STPR

STRATEGIC TRANSPORT PROJECTS REVIEW

PROTECTING OUR CLIMATE
AND IMPROVING LIVES

**SEA Environmental Report Appendix E – SEA
Consultation Feedback**

December 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 as set out in Appendix B. However, it	A separate column that lists the relevant SEA topics for each

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		steps point 1.	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.	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 point on impacts on the historic environment to read:	Suggested wording added to Table 2 (previously Table 1) in Environmental Report Appendix B.

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			• '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.' This will ensure that the key environmental requirements are aligned with this key national policy.	
		Chapter 7: Next steps point 2.	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	The regional baseline summaries and figures in Appendix D have been amended to take account of comments.

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			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? If this is the case, then you may wish to note that this includes the following types of asset: ● Scheduled monuments ● Listed buildings ● Sites on the Inventory of Historic Battlefields	A description of the historic environment is included in Appendix C. HMPAs and other heritage assets are listed for each region in Appendix D.

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			• Sites on the Inventory of Gardens and Designed Landscapes • Historic Marine Protected Areas (HMPA). 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. 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 environment in section 8.1. It would be helpful if this were improved to	

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			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 clearly sets out how you have considered the interrelationships between the topic	Environmental Report Appendix C describes the key interrelationships between the SEA topics

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			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 stage in the SEA process. We comment further on this below. As for other policies and documents	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. Both suggested policies have

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			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).	been added to the PPS (Environmental Report Appendix B)
		Chapter 7: Next steps Question 2.	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.	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.
		Chapter 7: Next steps Question 3.	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 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	Noted

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			questions.	
		General	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. 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.	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
			In the assessment process, care should be taken to ensure that the focus is on environmental effects. This should help avoid offsetting these against economic benefits.	The Environmental Report is focused on the potential environmental impacts of STPR2
			It would be helpful to have more detail – especially in the	The mechanisms to be used to achieve the desired outcomes

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			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.	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 environmental requirements emerging from the PPS review	In the section on Population and 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	Reference to the importance of cycling added to the environmental baseline in Environmental Report Appendix C

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			a linked equalities issue, as women are disproportionally discouraged and, therefore, less able to benefit from engaging in active travel and connecting with nature.	
			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, 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 | 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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			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 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	The baseline profiles referred to here have been amended in line with comments. These summarise the national environmental baseline of Appendix C.

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			be.	
			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.	
			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 highly vulnerable to flood risk.	
			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	

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			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. 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. In the final section on Landscape and Visual Amenity, there is no clear reference to landscape character and 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	Point noted and now reflected in table and in the interrelationships described for the soils topic in Appendix C.

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			interventions on Scotland's soil resources and the way soil interacts with other aspects of the environment – in particular, with biodiversity.	
		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 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.

In the section on Soil, the list of data sources should include:

- Maps of soil erosion risk (partial coverage 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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			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)	Data sources added to chapter 7 and Appendices C and D.
			In the final section on Landscape and Visual Amenity, there is a point about 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.	References to wild land removed
			We welcome the references to place and placemaking in the SEA Objectives, as well as elsewhere in	Comments noted

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			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.	
		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-plan impacts. 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. There is also reference in the STAG	Comments noted 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.

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			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 new approach may consider environmental issues from an earlier stage.	Text added to the Environmental Report. The STPR2 regional Case for Change reports also included sections on the environmental baseline for each region.
			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	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.

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			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.	
			There is mention of using a 7-point scoring system. It would be helpful 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.	The seven-point scoring system is described in Section 7.6 of the main Environmental Report
			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	The Environmental Report contains narrative on the assessment tables (Appendix F) and Chapter 9 of the main report describes strategic mitigation and enhancement measures.

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			be helpful if these are pulled together into a table within the Report.	
			We feel that the comments about assessing cumulative impacts are a bit vague in the Detailed Appraisal section. We welcome the comments 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
				Comments noted. Enhancements are described in Chapter 9 of the Environmental Report.
			We also suggest that a greater profile	

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			is given here to opportunities for enhancements in the assessments, in particular the opportunities for biodiversity net gain. 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.	Comments noted.
		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	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. In addition, some of the references to cultural heritage material are links to	Updated references have been included in the soils section in Appendix C of the Environmental Report

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			HES's website – but the references start with 'SNH'. This is probably just a typo.	Typo rectified in the Environmental Report
		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'

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			We understand that the intention is to move from the seven Regional 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	The regional environmental summaries now include data from the Regional Transport Strategies

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			link and coordination across different strategies.	
			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 | 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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			classes	
		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
SEPA	7 February 2020	Chapter 7 Next steps Question 1	We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit. 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. Many of the PPS outlined in Appendix B have themselves been	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.

