



Tayside and Central Scotland Regional Transport Strategy

SEA Post Adoption Statement

November 2008

Report

TACTRAN

Tayside and Central Scotland Regional Transport Strategy

**Strategic Environmental Assessment
Post Adoption Statement**

November 2008

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Report

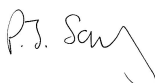
TACTRAN

Tayside and Central Scotland Regional Transport Strategy

Strategic Environmental Assessment Post Adoption Statement

For and on behalf of Natural Capital Ltd

Approved by: Dr Phil Say

Signed: 

Position: Director

Date: 21 November 2008

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1 INTRODUCTION

This document is the Post Adoption Statement (PAS) for the Strategic Environmental Assessment (SEA) of the TACTRAN Regional Transport Strategy (RTS). The Finalised RTS was submitted to Ministers on 30 March 2007, in compliance with the requirements of the Transport (Scotland) Act 2005 and Statutory Guidance on the preparation of Regional Transport Strategies.

Legislation provided for the granting of Ministerial approval for Finalised Strategies within 3 months of their submission to Ministers. Following the Scottish Government elections in May 2007, the anticipated date for Ministerial approval of RTSs was deferred to September 2007. This was further delayed pending the outcome of the Government Spending Review in autumn 2007.

The Cabinet Secretary for Finance and Sustainable Growth wrote to all RTPs on 7 January 2008, requesting that revised strategies should be prepared and re-submitted in the form of “high-level” documents focusing on the strategies necessary to support the Government’s key objectives. At the same time the Cabinet Secretary indicated that RTS Interventions should be removed from Strategies and addressed through refined Delivery Plans, which prioritise RTS delivery within the context of available finance and the Scottish Government/Local Government Concordat. Subsequently, Government officials requested that the revised RTS should be submitted as close to the start of the 2008/09 financial year as possible.

The RTS was revised in the light of the Cabinet Secretary’s instructions and the section outlining the suite of Interventions previously included was taken out and will now be included within a refined RTS Delivery Plan. The revised Strategy was submitted to the Minister for Transport, Infrastructure and Climate Change on 2 May 2008. Approval of the revised RTS, with no further changes, was granted by the Cabinet Secretary for Finance and Sustainable Growth in a letter dated 24 June. The responsible authority for delivery of the Strategy is the Tayside and Central Scotland Regional Transport Partnership (TACTRAN).

The production of a Delivery or Business Plan alongside the RTS was already a requirement in the Transport (Scotland) Act 2005. Associated RTS Guidance requires Regional Transport Partnerships (RTPs) to produce the Delivery Plan setting out a 3-year Implementation Programme for the RTS, which will be updated annually to reflect Local and Central Government planning and funding cycles. The Delivery Plan will be agreed by the Partnership and its constituent Councils, including prioritizing of Interventions having regard to the Government’s National Outcomes, Single Outcome Agreements of the constituent Councils, and the funding and resources likely to be available as agreed by the Partnership and Councils.

The key facts relating to the RTS and details of the SEA are presented in the Environmental Report that accompanies the original Draft and Finalised RTS. This statement brings together the process that has been applied to the RTS during its evolution and demonstrates its relevancy to the Delivery Plan. It has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005 and sets out the following:

- an overview of the SEA process which has been followed (Section 2);
- how environmental issues were integrated into the RTS (Section 3);

- how the environmental appraisal process has been taken into account (Section 4);
- how the findings of consultation were taken into account in the final RTS (Section 5);
- the reasons for choosing the RTS as adopted (Section 6);
- a review of key proposals for monitoring of the environmental effects of the implementation of the RTS (Section 7); and
- a summary (Section 8);
- contact details for further information and locations where any of the documentation for the RTS and its SEA can be seen (Section 9); and
- two attachments with supporting information.

Attachment 1 sets out the principal comments received from the SEA Consultation Authorities on the Environmental Report, the responses to any suggestions made and how these have been addressed in the updated RTS. The summary table highlights where action is required by TACTRAN in the future.

Information that has been used by TACTRAN to carry out an Appropriate Assessment of proposed measures that could have an environmental effect on European sites, is included within the Delivery Plan.

2 THE SEA PROCESS

The RTS has been subject to a process of SEA, as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- identification of relevant baseline information for the TACTRAN area;
- consultation with a wide range of stakeholders to make best use of available relevant environmental information;
- a review of relevant plans and programmes;
- identification of existing and potential future environmental issues and problems which may influence or be influenced by the RTS;
- development of SEA objectives to guide the RTS appraisal taking account of the objectives in other plans and programmes, the identified issues and the current baseline;
- a check for compliance between the RTS objectives and the SEA objectives;
- scoping of environmental issues to be appraised in the SEA;
- environmental assessment of the likely significant effects on the environment of the interventions within the draft RTS;
- setting out measures envisaged for the prevention, reduction and offsetting of any significant adverse effects; and
- presenting proposals for monitoring of the implementation of the final RTS.

During this process the views of the Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH) and the Scottish Ministers (Historic Scotland) have been taken into account regarding the scope and level of detail that was appropriate for the Environmental Report. Consultation with these organisations (the Consultation Authorities) has been undertaken at two stages:

- on the Scoping Report; and
- on the Environmental Report (and draft RTS).

Following consultation on the draft RTS and the Environmental Report, the RTS was amended and the finalised Strategy approved by the TACTRAN Board and submitted to the Scottish Government for approval by Scottish Ministers. As a result of consultation with SNH the earlier revised RTS included an Appropriate Assessment of the potential effects of three proposed interventions that could affect European sites in the area. This information will now be included in the Delivery Plan in line with the instructions from Scottish Ministers on re-shaping the RTS.

This PAS summarises how the feedback from the Consultation Authorities has been used in the SEA process and how environmental issues have been integrated into the preparation of the RTS.

3 INTEGRATION OF ENVIRONMENTAL ISSUES INTO THE RTS

The SEA has made strategic inputs to the key stages in the RTS development process from the identification of the issues and key trends through to the final preparation of the Strategy (see Section 4 of this PAS).

Environmental issues important for the RTS have been identified during the SEA process from the earliest stages of defining the key environmental topics for the assessment (see Section 4.3 of the ER). The examination of baseline conditions then allowed identification of potential environmental problems in the TACTRAN area, and the geographical areas likely to be affected by the measures in the RTS (see Sections 4.4 and 4.5). From this review, the future evolution of the environmental baseline in the absence of the RTS was predicted and discussed (Section 4.6).

Clearly it was not within the scope of the RTS to attempt to address all of these environmental issues and problems. Nevertheless, these were used to feed back into the RTS development to help to refine and focus particular measures and interventions, that will now feature in the Delivery Plan, in relation to areas of environmental importance, and to identify where transport related measures could provide benefits.

By comparing the predicted environmental effects of the proposals within the RTS (Chapter 5 of the ER) with the trends in environmental baseline/problems without the RTS, we have highlighted the extent to which the RTS has been able to address environmental problems. Table 1, presented overleaf, summarises the key environmental issues of relevance to the RTS.

Table 1 Effects of RTS on the Environment

SEA Topic	Environmental Issues & Problems	Evolution without RTS	Evolution with RTS	Comments
Air quality, climatic factors	<ul style="list-style-type: none"> Climate change Levels of NO₂ and PM₁₀ 	<ul style="list-style-type: none"> Adverse Adverse 	Positive effect. Dependent on the level of modal shift, the RTS has potential to reduce traffic flows (and thus carbon emissions and local air pollutants) but not to reverse them by 2015 (compared with 2001). Effect will be greater over time (to 2015) as more measures in the RTS are implemented.	The disparity between projections for national and regional traffic growth and carbon reduction commitments remains a key area for transport and environmental policy at all levels.
Landscape, biodiversity	<ul style="list-style-type: none"> Landscape Biodiversity 	<ul style="list-style-type: none"> Neutral Neutral 	<p>No significant landscape effects. The Delivery Plan that supports the RTS contains few interventions with potential for significant landscape effects. There are possible infrastructure schemes (in Perth and Stirling) that may go ahead within the RTS and bring with them negative effects on the landscape (e.g. new Tay crossing at Perth).</p> <p>Potential for adverse effects from new infrastructure that could require extensive habitat loss.</p>	<p>Detailed option studies and environmental impact assessment (EIA) would allow mitigation to be identified to reduce negative effects.</p> <p>In part can be mitigated by careful design, avoidance where possible, creative landscaping, habitat creation, and development of habitat and species plans which seek to benefit local biodiversity in the longer term.</p> <p>Since the RTS has a balance of measures that could impact both positively and negatively on landscape and biodiversity with a greater number of positive measures, it is unlikely that the evolution of the baseline with or without the RTS will differ significantly and so on balance the effect is considered to be indiscernible or neutral.</p>
Soil, land, water	<ul style="list-style-type: none"> Soil resources Peat Contamination Flooding 	<ul style="list-style-type: none"> Slight beneficial Neutral 	<p>No significant effects from RTS implementation.</p> <p>RTS contains few interventions which could</p>	

SEA Topic	Environmental Issues & Problems	Evolution without RTS	Evolution with RTS	Comments
			cumulatively affect flooding or flood risk.	
Population	<ul style="list-style-type: none"> • Accessibility • Demographics and lifestyles 	<ul style="list-style-type: none"> • Adverse 	Positive effect from improved public transport and promotion of sustainable modes.	
Human health and safety	<ul style="list-style-type: none"> • Obesity • Air quality • Nuisance • Safety 	<ul style="list-style-type: none"> • Adverse • Adverse • Adverse • Adverse 	<p>Positive effect through region wide modal shifts, better public transport and investment in, and promotion of, sustainable modes (e.g. cycling and walking).</p> <p>Positive effects from reductions in air pollutants.</p> <p>Measures that have the potential to deliver modal shift are not predicted to significantly affect noise and vibration although local benefits could result from specific interventions.</p> <p>No significant effects provided the new schemes are fully mitigated.</p>	Dependent upon achievement of mode share targets that will be defined in the Delivery Plan that supports the Strategy.
Cultural Heritage	<ul style="list-style-type: none"> • Historic environment • Monuments • Settings 	<ul style="list-style-type: none"> • Slight adverse 	The RTS includes objectives that aim to reduce or remove the effects of emissions, noise and vibration and seek ways to help protect the historic environment. In the absence of the RTS there could be a slightly adverse effect on cultural heritage in some locations.	
Material Assets	<ul style="list-style-type: none"> • Infrastructure • Materials • Recycling 	<ul style="list-style-type: none"> • Major adverse 	The Delivery Plan that supports the RTS will include measures that help to maintain the quality of transport infrastructure and also introduce measures to encourage more sustainable design and construction techniques and use of recycled materials. Without this therefore, the material assets considered in the SEA could degrade leading to a significantly adverse effect.	

