

A scenic view of a river flowing through a lush green forest. The river is the central focus, with water rippling and reflecting the sky. The banks are lined with dense, vibrant green trees and bushes. In the background, rolling hills or mountains are visible under a slightly overcast sky. The overall atmosphere is peaceful and natural.

# **Comrie Flood Protection Scheme**

## **Environmental Impact Assessment Report**

### **Chapter 4: Approach to Assessment**

## Document Control

Document title	Chapter 4: Approach to Assessment
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Approver	Gail Currie
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Status	Final

## Revision History

Version	Date	Description	Author	Approver
0001	22.11.18	Initial draft	Gail Currie	Rebecca McLean
0005	31.01.20	Final Issue	Gail Currie	Rebecca McLean
0006	28.02.20	Publication	Gail Currie	Rebecca McLean

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## 4 Approach to Assessment

### 4.1 Overview

4.1.1 This chapter describes the regulations and process behind Environmental Impact Assessment (EIA) and the methodology that has been adopted when preparing this Environmental Impact Assessment Report (EIAR) and supporting documents.

### 4.2 Statutory Requirements – Flood Act & Regulation

4.2.1 This EIA has been conducted in accordance with Scottish Government Regulations and relevant advice on good practice. The EIA has been undertaken in accordance with the “*The Flood Risk Management (Scotland) Act 2009*” and “*The Flood Risk Management (Flood Protection Schemes, Potentially Vulnerable Areas and Local Plan Districts)(Scotland) Amendment Regulations 2017*” (herein referred to as the ‘Flood Regs.’).

4.2.2 The advice within “Schedule 2 Information for Inclusion in EIA Reports” of the Flood Regs. is provided in **Appendix 4.1** for reference.

4.2.3 **Table 4.1** provides a collated summary of the information required for an EIAR, as outlined in Schedule 2 of the Flood Regs. and where this information can be found within the EIAR.

**Table 4.1: EIA Requirements**

EIA Requirement	EIAR Location
A description of the scheme including location, physical characteristics, main characteristics of the operational phase and expected residues and emissions	Volume 2, Chapter 3: Scheme Description and Alternatives and Technical Chapters 5-10
A description of reasonable alternatives	Volume 2, Chapter 3: Scheme Description and Alternatives
A description of the relevant aspects of the current state of the environment (the “baseline scenario”)	Volume 2, Technical Chapters 5-11
A description of the factors specified in regulation 2A(3) likely to be significantly affected by the scheme: population, human health, biodiversity, land, soil, water, air, climate, material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	Volume 2, Chapter 3: Scheme Description and Alternatives and Technical Chapters 5 – 11

EIA Requirement	EIAR Location
<p>A description of the likely significant effects of the scheme on the environment resulting from, inter alia:</p> <p>(a) the construction and existence of the scheme, including, where relevant, demolition works;</p> <p>(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;</p> <p>(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;</p> <p>(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);</p> <p>(e) the cumulation of effects with other existing and/or approved projects taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;</p> <p>(f) the impact of the proposed scheme on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the scheme to climate change;</p> <p>(g) the technologies and the substances used.</p>	<p>Volume 2, Chapter 3: Scheme Description and Alternatives, Appendix 3.1 Outline CEMP, Appendix 3.2 Outline CMS and Technical Chapters 5 – 11</p>
<p>A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment</p>	<p>Volume 2, Chapter 4: Approach to Assessment and Technical Chapters 5-11</p>
<p>A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements</p>	<p>Volume 2, Technical Chapters 5- 10 and Chapter 12: Summary of Residual Effects and Proposed Mitigation</p>
<p>A description of the expected significant adverse effects of the scheme on the environment deriving from the vulnerability of the scheme to risks of major accidents and/or disasters which are relevant to the scheme</p>	<p>Volume 2, Chapter 3: Scheme Description and Alternatives and Chapter 12: Summary of Residual Effects and Proposed Mitigation</p>
<p>A non-technical summary of the information provided under paragraphs 1 to 8</p>	<p>Volume 1, Non Technical Summary</p>
<p>A reference list detailing the sources used for the descriptions and assessments included in the EIA report in respect of the scheme.</p>	<p>Volume 2, All Chapters via footnotes</p>

## 4.3 EIA Screening and Scoping

- 4.3.1 The requirement for an EIA was confirmed in writing by Perth & Kinross Council (the Councils) Planning Service in November 2016 (**Appendix 4.2**). It was confirmed that *“the Council holds the view that an Environmental Statement<sup>1</sup> is required”*.
- 4.3.2 A baseline environmental report was submitted to the Councils Planning Service in December 2016 by the Councils Structures & Flooding Team in support of a Scoping Request. Upon review of the baseline environmental report, a Scoping Opinion was provided by the Councils Planning Service in June 2017. The Opinion included comments from statutory consultees the Planning Service had consulted with.
- 4.3.3 The baseline environmental report outlined topic areas for inclusion in an EIA but did not contain sufficient information on the proposed scope or methodology required for EIA. An updated EIA Scoping Report (**Appendix 4.2**) was prepared by Sweco on behalf of the Council and submitted directly to the Councils Planning Service and statutory consultees in November 2017.
- 4.3.4 **Table 4.2** summarises the updated scoping review and the consultee responses received.

**Table 4.2: Summary of EIA Scoping Review Outcomes**

Environmental Discipline / Assessment	Construction Impacts	Operational Impacts	Consultee Response
Landscape & Visual Amenity	IN	IN	SNH confirmed they agreed with the LVIA proposal
Hydrology, Flood Risk & Water Quality	IN	IN	SEPA confirmed that they considered the scope of the EIA acceptable
Geology and Contaminated Land Proposed that the assessment focuses upon Contaminated Land and Hydrogeology. No assessment of impacts to designated geological sites is proposed	IN	IN	The Councils Environmental Health team confirmed that they considered the approach to contaminated land appropriate
Ecology & Nature Conservation	IN	IN	The Councils Biodiversity Officer confirmed that the proposals were in line with recognised guidelines SNH confirmed they agreed with the ecological proposals
Cultural Heritage	IN	IN	The Councils Conservation Officer, PKHT and HES all confirmed they were content with the approach proposed

<sup>1</sup> With the amendments brought by the 2017 regulations, the Environmental Statement has been renamed an Environmental Impact Assessment Report (EIAR)

Environmental Discipline / Assessment	Construction Impacts	Operational Impacts	Consultee Response
Socio-economics, Public Access & Amenity	IN	IN	The Councils Community Greenspace team confirmed they were content that the effect on public amenity and public open spaces and particularly the core path network is scoped in and will be assessed
Noise & Air Quality Proposed to be considered solely within the outline CEMP	OUT	OUT	The Councils Environmental Health team confirmed they considered the approach to noise and air quality appropriate
Traffic Proposed to be considered solely within the outline CEMP	OUT	OUT	The Councils Transport Planning team confirmed they considered the approach to traffic appropriate
Cumulative Impact Assessment	IN	IN	
Construction Environmental Management	IN	N/A	

- 4.3.5 Whilst the EIA has been screened and scoped in accordance with the 2010 flood regulations<sup>2</sup> which were applicable at that time, the EIA presented herein has been prepared in compliance with the amended 2017 Flood Regs. which came into force during the interim period of the flood study.
- 4.3.6 The updated 2017 Flood Regs. identify additional topics which require assessment as part of any EIAR which were not covered within the Updated Scoping Report or the original Scoping Opinion. These topics include human health, natural disasters, climate and material assets and have been incorporated into the assessments presented within the EIAR as detailed in **Table 4.2**. The inclusion and scope of these additional topics have been discussed and agreed between Sweco, the Council and the Councils legal team.
- 4.3.7 As set out in **Chapter 3: Scheme Design and Alternatives** during the outline design of the Scheme, assumptions have been made regarding material assets including the design, construction and visual composition of the flood walls within the surrounding environment (taking account of the Comrie Conservation Area). The detailed design stage of the works will include a review of the design with a view to reducing the embodied carbon of the Scheme.
- 4.3.8 An assessment of the potential impact upon the population and human health has been included within **Chapter 10: Socio-economics, Public Access and Amenity**, an assessment of Major Accidents and Natural Disasters is also included in **Chapter 10**. An assessment of carbon and discussion regarding the climate resilience of the scheme is provided in **Chapter 3: Scheme Description and Alternatives**.

<sup>2</sup> The Flood Risk Management (Flood Protection Schemes, Potentially Vulnerable Areas and Local Plan Districts)(Scotland) Regulations 2010

## 4.4 EIA Approach

### Baseline Assessment

- 4.4.1 The EIA process commenced with a baseline data gathering exercise across the defined EIA Study Area (red line boundary) as shown on **Figure 4.1**. The EIA study area was defined to provide a consistent approach to the assessment for each technical specialism and covers all geographical areas which could potentially be impacted by the Scheme proposals. The study area also encompasses an allowance for the anticipated construction footprint, construction compound / laydown areas and construction access routes.
- 4.4.2 An Environmental Constraints Plan was drafted to aid the baseline exercise which identified all known environmental constraints within the EIA study area and wider buffer zone as shown on appended **Figure 4.1**.
- 4.4.3 Baseline information was gathered from a variety of sources including but not limited to site visits / surveys and statutory and non-statutory consultation, all of which are detailed in each technical chapter.
- 4.4.4 The baseline data gathering ensures that the extent of the study area is consistent upon which the impact of the Scheme proposals can be assessed within each specialism.

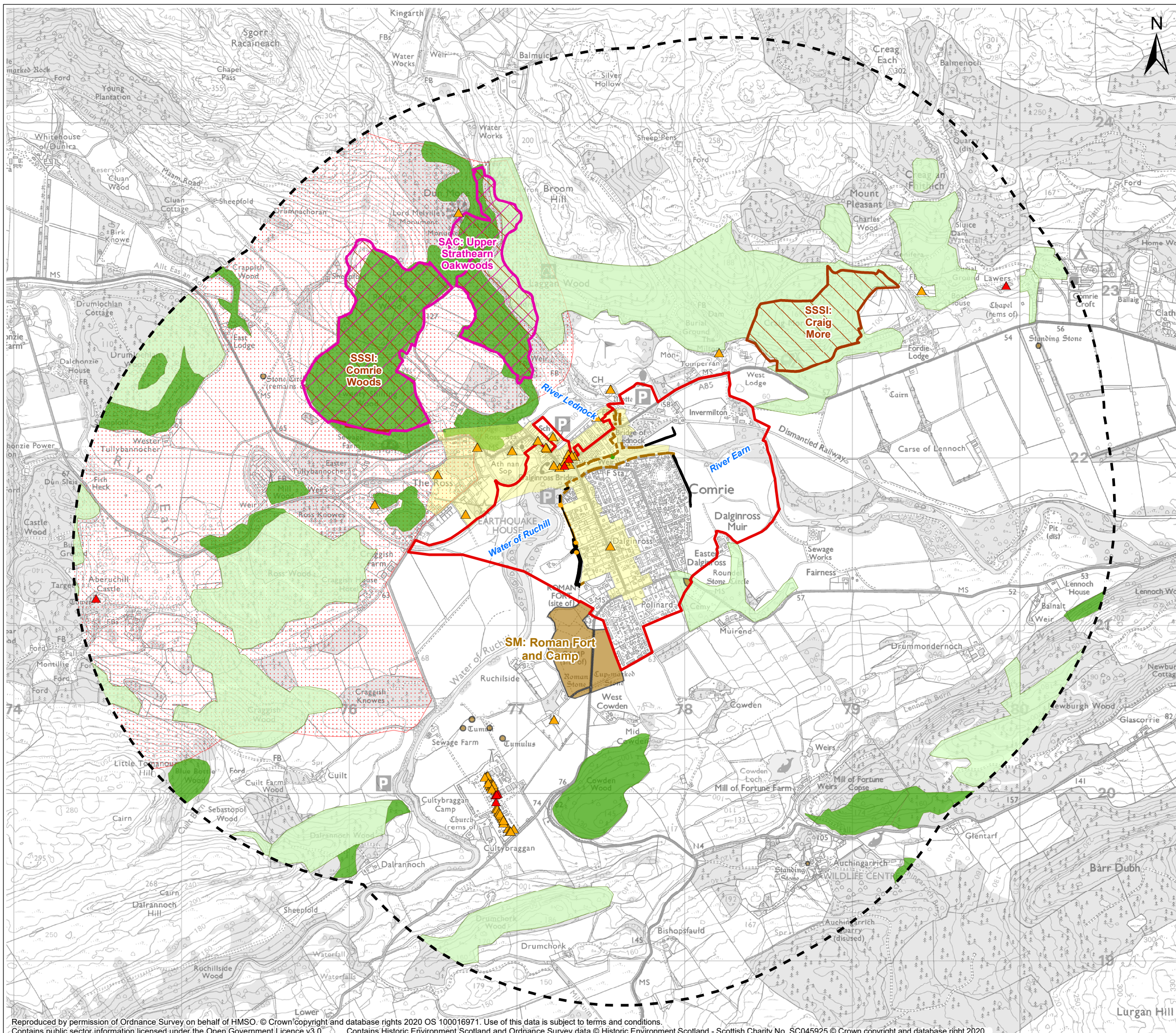
### Policy, Guidance and Legislation

- 4.4.5 Each technical Chapter contains topic specific information on the policy and guidance adopted in each assessment and relevant legislation followed in addition to compliance with the Flood Regs.
- 4.4.6 Each chapter also refers to relevant sections of Perth & Kinross Councils Local Development Plan 2 and Scottish Planning Policy to ensure that the Scheme remains compliant with planning policy even though the Scheme will be published under flooding legislation<sup>3</sup>.