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			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 Question 2	Previous discussions have taken place regarding the regional maps that are shown in Appendix D. Whilst it is acknowledged that showing every environmental issue on the maps is impractical the descriptors outlined in Appendix D should at	The regional maps, now included in Appendix A, have been updated to show medium and high flood risk for the

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			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. 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 for a region is of particular relevance to STPR2, nor is it clear what the definition of a surface water feature	whole of Scotland. Regional baseline summaries in Appendix D have been updated. The baseline summarises the general features and trends in each region. This includes discussion of vacant and derelict land in the soils topic

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			is. 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. Another issue which could be considered is how the STPR2 will assist in the delivery of a truly circular economy.	sections. 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 Vacant and derelict land is discussed in the regional baseline (Appendix D)
		Chapter 7 Next steps Question 3	We note that alternatives are still being considered. Any reasonable 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	Reasonable alternatives are discussed in Section 7.4 of the Environmental Report

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			preferred option. This should be documented in the 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 habitats through biodiversity objectives.	Reducing car dependence is a key aim of many of the SEA objective guide questions – for example, the climatic factors guide questions cover the topics of modal shift and facilitating coordination with spatial development planners to ensure communities are close to key services and

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				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	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. 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.	Comments noted. No further action required.

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			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.	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.
			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 intervention would "complement the SEA	Comments noted. The potential environmental effects of STPR2 are described in more detail in the Environmental Report assessment matrices (Appendix F).

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			and help to progress the SEA objectives".	
			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 consideration and assessment in the SEA during Phase 2. It is unclear whether the	Comments noted. The potential environmental effects of STPR2 are described in more detail in the Environmental Report assessment matrices (Appendix F).

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			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.	
		Proposed Phase 2 SEA Assessment Approach and Phase 2: SEA Environmental Report	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.	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.
NatureScot	31 March	N/A	Thank you for the SEA Progress Report send to us on 12 February 2021 via the	N/A

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	2021		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	Approach of issuing an SEA Progress Report 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 either the Scoping Report stage or Environmental Report stage of the SEA process.	N/A

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		Section 4.3	**Embedding a natural capital approach** 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 further how natural capital will be embedded in the work on STPR2.	Nature-based solutions will be considered in relation to transport interventions
		Section 4.5	**Matrix-based approach to the SEA**	In response to this comment, the same seven-point scoring system was

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			appraisals 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. 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	retained for use in all SEA assessment matrices for this project

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			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.	
		Section 4.6	Mitigation and enhancement measures 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. We have highlighted above the need to consider nature-based solutions wherever 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	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

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			use of nature-based solutions	

3. STPR2 SEA Draft Environmental Report Stage: Consultation Feedback

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Anon.	28/03/2022 (STPR2 SEA & EqIA Wider Stakeholder Information Session)	N/A	As part of the SEA or otherwise, is there any evidence of the likely impact of delivering the 20% reduction in car km target on improving health and reducing deaths from air pollution etc.?	Additional data on the health benefits of reducing car usage has been added to Section 4 (Population and Human Health) of **Appendix C (National Baseline)**
Anon.		N/A	Is the sifting process subject to each of SEA, EqIA and ICIA or is this process treated as done and not open to challenge?	Each stage of STPR2 has been subject to assessment in the SEA, including the sifting of all options. The assessment of transport interventions was presented in the Environmental Report and the other strategic impact assessments, consulted on between January and April 2022. Consultation feedback on the sifting

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				process and impact assessments is invited. Figure 15 of the Draft Technical Report presents the sifting approach. Under the deliverability criteria, options were considered in terms of whether Transport Scotland could directly delivery or facilitate. Options were also considered against the scope of STPR2. Further details of the scope of STPR2 can be found in the National Case for Change document (published in February 2021), including Appendix C which sets out information of projects that are considered out of scope. In February 2021 a report was published outlining the progress and plans for conducting the various impact assessments "STPR2 Update and Phase 1 Recommendations Impact Assessment Progress Report (EqIA)" Projects are sifted out for various reasons, however it does not necessarily mean they do not have merit. They may be considered by Transport Scotland in the future, may be

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				considered by other transport authorities or may be already being considered as part of another workstream of Government/ TS.
Historic Environme nt Scotland	13 April 2022	N/A	**Q38. To what extent do you agree or disagree with the overall findings of the SEA?** Agree.	N/A
		Appendix B: Plans, Programmes and Strategies	**Q39. The SEA has reviewed plans, policies, and programmes relevant to STPR2. Are there any others that should be considered?** No. We welcome the review of plans, policies and programmes and would offer the following additional comments on a number of the relevant documents.	N/A
			Historic Environment Policy for Scotland (HEPS) We welcome the historic environment plans, policies and programmes identified as relevant to STPR2. The focus on the Historic Environment	N/A

