STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE HITRANS REGIONAL TRANSPORT STRATEGY

Annex A - Response to consultation comments on Scoping Report

Report

October 2006

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1. CONSULTATION RESPONSES ON THE SCOPING REPORT FOR THE SEA OF THE HITRANS REGIONAL TRANSPORT STRATEGY

1.1 This Annex provides the responses to the comments received by the Consultation Authorities on the Scoping Report.

TABLE 1.1   SCOTTISH ENVIRONMENT PROTECTION AGENCY (SEPA)

COMMENT	RESPONSE
1. Context.	
1a. The Plan/Strategy	
SEPA is satisfied that all the important background information is supplied including a useful section on the Strategy itself. As a minor comment it is difficult to determine the Strategy area from Figure 1.2.	We are pleased SEPA is satisfied all the important background information is supplied. As part of the strategy development process interactive mapping has been developed that shows clearly the extent of the region and the relevant schemes.
Section 2 provides an outline of the plans, programmes and policies which are relevant to the Strategy, supplemented with Appendix A. Most of those SEPA would have expected to be covered are included, however the following is noted; • Area Waste Plans are not included (this was highlighted at the draft stage); and • Access Strategies / Core Path Plans are not included. A number of these including the Highland Council Access Strategy are currently being prepared and are considering whether SEA applies; • The Noise Directive (2002/49/EC), especially since 'noise' has potentially been identified as an issue in its own right; • UN Framework Convention on Climate Change & its Kyoto Protocol (although comments on the Protocol are made in the Report); and • PAN61 Planning and Sustainable Urban Drainage.	We will review all of these reports except the Area Waste Plans, which are not considered relevant to a strategic level transport plan such as this. Appendix D in the Environmental Report contains these additional reviews.
The Council may wish to consider whether the following SEPA policies, available on our website, are relevant to the strategy: Groundwater Protection Policy for Scotland (Policy 19) and Policy on the Culverting of Watercourses (Policy 26).	Yes, these policies are considered relevant to the strategy and will be reviewed. They are also contained in Appendix D with the other additional reviews.
1b The Area	
Section 4 provides an outline of the environmental baseline, including problems. SEPA has previously commented that it may be useful to assess the available data and then determine any trends.	The available data has indeed been addressed in Section 4 of the Scoping Report, and trends are determined from this and the policy review, in Section 5.
It is noted that 'noise' 'is not a major issue in the Highlands and Islands as a whole' therefore it is queried why it is being included as an issue for separate assessment.	Noise is well known as an unwanted externality from motorised transport. It is very likely that the transport strategy will have an impact on this. Whether this is strategically significant, or just

	small and localised, will be determined later on in the assessment.
The baseline for human health impacts should include road traffic statistics (e.g. casualties) and in terms of accessibility, an important factor in human health is accessibility to the countryside.	Data on road traffic accidents has been included in the baseline. A baseline for accessibility to the countryside has not been included as accessibility mapping has not been undertaken as part of the development of the RTS.
Please note that SEPA is the Scottish Environment (not Environmental) Protection Agency	Noted.

2. Scope

    2a. Scope and level of detail

From the information submitted it would seem that the proposal is to scope out 'population' and 'material assets', however, this is not explicit and SEPA requests that this issue be clarified and accompanied by any justification for scoping out. Could population demographics be altered by improved or modified transportation links?	The intention is not to 'scope out' population and material assets, but to amalgamate them into other groups to simplify the assessment. However, it should be noted that, as it is a transport strategy, with a fixed time period, so is unlikely to make *significant* impacts on population demographics.
It is presumed that 'biodiversity' will include 'flora' and fauna'. In addition 'noise' is identified as an additional environmental issue to be considered in its own right (which SEPA has commented on earlier).	This is correct – biodiversity does include flora & fauna.
The main policy principles that are relevant to the RTS and the SEA are identified in Section 2.3. SEPA considers a number of these, such as 'reducing social exclusion', are relevant to the Strategy itself but not the SEA. Additionally SEPA would have assessed that the review would identify principles to safeguard the water and air environment. For example, the Water Framework Directive requires that there is no deterioration in status of water bodies, requires the enhancement of the status of aquatic ecosystems, including groundwater; the promotion of sustainable water use; reduction in pollution; and contribution to the mitigation of floods and droughts. The Air Directive provides a framework to improve and protect ambient air quality; there are clear Climate Change objectives that need to be taken into account in developing a transport strategy.	Reducing social exclusion would come under the SEA topic of human health. Section 2.3 does include the sustainable use of resources, which includes water and air quality. However, this could be more explicitly noted, and we are adding separate key policy outcomes for these two elements.
Section 3 provides a scope of the environmental effects in general terms. In terms of "air quality", it should be noted that air quality hotspots may occur at key points of congestion. In relation to "water, geology and soils" SEPA would argue that transport routes are an important source of diffuse pollution. It is important that this is recognised and measures are put in place to mitigate such effects including the use of Sustainable Urban Drainage Systems (SUDS).	These points have been noted and passed on to those developing the transport strategy.

