

TAYSIDE & CLACKMANNANSHIRE

Tel: 01738 458582(direct line)  
Fax: 01738 458616  
e-mail addresses: denise.reed@snh.gov.uk

Niall Urquhart  
Team Leader Sustainability  
Clackmannanshire Council  
Kilncraigs  
Greenside Street  
Alloa  
FK10 1EB

10 August 2007

Our ref: CNS/EIA/SEA (PF 080/07-08)

Dear Mr Urquhart

**Environmental Assessment (Scotland) Act 2005: Clackmannanshire Council  
Sustainability Strategy Scoping Request**

I refer to your scoping report, sent to the Scottish Executive SEA Gateway on 9 July 2007. In accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, I have reviewed the report on behalf of Scottish Natural Heritage in its role as a Consultation Authority under the above Act. Our comments on the scope and level of detail to be included in the Environmental Report and on the duration of the proposed consultation period are set out below. Detailed comments are provided in the annex to this letter.

**Scope of assessment and level of detail**

Subject to the specific comments set out below and in the annex to this letter, SNH is content with the scope and level of detail proposed for the environmental report.

**Consultation period for the environmental report**

SNH notes that a period of 6 weeks is proposed for consultation on the Environmental Report and is content with this proposed period.

**Concluding remarks**

I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the Environmental Report and on the Sustainability Strategy in due course.

Yours sincerely



Denise Reed (Mrs)  
Operations Manager

Enc Annex: SNH response to Clackmannanshire Council Sustainability Strategy Scoping Report - PF 080 07/08.

cc Scottish Executive SEA Gateway  
Historic Scotland SEA Gateway  
SEPA Gateway

## **Annex – SNH SEA Scoping response for the Clackmannanshire Council Sustainability Strategy PF 080 07/08**

### **Relationships with other plans**

We welcome the list of plans, programmes and strategies to be analysed (Appendix 3). We also suggest the following:

- Directive 2003/30/EC “Biofuels Directive;” this has a target for biofuels to form at least 5% of transport fuels by 2010.
- The Land Reform (Scotland) Act 2003
- Clackmannanshire Landscape Character Assessment. No 96 (ASH Consulting Group) 1998, SNH.
- NPPG 14 - Natural Heritage
- We welcome reference to the Habitats and Birds Directives but suggest consideration of the national legislation underpinning these Directives in the UK i.e. Conservation (Natural Habitats, and c.) Regulations 1994 (as amended).

### **4.3 Baseline information**

Further details on designations and other natural heritage information within the Strategy area (such as Clackmannanshire’s ancient and semi-natural woodlands inventory) can be obtained by accessing SNH’s Natural Spaces system on our website. This aims to help with provision of information for SEA and other requirements by giving access to SNH’s data holdings; please see link:

[http://gateway.snh.gov.uk/pls/htmldb\\_ddtdb1/f?p=100:1:10988302647270585183](http://gateway.snh.gov.uk/pls/htmldb_ddtdb1/f?p=100:1:10988302647270585183)

Datasets can be searched for local authority areas, and through three broad dataset categories: Habitats and Species; Landscape, Open space and Access and Protected Areas. We also refer to our Site Link system which may be helpful:

[http://gateway.snh.gov.uk/portal/page?\\_pageid=53,854538&\\_dad=portal&\\_schema=portal](http://gateway.snh.gov.uk/portal/page?_pageid=53,854538&_dad=portal&_schema=portal).

This aims to provide easy access to data and information about sites designated for their natural heritage value across Scotland. The information displayed about each site comes from our corporate databases.

The Environmental Report should include a description of the likely evolution of the environment without the plan to provide a frame of reference for the assessment of the plan.

### **Environmental Problems:**

## **Biodiversity, flora and fauna**

Attention should be given to protected species, designated sites and nationally and internationally protected areas in considering specific environmental problems relevant to biodiversity. The issues of sustainable use of biodiversity, ecosystem level diversity, networks and wildlife corridors, threats of alien species and the importance of non-protected biodiversity should also be given attention. We support reference to national and local BAP species and habitats. It is possible that significant effects in relation to locally valued landscape and wildlife sites may also be identified.

We recommend specific reference to European Protected Species such as bats and otters. European Guidance (available at:

[http://europa.eu.int/comm/environment/eia/030923\\_sea\\_guidance.pdf](http://europa.eu.int/comm/environment/eia/030923_sea_guidance.pdf) notes that any effects on protected sites and on selected species in accordance with the Habitats Directive should be part of the Environmental Report. The guidance recommends that these effects might be described in a separate chapter as the findings on such effects are binding for the decision of the competent authorities on the plan or programme.

The decline of biodiversity and associated habitats is a key issue for Clackmannanshire, particularly through development pressure, land management practices and intensification of farming. Significant habitat losses have occurred in relation to native woodlands, species rich grassland and hedgerows.

## **Water and soil**

Development pressure along watercourses and within floodplains and the need for sustainable flood alleviation schemes. The spread of non-native invasive species along watercourses is also an issue for Clackmannanshire. We recommend reference to the wetlands at the Black Devon mouth.

## **Cultural heritage and landscape**

We recommend reference to the Areas of Great Landscape Value (AGLV) in Clackmannanshire, access and the developing Core Path Plan and Access Strategy. Inappropriately sited/designed development can impact negatively on the landscape and also historic settlement patterns such as in the hillfoot villages

## **Cumulative effects**

We are content with the proposed method for assessing cumulative effects outlined in Appendix 7, and following this assessment, any consideration of secondary or synergistic impacts which may arise.

## **SEA objectives and indicators**

A general comment is that we suggest the objectives and indicators proposed for the Sustainability Strategy would be more meaningful if adapted to the local circumstances and environmental pressures in Clackmannanshire, and which the Strategy could address.

### **Biodiversity flora and fauna**

Following on from our comments above, you may wish to consider a sustainability indicator such as one based on changing mowing regimes for Council maintained open space to enhance the biodiversity of these areas. In conjunction with this, the objective would focus on specific land management implementation by the Council for the areas of open space under its management, and could be actioned through the Strategy e.g. management of public open space such as roadside verges.

We also encourage the modification of proposed objectives to take into account enhancement/restoration of biodiversity, rather than simply maintenance.

### **Water and soil**

We recommend the use of additional biodiversity objectives and indicators for the contaminated/brownfield land aimed at surveying the resource to identify the opportunities for ecological enhancement.

## **4.2 Scoping of issues**

We support the scoping in of biodiversity, flora and fauna, soils, landscape, population and human health and cumulative effects. We would highlight that the inter-relationship between these issues should be considered

### **Alternatives and Mitigation**

While we note the intent to consider alternatives and mitigation/enhancement in the Strategy, we suggest further information identifying the type and range of reasonable alternative options is provided in the Environmental Report.

### **Assessment Methodology**

It would be helpful to make clear which elements of the Strategy are to be assessed through the SEA; this will also inform the level of detail. We suggest further consideration is made of monitoring arrangements to be put in place e.g. timescales. Subject to our comments in our response as above, we are content with the methodology outlined in section 5.1 of the scoping report.