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			Policy for Scotland is particularly welcomed. As is noted in the summary in Appendix B, HEPS sets out the 6 policies for managing the historic environment. Of particular relevance to STPR2 is HEP3 which states that "Plans, programmes, policies and strategies and the allocation of resources should be approached in a way that protects and promotes the historic environment".	
			Historic Environment Scotland – Climate Action Plan 2020-2025 This document primarily sets out the actions that Historic Environment Scotland will undertake over the plan period with regard to our own organisation and the estate we care for. As such the coverage of the direct actions is relatively small. However, as noted in the summary, it is hoped that the research underpinning the Action Plan, the recognised connections,	N/A

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			objectives and outputs inform the development of plans prepared by others in the areas of asset management, placemaking and infrastructure maintenance and development.	
			Infrastructure Investment Plan for Scotland The recognition of the importance of alignment with the Infrastructure Investment Plan for Scotland is particularly welcomed. As we noted in response to the consultation on the Infrastructure Investment Plan, our historic environment has a key role to play as part of the circular economy and a green recovery. It offers multiple benefits including tackling the climate emergency, improving wellbeing, reducing inequalities and supporting inclusive growth. In light of this we welcomed the proposed investment hierarchy and its prioritisation of the	N/A

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			enhancement and maintenance of existing assets.	
		Appendix C: National Baseline	**Q40. The SEA sets out the current national and regional baseline environment conditions and future trends. Do you have any comments on this baseline data?** Yes. The evolution of the historic environment baseline and trends are discussed in depth in Appendix C of the Environmental Report and we welcome that many of the challenges and opportunities presented for the historic environment are discussed here. In our responses to the draft National Planning Framework 4 and the Infrastructure Investment Plan we have highlighted the role that the historic environment can play in delivering on the aims and objectives of these plans through sustainable use of our existing built environment. We consider the issue of how we use our existing resources to also be of direct	N/A

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			relevance to the STPR2. However, the emphasis on maximising the use of our existing assets through their maintenance, repair and reuse will also require the availability of the skills and materials to deliver on this aspiration. In March 2019, Skills Development Scotland (SDS) and Historic Environment Scotland published the Skills Investment Plan for Scotland's Historic Environment Sector. This Plan has the overarching aim of ensuring that the historic environment has the appropriate skills to support its continued operation and growth. In order to deliver this, three priority themes of engaging the sector in skills and innovation, attracting future talent and improving access and workforce development have been identified.	
		N/A	**Q41. Are there any particular issues, problems, or opportunities you would like to mention that have not been captured within the SEA?**	

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			Yes. We welcome the response to our comments that we have provided during the evolution of the review and its environmental assessment. In general, we agree with the overall findings of the SEA. As would be expected of an assessment of recommendations at this level much weight placed on lower-level plans on identifying, mitigating and enhancing environmental effects. However, as recommendations vary in level we consider the assessment would have benefitted from more detailed consideration where the baseline could be identified with greater clarity. For example, where specific recommendations were put forward for specific assets such as railway stations, road bridges, a closer look at the potential environmental implications would have been helpful. The uncertain assessment findings	The narrative that accompanies the assessment of the 45 recommendations in Appendix F has been updated to refer to specific environmental and cultural heritage receptors where relevant.

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			highlight the importance of mitigation. In light of this, it is welcomed that a number of mitigation measures have been put forward for the historic environment. While generic in nature we welcome the opportunity to be involved in discussions at the earliest opportunity to help ensure that the historic environment is taken into account in decisions and that we can provide ongoing advice as these proposals emerge.	
			The assessment findings have identified many uncertain effects in relation to the historic environment, citing the lack of clarity around the nature of interventions put forward. As we noted in response to Phase 1 Recommendations and SEA Update Report there would have been a benefit in recording many of these as +/- as this would have helped in bringing out potential environmental	Noted. The SEA scoring methodology used for assessing the 45 STPR2 recommendations has been updated so that uncertain effects have been replaced by either positive or

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			effects (both positive and negative), aided in mitigation identification, and provided a clearer steer in informing lower-level decision making. This would also have been beneficial in identifying the connections between the objectives of the review and the objectives for the historic environment. In light of this the majority of our comments on the review itself are related to the identification of these connections and where opportunities for multiple benefits are available as well as identifying challenges at an early stage. We welcome that a high-level monitoring framework for STPR2 will be included in the SEA Post Adoption Statement. However, in noting that this will refer to existing monitoring regimes we would offer the following comments on those currently identified for the historic environment. The monitoring	negative effects. This is based on a cumulative score using all 14 SEA objectives and whether positives or negatives score the most. A new SEA narrative has been provided for these within the Appraisal Summary Tables and a revised Appendix F of the Environmental Report.