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Construction of transport infrastructure will generally require watercourse crossings which can lead to disturbance of watercourses and the presence of permanent structures such as bridges can increase the risks of flooding. In terms of "biodiversity", it should be noted that transport routes can cause the severance of habitats and their fragmentation and cause the disruption of hydrogeological patterns and cause an impact on aquatic biodiversity.	
For your information SEPA would normally expect that the following be considered in the assessment of the Strategy: • Water (both surface and ground water): flood risk; water quality (chemical and ecological); drainage issues (both foul and surface water and including the use of SUDS); engineering works (such as bridges); erosion and sedimentation; associated affects on biodiversity; • Soil: Land contamination, use of green field or brown field land; • Air: Impact on local air quality, particularly in relation to any declared AQMAs or where air quality thresholds are close to being exceeded; if relevant impact from traffic generated by the proposals on other parts of Scotland; • 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. This should include in the short term from construction or in the long term once completed.	These topics have been covered in the baseline study, and have been assessed & reported on, within the Environmental Report.
SEPA holds significant amounts of environmental data, such as watercourse classification, which could be of interest to the Council in preparing both the baseline assessment and environmental problem aspect of the ER. 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). *Level of Detail of Assessment:* It would seem that individual strategies and measures within the overall RTS will be assessed. If this is the case SEPA is satisfied with the proposals.	This additional data source will be investigated if it is found to be relevant to the impacts of the transport strategy.

2b. Alternatives

SEPA notes that a number of alternatives have been considered and welcomes the acknowledgement that the final Strategy is likely to	Noted.

be a combination of these alternatives.

3. Methods

3a. Assessment Method

Proposed Draft SEA Objectives and Indicators: SEPA considers that the objectives for air quality, biodiversity, water and soils should be made more robust and include an element of improvement. SEPA supports the use of objectives which largely have a positive or negative aspect to them, e.g. "increase" or "decrease" and this allows then to link these objectives to monitoring indicators and targets.	Comments noted for future consideration. At this stage (Scoping), the indicators are draft only, as the RTS may include relevant indicators when it is fully developed which can be used for the SEA.
Other key indicators that could be considered in addition to the ones suggested in Table 5.2 are: area of prime agricultural land affected by new development, area of development on vacant and derelict land, Scottish Executive Contaminated Land performance indicators (soil); groundwater quality; area of development in areas of flood risk and requiring flood defences, flooding events, number of water pollution incidents reported to SEPA, percentage of transport infrastructure incorporating SUDS (water/climatic factors); traffic growth statistics; travel/road traffic statistics (air).	These suggestions have been noted and considered. As a result, groundwater has now been specifically identified in the objective for Water in the table for SEA objectives & Indicators (Table 5.1 of the Scoping Report).
Assessment Methodology: SEPA notes that a matrix will be used for assessing and mitigating RTS components. SEPA considers such an approach valid, but queries whether this will be a summary of more detailed worksheets. If this is the case SEPA would wish the worksheets to be available as part of the ER as SEPA would want to be able to determine how specific objectives were scored. If not then full use of the comments column will be required to explain each of the assessment in the row.	The assessment has not been undertaken by scoring. A detailed description of the mechanism for assessing the strategy is contained in the Environmental Report, and the assessment will include commentary.

4. Next Steps

4a. Consultation

SEPA is satisfied with the proposed consultation period of eight weeks for the ER.	Noted.
The ER should be submitted to the Scottish Executive SEA gateway. However, in addition, I would very much appreciate if a hard copy of the ER and draft Strategy were sent to the following address: Planning Unit, SEPA, Graesser House, Dingwall, Ross-shire, IV15 9XB	Noted.

