



STRATEGIC TRANSPORT PROJECTS REVIEW

PROTECTING OUR CLIMATE
AND IMPROVING LIVES



SEA Environmental Report Appendix E – Consultation Feedback

January 2022

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1. STPR2 SEA Scoping Report: Consultation Feedback

CONSULTEE	DATE RECEIVED	SCOPING REPORT SECTION	CONSULTATION FEEDBACK	RESPONSE
HES	6 February 2020	General	HES note that the scoping report STPR2 has the potential to have both significant positive and negative impacts on designated and undesignated heritage assets and that there is a potential for positive impacts as a result of improving access to the historic environment. SNH is content with the approach and satisfied with the scope and level of detail proposed, subject to the comments below.	Positive response from HES noted.
		General	Consultation period: Noted timescales for consultation are indicative. HES would be happy to discuss and agree the consultation period in due course. SNH consider the consultation period beginning on receipt of relevant documents by the SEA Gateway.	Noted.
		Chapter 7: Next	We note the review of relevant PPS	A separate column that lists the



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		steps point 1.	as set out in Appendix B. However, it is not clear why NPF3 and SPP only appear in the review as being relevant to certain topic areas. For example, NPF3 is noted as being relevant to population and human health and landscape and visual amenity but not to the historic environment. Both NPF3 and SPP set out Scottish Ministers' vision and policies for the historic environment and we recommend that these two documents are included as relevant PPS for this topic.	relevant SEA topics for each PPS has been added to Table 2 (National Plans, Programmes and Strategies (PPS)) in Environmental Report Appendix B (Legislation, Plans, Programmes and Strategies). NPF3, NPF4 and SPP have been added to Environmental Report Appendix B.
			We note the content of table 1 which sets out the key environmental requirements emerging from the PPS review. Whilst we appreciate that this is a summary of a number of policy documents, we would recommend referring to the six policy areas within the Historic Environment Policy for Scotland (HEPS). We would also recommend rewording the third bullet	Suggested wording added to Table 2 (previously Table 1) in Environmental Report Appendix B.



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			<p>point on impacts on the historic environment to read:</p> <ul style="list-style-type: none"> • ‘Detrimental impacts on the historic environment should be avoided (rather than minimised). Alternatively, you may wish to use the following wording from HEPS’: • ‘Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.’ <p>This will ensure that the key environmental requirements are aligned with this key national policy.</p>	
		Chapter 7: Next steps point 2.	<p>Whilst we acknowledge that it is difficult to display historic environment data on the regional maps included in Appendix A, it is disappointing that the regional environmental summaries in Appendix D do not draw out the historic environment resource in each region. We had understood from our</p>	<p>The regional baseline summaries and figures in Appendix D have been amended to take account of comments.</p>



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			<p>discussions on the approach to SEA Scoping at our meeting in September 2019 that these summaries would be much more descriptive and would give a sense of the nature of the historic environment in these regions beyond the number of World Heritage Sites (WHS). Furthermore, we note that the summary provided on page 2 sets out that they will include World Heritage Areas and historic sites of significant importance. It is not clear what is meant by 'historic sites of significant importance' and it would be helpful to clarify this. For example, does this mean nationally important heritage assets?</p> <p>If this is the case, then you may wish to note that this includes the following types of asset:</p> <ul style="list-style-type: none"> • Scheduled monuments • Listed buildings • Sites on the Inventory of Historic 	<p>A description of the historic environment is included in Appendix C. HMPAs and other heritage assets are listed for</p>



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			<p>Battlefields</p> <ul style="list-style-type: none"> • Sites on the Inventory of Gardens and Designed Landscapes • Historic Marine Protected Areas (HMPA). <p>It would be helpful to revise the regional summaries to include these assets. If the current format is to inform the SEA, then you may wish to access data for these assets through our online portal. This will help to ensure that you have the most up-to-date information to inform your assessment.</p> <p>We note the baseline information provided in Appendix C, including the list of nationally important heritage assets. HMPAs are missing from this list and should be included. Whilst we note that WHS and the undesignated heritage resource are both mentioned, disappointingly little attempt appears to have been made to characterise the historic</p>	<p>each region in Appendix D.</p>



