental problems**

- 3.1 We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.

#### **4. Alternatives**

- 4.1 We note the proposal is to have a "do nothing" alternative; we consider this reasonable in this instance. It may also be possible to consider reasonable alternatives in relation to what issues the Guidance covers and how this is worded, or reasonable alternatives to specific proposals.

#### **5. Scoping in/out of SEA Objectives**

- 5.1 We are satisfied with the proposal to scope out soil and air.

#### **6. Methodology for assessing environmental effects**

- 6.1 None of the proposed SEA objectives explicitly cover the water environment; we request that one is included. We suggest "Protect and enhance the water and riparian environment" or similar.
- 6.2 Please note that we would expect all aspects of the Guidance which could have significant effects to be assessed.
- 6.3 We welcome the inclusion of the questions to be considered when answering the SEA objectives; such an approach is usually very helpful.
- 6.4 Guidance on assessment techniques and developing assessment methods can be found in Chapter 9 of the Scottish Government SEA Toolkit. We would recommend that enough information and justification is provided in the ER to allow the Consultation Authorities to understand how the results of the assessment were reached.
- 6.5 The new website [www.seaguidance.org.uk](http://www.seaguidance.org.uk) includes advice and guidance on how to take air, soil and water into account in SEA. In relation to climatic factors see *Consideration of Climatic Factors within Strategic Environmental Assessment (SEA)* available from the Scottish Government website.

## 7. Mitigation

- 7.1 One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the Guidance itself so that significant effects are avoided; we are pleased to note this is acknowledged. The ER should therefore identify any changes made to the plan as a result of the environmental assessment.
- 7.2 Where the mitigation proposed does not relate to modifications to the Plan itself then it should be clear how the mitigation will be achieved and by whom. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate). It would be extremely helpful to set out all mitigation measures in a way that clearly identified: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. A summary table could be included as part of the preparation of the ER. We provide an example below which may be helpful:

<b>Issue / Impact Identified in Environmental Report</b>	<b>Mitigation Measure</b>	<b>Lead Authority</b>	<b>Proposed Timescale</b>
Insert effect recorded in Environmental Report	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate
etc	etc	etc	etc

## 8. Monitoring

- 8.1 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 ER included a description of the measures envisaged to monitor the significant environmental effects of the plan.

**9. Next steps**

9.1 We are satisfied with the proposal for an eight week consultation period for the ER.