It is important to emphasise that the environmental effects of the RTS reported in Chapter 5 of the Environmental Report are residual effects following the assumed implementation of the mitigation measures and associated best practice.

4 HOW THE ENVIRONMENTAL APPRAISAL PROCESS HAS BEEN TAKEN INTO ACCOUNT IN THE DEVELOPMENT OF THE RTS

The contribution that the SEA has made to shaping the RTS and its supporting Delivery Plan is illustrated in Figure 1.

The SEA made an input at the early stages of identifying RTS issues and key trends, and helped to shape the RTS objectives in an iterative way. Since the RTS is objective-led the aim has been to embed environmental principles in at the earliest stages so that the RTS objectives had environment firmly integrated with the other important themes of economy, accessibility, social inclusion and health.

At the RTS options generating stage there was environmental input to the sifting and screening of a package of initiatives and interventions, which was developed following consultation and review of existing transport programmes. Analysis was also undertaken for specific groups of measures including potential region-wide initiatives.

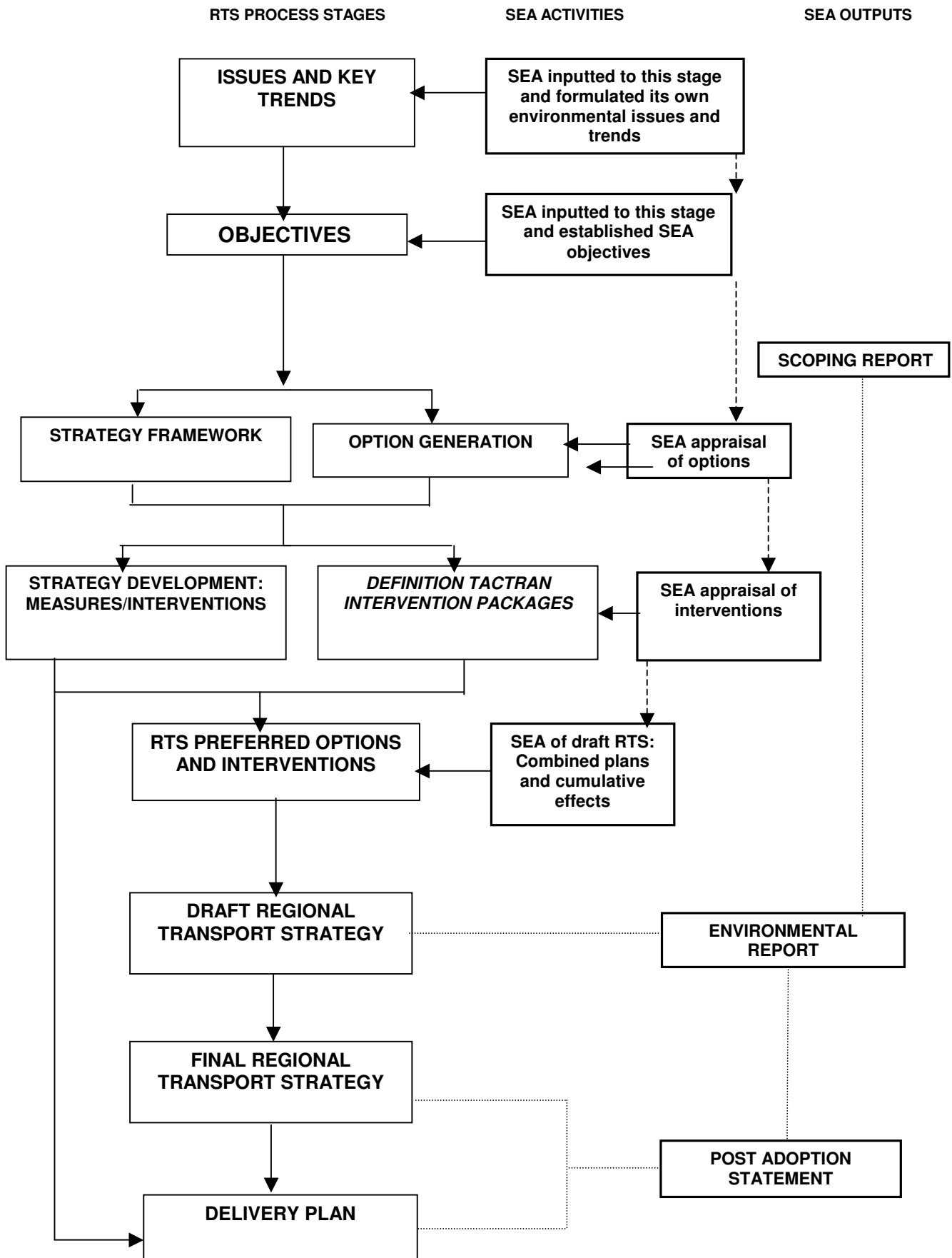
More detailed environmental assessment was then undertaken for the draft packages of interventions set out in various categories (e.g. land use and planning-related measures, information-related measures, walking and cycling measures etc) and the results used to fine-tune the proposed measures. The analysis included an assessment of possible cumulative effects of the draft packages of interventions and associated plans.

Originally the draft RTS was packaged to include all relevant interventions, plans and area-wide initiatives. SEA was undertaken on the Preferred Draft Strategy and this assessment is reported in the SEA Environmental Report. The package of relevant interventions, plans and initiatives will now be featured in the Delivery Plan that supports the RTS.

Consultation has played a significant role in the parallel processes of RTS development and SEA (see Section 5) so data gathered from RTS specific consultations were used in the SEA process and similarly data gathered from the SEA workshops have been used to inform the RTS process.

The Environmental Report was drafted late on in the process of RTS development and appraisal. It therefore presents an assessment of the likely environmental effects of the strategy at a stage when the environmental effects had been minimised as far as possible. Some changes were made to the layout and format of the RTS document following public consultation on the draft RTS and the Environmental Report together with recent instructions from Scottish Ministers. There were, however, no significant changes to the content of the strategy other than the removal of the Interventions into the Delivery Plan, together with the Appropriate Assessment of the three interventions that could have effects on European sites. The findings of the original Environmental Report are, therefore, regarded as remaining relevant and appropriate.

Figure 1 Integration of Environmental Assessment and RTS Development and relationship with the Deliver Plan



5 TAKING ACCOUNT OF CONSULTATION

Consultation has been undertaken throughout the development of the RTS and the SEA. Consultation undertaken through the SEA process has been used to adapt the approach to assessment, particularly in response to comments received at the scoping stage. The consultation process up to preparation of the Environmental Report is described in Section 2.8 of the ER.

Following public and stakeholder consultation on the draft RTS and the Environmental Report, all of the comments received were analysed and the RTS team determined how the document should be amended to take account of these comments. A separate RTS Consultation Report together with Section 2.8 in the Environmental Report set out how the opinions expressed by public and stakeholders were taken into account in the revision of the RTS from its draft to finalised status.

No comments from the general public were received on the Environmental Report. Comprehensive responses were received from the three SEA Consultation Authorities. The principal comments received, and the way in which TACTRAN has taken account of these comments (in revising the RTS or what it will undertake in the future in taking the strategy forward to implementation) are presented in Table 3 in Attachment 1. Where actions have been carried forward to be dealt with at more detailed stages of future project preparation (principally relating to the development of more detailed baseline information), these have been identified in bold in the table. Otherwise all points have been addressed in the responses provided in the table and/or with further information on monitoring (see Section 7).

TACTRAN does not consider that the RTS has significant effects on the environment of another Member State, therefore no consultation was undertaken under Regulation 14 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633).

6 REASON FOR SELECTING THE RTS AS ADOPTED

The approach to SEA has involved the consideration of alternatives throughout the iterative stages of strategy development (for the strategic themes, objectives, and grouped packages of interventions) as an integrated part of the process of the RTS and Delivery Plan development (see Sections 2.7 and 5.5 of the ER). However earlier drafts of the RTS did present three alternative strategies which demonstrated that if certain packages of measures within the emerging Preferred Strategy are given more weight and if some additional interventions are also added then the alternatives that could be considered would demonstrate more of either an economic, social or environmental focus.

The consideration and appraisal of the alternatives led to the conclusion that the Preferred Strategy appeared best in providing a good balance of measures and interventions that broadly supported the RTS Environmental Objectives, and where potential conflicts were identified the recommended mitigation would produce the desired effect.

