



SCOTTISH EXECUTIVE

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31 May 2006

00054 Scoping - Western Isles Council - Local Plan - Scoping request

Dear Diane,

With reference to the Scoping report you submitted to the SEA Gateway on 26 April 2006..

In accordance with Regulation 17(2) of the **Environmental Assessment of Plans and Programmes (Scotland) Regulations, 2004**, the Consultation Authorities have now considered the Scoping report you submitted. The individual responses from the Consultation Authorities to your report are attached to this letter.

As the Consultation Authorities have now expressed their views on the proposed scope and level of detail of the report, you should refer to the Regulations to consider what your next step should be. You should of course take into account the opinions offered by the Consultation Authorities.

Note, in accordance with Regulation 17(3) of the **Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004**, (when agreed) you are required to formally write to advise the Scottish Ministers of the period of consultation you intend to specify, both for the public and the Consultation Authorities.

If you have any queries or would like me to clarify any points, please call me on 0131 244 1704.

Yours sincerely

Elaine McCall
SEA Gateway Office

Attention: Diane McPherson

COMHAIRLE NAN EILEAN SIAR
Balivanich,
Isle of Benbecula
HS7 5LA

Our Ref: SH/LP/2006/0840

29 May 2006

By email: sea.gateway@scotland.gsi.gov.uk

Dear Ms McPherson

**ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES
(SCOTLAND) REGULATIONS 2004
WESTERN ISLES LOCAL PLAN – SCOPING REPORT**

I refer to your Scoping Report consultation in respect of the Western Isles Local Plan, submitted to SEPA via the Scottish Executive SEA Gateway on 26 April 2006.

SEPA considers that the Report provides an appropriate and useful level of detail on the proposed scope of the assessment. SEPA notes the Council is having to carry out SEA at a relatively late stage in the Plan process due to it not being able to finish the Plan before the July 2006 deadline. The Council's stated commitment to try and ensure that SEA can still inform and influence the preparation process is welcomed.

SEPA has used Table 3.2 set out on page 22 of the Scottish Consultation Authorities' publication 'Information for Responsible Authorities' (available on SEPA's website at currently: www.sepa.org.uk/consultation/closed.htm) to inform its detailed response which can be found in Annex 1.

If you wish to discuss any of the above I can be contacted on 01349 860359 or via SEPA's SEA Gateway at sea.gateway@sepa.org.uk. My colleague, Jim Mackay will also be happy to discuss any of the issues at your meeting arranged for 1 June 2006.

Yours sincerely

SUSAN HASLAM
SENIOR PLANNING OFFICER (SEA)
PLANNING UNIT (NORTH REGION)

Enc

Chairman
Sir Ken Collins

Chief Executive
Dr Campbell Gemmell

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Annex 1: Detailed comments

1. Context

1a – The Plan

Background Information

SEPA is satisfied that the appropriate background information is supplied.

Relationship with other Strategies, Plans and Programmes

Table 2 provides an extensive review of the plans, programmes and policies relevant to the Plan and includes most of those SEPA would expect to be considered. SEPA does however consider that there are a small number of other important publications which should also be assessed;

- As a significant area of Lewis and a number of the other islands are designated under the Ramsar Convention as wetland sites of international importance consideration should be given to the inclusion of this Convention in the list;
- There are a number of coastal areas designated under either or both Shellfish Directives (EC Directive 79/923/EEC, on the quality required of shellfish waters and EC Directive 91/492/EEC, on the Health Conditions for the Production and the Placing on the Market of Live Bivalve Molluscs). The objectives of these Directives are to ensure a very high water quality standard and therefore foul drainage arrangements for proposals in the Plan may have an impact. Details of SEPA's related policy (SEPA Policy 27 (Addendum) can be found on the SEPA website); and
- In relation to fish farming it is noted that the Loch Roag Area Management Plan is referred to but that the Area Management Agreements for fish farm co-ordinated lice treatment in other coastal areas such as East Lewis and Harris have not been included and potentially should be.