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			environment in section 8.1. It would be helpful if this were improved to ensure that the role of the historic environment as an asset to Scotland's character and identity is fully recognised in the SEA.	
			The STPR also presents opportunities for the historic environment which could also be brought out in this chapter. For example, the STPR may provide opportunities to provide connections between heritage and other publicly owned assets by low carbon means or via active travel routes for communities and visitors. In this regard, the historic environment should not be seen solely as a constrain but also an opportunity	Opportunities are more easily identified at the Environmental Report stage, when there are a list of STPR2 interventions to consider and assess and locations for some interventions are provided. These opportunities are described in Chapter 9 of the main Environmental Report.
		Chapter 7: Next steps point 3.	We are broadly content with the approach set out in chapter 6 of the SEA scoping report and the SEA objectives set out in table 4. However, it will be essential that the	Environmental Report Appendix C describes the key interrelationships between the SEA topics



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			Environmental Report clearly sets out how you have considered the interrelationships between the topic areas scoped into the assessment. This is unclear from the description of your proposed approach in this chapter.	
SNH (now NatureScot)	7 February 2020	General	SNH is content with the scope and level of detail to be included in the ER and welcome the approach to scope-in all SEA topics required by the 2005 Act. The analysis, commentary and recommendations from the ER of the NTS should be used to inform the STPR2 and its ER. There is no mention of consultation period timescales but SNH suggest a 12-week consultation period would be appropriate.	Positive response from NatureScot noted. The consultation period for the Environmental Report is discussed in Chapter 5 of the main report.
		Chapter 7: Next steps Question 1.	We feel that including a vision for the future of Scotland's transport network would help to ensure that all the relevant issues are covered in the Key Environmental Requirements	The vision for the future of Scotland's transport network is set out in the STPR2 main technical report and Chapter 2 of the SEA main Environmental



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			<p>stage in the SEA process. We comment further on this below.</p> <p>As for other policies and documents which should be included, we suggest the inclusion of the recently-published document People, Place and Landscape (a joint statement on landscape from SNH and HES).</p>	<p>Report.</p> <p>Both suggested policies have been added to the PPS (Environmental Report Appendix B)</p>
		<p>Chapter 7:</p> <p>Next steps Question 2.</p>	<p>We have provided more detailed comments below on Appendix A and D. We feel that the regional summaries could be improved by highlighting the positive contribution that many of the natural assets listed make to Scotland's economy and society – and how effective sustainable transport networks can improve this contribution.</p>	<p>Additional text added to the amended regional summaries (Appendix D) highlighting the benefits of Scotland's assets and how sustainable transport networks can improve these benefits.</p>
		<p>Chapter 7:</p> <p>Next steps Question 3.</p>	<p>We are content with the overall approach proposed – we have provided some more detailed comments below on Section 6 and the tables in that section. As noted in</p>	<p>Noted</p>



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			<p>our general comments, it would be helpful to revisit the guide questions to ensure a clear link to the environmental requirements – and that all issues are addressed by the questions.</p>	
		General	<p>We feel that the Scoping report should include a vision for the future of Scotland's transport network. Including this would help to give an idea of what is being aimed for.</p> <p>This vision should be used as to inform a revisiting of the Key Environmental Requirements set out in Table 1. We have made some detailed comments below on this table, but we feel that an overall check against a vision for the transport network would help with a joined-up approach in the Environmental Report and the overall STPR2 itself.</p>	<p>The vision for the future of Scotland's transport network is set out in the STPR2 main technical report and Chapter 2 of the SEA main Environmental Report</p>
			<p>In the assessment process, care</p>	<p>The Environmental Report is</p>