Following consultation the responses received about the strategy were given due consideration and re-drafting of the RTS was undertaken to present the document more effectively and concisely and to reflect the main themes of the consultation responses. The Finalised RTS, which was submitted in March 2007 to Scottish Ministers by TACTRAN for adoption, had therefore taken account of alternatives in

an iterative manner throughout its evolution and at adoption stage represented the Strategy which best met agreed objectives.

The new format of the RTS and its supporting Delivery Plan still reflects this process and differs only in the removal of the suite of Interventions to the Delivery Plan and adjustments to text to reflect this.

7 MONITORING

This section presents the updated monitoring proposals to which TACTRAN has committed in the delivery of the RTS and the implementation of the Delivery Plan. These proposals focus on the monitoring of the potentially significant environmental effects of the Strategy and they update those presented in Table 5.19 of the Environmental Report with the additional commitments made in response to comments received from the Consultation Authorities on the Environmental Report (set out in Table 3). The revised indicative monitoring schedule is presented in Table 2 below.

Table 2 Indicative Monitoring of the Significant Environmental Effects of the RTS and its supporting Delivery Plan

SEA Topic	SEA Objective	Indicator	Source/Responsibility
Air quality and noise	To improve air quality in the region and contribute to meeting national air quality and health objectives	<ul style="list-style-type: none"> Number of AQMAs Trends in monitored roadside NO₂ and PM10 by LA area Traffic flows on busy roads and in AQMAs Health data in AQMAs 	<ul style="list-style-type: none"> Local authority¹ routine air quality monitoring Local authority traffic count survey data NHS data where available
	To reduce transport related noise and vibration pollution	<ul style="list-style-type: none"> Key sources (contours) of transport noise 	<ul style="list-style-type: none"> Local authority environmental noise mapping (under Environmental Noise Directive implementation)
Climate Change	To contribute to meeting the Scottish share in the reduction of carbon emissions	<ul style="list-style-type: none"> National CO₂ emissions from transport sector Traffic counters on key road links Number of tonnes of CO₂ caused by increased air travel that are offset by the successful implementation of a carbon offset scheme 	<ul style="list-style-type: none"> Scottish Government statistics Local authority and Transport Scotland traffic count survey data TACTRAN
Water	To protect watercourses from the impacts of transport and maintain and enhance their water quality	<ul style="list-style-type: none"> No deterioration of the water environment or increase in flood risk The proportion of new transport infrastructure incorporating SUDS 	<ul style="list-style-type: none"> SEPA routine water quality monitoring data Flood risk data Local authorities and TACTRAN
Landscape and Townscape	To avoid negative impacts from visual intrusion from transport infrastructure	Number of significant visual effects predicted in ESs for new interventions	TACTRAN

¹ The role of the local authorities will depend on the Single Outcome Agreements

SEA Topic	SEA Objective	Indicator	Source/Responsibility
	To protect and enhance the landscape of the region	Number of significant landscape effects predicted in ESs for new interventions	TACTRAN
	To maintain and enhance townscapes and their settings	Number of objections to interventions from Historic Scotland	Historic Scotland/LA planning registers
Biodiversity	To protect and enhance biodiversity	Number of significant ecological effects predicted in ESs for new interventions Number of schemes with positive species and habitat enhancement measures	TACTRAN
	To minimise the effects of transport on designated areas and protected species	Number of significant ecological effects on protected species and designated sites predicted in ESs for new interventions	TACTRAN
Cultural Heritage	To protect all (known and unknown) archaeological and historic resources of the region and their settings	Number of significant effects predicted on archaeological remains and historic resources in ESs for new interventions	TACTRAN
Human Health and Safety	To improve health and safety by providing appropriate means and modes of transport which contribute to a healthier, safer lifestyle	Kms of new cycleway Number of safe routes to school projects Change in number of car trips <1km	Local authorities/TACTRAN Transport Scotland?

Several comments received from the Consultation Authorities related to the issue of addressing more detailed environmental impact assessment and mitigation as initiatives in the RTS are implemented. More detailed assessment, development of clear and deliverable mitigation and monitoring of construction works will be required for the projects that have been identified in the SEA as having the potential for significant environmental effects.

Whilst the precise approach to assessment for such projects will need to be agreed between the relevant competent authority and the proponent organisation(s), it is likely that for at least some, a full Environmental Impact Assessment (EIA) would be required. If there are any schemes which do not require an EIA but which it is established there are likely to be adverse effects on, for example the historic environment, then as part of the planning application process TACTRAN would recommend that consideration be given as to whether or not the scheme requires consultation under the General Development Procedure Order (GDPO). As a matter of course TACTRAN will recommend that early consultation be held with the consultation authorities for any scheme that is likely to have an adverse effect on the natural and historic environment.

In areas where there is potential for projects to affect the qualifying interests of European nature conservation (Natura) sites (SACs and SPAs), Appropriate Assessment may be necessary. A high-level Appropriate Assessment has been carried out for three Interventions (see Delivery Plan) that, should they be taken forward, have been identified as having the potential to affect four possible Natura sites (River Tay SAC, River Teith SAC, Firth of Forth SPA, and Montrose Basin SPA). The assessment demonstrates that the measures that are likely to have a significant effect on European sites can be mitigated so that the integrity of the sites is not adversely affected. Project specific potential adverse impacts have

been identified but have been considered to be capable of being satisfactorily mitigated through the detailed design and implementation of best management practices during construction.

Mitigation developed as part of these processes (for example schedules of mitigation in Environmental Statements) is likely to form part of any contractual requirements and TACTRAN is committed to ensuring that construction of any projects arising directly from the RTS and its supporting Delivery Plan is undertaken fully in accordance with mitigation commitments made and in compliance with all relevant environmental legislation and best practice.

8 SUMMARY

This PAS document has set out the background to the SEA for the TACTRAN RTS and summarises the process that was adopted for the environmental assessment. It examines how a range of environmental issues were taken into account in the process and how these were integrated into the RTS development, working iteratively with the Strategy development team. Key issues have been identified by reviewing the extent to which the RTS, and its supporting Delivery Plan, are predicted to affect the future environmental baseline conditions and problems in Tayside and Central Scotland.

The PAS has also reviewed the role of the SEA and Environmental Report in the RTS development process. Figure 1 illustrates the integration of the processes. It demonstrates how the SEA has fed into the evolution of both the RTS and the Delivery Plan. In addition, the role of consultation in the process has been explained and the PAS sets out a detailed table of comments received on the Environmental Report and the SEA team's response to these comments.

The approach to alternatives and the reason why the RTS was adopted in its current form are also laid out and the statement concludes with a revised schedule of proposals for monitoring of the environmental effects of implementation of the RTS.

9 CONTACTS AND PUBLICITY

Any queries on this PAS or the SEA of the Regional Transport Strategy can be addressed to:

Contact Name: Dr Phil Say
Address: Natural Capital Ltd
Contact Tel Number: 0131 220 6121
Contact email: phil.say@naturalcapital.co.uk

The adopted RTS, along with the Environmental Report and post-adoption SEA Statement are available on the TACTRAN website at: <http://www.tactran.gov.uk>
The RTS, as adopted, along with the Environmental Report and post-adoption SEA Statement (PAS) may also be inspected free of charge during office hours from the offices of TACTRAN at:

Bordeaux House
31 Kinnoull Street
Perth
PH1 5EN
Tel: 01738 475775
Fax: 01738 639705
E-Mail: info@tactran.gov.uk

Attachment 1

Response to Comments Table

This attachment responds to the Consultation Authorities' responses to the TACTRAN Environmental Report.

Table 3 Responses to Comments from the SEA Consultation Authorities on the TACTRAN RTS Environmental Report
 (NB The comments relate to the RTS as submitted in March 2007 together with its accompanying Environmental Report. The consultee comments on the Environmental Report and the various responses are equally relevant to the current version of the RTS and its supporting Delivery Plan)

Consultee, Contact Name and Date	Consultee Comment	Response	Comments
<p>Historic Scotland (HS)</p> <p>Contact: Amanda Chisholm</p> <p>Date: 19.03.07</p>	<p>Stated table 4.1 should include the setting of the environment features as a key environmental issue, in addition to the site itself. Further stated that 'historic gardens and designed landscapes' should read 'gardens and designed landscapes'.</p> <p>Pointed out where Annex D states there may be opportunities from new developments and schemes to enhance the setting and potentially the physical form of designated sites and buildings, that any enhancement measures should be carefully considered and only undertaken when appropriate to the historic environment feature.</p> <p>In appraisal Table 5.7 Historic Scotland would prefer the residual effects to be scored as uncertain as it is difficult at this strategic level to have any certainty that the proposed mitigation will indeed avoid significant environmental effects.</p> <p>In the key comments of Table 5.9 state that planting proposals should be sited to ensure direct effects on archaeological remains are avoided, Historic Scotland welcome this measure however indirect effects on setting of archaeological resources or the wider historic landscape should also be considered.</p> <p>In Table 5.11 Historic Scotland would prefer the residual effect to be scored as uncertain.</p>	<p>Comments noted. Effects on setting taken into account in other sections of the Environmental Report (ER)</p> <p>Comment noted and to be taken into account by TACTRAN at appropriate times</p> <p>Comment noted, however there are no significant changes to the findings of the environmental appraisal</p> <p>Comment noted and to be taken into account by TACTRAN at appropriate times</p> <p>Comment noted, however there are no significant changes to the findings of the environmental appraisal</p>	<p>TACTRAN to note when implementing projects in support of the strategy.</p> <p>TACTRAN to note when implementing projects in support of the strategy.</p>