The Council may also wish to consider whether the following SEPA policies, available on the SEPA website, are relevant to the Plan:

- Groundwater Protection Policy for Scotland (Policy 19); and
- Policy on the Culverting of Watercourses (Policy 26).

While a summary of the documents is given it would have been useful at this stage to explain what the relationship between these plans, programmes and policies and the Plan is. This should be addressed in the ER and should be accompanied by an analysis of the relevant targets and indicators and their implications for the Plan.

1b – The Area

Existing environmental problems

Table 3 provides an outline of some of the environmental problems in relation to the Plan area, however, a number of these sections do not consider *environmental*

issues as is required by SEA. For example while 'encouraging economic development' and 'need to accommodate growth in Greater Stornoway' may be valid problems that the Plan requires to address, they are not environmental problems. Other issues such as 'water and wastewater infrastructure' could be better defined so that the actual environmental problem is clearer. For example, is the problem that the current infrastructure is having an impact on the environment?

Likely future changes to the environment without the Plan

Section 4.10 and 4.11 make suggestions about the evolution of the environment without the Plan. In cases like this where the proposal is to replace an existing Plan it is usually the case that the likely future changes to the environment without replacement of the existing Plan be considered.

Environmental characteristics of the area

SEPA commends the Council's proposals to produce a state of the environment report. Such a document should be very helpful to the Council in the preparation of any subsequent Plans or Programmes which require SEA. Table 5 provides a suitable outline of the type of information that it likely to be collected but it should be ensured that the baseline information is linked to the aspects of the environment which could be impacted by the Plan. In addition to the usual issues covered by a Local Plan it is noted that allocations and/or polices cover both fish farming and transportation infrastructure; it would therefore be appropriate to consider baseline information on these issues.

In relation to coastal flooding, in the absence of the second generation flood maps SEPA recommends that assessment be based on the 5 metres above ordnance datum (mAOD) contour line or available spot heights (in line with PAN 69) and local knowledge (for example, in the Roads Department).

From the Report it seems that the Council are already aware of the type of information SEPA holds which could be of interest. Many of these data are now readily available on SEPA's website and a copy of our publications list is available from www.sepa.org.uk/access/index.htm. Table 2.1 of the aforementioned 'Information for Responsible Authorities' publication outlines a generic list of information that is available on the website. Other local information may also be available from SEPA's Access to Information unit at Corporate Office (Telephone: 01786 457700).

2. Scope

2a – Scope and Level of Detail

Environmental Issues to be Scoped In and Scoped Out

It is not absolutely clear which issues are to be scoped in and out of the assessment, however Table 5 suggests that all of the issues will be scoped into the assessment. If this is the case SEPA supports this proposal.

Level of Detail of Assessment

It seems clear that the Plans aims, policies and proposals (taken to include allocations) will all be assessed and if this is the case then SEPA supports the level of detail of assessment proposed.

For your information SEPA would normally expect that the following be fully considered in the assessment:

Water

- Flood risk;
- Water quality (chemical and ecological);
- Drainage issues and use of SUDS;
- Effects on coastal waters, including impacts relating to the shoreline, erosion and deposition of sediment;
- Groundwater quality (e.g. from remediation of contaminated land);
- Effects on aquatic biodiversity (e.g. from changes to coastal processes, disturbance etc).

Soil

- Contaminated land (sources, receptors, contamination pathways, remediation, risk etc);
- Impacts on groundwater, groundwater remediation;
- Use of greenfield and brownfield land.

Air

- Impact on local air quality, particularly in relation to any declared AQMAs or where air quality thresholds are close to being exceeded;
- Impacts from traffic generated by the proposals on surrounding areas.

Climate

- Risk to proposals from the effects of climate change (e.g. flooding).

Health

- Impacts on health of local communities caused by environmental effects associated with the Strategy.