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			should be taken to ensure that the focus is on environmental effects. This should help avoid offsetting these against economic benefits.	focused on the potential environmental impacts of STPR2
			It would be helpful to have more detail – especially in the Environmental Report – on how to deliver the objectives set out for the transport network. In particular, more specific thinking is needed as to what mechanisms will be used to achieve the outcomes wanted.	The mechanisms to be used to achieve the desired outcomes for the transport network are described in the NTS2 and STPR2 Delivery Plans.
			Linked to this, it would be important to revisit the guide questions in Table 4 to ensure that these are addressing all the issues highlighted in the Key Environmental Requirements column in Table 1. We have made some comments below on the questions in the table, but this overall check would help ensure a link between policy objectives and delivery mechanisms.	Comments noted and detailed responses are provided in the rows below.
		Table 1 – Key	In the section on Population and	Reference to the importance of



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		environmental requirements emerging from the PPS review	Human Health, the sixth bullet-point refers to creating a culture of walking. The points here apply equally to provision for cycling. Numerous studies indicate safety and concern, with the lack of separation from motorised vehicles being a significant deterrent for people cycling. There is a linked equalities issue, as women are disproportionately discouraged and, therefore, less able to benefit from engaging in active travel and connecting with nature.	cycling added to the environmental baseline in Environmental Report Appendix C
			In the section on Material Assets, the fifth bullet point refers to maximising investment in rail infrastructure to support a surge in demand. This reads more as an investment objective rather than an environmental requirement. If it is retained, it may be helpful to include a reference to supporting modal shift as a way of reducing emissions. Also in the Material Assets section,	References to modal shift and traffic segregation have been added to Chapter 9 of the main Environmental Report. Gender aspects are covered in EqIA. Reference to connecting ferry services to public transport and active travel added



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			the last bullet-point refers to improving connectivity between ferry services and public transport to encourage sustainable travel. The issue is broader than this – improved connectivity between all modes of transport is needed, including active travel (walking and cycling routes to major infrastructure are often quite unattractive).	
			In the Soil section, in the second bullet-point there is a reference to 'high-carbon soils'. The commonly-used term is 'carbon-rich soils', so it would be best to use this here. Also in this bullet-point, it is important to recognise that the benefits of peat is as a store of carbon as well as for carbon capture.	Wording revised
		Section 4 – Baseline Profile	We welcome the fact that all of the SEA topics listed in the SEA Directive have been scoped-in. However, the list of points under each of the topics in this section doesn't seem to have a	The baseline profiles referred to here have been amended in line with comments. These summarise the national environmental baseline of



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			<p>clear structure or rationale for what is being captured. It is an eclectic mix of items which includes statements on the need/policy objectives; facts; the framework/tools to be used; the status or importance of the resource; and future predictions. With this variation, it is difficult to identify what the key baseline information should be.</p> <p>In the Material Assets section, the third bullet-point is about the built environment. It might be better to say ‘The built environment encompasses the country’s infrastructure...’ rather than use the word ‘considers’ here.</p> <p>In the Water Environment section, the second bullet-point refers to flood risk. It is the management of water basins as a whole that is key. The other issue to consider is where we continue to develop and build infrastructure – we need to avoid areas which are or are likely to be</p>	<p>Appendix C.</p>



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			<p>highly vulnerable to flood risk.</p> <p>In the Soil section, there should be reference to the role of peatlands and other carbon-rich soils as existing stores of carbon as well as how they can play a role in climate change mitigation by capturing more carbon. It is important to minimise disturbance of carbon-rich soils, as disturbance can lead to significant releases of carbon. The Scottish Soil Framework and the State of Soil report identified national soil outcomes and baseline information on the importance of Scotland's soils.</p> <p>In the Cultural Heritage section, the first bullet-point highlights that some sites are on islands. It's not clear why this has been mentioned here – and only using the two examples mentioned.</p> <p>In the final section on Landscape and Visual Amenity, there is no clear reference to landscape character and</p>	