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TABLE 1.2   **HISTORIC SCOTLAND**

COMMENT	RESPONSE
The Scoping Report provides a clear outline of the approach to the environmental assessment of the strategy, and subject to the specific comments set out below, I am happy with the scope and level of detail proposed for the environmental assessment.	Noted.
Table 2.1 sets out the plans, programmes, policy and legislation that are relevant to the RTS and the SEA. I note that you have reviewed NPPGs 5 and 18 and PAN 42. You may also wish to refer to *Passed to the Future,* which sets out Scottish Ministers' policy for the sustainable management of the historic environment.	This document has been reviewed and added to the list in Table 2.1
Simply for information, Historic Scotland is developing a new series of policy documents (Scottish Historic Environment Policy (SHEP)) that both sets out Scottish Ministers' vision an strategic policies for the wider Historic Environment, and provides greater policy direction for Historic Scotland. SHEP1 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. SHEP1 was recently available for public consultation; however, I have provided a link to the draft document as you may find it helpful.	Noted.
Paragraph 2.3 sets out the main policy objectives that have been derived from the review of plans, programmes and policies. I note that the requirement to "…protect archaeological sites and listed buildings" is identified. I suggest rewording this to "protect and, where appropriate, enhance the historic environment" to use the term 'historic environment' more consistently and in line with the definition provided in point 1.3 of the covering letter.	Agreed. We have revised this in the Environmental Report.
In the Environmental Report it would be useful to describe how the environmental protection objectives have been taken into account during the preparation of the RTS.	This has been noted and incorporated into section 3 of the Environmental Report.
Scope of environmental effects	
Section 3 describes the potential impacts of transport on each of the environmental parameters, and I found this format helpful in clearly setting out the scope of the assessment. The potential impacts identified in paragraph 3.32, transport – related proposals and activities may also affect the historic environment in the following ways:	
o Construction of new infrastructure may affect the wider landscape setting of	This has been noted.

particular sites (e.g. scheduled ancient monuments) or sensitive historic landscapes	
o Maintenance and management of existing infrastructure may affect historic environment features e.g. historic bridges.	This has been noted.
o There may also be opportunities to improve the accessibility of historic environment features including towns, landscapes and individual sites, providing that this is undertaken sympathetically. Access could also be combined with measure to improve the enjoyment and understanding of the historic environment (e.g. interpretation boards), again provided that this is undertaken sensitively.	This comment has been noted and passed to the relevant local authorities for future notice.
I am content that the assessment of impacts on the historic environment features will be focussed on the features identified in Paragraph 3.37	Noted.
The scope of the assessment is summarised at Table 3.1, and in summary for the 'cultural heritage' topic notes that assessment of effects will be focussed on 'designated' suggests that locally important historic environment features may not be considered in the assessment however these are included in the preceding section of the report (paragraph 3.3). I would welcome clarification that impacts on locally important historic environment features will be considered in the assessment e.g. archaeological sites on the Sites and Monuments Record.	For clarification, our definition of 'designated' includes all historic features that are listed on the Sites and Monuments Record.

Environmental Baseline

As noted in my response to the draft Scoping Report, 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.	Noted. All these elements of the historic environment will be considered in the Environmental Report.
Section 4 sets out the baseline environmental information that will be used for the SEA. I am content that baseline data has been provided for most relevant features of the historic environment listed in point 8 (scheduled ancient monuments, listed buildings, conservation areas and gardens and designed landscapes). Information on locally important archaeological sites may be helpful when you are considering impacts of transport proposals	Noted.

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or schemes. This can be obtained from the Sites and Monuments Record held by each of the relevant Local Authorities.	
When you undertake the assessment it might be useful to map the baseline data alongside the elements of the strategy that have spatial information e.g. transport schemes. This will help you to define any environmental constraints and consider alternative options.	As part of the strategy development process an interactive map of the RTS schemes is being created. The core environmental protection will be included on this map. This was not however available at the time of the assessment.

Environmental objectives

Will potential impacts on townscape character be considered within the SEA objective for the historic environment or for landscape?	'Tonwscapes' have been added to the objective relating to Landscape.
Gardens and designed landscapes contribute to the area's historic environment and to the landscape. Potential impacts on gardens and designed landscapes could be considered using the SEA objective for the historic environment or for landscape, and I would welcome clarification in the Environmental Report as to which will be used.	We have classified gardens and designed landscapes under cultural heritage and this is made clear in point 3.74 in the environmental report.
You may also wish to add an SEA objective: 'to promote the understanding and enjoyment of the historic environment".	This has not been added as an objective as there are no policies contained within the LTS to evaluate this against.