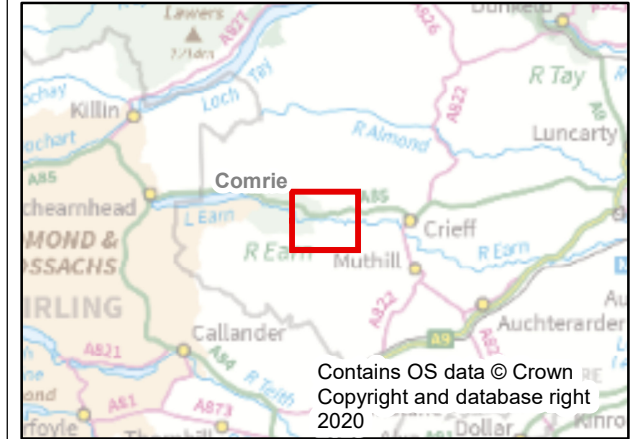
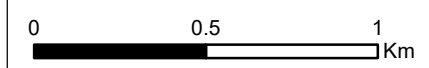
<sup>3</sup> The Flood Risk Management (Scotland) Act 2009 and The Flood Risk Management (Flood Protection Schemes, Potentially Vulnerable Areas and Local Plan Districts) (Scotland) Amendment Regulations 2017



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- Legend**
- EIA Study Area
  - EIA Study Area - 2km Buffer
  - Proposed Designs**
  - Embankment
  - Flood wall
  - Culvert
  - Reinforced grass - flood gate
  - Listed building**
  - ▲ Category A
  - ▲ Category B
  - Scheduled Monument
  - Comrie Conservation Area (CA585)
  - Special Area of Conservation (SAC)
  - Site of Special Scientific Interest (SSSI)
  - National Scenic Area
  - Ancient Woodland**
  - Ancient (of semi-natural origin)
  - Long-established (of plantation origin)



P01.1	04/02/2020	For Information	JB	RMcL
Rev.	Rev. Date	Drawing Suitability	Drawn	Appr'd

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Client

Project **Comrie Flood Protection Scheme 2020**

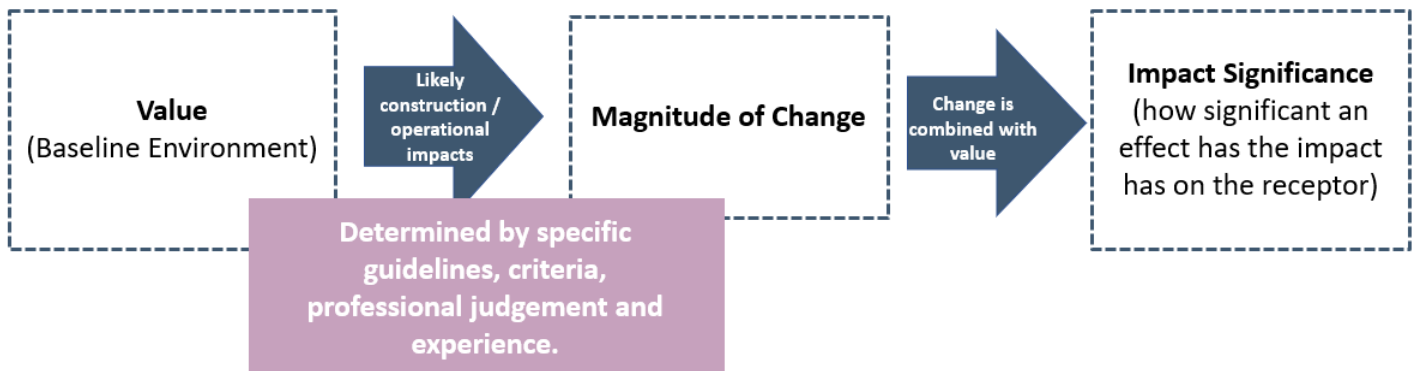
Drawing Title **Figure 4.1 - Environmental Constraints Plan**

Scale @ A3	1:22,000
Project No.	119702

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## Methodology

- 4.4.7 Predicted impacts and the significance arising from the Scheme is assessed in each technical chapter based on the outline design proposals presented. The sensitivity or value of the receptor is determined at the baseline stage and the scale of magnitude of the environmental impact is defined in order to assess the impact significance.



- 4.4.8 Mitigation measures are recommended where required to reduce any predicted impacts with a resultant residual impact identified for the Scheme. Some of these mitigation measures are embedded into the design to reduce the impact before it occurs (sensitive landscape design etc) and some are to be applied during construction such as ecological enhancement measures.
- 4.4.9 The impact assessment adopts a matrix-based approach consistently across the EIA. Impact significance is a function of the sensitivity (value/importance) of an attribute and the magnitude of impact (assessed before and after mitigation).
- 4.4.10 Cumulative impact has been assessed as both the impact on specific project receptors (i.e. affected watercourses, residential properties and amenity) and the impact with other known and planned developments within the local and wider area. This is provided in each technical chapter and summarised in **Chapter 11: Cumulative Impact**.

## Design Process

- 4.4.11 The EIA team have been part of the outline design process and environmental constraints such as public access, landscape character and cultural heritage assets have been taken into consideration during the design process with embedded mitigation provided wherever possible.

## 4.5 Consultation

### Overview

- 4.5.1 The objective of consultation ensures that the design process takes account of stakeholder opinion and community feedback to ensure that the design proposals provide the most practical solution for flood risk management with respect to environmental and engineering requirements.

### EIA Led Consultation

- 4.5.2 Consultation with statutory and non-statutory bodies has been undertaken during the course of the EIA by Sweco. Early consultation has provided opportunity for any issues to be raised which may affect the design or layout of the Scheme at an early stage. It also provides an early opportunity for representations to be considered and addressed as necessary.
- 4.5.3 Consultation has primarily comprised written correspondence by email with follow on meetings and telephone conversations as required. A summary of all the statutory and non-statutory consultations undertaken during the EIA is provided in **Appendix 4.3** and for each specific discipline detailed in the relevant technical chapter.

### Stakeholder Consultation

- 4.5.4 Three Value Management (VM) meetings have been held by the Council to present the project to key stakeholders. Two of these meetings have comprised a workshop format with a presentation followed by group led sessions to obtain opinions and feedback from the attendees.
- 4.5.5 The first VM workshop was held in the Councils Civic Office in Perth on 16th April 2018. The workshop was hosted by the Council and Sweco and presented the initial outline design and constraints identified to date. The VM1 meeting proved most useful in terms of providing local knowledge which was incorporated into the subsequent design stage as required.
- 4.5.6 VM2 was held on 25th June 2018 and comprised a client design review session between the Council and Sweco.
- 4.5.7 VM3 workshop was held on 25th April 2019 at the North Inch Community Campus hosted by the Council and Sweco. The session presented the updated outline design and the changes which had been proposed since VM1 to the invited stakeholders.
- 4.5.8 Sweco have also continued to consult with SEPA and Scottish Water throughout 2018 regarding the design of the Scheme and secondary flooding options.
- 4.5.9 Perth & Kinross Council internal departments including greenspace, structures, road maintenance and planning have also been consulted throughout 2018 and 2019 to ensure that the proposed design meets Council requirements.

## Public Consultation

- 4.5.10 A series of public consultation events have been undertaken by the Council during the full period of the Comrie flood study, some of which, has been undertaken before Sweco's commission.
- 4.5.11 Public consultation has comprised the following:
- Two local drop in sessions arranged by the Council and previous consultants Mouchel on the 1st and 8th September 2016. Information relating to these community sessions including a Q&A report can be found on the Councils website<sup>4</sup>.
  - Two local drop in sessions arranged by the Council and Sweco on the 30th April and 8th May 2019.
  - Landowner and affected resident meetings.
  - Community group meetings including, Comrie Community Council, Comrie in Colour and Comrie Fortnight.
  - The Council have a dedicated project webpage for the Scheme <http://www.pkc.gov.uk/comriefloodscheme> which provides regular updates on the project development and links to download documents relating to the Scheme proposals. The website is updated and maintained by the Council.
  - Community newsletters distributed to Comrie and Dalginross residents and local businesses which provide a quarterly update as the project progress.
- 4.5.12 A Public Consultation Report<sup>5</sup> has been prepared by the Council detailing the 2019 public exhibition events which responds to the comments received following the events. Two versions of this report are available to review – a short and full version. The full version provides the Councils detailed response to specific questions raised by the community with comprehensive responses to general themes raised at the events.
- 4.5.13 Early consultation with affected landowners and residents has informed the development of the outline design which considers the opinions of those directly affected. This consultation process has been led by the Council with the assistance of Sweco and has proved most useful in understanding and agreeing both Scheme and landowner requirements. This consultation driven process commenced in October 2018.
- 4.5.14 Early and ongoing engagement with local community groups including Comrie Community Council and Comrie in Colour has also been taken forward by the Council to gain local community opinions and feedback on community requirements.
- 4.5.15 The outline design presented in the Flood Order and on which this EIA is established upon, has been amended where possible to consider and account for consultation comments received .

<sup>4</sup> <https://www.pkc.gov.uk/article/20202/Comrie-Flood-Protection-Scheme-Feasibility-study>

<sup>5</sup> Public Consultation Report – Full and Short Version Comrie Flood Protection Scheme Perth & Kinross Council, November 2019

## 4.6 Summary

- 4.6.1 The EIA undertaken for the Scheme is considered an adequate assessment of all potential construction and operational impacts which may result and adequately assesses the effects these may have on the environment.
- 4.6.2 The EIA is submitted in support of the Flood Order and follows the regulatory requirements of the Flood Act and Flood Regulations as required.

A photograph of a river flowing through a lush green forest. The river is in the foreground, with some rocks and debris visible. The banks are covered in dense trees and vegetation. In the background, there are mountains under a cloudy sky.

# **Comrie Flood Protection Scheme**

## **Appendix 4.1**

### **Schedule 2: Information for inclusion in the EIA Reports**

## **Schedule 2: Information for Inclusion in EIA Reports of the The Flood Risk Management (Flood Protection Schemes, Potentially Vulnerable Areas and Local Plan Districts)(Scotland) Amendment Regulations 2017**

1. A description of the scheme, including in particular:
  - a) a description of the location of the scheme;
  - b) a description of the physical characteristics of all the works covered by the scheme, including, where relevant, demolition works, and the land use requirements during the construction and operational phases;
  - c) a description of the main characteristics of the operational phase of the scheme (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
  - d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation) and quantities and types of waste produced during the construction and operation phases.
  
2. A description of the reasonable alternatives (for example in terms of scheme design, technology, location, size and scale) studied by the local authority which proposed the scheme, which are relevant to the scheme and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.
  
3. A description of the relevant aspects of the current state of the environment (the “baseline scenario”) and an outline of the likely evolution thereof without implementation of the scheme as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
  
4. A description of the factors specified in regulation 2A(3) likely to be significantly affected by the scheme: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.
  
5. (1) A description of the likely significant effects of the scheme on the environment resulting from, inter alia:
  - a) the construction and existence of the scheme, including, where relevant, demolition works;
  - b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
  - c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;



- d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
  - e) the cumulation of effects with other existing and/or approved projects taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
  - f) the impact of the proposed scheme on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the scheme to climate change;
  - g) the technologies and the substances used.
- (2) The description of the likely significant effects on the factors specified in regulation 2A(3) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the scheme. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the scheme including in particular those established under Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora(a) and Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds(b).
- (3) In sub-paragraph (1) “projects” means—
- a) the execution of construction works or of other installations or schemes; and
  - b) other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources.
6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-scheme analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.
8. A description of the expected significant adverse effects of the scheme on the environment deriving from the vulnerability of the scheme to risks of major accidents and/or disasters which are relevant to the scheme. Relevant information available and obtained pursuant to legislation of the European Union such as Directive 2012/18/EU of the European Parliament and of the Council on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC(c) or Council Directive 2009/71/Euratom establishing a Community framework for the nuclear safety of nuclear installations(d) or relevant assessments may be used for this purpose provided that the requirements of these Regulations are met. Where appropriate,

this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

9. A non-technical summary of the information provided under paragraphs 1 to 8.
10. A reference list detailing the sources used for the descriptions and assessments included in the EIA report in respect of the scheme.

A photograph of a river flowing through a lush green forest. The river is in the foreground, with some rocks and debris visible. The banks are covered in dense green trees and bushes. In the background, there are mountains under a cloudy sky.

**Comrie Flood Protection Scheme**

**Appendix 4.2**

**EIA Screening (2016) & EIA  
Scoping Report Update (Sweco,  
Nov 2017)**

**Delayed Office Opening for  
Employee Training**

*This Office will be closed from 8.45 am –  
11.00 am on the 1<sup>st</sup> Thursday of each  
month*

**Mr Andrew Strang  
c/o Craig McQueen  
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Our ref 16/01863/SCRN

Your ref

Date 21 November 2016

Dear Mr McQueen,

**EIA Screening Opinion 16/01863/SCRN: Screening Opinion for proposed Flood  
Protection Scheme at Comrie.**

As a schedule 2 Development under The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 your proposal is required to be screened to determine whether an Environmental Statement is necessary and whether this should form part of any deemed planning consent.

This process has been undertaken and I can inform you that the Council holds the view that an Environmental Statement **is required** in this instance. The Council has taken cognisance of the Scottish Government and The European Commission's screening checklist and determined that the proposed development is likely to have significant effects on the environment by virtue of factors such as its size, nature, and situation. A copy of the Council's Screening Opinion is attached for your perusal.

I hope the above is of assistance.

Yours sincerely



Callum Petrie  
Planning Officer – Major Applications  
Development Management

Encl.