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			the diversity of Scotland's landscapes. The wording under the SEA Objective in Table 1 at the end of page 26 of the document (page 30 of the PDF) is preferable.	
		Table 3 – Scoping of SEA Topics	In the Soil section, the main point is about the relationship between soil and water quality. While this is important, it is not the primary issue here. Adequate consideration needs to be given to the impact of interventions on Scotland's soil resources and the way soil interacts with other aspects of the environment – in particular, with biodiversity.	Point noted and now reflected in table and in the interrelationships described for the soils topic in Appendix C.
		Table 4 – Draft SEA Objectives	We welcome the links being made here to spatial planning. In addition, we support the inclusion of a question about the future capacity of active travel networks. There is still a tendency to plan for current levels of use, but if that is what is done then Scotland will be faced with the same situation there is with parts of the	Capacity and travel demand are being considered in STPR2 and these considerations will be included in the main STPR2 reports.



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			<p>road network – much more demand than routes are designed to take. The assessment of the effects of the STPR should include looking at how well proposals are future-proofed for challenges such as this. It would be useful to ensure that future-proofing is part of the overall assessment.</p> <p>In the section on Soil, the list of data sources should include:</p> <ul style="list-style-type: none"> • Maps of soil erosion risk (partial coverage of the country – available on Scotland’s soils website) • Land capability for agriculture maps (partial coverage) – the Agricultural Land Classification is only relevant to England and Wales • Carbon and peatland 2016 map (as a proxy for peat map classifications) <p>In the final section on Landscape and Visual Amenity, there is a point about</p>	<p>Data sources added to chapter 7 and Appendices C and D.</p> <p>References to wild land</p>



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			<p>the protection of wild land areas. It is not clear why wild land has been mentioned specifically, so either the reference should be to these as well as National Scenic Areas, National Parks and local landscape designations; or remove any specific reference to wild land as these are covered by the question immediately above.</p> <p>We welcome the references to place and placemaking in the SEA Objectives, as well as elsewhere in the document. It is recognised that well-planned and implemented transport provision contributes to creating good places. It will be important to assess the effects of the STPR against this key objective.</p>	<p>removed</p> <p>Comments noted</p>
		Section 6.4 – Stages of Assessment	We welcome the proposal to assess cumulative impacts on both an intra- and interplan basis. This is often not fully addressed in SEAs, with the main focus appearing to be on intra-	Comments noted



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			<p>plan impacts.</p> <p>For the SEA input to the STAG Initial Appraisal stage, it appears that the SEA Environmental Baseline will be used to inform the Initial Appraisal – it might be best to say that explicitly here. As long as the correct baseline information is used, the scrutiny at this stage should help to flag issues and opportunities at an early enough stage for them to be properly addressed and designed-in. We welcome this approach.</p> <p>There is also reference in the STAG Initial Appraisal: Case for Change to the fact that the environment is not usually covered at this stage in any depth. However, given the climate emergency – and the level of emissions from transport – we feel that the environment should figure highly in the Case for Change. We are aware that the STAG methodology is under review, and a</p>	<p>Text added to Table 9 of the Environmental Report. The environmental baseline collected at the scoping stage was used to inform the Initial Appraisal Case for Change documents as well as all subsequent assessment for the SEA.</p> <p>Text added to the Environmental Report. The STPR2 regional Case for Change reports also included sections on the environmental baseline for each region.</p>



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			<p>new approach may consider environmental issues from an earlier stage.</p> <p>We are unclear about the planned approach at the preliminary appraisal stage, where the proposal is to use the STAG criteria. However, as is noted in the document, STAG does not include all the SEA topics – and STAG also includes economic issues which are not part of SEA. We assume that the approach will combine STAG and SEA criteria, but exclude economy. One way of doing it would be to include an assessment of economic issues, but keep this separate from the SEA – this is done in Habitats Regulations Appraisal – where this presented as a separate annex. We recommend you clarify your approach in this respect.</p> <p>There is mention of using a 7-point scoring system. It would be helpful</p>	<p>The STAG criteria were used in the development of the SEA objectives and their underlying guide questions, as described in Sections 2.4 and 7.3 of the main Environmental Report. Potential economic impacts of the STPR2 are not considered in the SEA unless they have a bearing on the Population and Human Health SEA topic.</p>