2b Alternatives & Mitigation

It is noted that alternatives at a detailed level have been considered and will be detailed in the ER. Comments on mitigation are made below in section 3.

3. Methods

3a – Assessment Method

Proposed Draft SEA Objectives and Indicators

The proposed SEA objectives heavily draw from the Scottish Executive Interim Planning Advice, with local adaptation. They cover all the aspects of the environment SEPA would expect, however, the Council may find it useful to consider directly relating the significant environmental issues outlined in Table 3 with the Objectives. As water and waste water infrastructure has been identified as a specific problem then a bullet point in SEA objective 7 could be explicitly related, for example, ‘to ensure appropriate drainage infrastructure in place’. Similarly, in relation to SEA Objective 7 the bullet point for flooding could be amended to ‘avoid flood risk’ in line with the identified problem (and SPP7).

Assessment Methodology

SEPA is satisfied with the proposed assessment matrix which covers two of the issues SEPA often requests; a comments box for the reason for any score and a space for the possible mitigation or modification that could be / has been implemented. SEPA would welcome the full use of the comments box as this allows the Consultation Authorities to understand how the scoring has been reached.

As a minor comment it is noted that one of the boxes is titled ‘note of *other* effects eg short, medium, long term, permanent or temporary, secondary cumulative or synergistic’. The ‘summary score’ should already take into consideration all these effects therefore it is not clear, at this stage, how this box will be used.

SEPA also notes and welcomes the proposals to check the policy range of the Plan to ensure all relevant environmental issues are covered. SEPA considers it a valid approach to also identify those issues which are covered by other relevant Plans, such as the Structure Plan so that duplication is avoided yet it is clear that mitigation exists elsewhere.

4. Next Steps

4a - Consultation

SEPA is satisfied with the proposal for a six week consultation period of the ER which will be run in parallel to the consultation of the Finalised Local Plan modification consultation.

Diane Macpherson
Planning Officer
Department for Sustainable Communities
Comhairle nan Eilean Siar
Balivanich
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HS7 5LA

Your Ref:

Our Ref: CNS/LP/WI/WILP
DM/AT

Date: 23 May 2006

Dear Miss McPherson

ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES (SCOTLAND) REGULATIONS 2004

1.1 Scoping Report for the Western Isles Local Plan SEA

1. I refer to your scoping report, sent to the Scottish Executive SEA Gateway on 26th April 2006. In accordance with Regulation 17, I have reviewed the report on behalf of Scottish Natural Heritage in its role as a Consultation Authority under the above Regulations. Our comments on the scope and level of detail to be included in the Environmental Report and on the duration of the proposed consultation period are set out below. Detailed comments are provided in the annex to this letter.

1.2 Scope of Assessment and Level of Detail

2. Subject to the specific comments set out below and in the Annex A to this letter, SNH is generally content with the scope and level of detail proposed for the Environmental Report. SNH notes that the SEA process is coming in late in the Local Plan process in this case.
3. A particular issue which requires to be addressed is the relationship of the policies in the Structure Plan which flow through into the Local Plan. SNH notes that this issue has been picked up in Section 5.5, *Checking the Policy Range of the Plan*, and that there are no policies in the Finalised Local Plan specifically on the natural heritage as these are covered at a strategic level in the Structure Plan. It is not clear, however, how the SEA process will apply to these Structure Plan policies. SNH advise that where a policy flows through from the Structure Plan but is not expressed explicitly in the local plan, that this Structure Plan policy should be assessed against the SEA environmental objectives and criteria.

4. Further, in *Checking the Policy Range of the Plan*, SNH will also be interested in how the SEA process will be applied to settlement development, as neither settlement envelopes or housing allocations have been included in the Local Plan, with the exception, to some extent of Greater Stornoway.
5. SNH suggest that in establishing baseline information and in assessing policies as part of the SEA process that CnES could use this as the opportunity to obtain enough information to establish any likely significant effect of any proposal on a Natura site. This would also help in establishing no adverse impact on the Natura interests, or otherwise, should a significant effect be identified.
1. Consultation Period for the Environmental Report
6. SNH notes that a period of six weeks is proposed for consultation on the Environmental Report and is content with this proposed period.