# COMRIE FLOOD PROTECTION SCHEME

Scoping Report Update  
November 2017

<b>Revision Record</b>						
<b>Rev No</b>	<b>Date</b>	<b>Originator</b>	<b>Checker</b>	<b>Approver</b>	<b>Status</b>	<b>Suitability</b>
<b>V1.1</b>	<b>06.10.17</b>	<b>Various</b>	<b>Mike Roberts</b>	<b>Rebecca McLean</b>	<b>Draft</b>	<b>For Client Comment</b>
<b>V1.2</b>	<b>16.11.17</b>	<b>Various</b>	<b>Mike Roberts</b>	<b>Rebecca McLean</b>	<b>Final</b>	<b>For Issue</b>

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# 1. INTRODUCTION

Sweco were appointed by Perth & Kinross Council (PKC) in August 2017 to progress the design and assessment of the Comrie Flood Protection Scheme. Sweco are currently in the process of reviewing the scheme design with a view to publishing the proposed scheme under Section 65 of the Flood Risk Management (Scotland) Act 2009 ('FRM Act'). Once the proposed Scheme has been confirmed a request will be made to the Scottish minister for the granting of deemed planning consent under Section 57 of the Town and Country Planning (Scotland) Act 1997.

To inform the design and assessment process a review of the existing scheme documentation including the Environmental Baseline Report (Mouchel, 2015, as set out in Appendix B), and the Perth & Kinross Scoping Opinion (PKC, 2017, as set out in Appendix C) has been undertaken.

This review has highlighted that the baseline environmental report submitted to support the request for a Scoping Opinion did not contain detailed information on the proposed scope or methodology of the required Environmental Impact Assessment (EIA).

Therefore this scoping update note has been drafted to formally agree the scope of the EIA and the methodologies associated with topics that will be scoped into the assessment. Furthermore we are also seeking to clarify the Regulations under which the EIA will be produced.

## REVIEW OF EIA SCOPE

The following sets out our review of the EIA Scoping Opinion and summarises the proposed methodology and scope of assessment for each of those disciplines which PKC have identified as being required for the EIA. Where we believe disciplines can be 'scoped out' of the EIA we have made suggestions for an alternative approach to the assessment process.

## EIA REGULATIONS

On 16th May 2017 the revised EIA Directive came into force leading to the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 being revoked. Furthermore the Flood Risk Management (Flood Protection Schemes, Potentially Vulnerable Areas and Local Plan Districts) (Scotland) Regulations 2010 were also revoked with both sets of regulations being replaced by the amendment regulations. However, as detailed in **Planning Circular 1 2017: Environmental Impact Assessment regulations 2017**

*"Where a developer who is minded to make an EIA application requests a scoping opinion in respect of the proposed development under Regulation 14(1) of the 2011 Regulations before 16th May 2017, the 2011 Regulations continue to apply to an application for planning permission subsequently submitted for that same proposed development for which the scoping opinion was sought".*

The Comrie FPS Scoping Request was submitted in December 2016 with the Scoping Opinion issued in June 2017. We therefore seek confirmation from PKC Development Management that the EIA for the proposed scheme is to be produced and published in accordance with the Flood Risk Management (Flood Protection Schemes, Potentially Vulnerable Areas and Local Plan Districts) (Scotland) Regulations 2010 as opposed to the 2017 Amendment Regulations.



## WHAT IS THE PROJECT?

The River Lednock and the Water of Ruchill meet the River Earn within the towns of Comrie and Dalginross 11km west of the town of Crieff and 40km west of Perth. Flood waters from these watercourses have historically resulted in flood damage in Comrie and Dalginross with the most recent flood events in August and November 2012.

Previously, Perth & Kinross Council commissioned flood feasibility studies to investigate options which could provide a flood protection scheme for Comrie.

Sweco have now been commissioned to further develop the previous flood study and to deliver a design which will secure the necessary statutory approval. PKC will publish the proposed Scheme (including the Environmental Statement) for consultation under the Flood Risk Management (Scotland) Act 2009. In order to confirm the Scheme and complete the statutory process a scheme notice will be published and an application (which will include relevant planning conditions for the proposed Scheme) will subsequently be submitted for deemed consent to the Scottish Ministers.

Figure 1-1 (Preferred Scheme Layout), Appendix A shows the location of the preferred flood defence scheme as detailed in the Comrie Flood Protection Scheme Feasibility Report (2017)<sup>1</sup>, and the key designed environmental sites identified by Mouchel in the scheme's Baseline Environmental Report (2015)<sup>2</sup> (Appendix B).

## STRUCTURE OF THIS REPORT

Following this introductory chapter, **Chapters 2 to 9** outline the overall approach to the EIA, by providing an overview of the methodology that will be adopted for each technical discipline. The baseline environmental information that was prepared by Mouchel for each topic can also be viewed in Appendix B.

**Chapter 12** provides a summary of the proposed EIA Scope across all disciplines and **Chapter 13** provides the suggested contents for the Environmental Statement and **Chapters 14** and **15** set out our approach to those various elements going forward.

The report is therefore structured as follows:

- Chapter 2: Landscape and Visual Amenity;
- Chapter 3: Hydrology, Flood Risk and Water Quality;
- Chapter 4: Geology and Contaminated Land;
- Chapter 5: Ecology and nature conservation;
- Chapter 6: Cultural Heritage;
- Chapter 7: Socio-Economic, Public Access and Public Amenity;
- Chapter 8: Noise and Air Quality;
- Chapter 9: Traffic;
- Chapter 10: Cumulative Impact Assessment;
- Chapter 11: Construction Environment Assessment;
- Chapter 12: Scoping Summary;
- Chapter 13: Proposed Environmental Statement;
- Chapter 14: Design Statement; and
- Chapter 15: Consultation.

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<sup>1</sup> Comrie Flood Protection Scheme Feasibility Report (WSP, 2017)

<sup>2</sup> Comrie Flood Protection Scheme, Environmental Baseline Report (Mouchel, June 2015)

## 2. LANDSCAPE & VISUAL AMENITY

The PKC Scoping Opinion confirmed that a landscape and visual assessment would be appropriate, “*tying back with the cultural heritage section*”. We agree that a landscape and visual impact assessment (LVIA) should be ‘scoped in’ to the EIA due to the potential for adverse effects on landscape and visual receptors. Appropriate cross referencing between the LVIA and cultural heritage chapters will enable the visual assessment to inform the cultural heritage assessment. The scheme extents lie outside of the River Earn (Comrie to St Fillans) National Scenic Area (NSA), however, the assessment will still consider any potential effects upon the NSA.

The assessment methodology will be in line with the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3). It is proposed that the landscape and visual assessment will consider effects upon: landscape elements; landscape character; the NSA; residential visual receptors; people in their place of work; users of footpaths and roads; and users of tourist/leisure attractions.

Representative viewpoints will be provided to consider key views experienced by visual receptors. Agreement is sought from PKC on the number and location of representative viewpoints to be included within the assessment. Photomontages are not proposed for this assessment.

A full arboricultural survey of trees<sup>3</sup> affected by the proposals will be undertaken as part of the wider project and the landscape and visual assessment will draw upon this. A review of the PKC Interactive Heritage Map<sup>4</sup> has confirmed that none of the trees within Comrie are individually protected under a Tree Preservation Order (TPO), however It is acknowledged that a large proportion of trees within the site fall into the Comrie Conservation Area and are therefore afforded protection if they have a stem diameter of 75 millimetres measured at 1.5 metres from ground level..

The proposed study area for the landscape and visual assessment is within 1km of the scheme extents.

Therefore on this basis it is proposed that **Landscape and Visual Assessment is ‘scoped in’** to the EIA.

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<sup>3</sup> In accordance with the guidance set out in BS:5387: Trees in relation to design, demolition and construction

<sup>4</sup> <http://www.pkc.gov.uk/heritagemap>

### 3. HYDROLOGY, FLOOD RISK & WATER QUALITY

The water quality assessment will draw upon desk-based resources, such as SEPA's River Basin Management Plan (RBMP) Interactive Map and SEPA's Water Environment Hub, to inform the baseline water environment. More detailed chemical analysis in the vicinity of the watercourses, collected as part of the ground investigation works, will be reviewed and included in the baseline where it provides further information on existing water quality.

Potential impacts on water quality will be assessed qualitatively during both construction and operational phases of the scheme and the assessment methodology will be in general accordance with SNH's 2013 Handbook on EIA and Design Manual for Roads and Bridges (DMRB) assessment criteria.

The assessment of impacts on fluvial geomorphology will follow industry-accepted methods. Geomorphic processes associated with the dynamic nature of the watercourses, particularly the Water of Ruchill, has been identified as a key issue to be addressed in the EIA. Due to the importance of the existing fluvial and sediment processes and the potential impacts on these, including potential impacts on the RBMP water body status, a standalone geomorphological report will be prepared which will inform the design of the scheme and the subsequent EIA assessment. This report will form an appendix to the ES chapter.

The baseline will also be informed by a river reconnaissance survey (or similar) by a suitably qualified surveyor(s) to identify existing processes and geomorphological features, and assess potential channel change and sediment issues which may impact on the scheme during both construction and operation.

A flood risk assessment (FRA) will be undertaken using SEPA and industry-standard guidance and will meet the requirements of SEPA's EIA scoping response (dated 2<sup>nd</sup> February 2017). The FRA will form an appendix of the ES chapter and a summary of relevant information will be included within the ES chapter.

Consultation will also be undertaken with SEPA and the Tay District Salmon Fisheries Board to augment information on the baseline environment (including water quality, any licensed abstractions and discharges, aquatic species and water-based recreation), gain agreement on assessment methods and identify any key mitigation requirements.

The study area for the water quality and fluvial geomorphology baseline assessments will be up to 2km from the extents of the Comrie Flood Protection Scheme. This should sufficiently cover a river reconnaissance survey, and allow a sufficiently robust assessment of existing upstream and downstream fluvial and sediment processes and potential impacts associated with the scheme. The study area for the flood modelling will be delineated by the upper and lower boundaries of the flood models.

In summary, it is proposed that **Hydrology, Flood Risk & Water Quality will be 'scoped in'** to the EIA.

---

## 4. GEOLOGY AND CONTAMINATED LAND

The Comrie Flood Protection Scheme Environmental Baseline Report did not identify any geological Sites of Special Scientific Interest (SSSI), Regionally Important Geological Sites (RIGS), underground or surface mining, or other designated sites of geological value adjacent to the proposed options. The nearest geological SSSI is Craig More located more than 500m northeast of the proposed Scheme, in the vicinity of West Lodge Caravan Park and to the north of the A85.

Given the distance to the nearest geological SSSI, it is considered that there is a low likelihood that the proposed flood protection scheme could have a significant impact upon designated geological sites. Therefore on this basis it is proposed that **Geology is 'scoped out'** of the EIA.

Due to the controls that will be imposed on any contractor through the requirements of a Construction Environmental Management Plan (CEMP), it is considered that potential impacts on soils will be sufficiently controlled and consequently impacts will not be significant and therefore do not warrant assessment within the EIA. We therefore propose that impacts on soils are covered in the Construction Environmental Management Plan (CEMP) section of the EIA, which the appointed contractor will be required to develop and agree with PKC and the statutory environmental bodies prior to work commencing on site. Potential impacts on agriculturally important soils are considered under the 'Socio-economic, Public Access & Amenity' section of the EIA Scoping Report Update below.

The impacts associated with Hydrogeology and Contaminated Land will be assessed through a qualitative (and quantitative where sufficient data exists) assessment of effects of the development in general accordance SNH's 2013 Handbook on Environmental Impact Assessment. This will include development of a conceptual site model to form the basis of a risk-based assessment (following BS 5930 and BS 10175), and will include consultation (especially with the PKC Land Quality team) and exploratory intrusive investigation in key risk areas. Assessment of potential hydrogeological effects (including effects on private water supplies and abstractions) will also consider the guidance within *Land Use Planning System SEPA Guidance Note 31* to determine whether further detailed site specific qualitative and/or quantitative risk assessment will be required.

In summary, it is proposed that **Contaminated Land and Hydrogeology will be 'scoped in'** to the EIA.

---

# 5. ECOLOGY AND NATURE CONSERVATION

In order to provide suitable data to inform the design process and to provide an ecological baseline for the environmental impact assessment we would anticipate the following ecological work to be required.

## **DESIGN STAGE – PRELIMINARY ECOLOGICAL APPRAISAL**

Completion of initial desk study, including data search using on-line data sources and receipt of data from the local biological records centre. This will identify statutory and non-statutory conservation sites and enable potential impacts to protected species and notable plants to be appraised. The desk study will also include a review of relevant policy and legislation, such as local Biodiversity Action Plan targets.

A walkover ecological (Phase 1 Habitat Survey) survey will be undertaken of the site and a 250m buffer (where access allows) to include the following:

- Identification of all main habitats within study areas;
- Identification of any invasive plant species (e.g. Japanese knotweed, giant hogweed and Himalayan balsam); and
- Identification of and assessment of the value of any habitats that may have to be removed by the scheme including trees, hedges and ponds.

As recommended by Joint Nature Conservation Committee (JNCC) and Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines, the surveys will identify the potential for protected species including:

- Great crested newt ponds and terrestrial habitat within 250m of the works;
- Badger setts within 30m of the work areas;
- Potential bat roosts and foraging habitat within the work areas;
- Nesting and foraging habitats for birds within the work areas;
- Otters and otter habitat within 200m of the work areas;
- Reptile habitat including hibernacula within the work areas;
- Water vole habitat within 30m of works areas;
- Potential habitat for aquatic species (e.g. salmon, freshwater pearl mussel, lamprey) in water courses affected by the works;
- Potential habitat for red squirrel or evidence of activity;
- Areas of significant botanical interest;
- All standing waterbodies to be assessed using the Habitat Suitability Index method to establish their suitability for great crested newt; and
- Production of a habitat survey report covering survey findings, and detailing potential ecological constraints and opportunities within the proposed development.

Recommendations will be made for further work where necessary and will detail likely mitigation requirements. The report will also include an annotated habitat map including target notes and photographs.