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			regime put forward here (HES System for (PiCAMS) relate only to the 300+ Properties in Care (PiCs) that we manage on behalf of Scottish Ministers. It is therefore unlikely that this monitoring regime will offer meaningful insight into the effects of the recommendations contained within the review. We would therefore look to the post-adoption statement to establish a framework that more closely reflects the likely effects of the recommendations. Such a framework would likely be more generic in nature and welcome that this section notes the importance of linking mitigation and monitoring to the STPR2 Delivery Plan in order to inform and influence the delivery of specific STPR2 interventions.	Comments noted and the reference to the PiCAMS monitoring has been removed from the updated main Environmental Report. The post-adoption statement will include a monitoring framework that is based on the STPR2 Delivery Plan and how better environmental outcomes can be achieved.
NatureScot	14 April 2022	N/A	<u>Overall Approach taken with the SEA</u> We welcome the approach taken with the use of SEA as part of the	N/A

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			development of STPR2 – with the SEA process starting early and running alongside the preparation of STPR2. In addition, it was helpful that the process was iterative enough to take account of the disruption caused by the COVID pandemic.	
			Consideration of Biodiversity We feel that biodiversity considerations should be given more weight in the Environmental Report. We need to address the twin crises of climate and nature loss – and the climate crisis is referenced throughout the document. The key points to take into account in further refinement of STPR2 and its implementation are: • The interrelationships between biodiversity and soils, and the links between these and landscape and visual amenity. • The importance and promotion of soil health, its resilience to	Added additional text regarding the importance of soils to Climate (Section 2.2), Biodiversity (Section 7.2) and Soils (Section 8.2) (Interrelationships with other SEA Topics sections) in Appendix C: National Baseline.

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			change and the role of soil as a sink and source of greenhouse gases and carbon. • The relevance of soil biodiversity to supporting above-ground communities and controlling biogeochemical processes vital for functions such as nutrient cycles, greenhouse gas emissions, pollution control, and soil structural stability and development.	
			Scottish Biodiversity Strategy The Scottish Biodiversity Strategy is currently being revised, with a consultation on the draft due in May 2022 and publication of the final version planned for October 2022. The final version of STPR2 and the post-adoption statement should make links to the key points emerging in the draft strategy. Two key issues that will be	The Scottish Biodiversity Strategy has now been added to SEA Appendix B (Plans, Programmes and Strategies) and the plans for at least 30% of Scotland's land to be protected for nature by 2030 has been added to Appendix C: National Baseline.

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			especially relevant are: • Protected Areas 30x30 – the Scottish Government's plans to protect at least 30% of Scotland's land for nature by 2030. • Nature networks – the intent in the SG's Programme for Government that every Local Authority will have a Nature Network of new, locally-driven projects which aim to improve ecological connectivity across Scotland.	
		Section 9.5	<u>Mitigation Measures for Biodiversity</u> As well as considering the impacts on individual areas of wildlife habitat, the planning and design of transport projects should aim to avoid disrupting existing ecological connectivity and look for opportunities to create new networks for wildlife.	

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			We have the following comments on the biodiversity mitigation measures: • In the first bullet-point, the reference to designated and undesignated biodiversity could usefully be expanded here to highlight the government commitment to protect at least 30% of Scotland's land and seas for nature by 2030, and highly protect 10%. • We welcome the reference in the second bullet-point to looking for opportunities to provide green infrastructure and new wildlife corridors. If well-designed and integrated, this could contribute to the development of nature networks. Wildlife corridors need to be carefully designed so that they support connectivity without facilitating the spread of	• Reference to Scottish Government's agreement to protect at least 30% of Scotland's land and seas by 2030, and highly protect 10% added. • Noted, and amended to include additional text regarding the potential benefits associated with the provision of green and / or blue infrastructure. Text regarding the provision of new wildlife corridors amended to note that careful design will be required to prevent the spread of invasive non-native species.

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			invasive non-native species. • On the third bullet-point, there are particular statutory obligations which do also extend to undesignated sites. In light of the 30 by 30 commitment, good liaison will be needed where new transport infrastructure is proposed.	• Text added to clarify that further liaison with NatureScot will be required in relation to the development of any new infrastructure, which in turn will allow any biodiversity opportunities to be maximised.
		Section 9.6	Measures for Soil in Mitigation Section On the first bullet-point, avoiding adverse impacts on carbon-rich soils is very important. In addition, the importance of other soils and soil biodiversity should not be overlooked. We would expect to see fuller reference to protection and enhancement of soil health and biodiversity, and the contribution to controlling biogeochemical processes for nutrient cycles, greenhouse gas emission, pollution control, soil	Additional bullet point added to Section 9.6 to acknowledge the importance of soils / soil biodiversity and their role in several processes.