Concluding Remarks

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

Yours sincerely

DAVID MACLENNAN
Area Manager, Western Isles

Enc

Annex A

General Approach

1. SNH notes that the scoping report follows current Scottish Executive guidance

SEA and Plan Objectives

The Local Plan Aims and Objectives – Para 3.3

2. The plan objectives are clearly stated but are a repeat of only some of the aims of the Structure Plan. It would probably be more helpful if the objectives were more holistic and picked up the objectives that relate to the four main topic headings (Development Management; Resource Management; Economic Development; Housing, Community and Leisure Facilities). At the very least, acknowledgement that the natural and cultural resources of the islands are essential and as stated in the plan, “where appropriate, developed in a positive manner to increase people’s use and enjoyment of them. The main policy approach is ‘to ensure prudent stewardship of the cultural, natural and built heritage resources in ways that maximise their economic potential in a sustainable manner’”. *Local Plan Context, page 12*. The Structure Plan chapter on resource management (*page 12*) more clearly highlights the CnES’s objectives in respect of the natural heritage and as both plans form the ‘development plan’, it would be helpful if these objectives were highlighted and flowed through into the Local Plan.

Related Plans Programmes and Policies – Table 2

3. The list of plans, programmes and strategies to be analysed for their relationship with the local plan is fairly comprehensive. The only additions SNH suggest include:
 - Scottish Executive’s Advice Note on Marine Fish Farming and the Environment, Jan 2003
 - Scottish Executive’s Locational Guidelines for the Authorisation of Marine Fish Farms in Scottish Waters, Oct 2002
 - European Protected Species, Development Sites and the Planning System, Interim guidance for local authorities on licensing arrangements, Oct 2001.

Significant Issues – Table 3

4. The key significant issues relevant to the Western Isles Local Plan are listed in Table 3. However, with the exception of those issues relating to population and demography and economic structure detailed in chapter 2, there is little information to detail what are the issues facing the natural or built environment or the landscape. These issues need to be more clearly defined in the Environmental Report. The issues of sustainable use of biodiversity, ecosystem level diversity, networks and wildlife corridors, threats of alien species and the importance of non-protected biodiversity should also be given attention as should matters relating to landscape, access, open space and informal recreational provision.

Any Effects on Natura Sites/species

5. *The European Guidance (available at: http://europa.eu.int/comm/environment/eia/030923_sea_guidance.pdf) notes that any effects on protected sites and on selected species in accordance with the Habitats Directive should be part of the Environmental Report. The guidance recommends that these effects might be described in a separate chapter as the findings on such effects are binding for the decision of the competent authorities on the plan or programme.*
6. *Further advice on integrating SEA and appropriate assessment is available in the guidance published by the Environment Agency et al 'Strategic Environmental Assessment and Biodiversity: guidance for practitioners' available at: <http://www.englishnature.org.uk/pubs/publication/PDF/SEAbiodiversityGuide.pdf>.*
7. *Where there are any potential significant effects on Natura sites, it should be noted that these would be required to be subject to an Appropriate Assessment. The sites, the reason for their designation and comments on any likely effects of the plan should therefore be noted. Any potential threats / benefits of the Plan's activities to named species should also be noted.*

Assessment Methodology

8. SNH notes that the assessment methodology follows the steps detailed in the Scottish Executive's Interim Planning Advice. The specimen matrix will help detail the impacts of the relevant policy or proposal on the environment.
9. As well as the specific policies and proposals, it is also important to assess the plan's overall vision and aims against the environmental criteria.
10. SNH recommend that CnES should also consider where any tension exists between the objectives and how impacts assessed against any conflicting objectives can be resolved, for example enhancing landscape character and encouraging renewable energy developments or encouraging opportunities to appreciate the Island's resources, whilst minimising the use of private transport.
11. In terms of monitoring measures, SNH would welcome the opportunity to discuss further the prioritisation of objective targets to be monitored. These are likely to become more apparent during the course of the assessment process. SNH suggest that the guidance in Appendix 10 of the ODPM 'A Practical Guide to the Strategic Environmental Assessment Directive' gives a useful example of developing a monitoring system.