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			<p>for more detail on this to be included – we assume that it will be aligned to the usual positive/negative-unknown approach used in SEA matrices.</p> <p>If there is a plan to provide commentary and mitigation proposals at the detailed appraisal stage, this should be made clear. We find that some Environmental Reports which include a combined commentary/mitigation column in the assessment tables – and often what is presented is just commentary, rather than any mitigation requirements. The Environmental Report should include suitably specific mitigation proposals. It would be helpful if these are pulled together into a table within the Report.</p> <p>We feel that the comments about assessing cumulative impacts are a bit vague in the Detailed Appraisal section. We welcome the comments</p>	<p>The seven-point scoring system is described in Section 7.6 of the main Environmental Report</p> <p>The Environmental Report contains narrative on the assessment tables (Appendix F) and Chapter 9 of the main report describes strategic mitigation and enhancement measures.</p>



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			about the assessment of cumulative impacts made earlier – and the principles set out in the preamble to Table 5 should be reflected in this section.	Further details on the cumulative effects assessment added to the Environmental Report
		Section 6.5 – Approach to mitigation and monitoring	This section refers to quite a long list of sources of material to inform the mitigation measures and enhancement. It is helpful to be able to draw on a wide body of evidence. However, it would be useful to clarify the sources and their respective influence. In particular, mitigation proposals arising from assessment may have more value than mitigation stemming from comments at workshops – although that again does depend on the source.	All evidence sources used to inform the mitigation and enhancement measures are provided in Chapter 9 of the main Environmental Report
			We also suggest that a greater profile is given here to opportunities for enhancements in the assessments, in particular the opportunities for biodiversity net gain.	Comments noted. Enhancements are described in Chapter 9 of the Environmental Report.
				Comments noted.



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			We welcome the proposal to assess cumulative impacts on both an intra- and interplan basis. This is often not fully addressed in SEAs, with the main focus appearing to be on intra-plan impacts.	
		Appendix B – Plans, Programmes and Strategies	The Soils section should include a cross-cutting reference to the soil outcomes included in Climate Ready Scotland: the Second Scottish Climate Change Adaptation Programme 2019-2024 and Scottish Planning Policy.	Cross-reference has been added to table
		Appendix C – Baseline	<p>The Soils section includes references to website links accessed as long ago as 2012. There may be more up-to-date web-based information which should be linked to here.</p> <p>In addition, some of the references to cultural heritage material are links to HES's website – but the references start with 'SNH'. This is probably just a typo.</p>	<p>Updated references have been included in the soils section in Appendix C of the Environmental Report</p> <p>Typo rectified in the Environmental Report</p>



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		Appendix D – Regional Environmental Summaries (maps in Appendix A)	The comment on page 2 of the document which describes what the summaries includes only refers to environmental constraints. However, many of the items listed here are assets for the country which an effective sustainable transport network can help Scotland benefit from. Active travel routes are possibly the main example, with the various types of protected areas mentioned encompassing many of the key places which attract visitors and are assets for Scotland’s tourism sector. By giving the impression that these are only constraints, it implies that the main objective is to see where infrastructure can be built rather than the development of an effective transport network to help deliver inclusive and sustainable economic growth.	The term ‘constraints’ in the title of the appendix has been replaced with ‘Regional Environmental Summaries’
			We understand that the intention is to move from the seven Regional	The regional environmental summaries now include data



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			<p>Transport Partnership areas to having the country divided into 11 STPR2 regions. However, the mapping of the regional working groups is unclear and leads to some duplication. For example, Scottish Borders is included in its own right – as well as part of Edinburgh City Region and as part of South of Scotland. The Regional Transport Partnerships have undertaken a significant amount of information gathering and analysis including on environmental issues – and it is important that this is used to inform future transport planning at a regional level. In particular, there will be information in the SEAs of the Regional Transport Strategies which should inform the SEA for the STPR2 – and could save much separate analysis. Making use of this existing information would provide a useful link and coordination across different strategies.</p>	<p>from the Regional Transport Strategies</p>