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			structural stability and development, and many other functions.	
		Section 9.8	<u>References to Landscape Character in Mitigation Section</u> We welcome the proposals for mitigation of potential impacts on landscape and visual amenity – including the emphasis on embedding landscape mitigation at the start of the mitigation proposals. However, it would be helpful to have references included in this section to landscape character. Landscape character is referred to elsewhere in the Environmental Report. Our suggestions are: • The second bullet-point includes 'in keeping with landscape character' at the end. • The third bullet-point also includes 'in keeping with landscape character' at the end. • In the fourth bullet-point, landscape character is added to	 • Added. • Added.

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			read 'Take account of local species composition, forest and woodland strategies, landscape character, climate change adaptation and biosecurity threats when developing planting proposals'.	• Added.
			• For the sixth bullet-point, we suggest adding a new sentence at the end: 'Ensure long-term management to maintain views'. Also, it may be best to remove the first use of the word 'key' in this bullet-point.	• Added / amended.
			• In the fifth bullet-point, we suggest rewording to read: 'Develop planting and landscape proposals that integrate with the surrounding landscape and secure positive effects for biodiversity and landscape character. Maintain and where feasible enhance ecological, landscape, and	• Amended.

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			active travel & recreational connectivity and minimise fragmentation. Consider and contribute towards local and strategic biodiversity priorities through planting proposals. Ensure long-term maintenance and management.'	
		Section 9.8	Other Landscape Comments In the first bullet-point in the list of mitigation, there is reference to 'limiting the extent of the cutting slopes with cognisance of landscape setting'. However, it may be that a more appropriate cutting slope might be gentler or more varied – this requiring more land take than would be the case by simply limiting the extent of the cutting. The earlier phrase 'input into the…form and extent of earthworks' should cover this point – possibly replacing 'input into' with 'influencing'. If the reference to 'cognisance' is retained it would be better to word this	Amended as suggested.

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			to say 'suitable cognisance of surrounding landscape' – a more direct reference than 'landscape setting'. For the seventh bullet point, it would be best to reword this to 'Consider dark skies, wild land and perceived wildness in Scotland and seek to avoid significant effects on them'. An additional phrase could be added at the end of this bullet-point: 'Avoid or minimise light pollution to reduce landscape, visual and biodiversity impacts'.	Amended as suggested.
		N/A	<u>Monitoring</u> In the section on Climatic Factors and Greenhouse Gas Emissions, it is important that greenhouse gas statistics should also be reported for infrastructure, both construction and maintenance. On Air Quality, if the text on monitoring of air pollution levels is referring to the	Text added to clarify that the Air Quality in Scotland's monitoring network does not

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			Air Quality in Scotland monitoring network, please note that this network does not monitor ammonia. Ammonia emissions are important due to their role in direct toxicity, nutrient enrichment and acting as a precursor to $PM_{2.5.}$ This last point means that elevated levels of ammonia in the countryside, mainly from agriculture, are likely to result in higher particulate levels in towns and cities. The key reference for trends in air pollution in the UK, with country breakdowns, is produced annually by the UK Centre for Ecology & Hydrology (UKCEH) for Defra and should be cited.	monitor ammonia emissions. Reference to the Air Pollution Information System (APIS) (UKCEH) added.
			On Population and Human Health, in the first bullet-point it should be noted that noise, vibration and light spill can also have a negative impact on marine and terrestrial biodiversity.	Added text relating to the impacts of noise to biodiversity monitoring section.
			On Material Assets (natural resources),	

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			the definition of material assets: natural resources used here appears to be quite narrow. It may be appropriate to use a natural capital approach and make use of the Natural Capital Asset Index. In addition, in the mitigation on the proportion of recycled or secondary aggregates being used, the total amount of aggregate should also be monitored in addition to these proportions. On Biodiversity monitoring, we recommend using changes in habitat (e.g., woodland, grassland, wetland converted to artificial sites) shown in the Habitat Map of Scotland. Changes to connectivity should be informed by the Ecosystem Health Indicator – 8 Connectivity. Given the importance of pollinators, the pollinator map of Scotland should also be used – it will be available soon via the overall Habitat Map of Scotland. Other	Added additional monitoring sources as suggested.

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			important biodiversity indicators are: • Impacts of marine noise (both construction of infrastructure and operation of both infrastructure and boats) – Marine Scotland collects data on this • Artificial light at night, both marine and terrestrial – more information can be found at https://doi.org/10.1098/rstb.2014.0133. On Landscape monitoring, we suggest the text is reworded to read: 'Scotland's Landscape Monitoring Programme is led by NatureScot in collaboration with others such as HES. It aims to provide a framework to monitor aspects of landscape change in Scotland. The programme monitors indicators, currently across four landscape themes: landscape qualities, public perception, land cover	Amended as suggested.