The SEA Environmental Objectives – Table 4

12. The SEA objectives roughly follow SE Interim Planning Advice, but have been adapted to the local plan situation. SNH largely concurs with these objectives, subject to the comments below.
13. The only important aspects which SNH consider to be missing are the objectives relating to environmental capacity and the precautionary principle

(Is the Policy likely to help to identify and to contain development within the limits of acceptable change, or is it likely to exceed environmental capacity? Would the precautionary principle be invoked and applied?). This is likely to be particularly appropriate when testing the housing and development policies. Similarly, the objective relating to ‘respecting land form, natural processes and systems’ could be included particularly to test the policies on impacts on natural systems and coastal erosion.

14. In terms of the SEA objective 3 relating to ‘Improve the quality and liveability of settlements’, SNH recommends the addition of two extra bullet points:

- promote re-use of redundant buildings and/or plots.
- reduce sporadic housing development in the countryside beyond settlements.

15. In terms of the SEA objective 4 relating to ‘Safeguard general landscape character and visual amenity’, SNH welcome the assessment of the policies against local distinctiveness. However, it is likely to be very difficult to measure general landscape quality and it is suggested that enhancement or loss of landscape character would be easier to measure. Have ‘important views’ been identified in the Local Plan and will changes to the visual amenity of areas be measurable. Have these been quantified already?

16. In respect of environmental objective number 6, ‘Achieve effective stewardship of the Island’s ecology’, it is not clear to what ‘diminish their enjoyment’ refers. Perhaps this was to relate to encouraging opportunities for the appreciation of the natural heritage which might be included in an objective for effective stewardship.

Baseline Information – Table 5

17. Again, the list of objectives for which baseline information is required is fairly comprehensive. It is important however, that the indicators are readily tied back to the objectives and are measurable.

18. With respect to SEA topic ‘landscape’ the indicators are a bit vague and not readily measurable. While the number of National Scenic Areas will give an indication of the scenic quality of the area, it is not clear how landscape character will be used as an indicator. It would be more useful if changes to landscape character can be identified. This could be based on findings from studies like the Siting and Design Guide for the Western Isles, where examples of good and bad design were identified or from a review of planning applications which will clearly result in changes to the landscape character, the obvious type being windfarm proposals.



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Our ref: AMA/30/W/6/JLC
Your ref:

31 May 2006

Dear Ms McPherson

**Environmental Assessment of Plans and Programmes (Scotland)
Regulations 2004
Western Isles Local Plan: Scoping Report**

Thank you for consulting Historic Scotland on the Scoping Report prepared for the environmental assessment of the Western Isle's Local Plan, sent to the Scottish Executive SEA Gateway on 26 April 2006.

I have reviewed the Scoping Report on behalf of Historic Scotland in its role as a Consultation Authority under the above regulations (Regulation 17). This letter contains the views of Historic Scotland on the scope and level of detail of the information to be included in the Environmental Report (part 1), and the duration of the proposed consultation period (part 2). I have also provided detailed comments on the Scoping Report in the annex to this letter.

I note that the Scoping Report has been prepared at a relatively late stage in the Local Plan process. My understanding is that the plan preparation process has been adjusted to incorporate a further stage of public consultation, where the Environmental Report will be available for comment along with the proposed Local Plan modifications. I note that any issues raised through this consultation exercise will be considered when finalising the Plan.

1. Scope of assessment and level of detail

1.1 I found the Scoping Report to be helpful and, subject to the specific comments set out below, I am content with the scope and level of detail proposed for the environmental assessment.