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			We feel that the maps in this Appendix are too small scale. It is clear that there are significant areas of designation, but it is often difficult to make these out even when they are not overlaid by other information.	All maps have been updated
			The summaries for each region are largely a list of designations, rather than an actual summary of what is most significant in that area and how it relates to planning for transport. In some instances, due to the scale of the mapping there are some features listed which are not mapped – for example the National Cycle Network.	More detail has been added to the regional environmental summaries in Appendix D. New data have been added to the maps, such as National Cycle Network routes
			Finally, soils are not covered in this section. It would be helpful to have some information on the distribution of: Carbon-rich soil/peatland Prime/most versatile agricultural land classes	The Soils topic is included in the regional environmental summaries in Appendix D. This includes figures that show soil categorisation in each region.



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SEPA	7 February 2020	General	SEPA noted they are generally content with the scope and level of detail proposed for the ER. Additional issues considered are relevant are set out below.	Noted
		Chapter 7 Next steps	We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.	The development of the STPR2 SEA has been influenced by PPS and the SEAs associated with these PPS, in particular the NTS2 SEA and NPF4 Integrated Impact Assessment. These data sources are included as footnotes in Appendix C.
		Question 1	Table 1 does not appear to bring out too many detailed environmental requirements from the PPS review. For example we would expect review of the existing PPS to bring out specific flood risk requirements. It is noted within other parts of the Scoping Report that key flood risk issues are highlighted. It would appear that Table 1 does not necessarily match up with the rest of the scoping documentation however.	



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			Many of the PPS outlined in Appendix B 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 STPR2. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere. It is noted within Section 3.3 that a review of the associated environmental protection objectives highlights existing and potential problems, as well as opportunities for enhancement and benefits, and has served as an important base upon which to build the SEA Assessment Framework.	
		Chapter 7 Next steps	Previous discussions have taken place regarding the regional maps that are shown in Appendix D. Whilst it is acknowledged that showing	The regional maps, now included in Appendix A, have



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		Question 2	<p>every environmental issue on the maps is impractical the descriptors outlined in Appendix D should at least detail them. There is inconsistency within the descriptors as there is no definition of the descriptors. It is noted that the descriptors for some of the regions include the major flood risk areas which is welcomed, albeit it is not clear why specific areas of flood risk have been identified over others. As an example, for the Forth Valley Cities region flood risk is not identified. Grangemouth and Stirling, to name but two, are very sensitive to fluvial flood risk.</p> <p>It is recommended that the descriptors are reviewed to ensure that consistent issues are brought up with the regional maps. It is also recommended that the descriptors themselves are reviewed as, for example, it is not clear why stating the number of surface water features</p>	<p>been updated to show medium and high flood risk for the whole of Scotland.</p> <p>Regional baseline summaries in Appendix D have been updated. The baseline summarises the general features and trends in each</p>



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			<p>for a region is of particular relevance to STPR2, nor is it clear what the definition of a surface water feature is.</p> <p>One additional issue that needs consideration is vacant and derelict land and the potential opportunities to reduce vacant, derelict or contaminated land through delivery of STPR2. This could be a positive outcome under soils or material assets. Vacant and derelict land is included in the proposed NPF4 SEA objectives which SEPA have been providing feedback on to Scottish Government.</p> <p>Another issue which could be considered is how the STPR2 will assist in the delivery of a truly circular economy.</p>	<p>region. This includes discussion of vacant and derelict land in the soils topic sections.</p> <p>The circular economy is one of the considerations in the SEA guide questions for one of the Material Assets SEA Objectives: Reduce use of natural resources</p> <p>Vacant and derelict land is discussed in the regional baseline (Appendix D)</p>
		Chapter 7 Next	We note that alternatives are still being considered. Any reasonable	Reasonable alternatives are discussed in Section 7.4 of the