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			and built development (NatureScot, 2017).	
			Scotland's Environment Web There is reference in the Environmental Report to Scotland's Environment Web as a source of information for monitoring purposes. It should be noted that the future of SEWeb is uncertain and it is likely to evolve over the next few years.	Noted.
			Other Sources of Information We consider that other projects, such as delivery of the Digital Strategy for Planning, will be essential to the success of a proportionate and effective approach to gathering evidence.	Noted.
STPR2 General Consultation Responses			**Consultation question and comment**	
East Lothian Council	April 2022	Section 4.2 and Appendix C (National	*The SEA sets out the current national and regional baseline environment conditions and future trends. Do you*	The climate section of the environmental baseline (Section 2.1 of the 'Climatic Factors' section of **Appendix C: National**

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		Baseline)	*have any comments on this baseline data?* There is no reference to the propensity to more powerful and frequent storms, of strengthened winds. The population is forecast to increase but this is mostly due to an aging population. Should we not acknowledge obesity and areas of deprivation link, and poor public transport? We would ask that the reference to 'increase in walking and cycling' is better qualified so to acknowledge the pandemic initially led to an increase in walking and cycling but this was related to exercise rather than people taking alternative modes. Their movement was significantly restricted with travel bans across authority areas. This has dropped back significantly	**Baseline)** is largely based directly on the headline findings of the third UK climate change risk assessment: Summary for Scotland (SNIFFER, 2021), which is based on UKCP18 projections. These reports focus on temperature, rainfall, sea level rise and storm surge. The expected impacts associated with different climatic variables, including wind, are discussed in **Section 2.1** of the 'Climatic Factors' section of **Appendix C: National Baseline.** The topics of obesity and deprivation and the links between them are discussed in **Section 4.1** of **Appendix C: National Baseline** and in the STPR2 Equality Impact Assessment. **Section 4.1** of **Appendix C: National Baseline** has been updated to reflect these trends in walking and cycling. This has also been summarised in **Section 4.2** of the **Final Environmental Report.**

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Individual	May 2022	N/A	*Please provide any further comments you have in relation to the STPR2 process* It discusses all the key points that have concerned active travellers in relation to improving both the networks and the environment. The involvement of SEA ensures that public planning authorities must take account of environmental issues at every stage.	Noted.
Sustrans			*Are there any particular issues, problems or opportunities you would like to mention that have not been captured within the SEA?* Looking at the wider economic context, oil price hikes due to Russian sanctions will lead to transport poverty increasing. Wider global trade impacts could lead to logistics issues that could affect active travel infrastructure delivery timelines and costs.	Comments noted about the wider economic context. The STPR2 Delivery Plan will need to consider potential impacts of the economic context on the delivery programme and costs. In relation to transport poverty, an Equality Impact Assessment has been conducted for STPR2, to ensure that the proposed recommendations are fair to all members of the public and supportive of disadvantaged communities.

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NatureScot			*Please provide any further comments you have in relation to the STPR2 process.* We had good engagement at a national level – through workshop opportunities and specific meetings with TS, Jacobs and AECOM contacts on both the general issues in STPR2 and on the specifics of the accompanying SEA and HRA processes. However, it was not so clear how best to engage in an ongoing way at the regional level – aside from workshops and other events that invites were sent out for. We were involved in the Tay Cities Regional Transport Working Group as a result of our engagement in TayPlan sub-groups, but were not aware of ways to get involved in any of the other RTWGs.	Noted. Further ways to include NatureScot will be explored for any further RTWG engagement for STPR2.
			Please provide any additional comments you have on the theme	Noted. The recommendations on enabling an effective modal shift are covered in the

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			Improving Active Travel Infrastructure and the recommendations within it. We welcome recommendations 1, 2, 3, 4 and 5 – and the recognition of the partnership approach required for effective delivery. In order to be effective in helping to enable a modal shift, active travel infrastructure will need to consist of existing, new and/or upgraded routes and paths that: - (a) are suitable for everyday journeys for work, leisure and visits to the outdoors - (b) are accessible, multi-surface and cater for a range of users and uses including walking, cycling and wheeling - (c) help create a nationally-connected network that facilitates short-, medium- and longer-distance journeys and linkages between	Appraisal Summary Tables for the active travel recommendations.

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			settlements, visitor destinations and to multi-modal hubs. There is recognition (in the STPR2 summary report on page 19) of the importance of addressing safety fears – especially through effective segregation from traffic, with on-road routes only being part of the network if they are quiet and have low traffic speeds. It is important to take stock of users' experience of on-road routes as part of the current active travel network to inform future planning – there is a perception that current on-road routes are not very popular as users felt unsafe. In rural areas especially, improving active travel infrastructure is essential to support changing behaviours – to deliver on STPR2 aspirations as well as the aims of other initiatives such as those set out in the 20% Reduction in Car Km Route Map. Limited networks	Noted. The STPR2 acknowledges the significance of enhancing rural transport networks and this was considered across themes such as active travel infrastructure, changes in behaviours, affordable public transport, decarbonising transport, enhancement of strategic connections, and increasing the safety and resilience of the strategic transport network.