## **ENVIRONMENTAL IMPACT ASSESSMENT INPUT - PHASE 2 SURVEYS**

The precise requirements of Phase 2 study will be dependent upon the outcome of the Preliminary Ecological Assessment (PEA), review of existing, available information and consultation with Scottish Natural Heritage (SNH). The following list of additional ecological surveys is drawn up for information only. The results of all below surveys will be reported as technical reports with mapping to be included within the EIA. All surveys will be conducted according

to the relevant best practice guidelines at the time of survey. The Phase 2 surveys will be restricted to the site area plus a 100m buffer (where access allows) except for the otter, water vole and signal crayfish surveys which will include 200m upstream and downstream of the works areas as a minimum.

Likely Phase 2 ecological surveys include:

- Beaver
  - INNS (Signal crayfish)
  - Otter
  - Water vole
  - Bats
  - Badgers
  - Red squirrel
  - National Vegetation Classification (NVC)
-

## 6. CULTURAL HERITAGE

The PKC Scoping Opinion confirmed that cultural heritage should be included as a topic in the EIA. Perth and Kinross Heritage Trust, as archaeology and heritage advisors to the Council, advised that a historic environment and archaeological desk-based assessment and walkover survey of the proposed scheme be undertaken to inform the archaeology and cultural heritage chapter.

The scope of works will consider the archaeological potential of the locations of the proposed flood defences and will assess both direct and indirect effects of the proposed scheme on below-ground deposits in these areas.

As noted in the consultation responses from PKC and Historic Environment Scotland, the scheme also has the potential to impact on the settings of listed buildings and the Comrie Conservation Area. Potential impacts of the settings of the Category A listed old parish church (LB-5385) and the Conservation Area will therefore also be assessed.

The assessment will be undertaken in accordance with relevant legislation and standards, as well as the following guidance:

- Historic Environment Scotland Policy Statement (HESPS), 2016;
- Guidance published by Historic Environment Scotland in the Managing Change in the Historic Environment series, in particular 'Setting', 2016; and
- Chartered Institute for Archaeologists '*Standard and Guidance for historic environment desk-based assessment*', 2017.

Given the nature of the proposed development, it is considered that a 200m (radius) study area will be sufficient to understand the nature and extent of any impacts on the historic environment.

It is therefore proposed that as per the EIA Scoping Opinion provided by PKC **that this discipline will be 'scoped in'** to the EIA.

---

## 7. SOCIO-ECONOMICS, PUBLIC ACCESS AND AMENITY

The impacts to socio-economics, public access and amenity will be assessed through a desk based, qualitative assessment.

The socio-economic assessment will be based upon information relating to the latest economic assessment of the proposed Flood Protection Scheme which will be presented as part of the Scheme documentation as a requirement under the FRM Act. Information on agricultural land classifications and potential land-take from agricultural land will also be considered and a desk based assessment undertaken of the potential impacts.

The assessment of impacts to public access and amenity will focus on locally important civic / green spaces and non-motorised user (NMU) routes which are utilised for sporting and leisure activities, including angling, canoeing, cycling, walking or equestrianism. Reference will be made in the assessment the guidance set out in Scottish Natural Heritage's A handbook on environmental impact assessment (2013) Appendix 5 (assessment of Outdoor Access), as well as the Flood Protection Scheme Economic Assessment.

The proposed study area for the socio-economics, public access and amenity is within 500m of the scheme extents.

It is therefore proposed that as per the EIA Scoping Opinion provided by PKC **that this discipline will be 'scoped in'** to the EIA.

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## 8. NOISE AND AIR QUALITY

It is noted in the EIA Scoping Response from the PKC Environmental Health Team that the EIA is not required to consider air quality and noise impacts from the operation of the proposed scheme and we concur with this opinion. The response does however highlight the need for consideration to be given to both noise and air quality during the construction phase of the scheme.

Whilst we are in agreement that air quality and noise should be considered, due to the stringent controls that will be imposed on any contractor through the need for a Construction Environmental Management Plan (CEMP), we do not consider that construction impacts relating to air quality, noise and vibration will be 'significant' under the EIA Regulations and therefore they do not warrant assessment within the EIA.

Furthermore, as a contractor has not been appointed for the construction of the proposed scheme it is not possible to know the type and volume of construction plant that will be required for the construction process therefore prediction of noise and air quality impacts will be estimated rather than accurate.

We therefore proposed that air quality, noise and vibration are covered in the Construction Environmental Management Plan (CEMP) section of the EIA rather than as a standalone assessment. The CEMP section of the EIA will outline the construction procedures that the appointed contractor will be required to develop and agree with PKC and the statutory environmental bodies prior to work commencing on site.

It is therefore proposed that these **disciplines will be 'scoped out'** of the EIA as a standalone section supporting the notion of proportionate environmental assessment, however they will be covered within the outline CEMP document submitted in support of the ES.

---

## 9. TRAFFIC

The PKC Scoping Opinion confirmed that “*A response from the Transport Planning Section did not identify any significant implications in relation to motorised transport, which cannot be covered as a construction traffic management plan as part of a Construction Environment Management Plan*”.

It is therefore proposed that **this discipline will be ‘scoped out’** of the EIA as a standalone section supporting the notion of proportionate environmental assessment, however it will be covered within the outline CEMP document submitted in support of the ES.

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# 10. CUMULATIVE IMPACT ASSESSMENT

The cumulative impact assessment will consider both intra-project (i.e. the combined impact of multiple environmental disciplines upon individual receptors), and inter-project (the cumulative impact of multiple proposed development upon individual receptors).

The cumulative impact assessment will consider other relevant committed developments with the potential for cumulative effects which might arise from the proposal in conjunction with other development proposals in the vicinity. Developments to be included in the assessment will include those developments which have outline / full planning consent or allocation in the Adopted Local Development Plan but have not started construction work.

It is therefore proposed that **this assessment will be 'scoped in'** to the EIA. However agreement will be sought from PKC Development Management on the proposed developments which are required to be included within the Cumulative Impact Assessment. It is proposed that the following development types will form part of the assessment:

- Any new development – erection of houses, new industrial developments, overhead lines, wind farms etc.
- Any development which is noted as changing the development boundaries
- Any development which is converting current non-residential uses to residential uses
- Change of land use from current open space to private land

Applications will not be considered include:

- Property extensions such as conservatories, sun lounges, new sheds, walls, fences etc.
  - Change of use from one business use e.g. restaurant to another e.g. office space
  - Refused planning applications
  - Erection of new signage
  - Applications noted as being screening / scoping opinions
  - Planning applications submitted before 2013 as it is considered that any extant planning permissions granted prior to this date will have lapsed.
-

# 11. CONSTRUCTION ENVIRONMENT ASSESSMENT

The ES will set out the principles of the Construction Environmental Management Document outlining how the draft Schedule of Mitigation will be implemented. An Outline Construction Environmental Management Plan (OCEMP) will be prepared and appended to the ES which will form the basis of more detailed site specific Construction Environmental Management Plans.

Best practice advice developed by The Highland Council (in conjunction with industry and other key agencies) on the Construction Environmental Management Process will be used as the basis for the OCEMP which will include mitigation measures for the control of noise, vibration and dust during the construction period.

It is therefore proposed that as per the EIA Scoping Opinion provided by PKC that **this assessment will be 'scoped in'** to the EIA.

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## 12. SCOPING SUMMARY

EIA aims to focus the assessment on the potentially significant impacts from a proposal, on this basis certain environmental disciplines are proposed to be included or excluded from the environmental assessment of the Comrie Flood Protection Scheme as a result of the review of the previous scoping process.

Table 1-1 lists the environmental disciplines that the Scoping Review proposes would be “*scoped in*” and those that would be “*scoped out*” of the EIA. It also details elements within each of the disciplines that are to be scoped in or out.

**TABLE 1-1: SUMMARY OF SCOPING REVIEW OUTCOMES**

Environmental Disciplines / Assessments	Construction Impacts	Operational Impacts	Notes
Landscape & Visual Amenity	IN	IN	
Hydrology, Flood Risk & Water Quality	IN	IN	
Geology and Contaminated Land	IN	IN	Proposed that the assessment focuses upon Contaminated Land and Hydrogeology. No assessment of impacts to designated geological sites is proposed.
Ecology & Nature Conservation	IN	IN	
Cultural Heritage	IN	IN	
Socio-economics, Public Access & Amenity	IN	IN	
Noise & Air Quality	OUT	OUT	Proposed to be considered solely within the outline CEMP.
Traffic	OUT	OUT	Proposed to be considered solely within the outline CEMP.
Cumulative Impact Assessment	IN	IN	
Construction Environmental Management	IN	N/A	

# 13. PROPOSED ENVIRONMENTAL STATEMENT CONTENTS

Based upon the above review of the EIA Scoping documentation we therefore seek agreement with PKC Development Management on the recommended scope of the EIA as set out in Table 1-1, and that the following comprises the contents for the ES:

- Chapter 1: Introduction & Project Description
  - Chapter 2: Flooding Act Remit & Policy Background, Land Uses
  - Chapter 3: Scheme Description & Alternatives
  - Chapter 4: Approach and Methods
  - Chapter 5: Landscape & Visual Amenity
  - Chapter 6: Hydrology, Flood Risk & Water Quality
  - Chapter 7: Geology and Contaminated Land
  - Chapter 8: Ecology & Nature Conservation
  - Chapter 9: Cultural Heritage
  - Chapter 10: Socio-economics, Public Access & Amenity
  - Chapter 11: Cumulative Impacts
  - Chapter 12: Construction Environmental Management
  - Chapter 13: Schedule of Environmental Commitments
-

# 14. DESIGN STATEMENT

A Project Design Statement will be produced which sets out how environmental aspects have been incorporated into the scheme design process. Given the nature and location of the scheme it is envisaged that the design statement will focus upon how the landscape and the distinctive cultural heritage features associated with the Comrie Conservation Area have been incorporated into the outline design of the Flood Protection Scheme.

The Design Statement will explain and illustrate the principles and concepts of the design of the proposed development, and will set out the process that has led to the outline design. The Statement will demonstrate how the site and its surroundings have been fully appraised and how the outline design solution takes that context into account.

The Statement will identify how the proposed scheme has taken account of national guidance, design policies within the development plan, the Comrie Conservation Area Appraisal and any supplementary planning guidance. It will summarise all consultation that has been undertaken on issues relating to the design principles and concepts that have been applied to the development, and what account has been taken of the outcome of any such consultation.

Enclosed is a plan setting out the preferred scheme as per the "*Comrie Flood Protection Scheme Feasibility Report*" (WSP, September 2017), and the proposed study area for assessment within the EIA. It should be noted that further design work is proposed to be undertaken, should the scheme extents differ significantly from those reflect in Appendix A Figure 1-1 (Preferred Scheme Layout) then these changes will be consulted upon to ensure any additional baseline information is captured and any associated environmental sensitivities are identified and incorporated into the required assessments.

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# 15. CONSULTATION

In order to inform the EIA process this Scoping Update Report has been issued to those consultees who were originally consulted by Perth & Kinross Council on the Comrie Flood Protection Scheme Scoping Request, these comprise:

- Scottish Environment Protection Agency
- Scottish Natural Heritage
- Historic Environment Scotland
- RSPB Scotland
- Scottish Water
- Scottish Government – Rural Protectorate
- Perth & Kinross Heritage Trust
- Perth & Kinross Council – Biodiversity Officer
- Perth & Kinross Council – Conservation Officer
- Perth & Kinross Council – Community Greenspace
- Perth & Kinross Council – Environmental Health
- Perth & Kinross Council – Forward Planning
- Perth & Kinross Council – Transport Planning

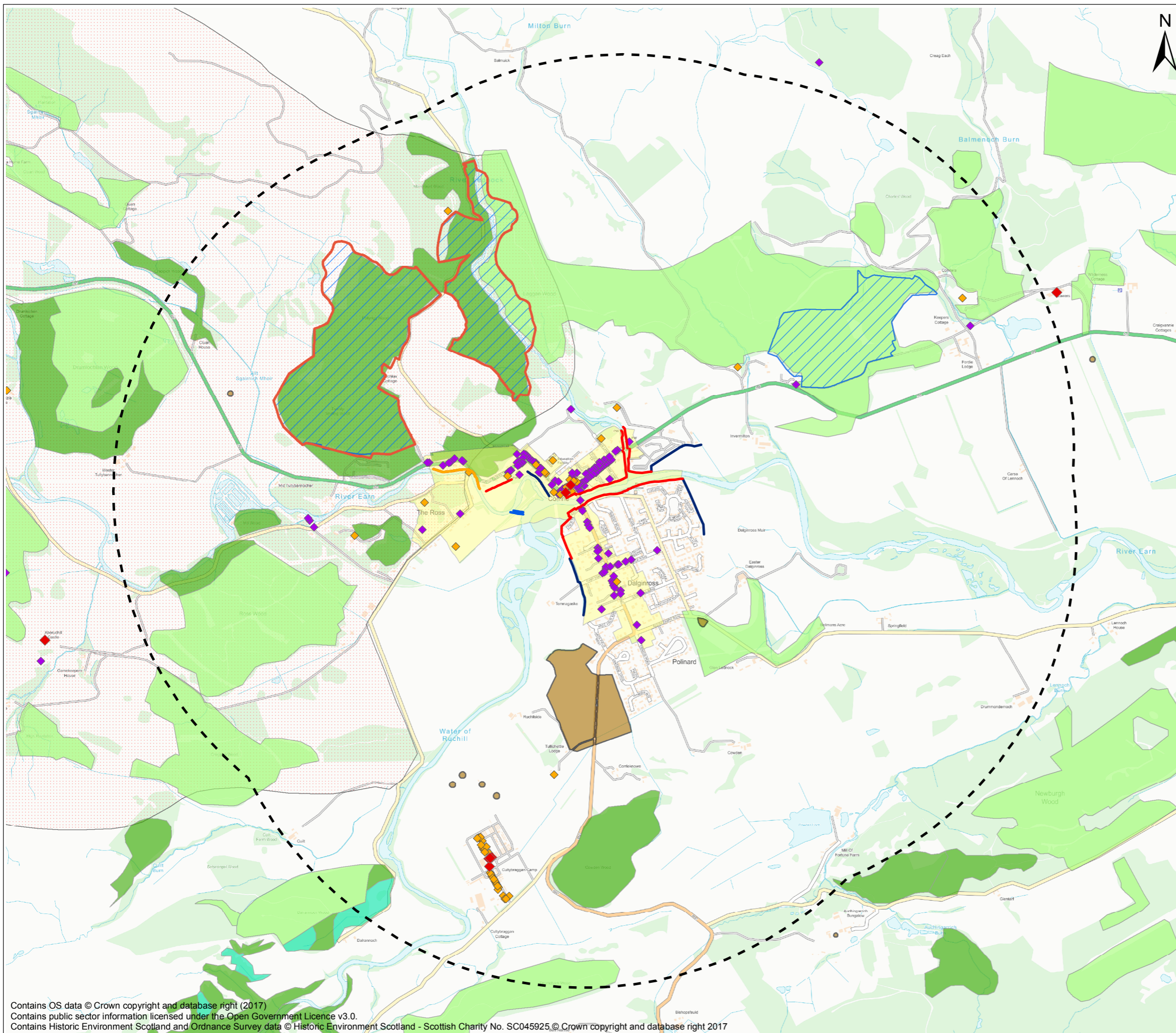
Following the consultation on the EIA Scoping Report Update we will be conducting a wider consultation exercise with other key environmental consultees in order to further inform the baseline studies and subsequent EIA assessments. A list of the proposed additional consultees is provided for comment in Appendix D.