Consultee, Contact Name and Date	Consultee Comment	Response	Comments
	<p>Pointed out that Intervention IV_I1² the 'significance of effect' column should include possible direct effects on historic environment features as well as effects on their setting.</p> <p>In Intervention IV_I2 direct effects on the designated landscape should also be identified.</p> <p>Historic Scotland feel that in Intervention IV_I3 the 'significance of effect' column should include possible direct effects on historic environment features as well as effects on their setting.</p> <p>In Intervention IV_J2 the 'significance of effect' column should include possible direct and indirect effects on historic environment features, i.e. listed/historic buildings and gardens and designed landscapes as well as archaeological sites.</p> <p>Suggested the first key comment in Table 5.13 for 'cultural heritage' should be along the same lines as the natural heritage topic, i.e. there may be some significant effects on the historic environment from new infrastructure schemes. It could also highlight that potential effects may be direct, e.g. loss or damage to a particular feature or indirect, e.g. effects on setting.</p> <p>Historic Scotland noted that in the 'assessment of residual effects' column in Annex I that it should also be recognised that it may not be possible to avoid direct effects on historic environment features (e.g. locally important archaeological sites) through the routing of new infrastructure and that this type of effect is likely to be permanent and long term.</p>	<p>Appraisal assumed direct effects would be avoided because of committed mitigation. However, point noted</p> <p>Point noted. Would be taken into account in EIA if Intervention taken forward</p> <p>Appraisal assumed direct effects would be avoided because of committed mitigation. However, point noted</p> <p>Direct and indirect impacts were considered in the appraisal</p> <p>Comment noted, however there are no significant changes to the findings of the environmental appraisal</p> <p>Appraisal assumed direct effects would be avoided because of committed mitigation. However, point noted</p>	<p>To be taken into account in future EIA</p>

² Please note that Consultation Authorities commented on the ER of the earlier RTS and that these Interventions have now been removed to the Delivery Plan. Table 3 has therefore been adjusted to reflect this where appropriate

Consultee, Contact Name and Date	Consultee Comment	Response	Comments
	<p>In Table 5.14 Historic Scotland suggest using the term 'historic environment' rather than 'archaeology' as there may be cumulative effects on other aspects of the historic environment.</p> <p>Where it is stated that TACTRAN will take responsibility for ensuring that mitigation is considered as the strategy is delivered Historic Scotland feel it would be helpful to set out this commitment clearly in the SEA Adoption Statement to help ensure that the mitigation measures are taken forward as the RTS is delivered.</p> <p>Noted that in Section 5.7 that measures and initiatives should be screened to determine whether an EIA is required, however there may be schemes that do not require an EIA but which may have adverse effects on the historic environment. Accordingly, Historic Scotland suggest adding the following mitigation measure to fill this gap 'as part of the planning application process the Council will consider whether or not the scheme requires consultation under the General Development Procedure Order (GRPO)'.</p> <p>Historic Scotland suggest that early consultation would be beneficial for those developments that may adversely affect the historic environment.</p> <p>In Table 5.19 where it states 'number of objections to interventions from Historic Scotland' as an indicator, this will not capture such impacts, as objection is not a reliable indicator of adverse effects. Further noted for other consent regimes, Historic Scotland may not object to a proposal, for example if mitigation measures have been agreed to reduce or offset an impact on the historic environment. Added that protection of the historic environment is also a responsibility of Local Authorities, in practice Historic Scotland's advice will tend to focus on nationally important issues and Local Authorities will generally deal with regional and local historic environment issues. Noted that this indicator should be focussed on</p>	<p>Comment noted, however there are no significant changes to the findings of the environmental appraisal</p> <p>Agreed. Incorporated into Section 7 of Post Adoption Statement (PAS)</p> <p>Agreed. Incorporated into Section 7 of PAS</p> <p>Agreed. Incorporated into Section 7 of the PAS</p> <p>Recommendation to amend this indicator accepted and a revised wording included in the updated list of monitoring proposals (Table 3) in the PAS.</p>	<p>TACTRAN to note and ensure point carried through</p> <p>TACTRAN to note and ensure additional mitigation implemented as part of delivery of measures</p> <p>TACTRAN to note and ensure point carried through</p>

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	<p>the potentially significant impacts of interventions on the resource and suggested amending this to “the number of applications/interventions affecting historic environment features”.</p>		
<p>Scottish Natural Heritage (SNH)</p> <p>Contact: Philip Gaskell</p> <p>Date: 12.03.06</p>	<p>Noted SNH is disappointed that the SEA did not include an Appropriate Assessment (AA) of the likely significant effects of the RTS on Natura sites. The RTS identified significant effects on River Tay SAC, River Teith SAC and Montrose Basin SPA.</p> <p>SNH consider that sub objective “To minimise the effects of transport on designated areas and protected species” in terms of Natura sites and European Protected Species, the statement is not appropriate. A separate objective for Natura would be recommended.</p> <p>Stated a more appropriate objective for the National Parks might be “to ensure transport planning contributes to meeting the four aims of the National Parks”.</p> <p>With regards to Section 2.6.3 SNH state that it is known that the road-based interventions mentioned in Table 2.5 involve crossings of water bodies which qualify as SACs. In addition, the proposals for Harbour facilities are likely to have a significant effect on an SPA, therefore it is possible to conclude that the proposals are likely to have significant effects on the sites. SNH advises than an Appropriate Assessment should be carried out before the plan can be adopted and that the Appropriate Assessment will need to determine whether the proposals will have an adverse effect on the integrity of the sites in view of their conservation objectives.</p> <p>The Appropriate Assessment should: (1) consider how the works could affect the qualifying interests of the European sites; (2) scope the required mitigation and (3) identify the policy amendments</p>	<p>Requirement for AA has been considered in more detail in consultation with SNH and an agreed high-level AA has been carried out. This is now featured in the Delivery Plan where the suite of Interventions has been placed Point noted. Further consideration has confirmed that this would not have materially changed the findings of the appraisal</p> <p>Noted. General commitments to integration with other policies given in RTS objectives</p> <p>Requirement for AA has been considered in more detail in consultation with SNH and an agreed high-level AA has been carried out (see RTS Delivery Plan)</p> <p>Noted and carried through in the AA</p>	

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	<p>required to protect the sites and finally conclude whether it can be ascertained that the proposals will not adversely affect the integrity of the sites.</p> <p>SNH is unclear what is meant by the sentence “all interventions with the potential to affect SPAs and SACs will be reviewed in more detail and the potential requirement for Appropriate Assessment will be considered further in consultation with SNH at the appropriate time”. SNH welcomes the proposal to consult them, but considers that appropriate assessment should be undertaken at all key decision stages, including the RTS, before the works commence.</p> <p>SNH pointed out Under Road Based Measures (V and 4.3 of the non-technical summary) it states “Appropriate Assessment would be required for all schemes with potential to affect European sites. Implementation of best construction practices would reduce the risk of significant effects.” This is unclear and could imply that even though best construction practices are carried out there could still be a significant effect on the site, which could thus affect the site integrity. SNH would welcome clarification on this meaning.</p> <p>SNH noted that IV_J2 could also have significant effects on the River Tay SAC and the Firth of Tay and Eden Estuary SAC and SPA. Also Montrose Bay qualifies as an SPA but not as an SAC.</p> <p>Noted that the Habitats Regulations have recently been amended. Also relevant conservation objectives for the sites are available via SNH’s Sitelink facility.</p> <p>Stated Section 2.6.4 on European Protected Species should identify the licensing procedures under Regulation 443 and the three associated tests. It should also note that otters, bats and great</p>	<p>See above. AA has now been completed in consultation with SNH</p> <p>Commitment given to detailed EIA at appropriate stage. Summary in ER recognised the importance of the implementation of best construction practices to reduce environmental risk. The precise effects on the sites could not be quantified at this stage because the projects have not been defined</p> <p>See above</p> <p>Information has been reviewed before appraisal</p> <p>Noted, licenses would be applied for if required</p>	

³ The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended)

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	<p>crested newts are key species, and that the latter is probably under recorded along the River Tay.</p> <p>SNH welcomes the consideration of alternative strategies. SNH believes that the alternatives considered in this case may not be genuine alternatives and that alternatives should be considered at all policy levels within the strategy. However, in terms of the requirements of the SEA Act, it is likely that these are sufficient.</p> <p>SNH consider that it might have been more effective to consider the broad policy alternatives first and to test these through the SEA. Testing the policy interventions identified for the preferred strategy, and any alternative interventions for meeting this, could have followed this up. It would appear that the SEA was not used within the decision making process to identify the preferred strategy and therefore the environmental decisions resulting in the preferred strategy are not transparent.</p> <p>SNH note it is disappointing that the environmental objectives rank lower than we would have expected, given the high level of agreement on the threat of climate change and the broad acceptance at government policy levels that transport has a significant role to play in sustainable development.</p> <p>SNH stated whilst recognising the contribution that transport can make to a sustainable economy, transport planning, should be a significant driver in promoting more environmentally sustainable lifestyles that recognise the limits of our environment. Therefore, SNH would have hoped that the SEA would have been used more proactively to help to shape the RTS to ensure that at the highest policy level it was committed to a significant reduction in the environmental impact of transport.</p> <p>SNH drew attention to the fact that in the interventions for “Walking and cycling measures” that it is likely, though not explicit, that the</p>	<p>Noted</p> <p>SEA integrated at all stages of development of the RTS. See Appendix A of RTS and Figure 1 in PAS</p> <p>In Chapter 3 of the RTS where the vision and objectives are first set out the objectives are not given a ranking. The environmental objectives are not ranked lower (or higher) than any of the others Commitment to reduction of the negative effects of transport has been fundamental to all discussions and environmental inputs to the development of the RTS. Measures which promote modal shift form a significant part of the RTS and its supporting Delivery Plan</p> <p>Point noted and considered further. It is not considered that there would</p>	<p>TACTRAN to consider further</p>