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		steps Question 3	alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report.	Environmental Report
			Within our response to the Draft SEA Objectives we suggested adding wording to include improving air quality in the Air Quality SEA objective. This does not appear to have been included (Table 4) and the only note of improvement to air quality is in the SEA assessment guide question and that only refers to disadvantaged areas. We again recommend that improving air quality is added to this SEA Objective.	There is already text on improving air quality in the headline objective.
			Additional SEA Objectives to be considered include reducing car dependence, circular economy benefits for soil and improving	Reducing car dependence is a key aim of many of the SEA objective guide questions – for example, the climatic factors



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			habitats through biodiversity objectives.	guide questions cover the topics of modal shift and facilitating coordination with spatial development planners to ensure communities are close to key services and places of employment
			Whilst acknowledging that this is the scoping stage there is a focus on objectives and not delivery mechanisms, we expect this to be addressed in the ER. This issue was raised for the ER for NTS2.	Delivery mechanisms are addressed in the strategic mitigation and enhancement measures (Chapter 9) and draft monitoring chapter (Chapter 10) of the Environmental Report



2. STPR2 SEA Progress Report: Consultation Feedback

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Historic Environment Scotland	30 March 2021	Phase 1: SEA Approach and Outcomes	<p>We note the information here on the environmental assessment of Phase 1 of the STPR. We understand that a high-level review was carried out on the STPR2 themes and interventions and it was found that these largely align with the identified SEA objectives.</p> <p>As no environmental report has been produced at this stage the high level findings are presented in brief summary against the majority of interventions. Given the lack of detail here we are unable to comment on the effectiveness of the assessment process at this stage. However, as discussed below there are a number of assumptions being made about the compatibility of the Interventions with the SEA Objective identified for the historic environment that it is unclear the level of consideration given to the issues involved.</p>	Comments noted. No further action required.



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			<p>As we noted in our response to the environmental assessment that accompanied the recent Infrastructure Investment Plan (IPP) we were disappointed at the narrow view taken by that assessment of the implications of the IIP on the historic environment. We would therefore look to this assessment to fully consider the positive and negative aspects of the interventions being put forward.</p>	<p>The STPR2 SEA has fully considered the positive, negative and uncertain aspects of the proposed STPR2 interventions. The full assessment is included as Appendix F and the summary findings are included in Chapter 8 of the main Environmental Report.</p>
			<p>The summaries of the potential interactions of the interventions with the SEA objectives is welcomed although, as noted above, the level of detail provided is such that we cannot offer a view on the merits of the assessment at this stage. However, in relation to the historic environment content of these summaries we would note that there is a focus on an individual effect (such as the visibility of the Waverley Station Ticket Office) and reports this as showing that the</p>	<p>Comments noted. The potential environmental effects of STPR2 are described in more detail in the Environmental Report assessment matrices (Appendix F).</p>



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			intervention would “complement the SEA and help to progress the SEA objectives”.	
			<p>This approach does not recognise that the environmental implications for the historic environment across a number of the interventions are complex and likely to be a mix of positive and negative effects. Furthermore, the summaries do not pick up upon potentially significant issues for the historic environment in areas such as the implications of access work, electrification and issues for historic bridges etc relating to gauge clearance work (Interventions 12,14 and 16). It may be the that the brevity of the summaries has not allowed the reporting of these issues. However, in noting that the update states that a “small number of these interventions were highlighted at this stage as having potential for significant effects on the achievement of the SEA objectives” and that these interventions will require further</p>	<p>Comments noted. The potential environmental effects of STPR2 are described in more detail in the Environmental Report assessment matrices (Appendix F).</p>