It is anticipated that the EIA will be completed and the proposed scheme published in late 2018 with a view to submitting an application to the Scottish Ministers for deemed planning permission under Section 65 of the Flood Risk Management (Scotland) Act 2009.

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APPENDIX A: FIGURE 1-1  
PREFERRED SCHEME  
LAYOUT



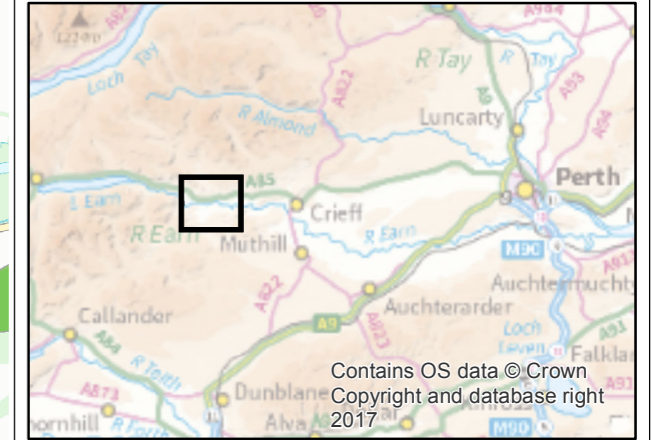
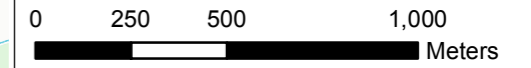
**Legend**

- Indicative 2km scheme buffer
  - Flood defence TBC (refer to note 3)
  - Potential flood relief channels
  - Proposed wall defences
  - Proposed embankment defences
  - Scheduled Monument
  - Conservation Area
  - Special Area of Conservation
  - Site of Special Scientific Interest
  - Ancient Woodland
  - Ancient (of semi-natural origin)
  - Long-Established (of plantation origin)
  - Other (on Roy map)
  - National Scenic Area
- Listed building**
- Category**
- A
  - B
  - C

**Note 1**  
The 2km Buffer surrounding the proposed scheme represents the maximum study area within which the environmental impact assessment will be undertaken. Further details of the individual discipline study areas can be found in the Scoping Update Report (2017).

**Note 2**  
Further design work will be undertaken on the proposed scheme which may necessitate an extension of the flood defences shown. Should the scheme design change the study areas within which the environmental assessment are undertaken will be updated accordingly.

**Note 3**  
The form and design of defences in this area is to be finalised through the design process and is therefore not currently known.



P01.106/10/2017	Work In Progress	JB	RMc
Rev.	Rev. Date	Drawing Suitability	Drawn Appr'd

**SWECO**

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Client

**PERTH & KINROSS COUNCIL**

Project

**Comrie Flood Protection Scheme**

Drawing Title

**Preferred Scheme Layout**

Scale @ A3	1:19,785	DO NOT SCALE
Project No.	119398	Status
BIM No.	N/A	S0

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# APPENDIX B: BASELINE ENVIRONMENTAL REPORT (2015)

# Comrie Flood Protection Scheme

## Environmental Baseline Report

June 2015

*Prepared By:*



*For:*

Perth and Kinross Council

## Document Control Sheet

Project Title            Comrie Flood Protection Scheme  
Document Title        Environmental Baseline Report  
Report Number        1033064-ENV-001  
Revision                0.2  
Status                  Final  
Control Date          June 2015

### ***Record of Issue***

<b>Issue</b>	<b>Status</b>	<b>Author</b>	<b>Date</b>	<b>Check</b>	<b>Date</b>	<b>Authorised</b>	<b>Date</b>
0.1	Draft	C Lucas	May 2015	J Booth	May 2015	R McEvan	May 2015
0.2	Final	C Lucas	June 2015	J Booth	June 2015	R McEvan	June 2015

### ***Distribution***

<b>Organisation</b>	<b>Contact</b>	<b>Copies</b>
Perth & Kinross Council	A Scotland	1
Mouchel	Andrew Williamson	1

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# 1 Introduction

## 1.1 Project Background

The River Lednock and the Water of Ruchill meet the River Earn within the towns of Comrie and Dalginross, 7 miles (11 km) 8 km west of the town of Crieff in Perthshire. Flood waters from these watercourses have historically resulted in flood damage in Comrie and Dalginross. Significant flooding occurred in the Dalginross area in 1993, 1997 and 2006. The most recent flood events were on the 27th August and 19<sup>th</sup> November 2012 (see Figure 1 in Appendix A and Figure 1a: Location Plan below).

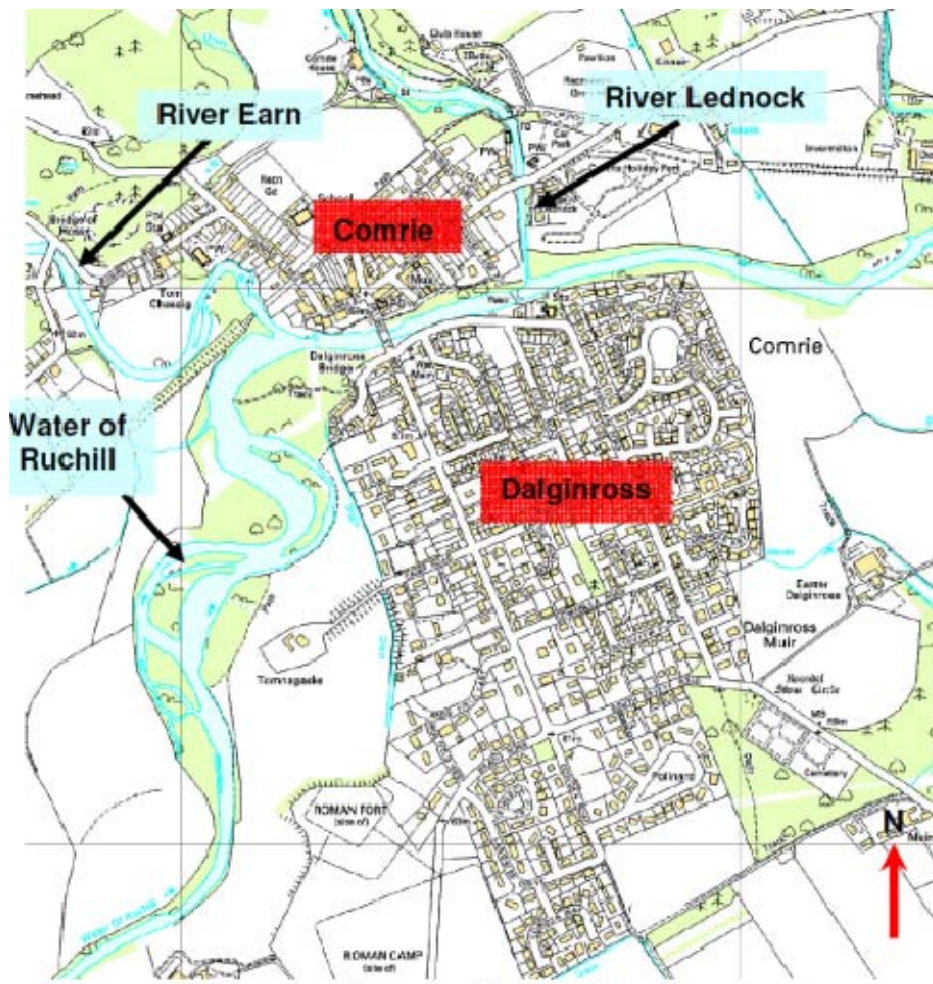


Figure 1a: Location Plan

Previously, Mouchel was engaged by Perth & Kinross Council (PKC) in 2006 and again in 2008 to carry out flood feasibility studies to investigate options to provide flood protection to Comrie. Following the flood in August 2012, PKC commissioned Mouchel to particularly investigate the flood mechanism that allowed flood water from the Water of Ruchill to enter Camp Road and areas close to the property 'Tomnagaske' and to design potential flood protection measures that may alleviate the flooding at this location. During

the development of the Camp Road Flood Protection Scheme a second flood event occurred on 19th November 2012 of a similar magnitude to the flood which occurred on the 27th August 2012. However, the impact of the November flooding was much greater as approximately double the number of properties were affected.

Mouchel has now been commissioned to further develop the previous flood study and in particular to provide details of feasible options to address flood risk in Comrie and Dalginross. As part of this work Mouchel has undertaken a preliminary environmental review to examine existing baseline conditions within the study area and to make further recommendations for environmental assessment.

## 1.2 Purpose of Baseline Report

The purpose of this baseline report is to identify environmental features which may be impacted by the introduction of the Proposed Scheme or that may constrain development of a scheme. The baseline information presented will be used to inform the development of a proposed scheme. In addition, the information in the report will be used to inform a screening request to determine if a statutory Environmental Impact assessment (EIA) will be required for the Proposed Scheme.

## 1.3 Report Content

This Baseline Report considers the following environmental parameters are of relevance and information on the following aspects have been included in this report:

- Planning Policy;
- Land Use;
- Landscape Effects and Visual Impacts;
- Ecology and Nature Conservation;
- Cultural Heritage;
- Geology, Hydrology and Water Resources;
- Socio-economy, Public Access and Amenity; and
- Traffic, Noise and Air Quality.

This Baseline Report is split into five sections:

- Section 1 provides background information on the need for a flood protection scheme and explains the purpose of the report.
- Section 2 provides a brief description of the options being considered.
- Section 3 provides methodology adopted for the scoping study, information on the consultation process applied and the outcome of these consultations.
- Section 4 provides baseline information on the study area gathered as a result of the consultation exercise and a desk study of available environmental information. This has been supplemented by a site visit.
- Section 5 makes recommendations on further environmental assessment.



## 2 Options

### 2.1 Background

Perth & Kinross Council's aim is to deliver a fully designed flood protection scheme to mitigate the effects of flooding in Comrie and Dalginross. The following options have been considered as part of this baseline study (see Figure 2 Scheme Extents and Wider Setting):

- Traditional flood walls and embankments
- Upstream flood water storage on River Earn
- Upstream flood water storage on Water of Ruchill
- Upstream flood water storage on the River Lednock

### 2.2 Primary Flood Protection Measures

The potential extent of the flood protection options is shown in Figure 2. An outline design for the scheme is currently being developed and will be based on the results of hydrological and hydraulic assessment, geotechnical and structural analysis.

Flood walls are proposed along the left and right banks of the River Earn, through the town centre, with the wall on the left bank also extending further west beyond the confluence with the Water of Ruchill. The wall on the right bank of the Earn extends southward at the Water of Ruchill confluence where it is set back from the watercourse following the line of an existing concrete wall. The options include the removal of this concrete wall.

Flood walls are also proposed along both banks of the River Lednock / Lednock Burn from its confluence with the Earn.

From the River Lednock confluence, a flood embankment extends along the left bank of the River Earn. A flood embankment is also proposed around the eastern edge of Dalginross.

Flood storage areas may also form part of the proposed scheme and three such areas have been identified where water could be temporarily stored upstream of Comrie during a flood event (see Figure 2). This would necessitate some local lowering of the land within these sites.