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	<p>underpinning Actions would involve the creation of paths. If so, there may be Natura considerations and if this is the case these should then be reflected through the assessment.</p> <p>Pointed out Under Table 3.2, Relationship with other Plans, Programmes and Environmental Objectives, there is no mention of the Birds Directive, Habitats Directive or Habitats Regulations. While they are included in Annex C, SNH would suggest that their relevance has been underestimated and they should be presented in this table. Also the European Landscape Convention could be included.</p> <p>Observed that Table 4.1 - within the summary appraisal for Aquatic Environment, reference is made to water quality but not to Natura sites. Under the Biodiversity section reference is made to habitat loss but not to disturbance to protected species. Reference to the Conservation Objectives could also be made.</p> <p>With regards to Table 4.2, SNH stated aquatic environment could include freshwater SACs and SPAs which qualify for habitats and species that are dependant on water quantity and quality. These are – South Tayside Goose Lochs SPA, Loch Leven SPA, Loch of Kinnordy SPA, Loch of Lintrathen SPA, Rannoch Lochs SPA, Loch Lomond SPA, River Spey SAC, Shingle Islands SAC, Endrick Water SAC, River Teith SAC, River Tay SAC and the South Esk SAC. It could also make reference to Water Framework Directive water quality standards. Also, biodiversity could include European Protected Species and other species given protection by the Habitats and Birds Directives, the Habitats Regulations and the Wildlife and Countryside Act (as amended). And that accessibility to</p>	<p>be any significant changes to the environmental appraisal</p> <p>Point noted, however can clarify that the importance of European Sites has not been underestimated (see also text in section 3.4 (paragraph 3) of ER)</p> <p>Noted</p> <p>All European Sites taken into consideration for potential impacts of all interventions. The biodiversity column confirms this and sites are shown on Figure D3. Table 4.2 could have been more comprehensive as noted, however all suggestions were taken into account in the appraisals. See also Section 4.5 of ER.</p>	<p>when detailed measures are to be taken forward. If any potential for adverse environmental effects appropriate mitigation to be defined</p>

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	<p>footpaths and cycle routes could have been included. These are important for access to the natural heritage and for human health and well-being.</p> <p>SNH feel that at 4.6.3 the second paragraph seems to downplay likely impacts, for example with reference to new bypasses and bridges.</p> <p>In the section on Environmental Issues and Problems SNH would suggest aquatic environment should include reference to the potential for significant effects on sites designated for aquatic features, including Natura sites; the effects of climate change (heavier, flashier precipitation events), which requires management measures to be provided at some distance from the road corridor; landscape and townscape – the opportunity to improve views from the road which improve perception and enjoyment of the landscape and Biodiversity or Population – one of these should include the need to improve people’s access to the natural heritage, including functional greenspace and the wider countryside, and the two national parks within the Strategy area.</p> <p>Noted that Table 5.1 – The policy should state a stronger commitment to meeting the aims of the two National Parks. It would be helpful if the SEA had investigated how Policy IV_A5 – would interact with National Park aims for transport.</p> <p>Pointed out that in Table 5.5 and 5.6 – throughout the RTS, opportunities to make links between public transport and access and</p>	<p>First paragraph of Section 4.6.3 clearly recognises the potential negative effects of new infrastructure schemes</p> <p>Biodiversity section was intended to be wide ranging – trying to avoid double counting and repetition</p> <p>Point noted</p> <p>Point noted</p>	<p>TACTRAN to consider further how the RTS can contribute to National Park aims for transport as it develops and delivers proposed interventions from the Delivery Plan</p> <p>TACTRAN to consider how</p>

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	<p>recreation opportunities seem to have been missed. Cycle carrying on buses and greater capacity and reliability on trains are just two possible options. SNH would expect these measures to include options to positively affect access to the natural heritage and recreation opportunities.</p> <p>With regards to Table 5.9 – SNH considers that impacts on natural heritage in this table are underestimated. SNH explained its concerns as being; the proposal at IV_I2 (Table 5.9) for a new crossing of the Tay linking the A9 to the A94 is likely to significantly affect the qualifying interests of the River Tay Special Area of Conservation (SAC) and also impact on the designed landscape at Scone. The Tay qualifiers include: Atlantic salmon, three species of lamprey and otter. As this proposal is likely to have a significant effect on the SAC, SNH advises that an appropriate assessment is required at this stage. While no specific details may be known about the proposal, the possible effects on the site should be considered at the strategic level. Advice on undertaking strategic level appropriate assessment is provided by the Scottish Government⁴. Also that; the proposal at IV_I3 for a new link road in Stirling is likely to significantly affect the qualifying interests of the River Teith Special Area of Conservation (SAC). The River Teith qualifies as an SAC for Atlantic salmon and three species of lamprey. As this proposal is likely to have a significant effect on the River Teith, SNH advises that an appropriate assessment is required at this stage. While no specific details may be known about the proposal, the effects of the possible on the site should be considered at the strategic level. This link road could also have adverse impacts on the greenbelt, especially as a setting for the castle and the old town.</p> <p>Commented that It would have been helpful if the SEA was more specific in its discussion on the possible effects of these measures.</p>	<p>Requirement for AA has been considered in more detail in consultation with SNH and an agreed high-level AA has been carried out (see the supporting Delivery Plan)</p> <p>It is generally recognised that as mitigation planting matures that the</p>	<p>relevant measures can positively affect access to the natural heritage and recreation opportunities</p>

⁴ Assessing Development Plans in Terms of the Need for Appropriate Assessment *Interim Guidance, Scottish Government, May 2006*

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	<p>It is unclear why effects may be “positive or negative at first” and it has not been demonstrated how the proposed mitigation will result in a neutral effect.</p> <p>Stated that in table 5.11 Freight intervention is identified under Table 2.5 as having a potential cumulative effect on Natura sites, specifically on Montrose Basin SPA. Montrose Basin qualifies for its waterfowl assemblage and specific waterfowl species. This effect should therefore be identified as having a significant negative effect in this Table and the effect on site integrity be considered through an AA.</p> <p>Drew attention to Table 5.12 – that there is potential for developments at Dundee airport to affect the Firth of Tay and Eden Estuary SAC and SPA, for example if the runway required to be extended to accommodate larger planes as an indirect result of promoting flights.</p> <p>Pointed out that Table 5.13 presents an assessment of the combined effects of the RTS interventions and actions. It suggests there may be combined effects on Natura sites, but this does not seem to be addressed in section 2.6.3 on appropriate assessment. It is also not clear how indirect effects are dealt with. For example, the outer bypass of Dundee (A90) may create additional development land on its city side, which could have landscape issues. Likewise, a new bridge across the Tay is likely to be followed by major development along the south side of any new road. The Report does not seem to pick up these impacts.</p> <p>Commented on Table 5.12 – noting it is not clear how proposals for increases in flights through Dundee have been construed as potentially neutral. The SEA should not shy away from highlighting those mechanisms which are likely to have a significant negative</p>	<p>significance of some initial effects can be reduced</p> <p>The potential for effects on the integrity of the SPA was not considered to be high at this stage because the proposed intervention measures were relatively small scale, e.g. improvement to road sightlines. This now included in the high level AA reported in the supporting Delivery Plan</p> <p>Extension of the runway is no longer part of the intervention (see Delivery Plan)</p> <p>Point noted. Section 2.6.2 clearly states the approach to the appraisal of cumulative effects (which would include designated areas). The RTS addresses transport based measures and can only influence not define related planning issues</p> <p>Runway extension is not part of the intervention (see Delivery Plan). The additional flights are considered unlikely to be at a level to</p>	<p>TACTRAN to consider specific effects further as measures are detailed</p> <p>TACTRAN to consider specific effects further as measures are detailed</p>

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	<p>effect, including cumulative effects with other strategies. Increased flights from Dundee could also have a significant effect on noise and public appreciation of the local landscape. We advise that any future runway extension and associated land reclamation is be unlikely to meet the conservation objectives for the European sites.</p> <p>SNH commented on Table 5.14 Predicted Cumulative Effects – SNH considers that there could be significant cumulative effects from within the Strategy, and with other PPS which have not been identified. Promotion of air travel from Scotland through the RTS is likely to have negative effects on climate change. Combined with the National Transport Strategy (NTS), this will have a cumulative effect on climate change and this should be made explicit within this document.</p> <p>Noted under biodiversity the need for AA is identified. SNH considers that AA should be undertaken at this stage and that this should include consideration of cumulative effects, for example from the combination of impacts from the proposed new Tay crossing and the freight interventions, which are both identified individually as having a significant effect on the River Tay SAC.</p> <p>Stated that Table 5.15 - as SNH commented in their response to the RTS, considers that there would be significant impacts associated with the dualling of the A9 north of Perth. The SEA does not adequately reflect these potential environmental impacts.</p> <p>Table 5.18 – this presents a summary of the proposed mitigation. The report does not mention the likely impacts of climate change (flood risks changing, change flow rates of drainage channels, off road corridor management measures). Additional mitigation measures may well be required to cope with heavier storm events.</p>	<p>significantly affect the European site. Any increase in flights at Dundee could decrease flights from, for example Edinburgh, with potential benefits to amenity etc there. However, detailed information is not available at the strategy level to consider this fully</p> <p>The measure contributes to commitments within the NTS and therefore is not additional to interventions already considered by SNH in their review of the NTS</p> <p>See discussion of AA above</p> <p>Table 5.15 does recognise the potential for natural heritage effects from all new infrastructure projects</p> <p>Noted</p>	