1.2 My understanding from the Scoping Report is that the environmental assessment will include assessment of the Local Plan's:

- aims
- policies
- proposals
- reasonable alternatives to the Plan's policy framework
- reasonable alternatives to the Plan's spatial strategy

1.3 I note that you intend to use SEA objectives to assess the impacts of the Plan on the historic environment. The "historic environment" is defined in Section 16(3) of the Public Appointments and Public Bodies etc. (Scotland) Act 2003 as "... any or all of the structures and places in Scotland of historical, archaeological or architectural interest or importance". NPPG 18 builds on this definition by identifying the following features of interest:

- scheduled ancient monuments
- historic buildings
- designed gardens and landscapes
- archaeological sites
- townscapes
- historic landscapes
- the wider setting of the features listed above

Please note that this list should be read as including Conservation Areas and maritime archaeology. The environmental assessment should take these features into account, for both the collation of baseline environmental data, and when considering the potential impacts of the Plan on the historic environment.

1.4 Impacts on historic environment features often depend on the land-take associated with infrastructure and supporting activities, and may be avoided through appropriate locational measures. Impacts on the historic environment should be considered in terms of the following:

- direct i.e. loss and or damage to a feature of the historic environment; effects on setting
- indirect e.g. through changes to surface drainage patterns; local air quality; removal of peat; etc

1.5 When undertaking the environmental assessment, you may find that some impacts are uncertain at the strategic level, for example due to dependence on locational factors. Where this is the case it is important to identify these issues and to be clear how they will be taken into account at the lower level, for example at project level, and who will be responsible for following them through. On the other hand, it negates the purpose of SEA to always "park" assessment of impacts until the project stage, as one of the purposes of SEA is to avoid impacts at project level by assessing at the strategic level. A balanced approach is needed.

2. Consultation period for the Environmental Report

- 2.1 I am content with the 6 week period proposed for consultation on the Environmental Report. For administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.
- 2.2 At the Environmental Report stage, I would prefer to receive paper copies of the report and the Local Plan modifications, both of which should be sent via the Scottish Executive Gateway in line with the procedures set out in the Consultation Authorities' draft Information Note (a copy of which is enclosed).

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA regulations. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA. Please do not hesitate to contact me should you wish to discuss this response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Amanda Chisholm', written in a cursive style.

Amanda Chisholm
Strategic Environmental Assessment Team Leader

Annex A: Detailed comments on the Scoping Report

Western Isles Local Plan

1. Table 2 sets out the plans, programmes and strategies that will be analysed in the Environmental Report for their relationship with the Local Plan. As part of your review of the relevant policy framework you may also wish to refer to the following documents that are relevant to the historic environment, particularly in terms of objectives for its protection:
 - NPPG 5 Archaeology and Planning
 - NPPG 18 Planning and the Historic Environment
 - PAN 42 Archaeology – The Planning Process and Scheduled Monument Procedures
 - Memorandum of Guidance on Listed Buildings and Conservation Areas, Historic Scotland, 1998 (available at <http://www.historic-scotland.gov.uk/index/policyandguidance/memorandumofguidance.htm>)
 - Passed to the Future (Historic Scotland’s policy for the sustainable management of the historic environment, available at <http://www.historic-scotland.gov.uk/index/policyandguidance/free-publications/free-publications-3.htm>)
2. Historic Scotland is developing a new series of policy documents (Scottish Historic Environment Policy (SHEP)) that both sets out Scottish Ministers’ vision and strategic policies for the wider historic environment, and provides greater policy direction for Historic Scotland. SHEP 1 is the overarching policy statement for the historic environment. It provides a framework for more detailed strategic policies and operational policies that inform the day to day work of a range of organisations that have a role and interest in managing the historic environment. SHEP 1 is currently available for public consultation, however I have provided a link to the draft document as you may find it helpful (<http://www.historic-scotland.gov.uk/sheps>).