## 3 Methodology

### 3.1 Overview

The baseline information contained within this report has been collated from a desk study. It is recommended that consultation with statutory and non-statutory bodies is undertaken in conjunction with a site walkover to inform of any further environmental assessment. The following data sources have been used:

- Scottish Planning Guidance
  - <http://www.gov.scot/Topics/Built-Environment/planning/Roles/Scottish-Government/Guidance>
- National Planning Framework Scotland
  - <http://www.gov.scot/Topics/Built-Environment/planning/National-Planning-Framework>
- Scottish Planning Policy
  - <http://www.gov.scot/Publications/2014/06/5823>
- TAY Plan
  - <http://www.tayplan-sdpa.gov.uk/>
- National Scenic Areas
  - <http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/national-designations/nsa/>
  - [http://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa\\_code=9145](http://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa_code=9145)
  - <http://crtb.sedsh.gov.uk/spatialDataDownload/dload.asp>
- Perth and Kinross Local Development Plan
  - <http://www.pkc.gov.uk/Local-Development-Plan>
- Protected Species Record:
  - [https://data.nbn.org.uk/https://data.nbn.org.uk/Reports/10km\\_Grid\\_Square/Sector/NN](https://data.nbn.org.uk/https://data.nbn.org.uk/Reports/10km_Grid_Square/Sector/NN)
- EU Protected Species list of those found in Scotland
  - <http://www.snh.gov.uk/docs/B551085.pdf>
- Listed Buildings and Heritage
  - <http://data.historic-scotland.gov.uk/pls/htmldb/>
- Core Path Plan
  - <http://www.pkc.gov.uk/corepaths>

## 4 Baseline Information

### 4.1 Introduction

This chapter provides baseline environmental information for the study area. The study areas and potential areas of influence are defined in Figures 3, 4 and 5.

### 4.2 Planning Policy

In the UK, development is guided and regulated through national, regional and local planning policy.

The National Planning Framework 3 (NPF3) for Scotland published in June 2014 sets out a vision of Scotland, guiding Scotland's development for the next 20 to 30 years and setting out strategic development priorities to support the Scottish Government's central purpose - promoting sustainable economic growth. Planning authorities are required to take NPF3 into account when preparing development plans and it is a material consideration in the determination of planning applications.

The Planning Framework complements the statements of national planning policy set out in the Scottish Planning Policy (SPP). Planning Advice Notes (PANs) and circulars also provide guidance on planning issues.

Development Plans (Structure and Local Plans) form the basis on which decisions about development and future land use are made, and effectively incorporate national, regional and strategic policies within the local framework.

A Strategic Development Plan ("TAYplan") was adopted in June 2012 by Perth & Kinross, Dundee, Angus and Fife Councils. The TAYplan identifies the general scale and location of new development and infrastructure for the Perth & Kinross area within which Comrie and Dalginross are situated. The Perth & Kinross Local Development Plans show the detail of what development should take place for the next ten years reflecting the TAYplan strategy.

At a more local level, the Perth & Kinross Council Local Development Plan (LDP) approved in 2014 sets out the vision for how the region should develop up to 2024 and beyond. The current LDP will be replaced by the Perth and Kinross Local Development Plan 2 2018:2023 which is in preparation. The LDP forms the framework for making decisions on planning applications. The Plan provides all relevant policies and proposals that should be considered for any development proposal. It outlines the means by which sensitive areas are protected from the adverse effects of development and by which sustainable development can be achieved.

The LDP policies of relevance to the proposed flood protection scheme that should be considered further during any further detailed assessment are as follows.

### 4.3 Local Policy

The following local policies within the LDP are considered applicable to the environmental aspects or to the wider scheme.

Place-making Policies:

- Policy PM1: Place making
- Policy PM2: Design Statements
- Policy PM3: Infrastructure Contributions

Community Facilities, Sport and Recreation:

- Policy CF1: Open Space Retention and Provision
- Policy CF2: Public Access

The Historic Environment:

- Policy HE1: Scheduled Monuments and Non-Designated Archaeology
- Policy HE2: Listed Buildings
- Policy HE3: Conservation Areas
- Policy HE4: Gardens and Designed Landscapes
- Policy HE5: Protection, Promotion and Interpretation of Historic Battlefields

The Natural Environment:

- Policy NE1: Environment and Conservation Policies
- Policy NE2: Forestry, Woodland and Trees
- Policy NE3: Biodiversity
- Policy NE4: Green Infrastructure
- Policy NE5: Green Belt

Environmental Resources:

- Policy ER5: Prime Agricultural Land
- Policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes

Environmental Protection and Public Safety:

- Policy EP1: Climate Change, Carbon Reduction and Sustainable Construction
- Policy EP2: New Development and Flooding
- Policy EP3: Water Environment and Drainage
- Policy EP4: Health and Safety Consultation Zones
- Policy EP12: Contaminated Land
- Policy EP15: Development within the River Tay Catchment Area

## Environmental Resources

- Policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes

### 4.4 Land Use

The proposed flood walls and embankments are located alongside the River Earn, River Lednock and Water of Ruchill which flow through the town of Comrie. Land use is therefore generally described as urbanised, with some riparian amenity areas adjacent to the River Earn. A main river crossing provides a road linkage between Comrie with Dalginross at Bridge Street. A network of footpaths and paved footways run adjacent to the River Earn and thereby provide public access close to the watercourse (see Figure 2).

The banks of the River Lednock comprises riparian woodland/scrub habitat and the edges of gardens associated with residential properties. A caravan park is situated close to the confluence of the Earn and the Lednock.

Land use associated with the proposed flood storage areas comprises flood plain land currently used for agricultural or for informal open space/recreation and woodland along the River Earn and Water of Ruchill. Current agricultural land use mainly comprises improved grassland and arable, with some intermittent interconnecting field boundaries. These areas are frequently bordered by trees/woodland, but there no information has been obtained that suggests these wooded areas have any specific commercial value.

### 4.5 Landscape and Visual Amenity

#### 4.5.1 Landscape Designations

The options are not located in areas particularly designated for their landscape value; however, once such site does lie within the wider study area. The River Earn (Comrie to St Fillans) National Scenic Area, shown on Figure 2 is situated to the west.

National Scenic Areas (see Figure 2) are Scotland's only national landscape designation and constitute those areas of land considered of national significance on the basis of their outstanding scenic interest. They have been selected for their characteristic features of scenery comprising a mixture of richly diverse landscapes including prominent landforms, coastline, sea and freshwater lochs, rivers, woodlands and moorlands. LDP Policy ER6: 'Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes' indicates that development and land use change should be compatible with the distinctive characteristics and features of Perth & Kinross's landscapes and that priority will be given to safeguarding and enhancing the landscape of National Scenic Areas.

#### 4.5.2 Landscape Character

Comrie lies west of Crieff where the broad valley of Strathearn narrows at the respective confluences of the Water of Ruchill and River Lednock with the River Earn (see Figure 1).

According to SNH's Tayside Landscape Assessment<sup>1</sup> Comrie falls within the regional character area, Tayside Lowlands, and within the Broad Valley Lowlands landscape character area, defined as follows:

*"These areas (the 5 broad lowland glens or straths) share a range of common characteristics which set them apart from other valleys and glens. There are, however, significant variations in landscape character within this type. Strathearn, extends from Crieff eastwards to the Bridge of Earn, and to the south is the enclosed slopes of the Ochills, while to the north the Gask Ridge separates it from the valley of the Pow Water. Strathearn is considerably narrower and less extensive than other broad lowland glens and the River Earn is more prominent feature in the landscape, its broad meanders swinging back and forth across the floodplain. Overall, the strath retains a rich, well-wooded agricultural landscape, particularly towards the east."*

At a more local level, the landscape of the flood storage areas comprises flat floodplain which is influenced by agricultural practices and informal recreational use. Woodland is also a feature of the landscape, generally associated with the riparian corridor of the Water of Ruchill and the River Earn and the boundary edges of fields.

The location for the flood walls and embankments can generally be characterised as an urban landscape associated with the centre of Comrie, although the riverside setting and amenity grassland areas does increase the value of the landscape within this urbanised context.

#### 4.5.3 Visual Amenity

In terms of potential visual receptors within and in the vicinity of the proposed flood protection measures, there are several residential properties / gardens and the caravan site in close proximity where views of the river may be gained. Views may also be gained from the local road network and residential properties (see Figure 2).

## 4.6 Ecology and Nature Conservation

### 4.6.1 Nature Conservation Designations

There are three International/European Designated Sites within 10km of the options (see Figure 3).

The Upper Strathearn Oakwoods Special Area of Conservation (SAC) is divided into three separate areas situated immediately northwest and southeast of Comrie. The first area lies adjacent to the River Lednock approximately 130m to the north west of the proposed flood wall locations and 2 km to the east from the River Earn storage area, the second Upper Strathearn Oakwood SAC is situated 400m to the north of the proposed flood wall and 1.6km to the south of the Lednock storage area and the third is approx. 7km to the south east of the flood wall. This site covers an area of approx. 150 hectares (ha) and is designated for its old sessile oak woods with *Ilex* and *Blechnum*. The site includes one of the most extensive deciduous woodlands in Tayside, formerly managed

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<sup>1</sup> Land Use Consultants (1999). Tayside Landscape Character Assessment. Scottish Natural Heritage Review No. 122.

for coppice wood production. One of the woods is also of national importance for its lichen flora.

The Glenartney Juniper Wood SAC is situated approximately 600m to the south of the Water of Ruchill storage Area and is approximately 101ha in size. Glenartney holds the largest extent of *Juniperus communis* formations in Tayside at the southern edge of the Scottish Highlands. The juniper occurs widely at moderate altitude within a wide range of habitat mosaics, including acidic heaths, rush-pasture, bracken *Pteridium aquilinum* and grasslands.

The South Tayside Goose Roosts Special Protection Area (SPA) and RAMSAR site, designated under the Birds Directive, is situated 9.2km to the east of the Water of Ruchill storage area and 7.5 km to the south east of the proposed flood walls. There is second section to the South Tayside Goose Roosts, approx. 15km to the south of the proposed options, but it is thought to be outside the area of influence. The South Tayside Goose Roosts SPA covers an area of approximately 331ha. This site qualifies under Article 4.2 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

- Over winter populations of Greylag Goose *Anser anser*, and
- Over winter populations of Pink-footed Goose *Anser brachyrhynchus*.

It also qualifies for the SPA status as it regularly supports at least 20,000 waterfowl.

SACs and SPAs are strictly protected sites designated under the EC Habitats Directive and the Birds Directive respectively and are called Natura sites. They are internationally important for threatened habitats and species. Natura sites form a unique network of protected areas which stretches across Europe. SACs are included under Policy RC1 (Town and Neighbourhood Centres), and RD3 (Housing in the Countryside) of the Perth and Kinross LDP. SPAs and SACs are included under Environment and Conservation Policy NE1 (International Nature Conservation Sites) of the Perth and Kinross LDP.

There are three Special Sites of Scientific Interest (SSSI) within 1km of the proposed options (see Figures 4b, 4c and 4d), Comrie Woods SSSI, Glenartney Juniper Wood SSSI and Craig More SSSI.

Craig More SSSI (see Figure 4b and 4d) is located on the north side of the A85, one mile to the east of the village of Comrie and approx. 500m to the northeast of the proposed flood wall. This site is designated for its geological attributes and is therefore discussed under Section 4.8.

The Comrie Woods SSSI (see Figure 4b and 4d) is situated immediately south of the Lednock holding area. Comrie Woods SSSI forms part of the Upper Strathearn Oakwoods SAC, important for its upland oak woodland. The site is in two sections; the western section lying on the low hillsides to the west of the minor road running from Comrie up Glen Lednock and the eastern section situated on both sides along the River Lednock. The SSSI covers the woodlands in the valley of the River Lednock together with Pollyrigg and Twenty Shilling Woods which lie on two hills to the west of Glen Lednock.

Comrie Woods was selected as a SSSI on the basis that it represents one of the largest areas of sessile oak wood in Perth and Kinross. There is a good diversity of woodland

habitat types with some areas of alder wood and fragments of richer woodland, including ash, hazel, and wych elm, in the gorge adjacent to the River Lednock. The total broadleaved woodland area (not continuous) is 81.4 hectares. The woodland is mainly of Ancient Semi-Natural origin and is notable for a few exotic tree species; namely mature and regenerating beech which is a threat to the oak wood in the long term.

Glenartney Juniper Wood SSSI (see Figure 4c) is situated within the Glenartney Juniper Wood SAC (see above for designation description) 600m to the south of the Water of Ruchill storage area.

SSSIs are those areas of land and water considered to best represent our natural heritage - its diversity of plants, animals and habitats, rocks and landforms, or combinations of such natural features. SSSIs are designated and protected by the Nature Conservation (Scotland) Act 2004 and the Wildlife and Natural Environment (Scotland) Act 2010. SSSIs are protected from inappropriate development by the Strathmore and Glens Area Spatial Strategy of the Perth and Kinross LDP.

#### 4.6.2 Woodland and trees

No Tree Preservation Orders (TPO) have been identified within the study area to date however Comrie is a Conservation Area. All trees in the Conservation Area are protected if they have a stem diameter of 75 millimetres measured at 1.5 meters from ground level. All trees in a Conservation Area are protected from pruning, lopping or felling without prior application to the Local Authority.

There are, however, areas of ancient woodland and long-established woodland within the study area, as shown on Figures 4a to 4d.

#### 4.6.3 Protected Species Records

A desktop search of the National Biodiversity Network (NBN) and SNH records indicate that the following species of conservation concern are potentially within 2km of the extent of the options:

- Grey squirrel *Sciurus carolinensis*
- Red squirrel *Sciurus vulgaris*
- Pipistrelle bat *Pipistrellus pipistrellus*
- Soprano bat *Pipistrellus pygmaeus*
- Otter *Lutra lutra*
- Slow worm *Anguis fragilis*
- Atlantic salmon *Salmo salar*
- Sea Trout *Salmo trutta* and
- Lamprey *spp.*

The River Earn, the Water of Ruchill and the Lednock Water/Burn are all protected under the EC Freshwater Fish Directive (2006/44/EC) as salmonid waters.



Further consultation with statutory and non-statutory consultees will be undertaken to establish species records and to inform further surveys on completion of the outline scheme design.

## 4.7 Cultural Heritage

### 4.7.1 Overview

There are several designated sites / features of cultural heritage interest within the vicinity of the Proposed Scheme. These sites and their designations are listed below and indicated on Figures 5a to 5d.