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	<p>Pointed out mitigation of effects will be required to avoid adverse effects on the integrity of Natura sites through capital interventions, e.g. IV_I2 and IV_I3. This table could mention that compensatory measures are required if Natura sites' integrity is adversely affected.</p> <p>Noted that Table 5.19 presents a set of indicators to monitor the environmental effects of the strategy. The indicators could possibly be made more specific and stronger. SNH suggest for Biodiversity, "Projects identified to have adverse effects on Natura sites to be zero" and "Increase in area of enriched habitat provided".</p> <p>Appendix D: Environmental Baseline D3 Soil and Geology: D3.1 – SNH note that the underlying soils and geology also have a strong influence on the ecology of the area and on its accessibility</p> <p>D4 Aquatic Environment: SNH welcomes identification of the rivers identified as SAC. Other aquatic Natura sites include South Tayside Goose Lochs SPA, Loch Leven SPA, Loch of Kinnordy SPA, Loch of Lintrathen SPA, Rannoch Lochs SPA, Loch Lomond SPA, River Spey SAC, Shingle Islands SAC.</p> <p>New and upgraded transport infrastructure can have direct and indirect significant effects on Natura sites including from disturbance, drainage and construction works</p> <p>Landscape and Townscape: D6.1 (and Table D8.1) Delete 'Historic'</p>	<p>The assumption was that the integrity of Natura sites would not be adversely affected</p> <p>Comments noted. Indicators have to be practical and measure something that is deliverable. The indicators suggested are regarded as realistic and have been further developed in Table 2 of the PAS. These should be able to form the basis of a monitoring framework for the RTS and the Delivery Plan to be further developed by TACTRAN and its delivery partners</p> <p>Noted</p> <p>Noted – European sites mapped on Figure D3</p> <p>Noted and can confirm such impacts taken into account in the appraisal</p> <p>Noted</p>	<p>TACTRAN will further define and refine the indicators to reflect:</p> <ul style="list-style-type: none"> • The new national 'Scotland Performs' Strategic Objectives and Outcomes • Local Authority Single Outcome Agreements

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	<p>from Historic Gardens and Designed Landscapes' to be correct</p> <p>D6.2: baseline also affected by ecology, land cover and human activity</p> <p>D 6.2.1 - SNH has "commissioned" rather than "prepared" Landscape Character Assessments (LCA). It would be helpful to list relevant LCAs and clarify where the selected list of features, e.g. "open upland hills", comes from and clarify that this list is from combined, summarised LCAs rather than individual LCAs.</p> <p>It may be more accurate to add "<i>relatively</i>" before "<i>wild, undeveloped character</i>".</p> <p>Note that this section does not include the role of greenbelt in its discussion of landscape and townscape. Greenbelts provide the setting of towns and urban areas and provide protection from urban sprawl. The Stirling greenbelt is particularly important in maintaining the historical setting of Stirling Castle and the Wallace Monument.</p> <p>A map of relevant Landscape Character Assessments would be helpful.</p> <p>D.6.2.2 The National Parks have planning documents – National Park Plans and Local Plans, supported by baseline information presented in the "State of the Park" reports and "Special Qualities" documents. These documents are at various stages of development and finalisation. Reference should be made here to the four aims of the National Parks.</p> <p>It should also be noted that the National Parks are not only landscape designations, but also recognise the special qualities of the areas in terms of their biodiversity, cultural and historical heritage. They also reflect the issues, pressures and opportunities resulting from access and recreation in the area and the socio-</p>	<p>Noted</p> <p>Noted – specific interventions requiring EIA would refer to the specific LCA(s)</p> <p>Noted</p> <p>Noted and to be considered further as part of the appraisal of any specific intervention</p> <p>Noted</p> <p>See Annex C, Analysis of other plans, programmes and strategies</p> <p>Noted</p>	

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	<p>economic needs of its residents.</p> <p>D.6.3 It would be useful if this section had considered how transport and transport planning interact with and could affect the four aims of the National Parks.</p> <p>Annex F IV_A5 - National Parks access should have a positive effect on the objective for the National Parks provided it has been developed in partnership with the Parks and is in line with their four aims and any of their policies on transport.</p> <p>IV_D1 - The development and delivery of a walking and cycling strategy for the region could have significant effects on Natura sites if it included new tracks in or close to Natura sites.</p>	<p>Noted</p> <p>Noted</p> <p>Noted – this will be taken into account as measures become more clearly defined</p>	<p>To be taken forward in the Delivery Plan</p> <p>To be taken forward in the Delivery Plan</p>
<p>Scottish Environment Protection Agency (SEPA)</p> <p>Contact: Sofia Billet</p> <p>Date: 16.03.07</p>	<p>Appendix 1 Comments on the Environmental Report</p> <p>1. General Comments SEPA considers that the ER represents an adequate assessment of the potential significant environmental effects of the draft TACTRAN RTS.</p> <p>In relation to effects on climatic factors, the ER does not adequately acknowledge the impacts of the RTS air transport measures. The proposed air transport measures are likely to have a significant adverse impact on the SEA objective “to contribute to meeting the Scottish share in reduction of carbon emissions” and these effects are likely to contribute to a cumulative effect on national and international binding commitments on climate change. The only mitigation measure proposed is a carbon offsetting scheme and relying solely on carbon offsetting for mitigation of increased air travel undermines current efforts of tackling emissions from transport and sends a signal that transport emissions should be</p>	<p>Noted</p> <p>Comment noted. Proposals at Dundee no longer include extension to the runway. Provision of local services could reduce travel to and from other cities. The intervention contributes to strategy committed to in the NTS</p>	

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	<p><u>2. Detailed Comments</u></p> <p>Non- Technical Summary SEPA considers that the non-technical summary is succinct and summarises the key points in the assessment.</p> <p>Section 2- Appraisal Methodology SEPA is content with the approach to the environmental assessment and the appraisal methodology described in this section.</p> <p>The comments provided by SEPA at scoping and how these have been taken into account have been provided in Annex B and SEPA welcomes this approach. In relation to objective 3 “Natural Heritage” and the sub-objective “to protect watercourses from the impacts of transport and maintain and enhance the water quality”, please note under the WFD there is a requirement to ensure no deterioration and the enhancement of the status of aquatic ecosystems (including surface waters, coastal waters, transitional waters and groundwater) and that the “status” of a water body takes account of biological, physico - chemical, hydrological and morphological properties. The sub-objective could therefore reflect the requirement to consider the impact of the proposals on the overall surface water <u>status</u> of affected water bodies rather than just water quality. It is however noted that the different aspects of ecological status are covered by the SEA questions (Table 2.3).</p> <p>Section 3- Plan Context SEPA found the information provided in this section very useful in relation to the background to the RTS.</p> <p>Section 4- Baseline Environment As required by the Regulations, a description of the relevant aspects of the environmental baseline for the TACTRAN area and the likely evolution without the implementation of the Strategy has been</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	

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	<p>provided in these sections.</p> <p>Comments made above regarding the requirements of the WFD in relation to water body ecological status also apply to the description of key environmental issues in Table 4.1 and the summary of environmental baseline in Table 4.2.</p> <p>The ER acknowledges that air quality data is available but trends have been difficult to assess, however monitoring data is available for both Dundee and Perth for several years and this could provide a good indication of trends in concentrations on the city centres.</p> <p>In terms of Human Health, Table 4.2 fails to recognise that the population living in the Air Quality Management Areas (AQMA) is already being exposed to the harmful effects of poor air quality. The presence of an AQMA implies that atmospheric pollution exceeds the EU objectives that have been set to protect human health.</p> <p><i>Environmental Issues and Problems; Opportunities- Air Quality and Noise</i> In relation to air quality, a potential opportunity would be to include parking controls as this could have a significant impact on the volume of commuter traffic entering cities on a daily basis. Reducing city centre parking will ensure the success of more sustainable alternative modes of transport.</p> <p>One of the opportunities identified is the improvement of transport infrastructure using cleaner fuels and vehicles. This should be encouraged particularly in urban areas in line with EU Biofuels</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Point noted. RTS identifies Issue E5 – Parking in city and town centres and in tourist areas where there is scope for improved management of Car, Coach and HGV parking and this is a high priority. Intervention IV_C3 (in the supporting Delivery Plan) focuses on Establishing a Strategic Regional Parking Policy Framework to help address these issues</p> <p>A new action has been added to the Delivery Plan in response to this – Action C1.4: Support measures to</p>	<p>TACTRAN or their consultants to access relevant data to inform appraisals of detailed interventions</p>