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			and other infrastructure in rural areas does not currently encourage active travel due to safety and other considerations among users and potential users. We note the intention to publish a delivery plan – but there are few details at this stage. The final version of STPR2 should include more details on what form this will take. We advise that it should take a map-based strategic look at routes – working with partners including Sustrans, Local Authorities, Regional Transport Working Groups and NatureScot – to assess needs across the country. This would have significant advantages over a more locally-focussed piecemeal approach. The delivery plan should align with the delivery programme for NPF4. It is essential that planning for active travel is a key part of both transport planning and land-use planning overall.	The Final STPR2 Technical Report and STPR2 Delivery Plan will contain further details on how and where the recommendations will be delivered. However, in general STPR2 is strategically looking at the concept of improvements rather than suggesting or mapping specific route improvements.

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			Planning the delivery of high-quality active travel infrastructure to make journeys attractive, safe and enjoyable is important. However, this needs to be complemented by broader planning policies and decisions that help make active travel the norm – these decisions need to facilitate and encourage active travel, and not put barriers in the way. Good public transport connections, green infrastructure and active travel infrastructure should be designed in at plan and project consenting stages. We are also aware that cycling infrastructure projects can now qualify for clean development credit mechanism credits. This could help with additional finance for delivery if active travel infrastructure in Scotland.	The objectives and recommendations for active travel have been carefully weighed against a variety of government policies, strategies, and commitments.
			Please provide any additional comments you have on the theme Influencing Travel Choices and Behaviours and the recommendations	Noted. However, it is recognised that there are other factors (especially related to segregation from traffic and personal security) that are also important factors to

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			within it. A key aspect of encouraging behaviour change is the importance of making the preferred options as attractive as possible for users. Active travel routes which are nature-rich and green will be attractive to users. Combining active travel routes with green and blue infrastructure will help with this both by them being pleasant places to be as well as by providing shade and shelter to help make them climate-change-resilient. In addition, active travel routes – and other transport interventions – can help deliver multiple benefits through the inclusion of or integration with green and blue infrastructure. This will deliver biodiversity benefits to help address the nature crisis. This integration of active travel routes with green and blue infrastructure	consider in influencing travel choices and behavioural change.

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			needs to be part of the planning considerations from the outset in order to deliver the widest range of benefits possible. This is a key reason why planning for active travel needs to be integrated with other transport planning and land-use planning more broadly. By taking this integrated approach from the outset high-quality, safe and attractive places which are climate-resilient are more likely to be the outcome. We have highlighted this in our response to the recent consultation on NPF4 – for example, in relation to the proposals for Aberdeen Rapid Transit.	Noted.
			As part of the work to deliver the Cleaner Air for Scotland 2 strategy, we understand that the Scottish Government plans to commission a review of nature-based and green infrastructure interventions which can benefit air quality, using the outcomes of this to develop a database of	Noted. It is likely that minimum standards will be defined for active travel infrastructure. Cycling by Design is anticipated to be the main source for this, but these wider considerations should also

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			potential solutions. This should help support additional guidance on the integration of nature-based solutions and green and blue infrastructure with active travel infrastructure. As mentioned in response to Q13, more active travel infrastructure is needed in rural areas to facilitate and encourage a modal shift to active travel.	be considered.
			Please provide any additional comments you have on the theme Enhancing Access to Affordable Public Transport and the recommendations within it? Public transport provision in rural areas is very variable, so this makes car travel the current predominant and only workable means of travel for most people – whether for work, access to services or for leisure. The distance between locations and	Noted. The SEA Environmental Report recognises the importance of reducing automobile use in rural areas, hence proposes active travel through village-town travel connections. To achieve this, certain recommendations have been proposed, namely, mobility hubs, enhancement of travel networks and public infrastructure, behaviour change, and integrated smart ticketing.

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			issues around road safety contribute significantly to this. In particular for island residents, the locations of ferry terminals combined with the limited provision of bus services means that arranging a workable journey without the use of a car is very difficult or impossible. These issues need to be addressed in order to deliver behaviour change and modal shift to a more sustainable transport system.	
			Please provide any additional comments you have on the theme Decarbonising Transport and the recommendations within it. There is a need to significantly expand the network of charging points for electric vehicles (including e-bikes) in rural areas if we want to achieve the desired wholesale shift to electric vehicles. This is especially important given the challenges of encouraging a large-scale shift to other means of	Noted.