### 4.7.2 Scheduled Ancient Monuments

Scheduled Ancient Monuments (SAMs) are nationally important sites and monuments that are legally protected under the Ancient Monuments and Archaeological Areas Act 1979.

There are no SAMs adjacent to the flood protection options, however the following SAM lies approximately 300m to the south of the Comrie flood defence shown on Figure 5d:

- Dalginross, Roman Fort and Camp, and stone circle – comprises the remains of a Roman fort and temporary camp represented by cropmarks, and a stone circle of prehistoric date.

Policy HE1 of the Perth and Kinross LDP covers the protection of Scheduled Ancient Monuments.

### 4.7.3 Listed Buildings

Listed Buildings (or structures) are notified due to their special architectural or historic interest. There are three categories of Listed Building: Category A (national or more than local importance); Category B (primarily local importance); and Category C(S) (may have been altered but retain elements of interest).

There are a number of Listed Buildings within Comrie and Dalginross (see Figure 5d), including the following:

- the Dalginross Bridge over the River Earn (Cat C);
- numerous properties on the left bank of the River Earn, set back along the river frontage and adjoining streets along Drummond Street, Dundas Street and Burrell Street (Cat A, B and C);
- old parish church (now Comrie Youth Centre Flambeaux Club) Dunira Street (Cat A) and church yard (Cat B);
- war memorial institute Bridgend (Cat C);
- Comrie post office buildings Bridge Street (Cat C);
- Comrie and Strowan parish church (Cat C);
- Schoolhouse Dundas Street (Cat B);
- Dunira Sawmill (Cat B);

- Dalchonzie Mill Bridge of the River Earn (Cat C);
- Bridge of Ross over River Earn (Cat B); and
- properties in the centre of Dalginross along Bridge Street and other adjoining streets, away from the location of the proposed flood defences;

Policy HE2 of the Perth and Kinross LDP insures that Listed Buildings are protected from unsympathetic alterations or works within the curtilage or in the general vicinity of the building which could damage the character of the building and/or impact on its setting.

#### 4.7.4 Designed Landscapes

The Inventory of Historic Gardens and Designed Landscapes in Scotland, identifies those sites which are considered by SNH and Historic Scotland to be of national importance and which merit protection. The following such sites are situated in the study area (see Figures 5a and 5d):

- Dunira (see Figure 5a) – a 340 ha site in which the northern section of the River Earn storage area is situated.
- Aberuchill Castle (see Figure 5d) – a 308 ha site situated approximately 500m to the west of the flood walls and embankments.

Policy HE4 of the Perth and Kinross LDP seeks to protect and enhance Historic Gardens and Designed Landscapes and therefore considers development affecting the integrity of these sites through direct impact or impacts on their setting.

#### 4.7.5 Conservation Area

The area of Comrie (see Figure 5d) to the north of the River Earn is identified as a Conservation Area. The south western quarter of the town to the south of the River Earn, is also identified as a Conservation Area and, in accordance with General Policy HE3 of the Perth and Kinross LDP development within the Conservation Area must “preserve or enhance its character or appearance. The design, materials, scale and siting of new development within a conservation area, and development outwith an area that will impact upon its special qualities should be appropriate to its appearance, character and setting”.

#### 4.7.6 Other Archaeological Features

Other numerous sites and features have been recorded throughout the study area (both on the National Monuments Record of Scotland (RCAHMS) and the Scottish Sites and Monuments Record (local authority) and are generally associated with the designated sites listed above.

Further consultation will be undertaken with relevant statutory and non-statutory organisations to inform the identification and assessment of heritage assets.

## 4.8 Geology, Hydrology and Water Resources

### 4.8.1 Designated Sites

There are no geological Sites of Special Scientific Interest (SSSI), Regionally Important Geological Sites (RIGS) or other designated sites of geological value adjacent to the proposed options.

Craig More geological SSSI lies on the wooded slopes of Craig More approx. 500m northeast of the flood walls and covers an area of around 28 hectares (see Figures 4b and 4d). This SSSI contains excellent exposures of a large body of igneous rock (rock formed through the cooling of molten rock, or magma) called the Comrie Pluton. This pluton would have been formed about 400 million years ago by the cooling and crystallisation of magma deep within the Earth. This example is part of a large suite of plutons across the Highlands and Southern Uplands, collectively known as the Newer Caledonian Granites. Craig More SSSI is important both historically, as one of the places where this type of metamorphism was first studied, and for research and education.

### 4.8.2 General Geology

In terms of general geological conditions, two major groups and ages of rocks are found in the Strathearn area of Perthshire. These are separated by the Highland Boundary Fault (HBF) which is a major fracture running NE - SW across Scotland. To the north of the fault line lie the crystalline metamorphic rocks of Precambrian to Lower Cambrian age (older than 590Ma) of the Scottish Highlands. These contain igneous intrusions of Caledonian age. South of the HBF are younger sedimentary rocks with lava extrusions (Lower Devonian) which form the Ochil Hills on the southern fringes of Strathearn. The relative hardness of Highland metamorphic rocks, the sediments and the lavas have resulted in erosion into the 3 different landscapes of present day Strathearn: the craggy Highlands rising to 985m, the relatively flat valley floor and the modest Ochil Hills. Comrie lies just to the south of the HBF.

The Comrie and Dalginross areas are located on the Upper Earn bedrock and localised sand and gravel aquifers. Part of these aquifer are considered to be Water Protection Zones but none of the proposed options is within this zone.

### 4.8.3 Surface Water and Water Quality

The EC Water Framework Directive (WFD) was introduced to national legislation through the Water Environment and Water Services (Scotland) Act 2003. The Directive, through the Act, introduces a different approach to the management and regulation of the water environment than previous regimes. A central part of this Directive is the preparation of River Basin Management Plans that aim to protect and improve the water environment from current status.

The River Earn emerges from the eastern end of Loch Earn at St Fillans (Loch Earn itself extends some 10.5 km from St Fillans to Lochearnhead). The River Earn flows 51 km eastwards through Strath Earn, eventually meeting the River Tay at the head of the Firth of Tay near Bridge of Earn and discharging to the Tay Estuary. On its course it passes the settlements of Comrie and Crieff and is crossed by bridges at Kinkell, Dalreoch, Dupplin and Bridge of Earn.

The Water of Ruchill is a tributary of the River Earn, which drains east to the Firth of Tay. The Ruchill drains a 99.5 km<sup>2</sup> area of diverse and steep topography – the altitude ranges from 984m at Ben Vorlich to less than 80m at the point where the Ruchill discharges into the River Earn at Comrie.

The River Lednock rises as headstreams on the slopes of Ruadh Mheall and flows eastward passing through Loch Lednock then south, through Glen Lednock to join the River Earn at Comrie. The Falls of Lednock, which include the Deil's Caldron, are located on the river a mile (1.5 km) north of Comrie.

After prolonged periods of rainfall within these catchments the ground becomes saturated and further rainfall causes the rivers to rise rapidly - this is most pronounced in the case of the Ruchill. Water can be held back in Loch Earn by a gating system, but for only a limited period of time.

Under the WFD, there are ecological status and chemical status classification schemes for surface waterbodies, with differing ecological status classification schemes for rivers, lakes, transitional waters and coastal waters. Heavily modified and artificial water bodies are assessed in relation to their ecological potential and chemical status.

The quality elements relevant in assessing ecological status and ecological potential for surface waters are:

- Biological quality elements (covering algae, plants, fish and invertebrates);
- General physico-chemical quality elements;
- Environmental Quality Standards (EQSs) for specific pollutants (i.e. synthetic and non-synthetic pollutants); and
- Hydromorphological quality elements.

Surface water bodies are assigned to one of five ecological status classes (high, good, moderate, poor or bad) or one of five ecological potential classes (maximum, good, moderate, poor or bad). The status assigned is determined by the worst classed quality element.

There are two surface water chemical status classes; Good and Not Good. 'Not good' applies if an EQS for one or more relevant priority substances or dangerous substances is exceeded. The surface water chemical status classification scheme is common to all surface water bodies.

To achieve overall "good status", a surface water needs to be at least good for ecological and chemical status.

The classification data shown in Table 1 below has been obtained for the three watercourses under consideration.

**Table 1: Water Framework Directive River Classification Data**

River	Overall Status (at 2008)	2015 Objective	2021 Objective	2027 Objective
Water of Ruchill	High	High	High	High
River Earn (Loch Earn to Water of Ruchill confluence) – upstream of Comrie	Moderate (ecological potential) – heavily modified	Moderate	Moderate	Moderate
River Earn (Water of Ruchill to Ruthven Water confluence) – downstream of Comrie	Good	Good	Good	Good
River Lednock/Lednock Burn	Bad (ecological potential) – heavily modified	Bad	Good	Good

The current status of the Water of Ruchill and the River Earn, downstream of Comrie, meets the requirements of the WFD therefore it is important to ensure that no deterioration from good status occurs.

## 4.9 Socio-economy, Public Access and Amenity

### 4.9.1 Socio-economy

Aspects of socio-economy relevant to this study relate to the following:

- Land use and agricultural practices.
- Fishing activity along the three watercourses.

These aspects may be influenced by the options and therefore will require further consideration and detailed assessment.

### 4.9.2 Public Access and Amenity

Under the Land Reform (Scotland) Act 2003, local authorities are required to produce a Core Path Plan which includes “a system of paths sufficient for the purpose of giving the public reasonable access throughout their area.” Such paths may include rights of way, other existing paths or tracks, paths created by a path agreement or any other routes, waterways or places where people may cross land. A Core Paths Plan (January 2012) has been produced by Perth & Kinross Council and core paths identified within the study area include the following:

In the vicinity of the flood wall and embankments (see Figure 2):

- From the north of the River Earn in Comrie incorporating Monument Road, Burrell Road, School Road, Dunira Street, Neville Lane, Bark O Toon Lane, Nurses Lane and along the B827 (Bridge Street).
- South of the River Earn from Bridge Street through Dalginross, along Field of Refuge, Camp Road, along South Crieff Road, Cowden Road and around the edge of the housing estate to the east of Cowden Road.

- From Dundas Street along School Road and Melville Lane to the north of the River Earn and the A85, routing past the caravan park to join the line of a dismantled railway.
- On the eastern side of Dalginross, on the right bank of the River Earn, a core path arises off Strowan Road and routes close to the river.
- On the western side of Dalginross, at the Bridge Street crossing of the River Earn, a core path meanders to the floodplain and banks of the Water of Ruchill.

In terms of public amenity in the town centre, there are areas of open space / parkland adjacent to the River Earn. With regard to the proposed flood storage areas, access is available via the local road network and a series of tracks and paths. There is an informal path across the Water of Ruchill floodplain and adjacent to the river and this route is being promoted as a Core Path as indicated above.

Core paths in the vicinity of the upstream storage areas (River Earn and Lednock) have been identified as (see Figure 2):

- Along the southern bank of the River Earn between Dalchonzie Fruit Farm and Riverside Wild Garden. This core pathway passes through the River Earn storage area.
- Along the western bank of the River Lednock between the river and Monument Road. This core pathway passes to the south east of the River Lednock storage area.
- Through Laggan Wood along the eastern bank of the River Lednock. This core pathway passes through the River Lednock storage area.

#### 4.10 Traffic, Noise and Air Quality

Comrie and Dalginross are served by trunk road links (the A85) from the east and west, with a B-road link from the south. It has the usual local road and public access arrangements associated with a small size town. As with all town centres, there are elevated air and noise emissions mainly associated with traffic and day-to-day activities of residents and visitors. Ambient air quality in the vicinity of the flood protection options is, however, anticipated to be relatively good considering the size of the surrounding built up area. As the embankments and walls are situated within an urban area, traffic emissions are anticipated to comprise the main source of air pollution. Similarly, the emissions associated with the three storage areas will arise from use of the local road network. The construction of the options is likely to increase the volume of Heavy Duty Vehicles using the local roads, further assessment may be necessary to quantify the likely effect on local air quality and dust deposition from the construction works and associated traffic.

The Proposed Scheme is located in areas which can be described as generally being quiet in terms of ambient noise levels. There are, however, several locations where the proposed flood measures are adjacent to roads, individual residences or the edges of built up areas. In the absence of noise level data, existing background noise sources are

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assumed to be relatively low and, as for air quality, mainly associated with vehicular use of the local road network.

No significant existing sources of noise nuisance have been identified.

## 5 Key Potential Impacts

### 5.1 Introduction

This chapter presents an outline of the potential environmental impacts and issues that may need to be considered further through detailed environmental assessment. The following summary of potential issues describes both the potential positive or negative impacts on the physical, natural and human environment, which might result from the implementation of the flood protection options.

### 5.2 Summary of Key Issues

Key environmental issues where potential impacts (positive and negative) may arise are identified as follows:

- Beneficial effect of reduced flooding in the town centre.
- Negative temporary impacts from construction activities and permanent earthworks on landscape character / visual amenity.
- Negative visual impacts to receptors associated with the proposed wall and embankments.
- Adverse effects on flora and fauna, including protected habitats and species, due to temporary and permanent loss of habitat, construction disturbance and pollution.
- Impacts on breeding bird habitat. A range of common birds may nest in trees, scrub, ground cover or in riparian vegetation.
- Opportunity to enhance habitats for fauna within the catchment through wetland creation.
- Indirect impact on setting of SAMs, listed buildings and conservation area.
- Permanent loss / temporary loss / disturbance of agricultural land as a result of requirement for flood storage areas and water inundation.
- Implications for existing hydrogeological regime and hydrogeomorphology of watercourses - erosion, deposition and sediment transport.
- Impacts on access, e.g. public footpaths and cycleways, and amenity areas during construction and, potentially, operation.
- Opportunity to increase public amenity through landscaping enhancements.
- Sensitive receptors may experience temporary disturbance to the road network during the construction phase.