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	<p>Directive (2003/30/EC), which aims to promote the use of biofuels or other renewable transport fuels as substitutes for fossil fuels in the transport sector. It is important to ensure an increase in uptake of cleaner fuels where they produce less harmful emissions but also to recognise the need in the long term to support alternative technologies that enable a move towards true carbon-free fuels.</p> <p><i>Environmental Issues and Problems; Opportunities- Human Health</i> As stated above, the ER needs to clarify the fact that failing to meet air quality objectives that have been set to protect human health will result in the population within the AQMAs being exposed to the harmful effects of pollution and that there is sufficient evidence linking this pollution to respiratory diseases and increased mortality rates in vulnerable people.</p> <p>Another issue that could be highlighted is the “school run” since it generates significant air pollution at the time when children are more likely to be exposed to its harmful effects. This is one of the sensitive groups that the air quality strategy sets out to protect.</p> <p><i>Environmental Issues and Problems; Opportunities - Soils and Geology</i> In terms of opportunities to minimise the impact on soil resources (Section 4.5 and Annex D- 3.3), the remediation of contaminated sites as new development takes place in areas of previous industrial land use could result in a positive impact on soil resources and also any affected groundwater and surface water bodies. There is an opportunity for the RTS to actively encourage the construction of new infrastructure on Brownfield Land as opposed to Greenfield,</p>	<p>promote the use of cleaner and more sustainable fuels</p> <p>Noted</p> <p>The RTS emphasises in Section 4.2 that ‘<i>The combination of work commuting and the ‘school run’ are key drivers of congestion and crowding on the transport network</i>’ it also stresses in a review of issues that large school catchment areas, particularly within rural areas, which reduce opportunities for walking and cycling should be reviewed</p> <p>Noted. However, it is unlikely that new infrastructure could be specifically sited only in Brownfield land. Opportunities would be taken where appropriate</p>	<p>TACTRAN and its delivery partners to take account of the detailed implications of all interventions on air quality at the appropriate stage TACTRAN to note as above</p> <p>TACTRAN to note</p>

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	<p>thus potentially improving the overall quality of the soil in the TACTRAN area.</p> <p><i>Annex D Environmental baseline</i> The ER (Annex D- 2.3) recognises that air pollution may have an impact on human health, particularly in areas in close proximity to heavily trafficked roads and areas where air quality values are exceeded. It would have been useful to include baseline data on human health problems in areas of poor air quality, particularly AQMAs, if available.</p> <p>The ER recognises road traffic and other forms of transportation as key sources of noise within the urban and rural environments of the TACTRAN area and the lack of monitoring currently undertaken and available for the region (D- 2.2.2). The monitoring strategy proposed for the ER identifies the requirement for noise mapping under the implementation of the Noise Directive (Table 5.19).</p> <p>SEPA welcomes the reference in the ER to SEPA's flood plans (Annex D- 4.2.5). SEPA's 2nd generation Indicative River and Coastal Flood Map (Scotland), which provides an indication of the 1 in 200-year (0.5% annual probability) return period flood extent for both riverine and coastal flooding, have now been published and are designed to be used as a national strategic assessment of flood risk to support planning policy in Scotland. The Indicative River & Coastal Flood Map (Scotland) is available on SEPA's website http://www.sepa.org.uk/flooding/mapping/index.htm.</p> <p>The Indicative River & Coastal Flood Map (Scotland) has been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river cross-sections and low-lying coastal land. The outlines do not account for flooding arising from sources such as surface water runoff, surcharged culverts or drainage systems. The methodology was not designed to quantify</p>	<p>Noted. Collation of data on health conditions is included in Attachment 2 of the PAS.</p> <p>Noise mapping now available from the Scottish Government at www.scottishnoisemapping.org</p> <p>Noted</p> <p>Noted</p>	<p>Data sources to be used when collating baseline information to inform the detailed design and appraisal of relevant interventions</p> <p>Data sources to be used when collating baseline information to inform the detailed design and appraisal of</p>

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	<p>The ER presents a detailed assessment of the environmental effects of the RTS interventions (NB note interventions now in Delivery Plan) and measures in Annex F, G and H. The key findings of the assessment of the proposed interventions are summarised in Tables 5.1 to 5.12. The interventions include significant infrastructure projects such as the new Tay Crossing, city bypasses, link roads and interchanges and an increase in air travel at Dundee airport.</p> <p>SEPA considers that the initiative to increase air transport at Dundee airport is likely to have a strongly negative effect on climatic factors and the SEA objective “to contribute to meeting the Scottish share in reduction of carbon emissions” (Table 5.2 and Annex F, Table F1.4). The proposals conflict with the RTS’ main objectives in relation to the Environment which are to contribute to the achievement of Scottish national targets and obligations on greenhouse gas emissions, to promote a transport system that respects both the natural and the built environment and to promote a shift towards more sustainable modes (RTS section 3.2.2).</p> <p>The ER states that this initiative will have “<i>negative potential effects but with mitigation could become neutral. Effect would be dependent on offset measures and if these include planting this would take time to create an effective carbon sink. Effect would only be neutral if carbon offset scheme successfully implemented</i>”. Carbon offsetting should not be considered as the primary solution to mitigating increases in greenhouse gas emissions and their effects on climate change resulting from the RTS proposals to increase air travel. Relying solely on carbon offsetting for mitigation of increased air travel undermines current efforts of tackling emissions from transport and sends a signal that transport emissions should be allowed to continue to increase since any increases can be offset.</p> <p>Mitigation proposals should include measures to avoid and reduce emissions as primary measures and offsetting as a last resort, in accordance with the mitigation hierarchy: avoid, reduce, remedy and</p>	<p>Comment noted. Proposals at Dundee no longer include extension to the runway. Provision of local services could reduce travel to and from other cities. The intervention (now featured in the Delivery Plan) contributes to strategy committed to in the NTS</p> <p>See above. Offset suggested as possible mitigation given commitment in NTS. Offsets could include a variety of measures including renewables, energy efficiency and carbon sinks etc</p> <p>See above</p>	

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	<p>compensate adverse environmental effects. Offsetting should only be considered as a mitigation measure for emissions that cannot realistically be reduced. At the present moment there is a great degree of uncertainty surrounding carbon offsetting schemes which are currently non-standardised and unregulated and have issues of verification. Planting is one of the measures identified in the report however planting schemes only have temporary benefits as the carbon stored will ultimately be released back into the atmosphere.</p> <p>Table F1.3 details the environmental appraisal of measures associated with improving multi-modal interchange and road-based measures such as a new bypass for Dundee and a new crossing of the Tay. The assessment identifies uncertain effects on climate change objectives but also neutral and positive effects. SEPA considers that the construction of this type of infrastructure is likely to have significant negative effects on the objective “to contribute to meeting the Scottish share in reduction of carbon emissions”, as more car based traffic will be generated by this infrastructure. The assessment identifies potential uncertain or negative effects from the new crossing of the Tay on biodiversity and protected species and SEPA considers that potential uncertain or negative effects should also be used to describe potential impacts on the water environment.</p> <p>New transport infrastructure such as park and rides and new roads will also have the potential to cause impacts on water environment. Construction of this type of infrastructure may require watercourse crossings which can lead to impacts on the status of watercourses and the presence of permanent structures such as culverts or bridges can increase the risks of flooding. It is noted that limited detail is available in the RTS in relation to the geographical location of such interventions. If locations are not yet determined then the predicted effects on the water environment and flooding would be better scored as uncertain (?) rather than neutral/no effect (Annex F, Table F1.3 and Annex G, Group G and I). The ER can help reduce</p>	<p>Noted. Appraisal assumed effects on water would be mitigated in accordance with current regulatory requirements (e.g. CAR etc) and best practice</p> <p>See above</p>	

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	<p>the potential risks to the water environment by identifying possible adverse effects, even if uncertain so that further assessment/mitigation can be undertaken at lower planning levels and project level (e.g. EIA). However, mitigation measures including the use of SUDS, avoidance of flood risk and reference to the Controlled Activities Regulations (CAR) have been proposed and are supported by SEPA.</p> <p>Table F1.3 also identifies neutral effects on watercourses from the transport-related maintenance measures. Maintenance of transport infrastructure through the application of salt or pesticides can be a source of diffuse pollution. Maintenance of bridges may require engineering works in or around watercourses that have the potential to affect waterbody status The effects of road-based maintenance measures may therefore be better described as uncertain with potential negative effects ?(x) in relation to the water environment. Appropriate measures to mitigate these effects would include the use of Sustainable Urban Drainage Systems (SUDS) and compliance with Controlled Activities Regulations (CAR).</p> <p>Table F1.4 describes in detail the environmental appraisal of Freight specific measures. The RTS initiative on regional freight facilities includes water-born freight and in the assessment table this initiative has scored neutral effects (0) in relation to the water environment. The initiative will promote water-borne freight transport at one or more of the three main ports (Dundee, Montrose and Perth) and this is likely to increase the potential for impact on water quality from low grade oils used in shipping resulting also in an impact on aquatic biodiversity, particularly in sensitive waterbodies and designated sites (River Tay and Montrose Basin). An increase in water-borne activities may also result in increased development in coastal areas, including harbour works and port and infrastructure services enhancements that could impact on water quality and cause disturbance to species dependent on the aquatic environment. The effects of water-based freight measures would therefore be better</p>	<p>Noted, see above</p> <p>Noted. The appraisal assumed that additional water borne freight transport would be focused at operational ports with existing environmental management arrangements in place and therefore the additional traffic was unlikely to result in significant effects</p>	<p>TACTRAN to note port requirement for EMS etc</p>