Draft RTS alternatives and assessment methods

I note that alternative options for the strategic direction of the strategy will be assessed and documented in the Environmental Report. The policies and proposals of the preferred strategy will then be assessed. When assessing policies and proposals, you may wish to group policies which are unlikely to exert environmental effects.	Noted.
Where a preferred option for a project is identified in the LTS, a discussion of the project's alternatives would need to be included in the Environmental Report to demonstrate that the environmental implications of the various options have been taken into account in the final decision that is being taken forward in the LTS.	We will discuss any alternative projects where there is information available as the Environmental Report includes discussion of the overall strategy alternatives.
Section 6 sets out the assessment methods, and I note that impacts of the historic environment will be considered in qualitative terms using an 'environmental capital' approach (the information on locally important sites would be used in this context). I am content with this approach, and with the matrix that will be sued to document the assessment. I found the information in paragraphs 6.34 to 6.36 helpful in describing how impacts on the historic environments will be assessed.	Noted.

Next steps

I note that mitigation measures will be developed to address the environmental effects identified in the strategy. Mitigation measures should be	Noted. We will use the mitigation hierarchy when considering mitigation measures.

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.

TABLE 1.3   SCOTTISH NATURAL HERITAGE

COMMENT	RESPONSE
Firstly, it is important to recognise that some parts of the HITRANS area (notably Inverness) are not experiencing population decline or loss of employment opportunities (as highlighted in para 1.13), and the transport needs of such areas are therefore very different.	Noted.
We would also stress the importance of the natural heritage as a foundation for much of the tourism industry, as noted in 1.14, and consider that this, along with its wider cultural and recreational value, offers positive opportunities which are of much greater significance that the occasional conflicts noted in this paragraph.	Noted
The most important issues for consideration at a strategic level relate to the overall sustainability of the available transport options, in particular air travel, and realistic alternatives should be encouraged where these exist. There will also be scope to reduce dependence on private cars, in particular within the commuter belts around large population centres (notable Inverness)	This comment has been noted and passed on to Hitrans for consideration in the development of the strategy.
Relationship with other plans and programmes	
A number of other national or international policies and strategies will be relevant to the HITRANS RTS, as follows: o UK Energy policy: this indicates a target for the UK to make a transition to low carbon energy generation and use by 2050. o EU Biofuels Directive: this indicates a target for biofuels to form at least 5% of transport fuels by 2010. o UK Aviation Strategy: this should have a bearing on the role of air services and expansion if air facilities, and the need for public transport connections. o European Landscape Convention: this provides a broad framework for positive management of landscapes; Articles 5 and 6 are particularly relevant. The UK	These have been reviewed and added to the table in Chapter 2 of the Environmental Report.

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has recently signed this Convention and is in the process of formal ratification.

- o Nature Conservation (Scotland) Act 2006: this places a duty on all public bodies to further the conservation of biodiversity, so far as is consistent with the proper exercise of their functions. The Scottish Biodiversity Strategy is also relevant.

- o Land Reform (Scotland) Act 2003: this is intended to promote non- motorised access to the outdoors and places a responsibility on local and National Park authorities to develop a core path network in their areas.

- o Safe Routes to Schools: this Executive policy links with the objective of promoting modal shift.

At regional / local level, the various regional Tourism Strategies and the Cairngorms Local Biodiversity Action Plan should also be considered.

Scope of Environmental Effects

Greenhouse gas emissions

We would underline the importance of impacts due to greenhouse gas emissions, particularly in relation to air travel. While recognising the lifeline nature of much air transport within the region, it will be important for the Environmental Report to give due weight to the opportunities to reduce dependency on this mode of transport and encourage a shift towards rail, in particular for journeys to southern Scotland and the rest of the UK.	It is not the role of the Environmental Report to generate options for the strategy, however these comments will be passed on to Hitrans. The environmental impacts of the strategy will have to be weighed against the impacts on the economy and accessibility.
Transport by sea carries an associated contamination risk from fuel or oil spillage which should be noted in or around para 3.23.	This has been noted, however this section is not replicated in the Environmental Report. Impacts on the marine environment, such as spillage, have been considered in the assessment tables where appropriate.
The scope of potential environmental impacts on biodiversity is clearly highlighted, but stronger reference should be made to effects on protected habitats and species in the wider countryside, as distinct from designated sites (the existence of these wider interests is acknowledged later in para 4.60). Table 3.1 should accordingly include effects on relevant biodiversity interests beyond 'designated areas of protection'. This broader focus would be more consistent with the biodiversity duty under the nature Conservation Act, which applies throughout Scotland.	This has been noted and taken into consideration in the preparation of the Environmental Report. Table 3.1 has not however been included in the Environmental Report.
These interests do not necessarily represent constraints on development, and there will sometimes be scope for positive management in conjunction with the management of transport infrastructure.	Noted