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			<p>consideration and assessment in the SEA during Phase 2. It is unclear whether the omissions highlighted above have been considered. We would therefore suggest a precautionary approach to the scope for further consideration and assessment of the Interventions in Phase 2.</p>	
		<p>Proposed Phase 2 SEA Assessment Approach and Phase 2: SEA Environmental Report</p>	<p>We welcome the detail set out here regarding the ongoing assessment process. In considering the proposed matrix approach for the preliminary appraisal it should be borne in mind that proposed interventions such as major rail station enhancement have the potential to both contribute positively to and detract from the SEA objectives. In terms of reporting against the scoring system for the detailed appraisal stage, it will be important for this to be flexible enough to recognise the combination of positive and negative effects likely to arise for the historic environment from a number of the interventions.</p>	<p>The STPR2 SEA has fully considered the positive, negative and uncertain aspects of the proposed STPR2 interventions in its matrix assessment and the accompanying narrative. The full assessment is included as Appendix F and the summary findings are included in Section 8 of the Environmental Report.</p>



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NatureScot	31 March 2021	N/A	Thank you for the SEA Progress Report send to us on 12 February 2021 via the Scottish Government SEA Gateway. We have given comments in this letter on the SEA approach outlined in the Progress Report. We have also submitted comments on the main STPR2 Update and Phase 1 Recommendations documents using the comments form being used for that purpose.	N/A
		N/A	<p><u>Approach of issuing an SEA Progress Report</u></p> <p>We support the publication of this progress report at this stage. It is helpful to have this given that the STPR2 process is quite lengthy – and the unusual circumstances in which STPR2 is being prepared. The COVID-19 pandemic has led to a significant change in both the short-term and longer-term contexts for provision of and demand for transport. The report is clear on what its purpose is to avoid any potential confusion with</p>	N/A



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			either the Scoping Report stage or Environmental Report stage of the SEA process.	
		Section 4.3	<p><u>Embedding a natural capital approach</u></p> <p>We welcome the plan – outlined in section 4.3 – to embed natural capital principles into appraisal mapping requirements, as well as the stronger focus on place and placemaking. We would expect this work on natural capital and placemaking to include the consideration of the use of nature-based solutions wherever possible as part of the enhanced approach to meeting STAG and SEA requirements. It will be helpful for the SEA process to highlight the opportunities to embed nature-based solutions as measures that should be considered for all interventions, although the detailed considerations should also be part of subsequent appraisal, planning, design and implementation phases. We would be happy to discuss</p>	Nature-based solutions will be considered in relation to transport interventions



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			further how natural capital will be embedded in the work on STPR2.	
		Section 4.5	<p><u>Matrix-based approach to the SEA appraisals</u></p> <p>Section 4.5 of the progress report sets out proposals for a two-step process for the appraisal of transport options and interventions – with a three-point scoring system in the first stage and a seven-point scoring system in the second stage. However, we have compared this with our experience of the approach used in the Local Development Plan preparation process – where there is an interim Environmental Report and then a revised ER. In the LDP process, there isn't usually a change in the scoring criteria from one step to the next. The same set are used and the score is updated based on the additional information available later in the plan preparation process. We feel that a similar approach could be used here.</p>	<p>In response to this comment, the same seven-point scoring system was retained for use in all SEA assessment matrices for this project</p>



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			<p>In addition, the very simple three-point scoring system set out in Table 2 means that there is a need to identify an effect rather than the appraisal being able to conclude either 'uncertain' or 'none/negligible'. Overall, we feel that it would be more straightforward to use the scoring system outlined in Table 3 throughout the process.</p>	
		Section 4.6	<p><u>Mitigation and enhancement measures</u></p> <p>We welcome the range of sources of mitigation and enhancement measures that are outlined in section 4.6. We would like to see specific mention in this list of opportunities to deliver Positive Effects for Biodiversity (also known as Biodiversity Net Gain), especially given the proposals for developing and implementing PEfB set out in the Scottish Government's NPF4 Position Statement published in late 2020.</p> <p>We have highlighted above the need to consider nature-based solutions wherever</p>	<p>The strategic mitigation and enhancement chapter (Chapter 9) of the main Environmental Report now includes discussion of nature-based solutions and Positive Effects for Biodiversity</p>



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			possible as part of transport options and interventions. It would be helpful to have a reference in the section on mitigation and enhancement to the potential for the use of nature-based solutions	