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			transport in rural areas – the current limited active travel infrastructure, variable public transport provision, and the road safety issue for those using active travel where there is not a segregated route. Planning for active travel and public transport should remain priorities for the long-term – with electric vehicle infrastructure being addressed as soon as possible.	
			Please provide any additional comments you have on the theme Increasing Safety and Resilience on the Strategic Transport Network and the recommendations within it. Recommendation 31 is on trunk road and motorway network climate change adaptation and resilience. The issues of climate change adaptation and resilience also need to be addressed on the rail network across Scotland.	Climate change issues have been considered and assessed in Section 8.3.1 Climatic factors and the baseline appendices (SEA Environmental Report and appendices C and D), and climate adaptation opportunities are discussed in Section 9.2.6 of the main Environmental Report. Transport Scotland Rail have advised that Resilience and Climate Change Adaptation is covered under Network Rail funding through the Periodic Review process and therefore is not in scope of STPR2 but is

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				through the Office of Rail and Road (ORR) settlement. As a result, there was a decision not to retain a draft STPR2 Grouping related to resilience and climate change adaptation for the rail network.
			Please provide any additional comments you have on the theme Strengthening Strategic Connections and the recommendations within it. In relation to recommendation 41 on potential fixed links in the Outer Hebrides and Mull, there is a risk that these fixed links could lead to increased car use – especially given the current variable public transport services in these parts of the country. If fixed links are the selected option, they should include appropriate provision for active travel. For the proposals for the Outer Hebrides, both areas – Sound of Harris and Sound of Barra – are very sensitive environmentally. There are	Comment noted. The STPR2 emphasises the development of sustainable travel options, including the improvement of ferry services, connectivity and transportation networks. The implementation and integration of all 45 recommendations should contribute to the achievement of the vision, priorities, and outcomes for transport outlined in the National Transport Strategy and other national plans. The SEA also recognises that environmentally sensitive areas, such as Geological Conservation Areas and Sites of Special Scientific Interest are present in the mentioned areas. As per Appendix F, at this stage of the process, the impact is uncertain. Therefore, it is recommended that further environmental assessment be

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			European sites whose features should be considered from as early as possible in the planning and design of any options here.	undertaken as individual options are progressed through the design and development process in order to assess the location and scale of specific environmental effects as well as to identify appropriate mitigation where required.
			For any fixed link connection between Mull and the mainland of Scotland, this will be a challenge and any proposal would probably need some development within protected areas. There are both terrestrial and marine protected areas on Mull and Morvern, and in the Sound of Mull and the Firth of Lorn.	The potential environmental impacts of fixed links have been included in the assessment of the 'Island Connectivity' groupings and recommendation 41 (Environmental Report Appendix F), available here: https://www.transport.gov.scot/publication/strategic-environmental-assessment-draft-environmental-report-january-2022-stpr2/
			There is a risk to nature on islands such as Mull where a fixed link is being considered – as non-native species are likely to use this to reach the island. This has happened on Skye since the bridge was built. It may be that the link	Further consultation with NatureScot will be required if any fixed links are taken forward for further consideration.

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			can be designed to reduce this risk. We are happy to discuss these further as soon as decisions are made on the way forward.	
			Please provide any additional comments you have on the STPR2 recommendations' contribution to Government policy. There is a list above of key objectives that are consistent across Scottish Government policy. The need to address the biodiversity/nature emergency should be added to this list. This would help ensure that STPR2 can align with the Scottish Biodiversity Strategy (currently being revised) and help deliver actions to address the biodiversity/nature emergency. In addition, STPR2 should align with Policies 2 and 3 of the draft NPF4 – on the climate emergency and nature crisis respectively. Nature-based solutions (NBS) can help	Noted. Reference to the Scottish Biodiversity Strategy has been added to Environmental Report Appendix B (Plans, Programmes and Strategies).

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			address infrastructure and other challenges – for example, managing flood risk or sea-level rise – as well as provide biodiversity benefits. Transport infrastructure projects should look to make use of NBS wherever possible to deliver climate resilience and other outcomes.	Nature-based solutions have been referred to in Section 9.5 of the main Environmental Report, in relation to enhancement opportunities.
			Transport projects should also look to deliver Positive Effects for Biodiversity by integrating nature into new or retro-fitted infrastructure projects. Alongside the NPF4 consultation, NatureScot consulted on guidance on Developing with Nature. This is likely to be refined and published later this year. This delivery of multiple benefits needs to be planned for from the outset – but the reward is the adoption of hybrid solutions that support healthy green and blue environments and that lead to high-quality climate-adapted places.	Positive effects for biodiversity have been referred to in Section 9.5 of the main Environmental Report, in relation to enhancement opportunities.
			The SEA sets out the current national	Noted. The best available monitoring data

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			and regional baseline environment conditions and future trends. Do you have any comments on this baseline data?	sources will be referred to in the SEA Post Adoption Statement.
			There is reference in the Environmental Report to Scotland's Environment Web as a source of information for monitoring purposes. It should be noted that the future of SEWeb is uncertain, and it is likely to evolve over the next few years.	
			We consider that other projects, such as delivery of the Digital Strategy for Planning, will be essential to the success of a proportionate and effective approach to gathering evidence.	

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