Landscape and visual amenity	
In a similar vein, the Environmental Report should include a fuller strategic assessment of landscape and visual impacts in all areas, not merely those carrying formal designations. This scope should also be reflected in Table 3.1.	There is a particular focus on designated landscapes in the scope of the SEA, however this is not to the exclusion of other landscapes elsewhere.
Significant landscape impacts can arise from lighting associated with new transport routes, particularly in the remote rural settings which predominate in the Highlands and Islands. These effects should also be considered at a strategic level.	The impact of lighting has been considered in conjunction with any new road schemes proposed.
There should be more explicit recognition of the outdoor access agenda. There are frequently opportunities for improved provision for more sustainable modes of transport in conjunction with major infrastructure developments, closer integration with core path networks and improved public transport to popular recreational destinations. There is also a converse need to avoid severing routes which are important for non-motorised users. While much of the detail of specific developments will emerge through EIA, these positive and negative impacts should also be considered at a strategic level.	This comment will be passed on to Hitrans for consideration in the development of the RTS.

Environmental Baseline

Landscape and visual quality	
In general terms, it is important to recognise the importance of coastal landscapes, which are not highlighted in the LCA extracts in paras 4.63 to 4.75. These landscapes can be highly valued, are often relatively densely populated and frequently provide important transport corridors.	We feel that we have sufficiently addressed this issue.
On a more specific point, Figs 4.1 and 4.2 do not map any landscape designations (such as NSAs or AGLVs). National Parks are wrongly referred to as Nature parks in the legend to 4.2.	Data on NSAs or AGLVs was not available at the time of mapping.

Heritage / health impacts	
In line with the point made in para 4.82 in relation to historic sites, it would be appropriate to note at the appropriate point that access to attractive recreational destinations is often difficult by public transport. The current baseline with regard to provision for non-motorised transport is not currently noted, and this section should highlight the scope for improved path networks around settlements, which should in due course be addressed, at least in part, through the core path plans.	The Regional Transport Strategy only addresses issues at a strategic level. Footpath networks surrounding towns will be dealt with through Local Transport Strategies.

Objective setting	
In line with our comments above, Table 5.1 should adopt indicators and baseline measures which reflect the full extent of biodiversity and landscape	The landscape indicator relating the number of conservation areas affected has been set as it is not possible to set an indicator for something that

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interests. In the former case, this might be achieved, for example by also referring to the wider extent of semi-natural habitats rather than just the number of designated sites. The suggested indicator for 'landscape and visual amenity is based on the number of 'conservation areas' affected. This should certainly include landscape designations such as NSAs and AGLVs and should also seek to address the net impacts on non-designated landscapes (accepting that this may not lend itself to a quantitative approach). The 'health' section should also include indicators relating to provision for non-motorised transport modes.

Those wider perspectives should in turn be carried through into the SEA objectives set out in Table 5.2 (which currently make no reference to landscape).

| is measured through a non-quantitative approach. An objective relating to landscape has been added. |

Draft RTS alternatives and assessment methods

Climate change

| In assessing the impacts of various strategy options on greenhouse gas emissions, it will be important to give due weight to the disproportionate impact of air transport. Para 6.34 suggests that 'most of the effects of climate change (e.g. flooding) will be reversible', while acknowledging that 'the timescale will span many years'. This rather understates the potential significance of these effects, which are likely to be rather irreversible over meaningful human timescales, and we would suggest that this is probably the most important single issue for the RTS to consider. | Agreed and noted. It is not however contradictory to national transport policy to expand air services. |

Biodiversity, flora and fauna

| The evaluative approaches used should encompass the full range of biodiversity interests as highlighted above (the reference to hedges in 6.36 will be of limited relevance to the Highlands and Islands and could probably be deleted). Similar considerations apply in relation to landscape. | Agreed and noted. |

Health

| This section could also factor in the positive opportunities for improved provision for non-motorised transport and integration with other modes. | Noted. This comment has been passed on to the RTS development. |

Next steps

| As noted in this section, many impacts on the natural heritage can be effectively mitigated at a local level by appropriate design. It is important to note that the stated aim of 'minimising impacts' may not be sufficient to satisfy the stringent requirements of the European Directives which | If a Natura site is likely to be impacted upon, this will be highlighted. |

apply to Natura sites. In these instances, it is necessary to ascertain that there will be *no* adverse impact on the integrity of the site, and failure to meet this requirement carries the risk of subsequent action through the European Court.	
As a general point, effective mitigation will often depend on allowing sufficient lead time during the development of a project to ensure that both potential impacts and mitigating measures can be appropriately assessed.	Noted.

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