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	<p>described as uncertain with potential negative effects ?(x) in relation to the water environment.</p> <p>In relation to soil resources, there is an opportunity for the RTS to encourage new developments on brownfield or land known to be affected by contamination. This could result in positive effects on the regions soils through their remediation and avoiding development of Greenfield land.</p> <p><i>Assessment of the draft RTS</i> The predicted effects of the preferred strategy on climate change do not adequately reflect potential effects from the proposed increase in air travel. Proposals to enhance air services at Dundee airport are contrary to the RTS objectives to contribute to the achievement of the Scottish national targets and obligations on greenhouse gas emissions and this should be clearly described in Table 5.13.</p> <p>SEPA supports the RTS proposals for an increase in public transport infrastructure however these measures need to be complemented by the replacement of high polluting vehicles, so that the improvements that the RTS is seeking to achieve in relation to pollutant emission levels are realised. This is particularly important for public transport operating within an AQMA.</p>	<p>Noted. However, it is unlikely that new infrastructure could be specifically sited only in Brownfield land. Opportunities would be taken where appropriate</p> <p>Comment noted. Proposals at Dundee no longer include extension to the runway. Provision of local services could reduce travel to and from other cities. The intervention (now featured in the Delivery Plan) contributes to strategy committed to in the NTS</p> <p>Noted</p>	<p>TACTRAN to take account of the detailed implications of all interventions on air quality at the appropriate stage with its delivery partners and ensure that the measures support those put forward in the relevant Air Quality Action Plans</p>

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	<p>SEPA supports the measures that discourage the use of car and encourage the use of public transport however these measures need to be complemented by the replacement of high polluting vehicles. This is particularly important for public transport operating within an AQMA.</p> <p>These measures will also need to be supported by land-use policies that remove/reduce the need to travel by ensuring that new traffic generating developments are close to facilities and can be accessed by sustainable transport means and that introduce parking limitations, particularly in high density development in city centres. It is not clear how this will be achieved as it is not clearly identified in the assessment summary and mitigation measures required.</p> <p>No mitigation measures were identified in Table 5.18 to tackle the increases in greenhouse gas emissions and their impacts on climate change from the proposed increase in air travel at Dundee airport, although in other sections of the report carbon offsetting has been identified as the primary mitigation measure (Table 5.12 and Annex G, Group K). SEPA's concerns on the reliance on carbon offsetting as the primary mitigation measure to address the adverse effects of increases in air travel have been highlighted above (please see</p>	<p>Point noted and although not directly addressing this issue Intervention E1 (now featured in the supporting Delivery Plan) – Quality Bus Partnerships has an action committing TACTRAN to work in close partnership with all relevant stakeholders to improve the quality of vehicles.</p> <p>RTP supports development proposals which reduce the need to travel</p> <p>Comment noted. Inclusion of Dundee proposals discussed in some depth but RTP wish to support the NTS commitments. Measure has been modified (no longer includes extensions to the airport). Offsets could include a variety of measures including renewables,</p>	<p>appropriate stage with its delivery partners and ensure that the measures support those put forward in the relevant Air Quality Action Plans</p>

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	<p>comments under heading “Assessment of Interventions”). The lack of a current regulated and verifiable carbon offsetting industry will continue to pose uncertainties for carbon off-setting plans. However, other measures could be identified that avoid or reduce the need to travel by plane in accordance with TACTRAN’s objectives of promoting sustainable public transport, such as the promotion of reliable, frequent and affordable train links between Dundee and UK destinations served by air travel. Please note that one of the most important mitigation measures to consider are changes to the strategy itself as a result of the environmental assessment process.</p> <p>SEPA considers that mitigation measures are a crucial part of SEA and therefore it is important to ensure that these measures are actually implemented and there is a clear commitment to do so in the ER. SEPA would encourage the Responsible Authority to be very clear in the ER about mitigation measures which are proposed as a result of the assessment. It would be extremely helpful to set out all mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. This is important to ensure that mitigation actions are implemented effectively. An example of a summary table that could be included is provided below (see original response (page 8)).</p> <p>SEPA welcomes the mitigation measures proposed to protect the aquatic environment, including the use of SUDS, flood risk avoidance and mitigation and the need for infrastructure to be designed taking account of effects of climate change. The ER also considers the need for drainage systems to be supported by adequate maintenance regimes and SEPA welcomes this approach. The other element to consider in relation to SUDS is the potential for habitat enhancement measures. Consideration should also be given to the potential for improving existing drainage systems in existing transport routes when maintenance works are carried out. It is good practice to include mitigation measures that enhance the</p>	<p>energy efficiency and carbon sinks etc</p> <p>TACTRAN will be responsible for making sure that all interventions and committed mitigation are delivered. Where it delegates responsibility for action it will remain the responsible authority for ensuring delivery of mitigation</p> <p>Points noted</p>	<p>TACTRAN to note the importance of seeking to deliver habitats enhancement measures in appropriate areas as part of the delivery or maintenance of measures</p>

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	<p>environment. In the development of new transport infrastructure the potential for historical contamination due to previous land uses should be considered. Where potential contamination is present appropriate risk assessment and remediation should be carried out in accordance with PAN33 ensuring there are no unacceptable risks to human health and to the wider environment, including the water environment (groundwater and surface water).</p> <p>SEPA welcomes the measures that support the re-use of materials in relation to transport projects and reference to the principles of the waste hierarchy – “Reduce – Reuse – Recycle – Recover” and proposals for coordination with Area Waste Plans.</p> <p><i>Monitoring</i> The monitoring proposals in relation to air quality propose monitoring of the number of AQMAs and trends in monitored roadside NO₂ and PM₁₀. SEPA also welcomes the monitoring of traffic counts on key road links (proposed under the SEA topic climate change) as these will also provide an indication of increasing road traffic at locations not currently part of the air quality monitoring regime and will provide an early indication of areas with potential high levels of air pollution. It may be appropriate to include an element of the types of vehicles that are using particular targeted routes since HGVs and buses are currently responsible for a high proportion of emissions.</p> <p>In relation to climate change, the proposed indicators are national CO₂ emissions from the transport sector and traffic counters on key road links. It is not clear if quantification of greenhouse gas emissions from transport sources for the TACTRAN area will be carried out and if air transport growth will be monitored. The ER claims that the potential negative effects of increased air travel will</p>	<p>Noted</p> <p>Point noted and traffic counts plus vehicle type added as potential indicators to Table 2</p> <p>Point noted and a revised monitoring target that includes monitoring any carbon offset scheme that is adopted is included in Table 2 of the PAS. delivery partners</p>	<p>TACTRAN to be aware of risks of contamination when implementing measures and to define appropriate detailed mitigation proactively in advance of construction</p> <p>TACTRAN will need to agree these with its delivery partners</p> <p>TACTRAN to be aware of the potential controversy that surrounds carbon offsetting and to</p>

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	<p>be neutral if a carbon offsetting scheme is successfully implemented, however proposals for monitoring the effectiveness of carbon offsetting schemes have not been included.</p> <p>In relation to the harmful effects of air pollution on human health, consideration should be given to monitoring the health of the population living in AQMAs.</p> <p>SEPA welcomes the monitoring programme proposed and accepts that it is not possible or practicable to carry out extensive monitoring and that some indicators may not be solely affected by the implementation of the RTS. However, transport infrastructure has the potential to affect hydrogeological processes or result in engineering works in or around watercourses that have the potential to affect waterbody status. The “no deterioration” of the water environment is an objective of the WFD and consideration should be given to the monitoring of changes to waterbody status resulting from the implementation of the RTS. Consideration should also be given to monitoring the proportion of new transport infrastructure in flood risk areas, the proportion of flooding events resulting from surcharged transport drainage systems and the proportion of new transport infrastructure incorporating SUDS.</p> <p>New transport infrastructure may involve the remediation of brownfield land or may have an impact on the use of construction aggregates. Therefore, consideration should be given to the monitoring of the number of brownfield sites remediated as a result of their use for transport schemes and the percentage of recycled</p>	<p>Point noted and monitoring target included in Table 2 of the PAS.</p> <p>Noted. A target of ‘no deterioration of the water environment or increase in flood risk as a result of implementation of the RTS’ has been included in the revised monitoring schedule in Section 7, Table 2 of the PAS</p> <p>Noted. However, it is considered unlikely that any significant areas of brownfield land would be affected by this RTS</p>	<p>ensure that if a scheme is used that it can be fully verified and the carbon that is offset can be assured</p> <p>TACTRAN will need to agree these sort of indicator with its TACTRAN will need to agree the final selection of indicators with its delivery partners TACTRAN will need to agree the final selection of indicators with its delivery partners</p>

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	materials used in maintenance, improvement and construction of new transport infrastructure.		

Attachment 2

**Baseline data on human health problems in areas of poor
air quality, particularly AQMAs**

Local Authority	Coronary Heart Disease Admissions – both sexes – all ages – rate/100,000: 2002	Coronary Heart Disease Admissions – both sexes – all ages – rate/100,000: 2003	Coronary Heart Disease Admissions – both sexes – all ages – rate/100,00: 2004	Coronary Heart Disease Admissions – both sexes – all ages – rate/100,000: 2005	Respiratory Disease Admissions – both sexes – all ages – rate/100,000: 2002	Respiratory Disease Admissions – both sexes – all ages – rate/100,000: 2003	Respiratory Disease Admissions – both sexes – all ages – rate/100,000: 2004	Respiratory Disease Admissions – both sexes – all ages – rate/100,000: 2005	Deaths, all ages, 2004
Angus	744	733	705	665	1152	1257	1274	1257	1330
Dundee	809	819	803	746	1495	1579	1544	1681	1754
Perth & Kinross	627	729	629	709	1108	1224	1051	1298	1616
Stirling	593	609	543	687	1118	1168	1190	1298	868

Source: <http://www.sns.gov.uk/Reports/Table.aspx> Scottish Neighbourhood Statistics, Scottish Government General Register Office for Scotland, 2005

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