SEA of the Local Plan

3. I note that the Local Plan’s aims, policies and proposals will be assessed against the SEA objectives listed in Table 4.
4. SEA objectives have been proposed for all of the environmental parameters listed in Schedule 2 of the Regulations, and although this is not explicitly stated, I am therefore content that the historic environment has been scoped into the assessment. My comments on the SEA objectives in Table 4 are set out below:
 - SEA objective 5 will be used to assess the impacts of a particular policy or proposal on the historic environment. For clarity, the Environmental Report should include a definition of the features of the historic environment that will be considered when undertaking the assessment (see point 1.3 of the covering letter).
 - SEA objective 5 currently states “enhance and promote the historic and cultural environment”. I suggest amending this objective to “protect, promote and, where appropriate, enhance the historic environment” as

some features of the historic environment do not lend themselves to enhancement.

5. Table 5 summarises the environmental baseline information. My comments on the baseline data for the historic environment are set out below:

- I note that “cultural heritage” has been grouped with “material assets” as a topic, however I would prefer the historic environment to be considered as a distinct topic. Most of the indicators listed in this section of Table 5 relate to the historic environment rather than to material assets.
- One of the suggested indicators is the “% of listed buildings and archaeological sites at risk”. Is this currently monitored by the Council? You may be aware that the principal purpose of the ‘Buildings at Risk Register for Scotland’ is to assist the sale or lease of historic buildings in need of rescue, by publishing details of them from its database to a wide range of potential restoring purchasers or tenants. It may not include all of the buildings that are potentially at risk in a particular area.
- Simply for information, at some point in the future Historic Scotland is likely to request that historic landscapes are taken into consideration. Historic land-use assessment (HLA) can add information on the historic dimension to landscape character assessment. The HLA is a GIS-based analysis of past and present land-use, developed jointly by Historic Scotland and RCAHMS, and can be found on the RCAHMS web-site (<http://www.rcahms.gov.uk/>) at HLAMAP. However, the HLA programme does not yet have Scotland-wide coverage.

I am otherwise content with the baseline data for the historic environment.

6. The Scoping Report notes that you are currently preparing a State of the Environment Report. The draft Information Note accompanying this response provides details of how to obtain data for the historic environment. For example, data on listed buildings, scheduled ancient monuments and gardens and designed landscapes can be provided by Historic Scotland in GIS format, under licence (contact hsgimanager@scotland.gsi.gov.uk). The regional archaeological service can provide information on sites included in the Sites and Monuments Record (SMR). Please do not hesitate to contact me should you require any assistance.

Scope and level of detail proposed for the SEA

7. I note that the assessment will be guided by the Interim Planning Advice and that reasonable alternatives considered as part of the plan preparation will be explicitly documented in the Environmental Report. I am content with this approach.
8. I am content with the matrix shown in Table 6 that will be used to assess the Plan policies and proposals and welcome the inclusion of a ‘reasoning for score’ column to explain the results of the assessment. There are around 25 policies and 30 proposals in the finalised Local Plan, and so it

would be helpful when reporting the assessment to include a summary of the key impacts of the Local Plan on the historic environment.

9. I note that mitigation measures will be considered for significant environmental effects identified in the environmental assessment. Mitigation measures should be considered using the mitigation hierarchy i.e. avoid, reduce, remedy or compensate (for negative effects) and enhancement where appropriate (for positive effects). Please note that any enhancement of the historic environment should only be undertaken where appropriate and should be discussed with Historic Scotland in the first instance when features of national interest are being considered.

Next steps

10. I note that you are developing indicators to monitor the significant environmental effects of the Plan. When developing indicators it is useful to first consider how the Local Plan is likely to affect the historic environment, and then to relate this to appropriate indicators. Other local authorities are looking at how planning applications affect features of the historic environment, and you may wish to explore this avenue. I would be happy to discuss this further if you would find it helpful.