It is proposed that the above aspects will form the basis of any further and more detailed environmental assessment deemed necessary. Other aspects will be included where relevant and identified through EIA screening and scoping and further development of the scheme design.



There are specific impacts, explained below, which could inform scheme design and should be considered before seeking a screening opinion for a proposed scheme.

Construction of the River Earn or Water of Ruchill storage areas is unlikely to give rise to significant impacts. However, impacts that will require further assessment could include, but not be limited to; dust deposition, increased sedimentation and accidental spillages. These impacts are envisaged to be temporary, relatively short term and mitigated through the use of sensitive and appropriate construction methods outlined in a Construction Environment Management Plan (CEMP).

There is one listed building close to the proposed storage area on the River Earn but with the introduction of screening the potential impacts to the setting of this building are likely to be reduced. Due to the size of this storage area a portion of ancient woodland would be inundated with water and potentially removed. There is also a core path that runs through the proposed area which would need to be stopped up or diverted.

The Water of Ruchill storage area is also located in an area of ancient woodland which would be inundated with water or removed. Avoidance of ancient woodland is recommended although it has no statutory protection from development within it. A further Habitat Regulation Assessment (HRA) would be required to determine impacts to the Glenartney Woods SAC.

The River Lednock storage area is located within agricultural land which would be inundated but this is unlikely to give rise to significant impacts. However, this storage area is located adjacent to and upstream of the Upper Strathearn Oakwoods SAC and Comrie Woods SSSI. The construction and operation of this storage area could lead to direct and significant impacts to the flora and fauna which are present in the SAC and downstream as the natural flow and retention of water through the site could be altered by the control of waters upstream. A further HRA will be required to determine the magnitude of these potential impacts.

The proposed walls and embankments within Comrie are unlikely to have significant impacts on ecological designated sites. However, the proposals will be constructed within a Conservation Area, within sight of numerous listed buildings and the SAM. The setting of both of these will be impacted by the proposed walls and embankments is anticipated to require further consideration.

It is unlikely that any of the proposed options would have impacts on the South Tayside Goose Roosts SPA and RAMSAR site but a further HRA would be required in order to potentially scope these out of an EIA.

The proposed storage areas, wall and embankments may have impacts on the hydrogeomorphology of the River Earn, Lednock and Water of Ruchill. These impacts could affect terrestrial and aquatic ecology, water abstraction and agriculture and would require further consideration to ensure that these, and other potential impacts, can be mitigated through tertiary measures.

Potential construction impacts to air quality and ambient noise levels are expected to be short term and not significant but may require further consideration.

### 5.3 Environmental Impact Assessment

This Baseline Report has been carried out with reference to the Town & Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011, as amended (referred to as the EIA Regulations), which implement Council Directive No. 85/337/EEC on the assessment of the effects of certain public and private projects on the environment (the EIA Directive), as amended by Council Directive No. 2011/92/EU.

The EIA Directive's main aim is to ensure that the authority giving the primary consent (the 'competent authority') for a particular project makes its decision in the knowledge of any likely significant effects on the environment. The Directive therefore sets out a procedure that must be followed for certain types of project before they can be given 'development consent'. This procedure – known as Environmental Impact Assessment (EIA) – is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This helps to ensure that the importance of the predicted effects, and the scope for reducing them, are properly understood by the public and the relevant competent authority before it makes its decision.

Considering the criteria in the EIA Regulations, flood protection works are listed as Schedule 2 development and the 'area of works' proposed for the flood protection scheme for Comrie and Dalginross is likely to exceed the relevant threshold listed within this schedule i.e. greater than 1 hectare.

It is therefore recommended that the information in this report is transposed into a screening request to determine whether a statutory EIA is required for the Proposed Scheme.

## Appendix A: Figures

Figure 1: Location Plan

Figure 2: Scheme Extent and Wider Context

Figure 3: European Designated Sites

Figure 4: Ecological Extents

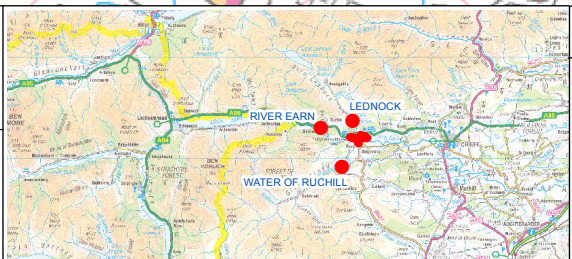
Figure 5: Cultural Heritage Assets

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<b>Legend</b>
Potential Flood Defence Wall
Potential Flood Storage Area

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Issued only for purpose Indicated <b>INFORMATION</b>	Title <b>LOCATION PLAN</b>

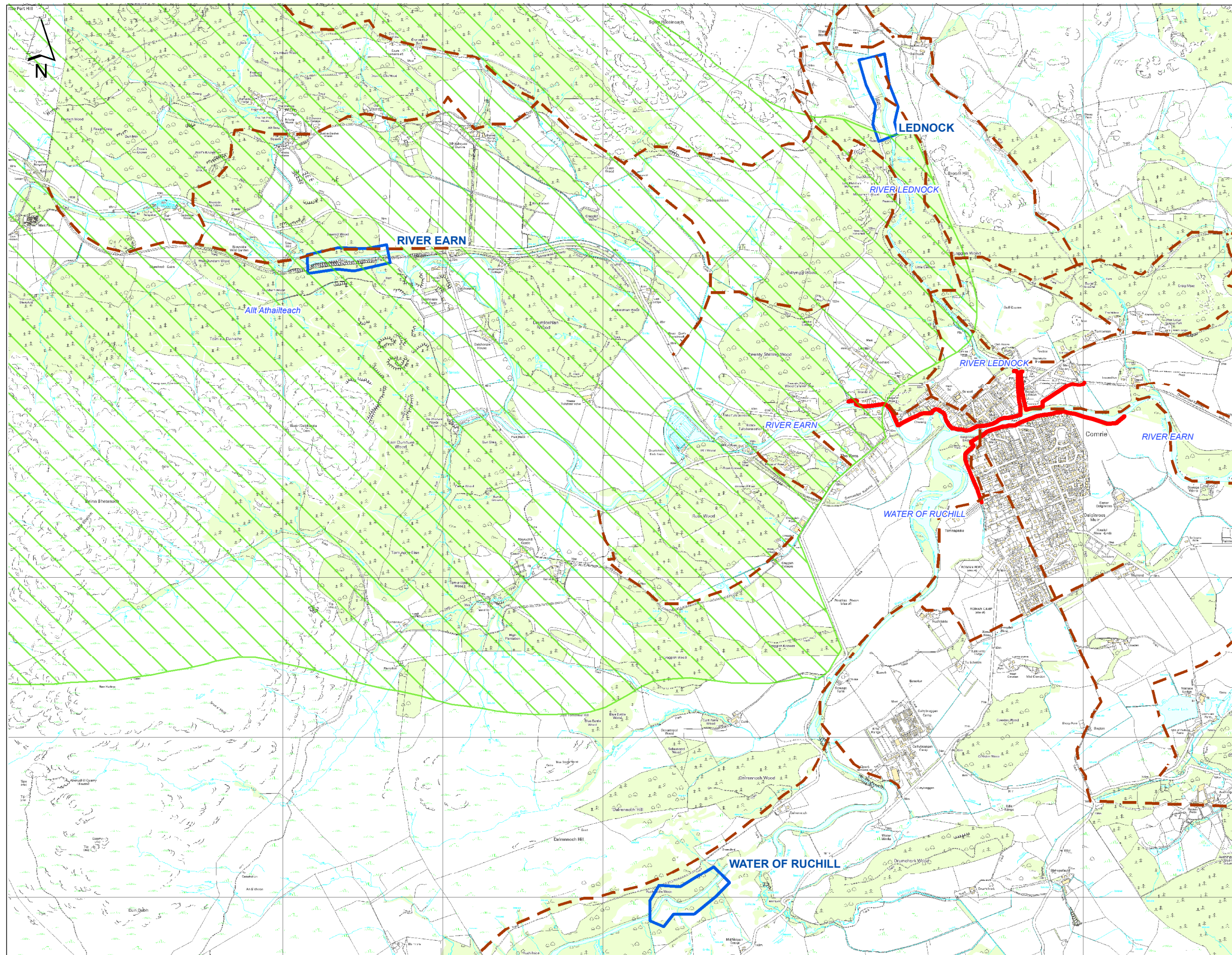


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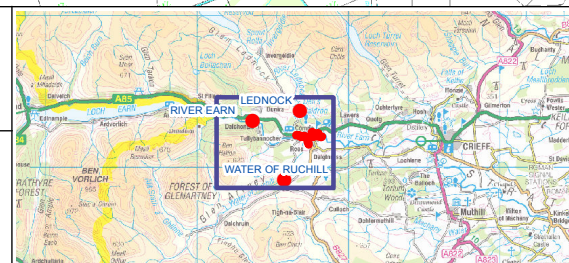



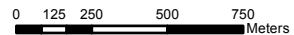
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-  Potential Flood Defence Wall
-  Potential Flood Storage Area
-  Core Path
-  National Scenic Area

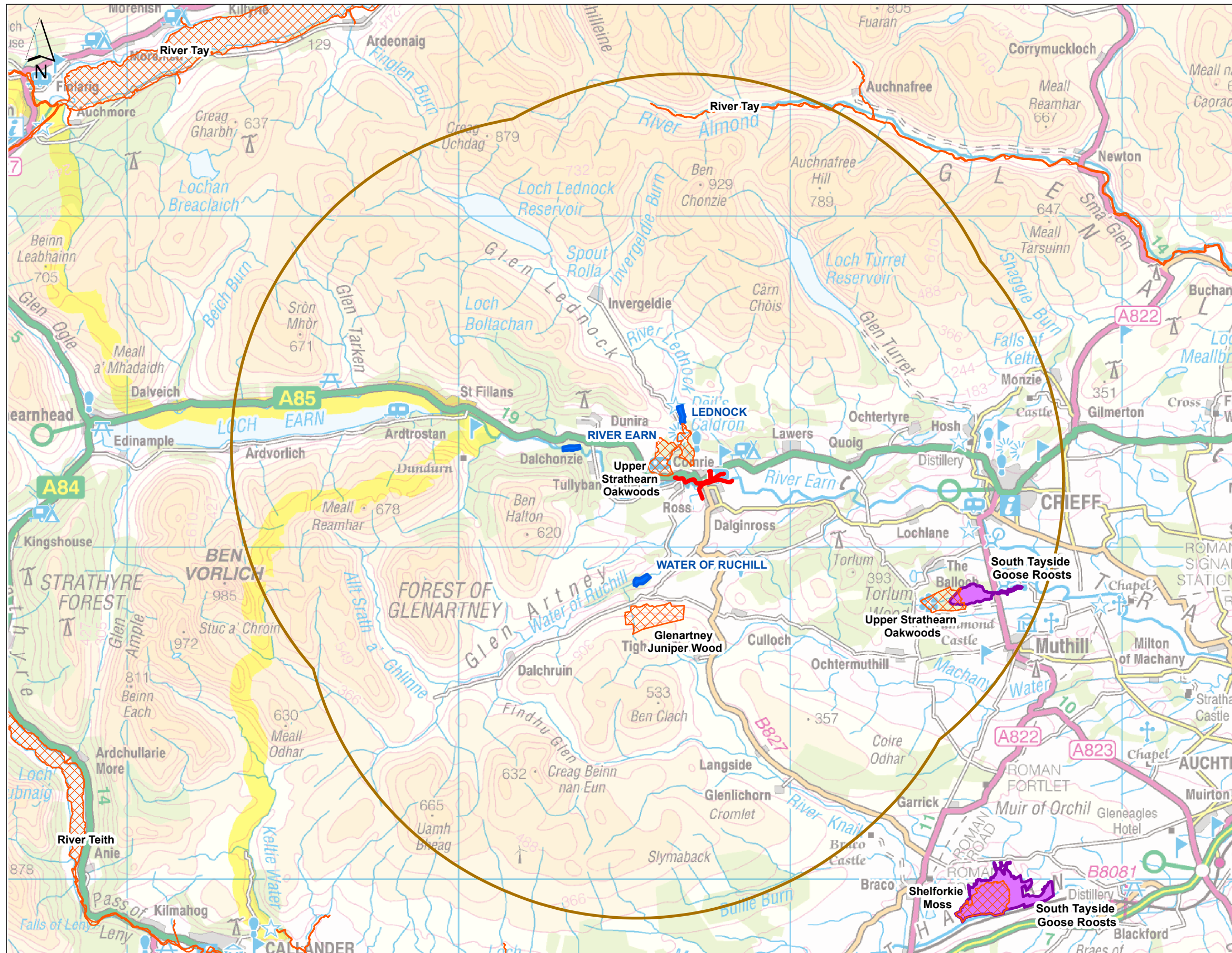
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**SCHEME AND WIDER SETTING**










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			Drawing No. <b>FIGURE 2</b>		Issue 1
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### Legend

-  Potential Flood Defence Wall
-  Potential Flood Storage Area
-  10km Study Area
-  Ramsar
-  Special Protection Area (SPA)
-  Special Area of Conservation (SAC)

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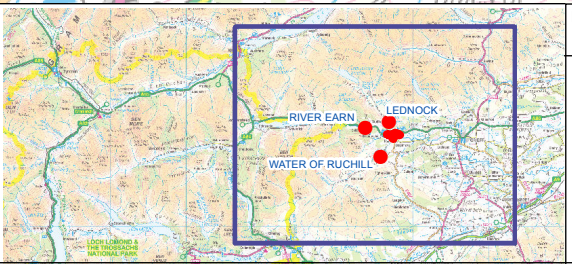
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**INTERNATIONAL / EUROPEAN DESIGNATED SITES**



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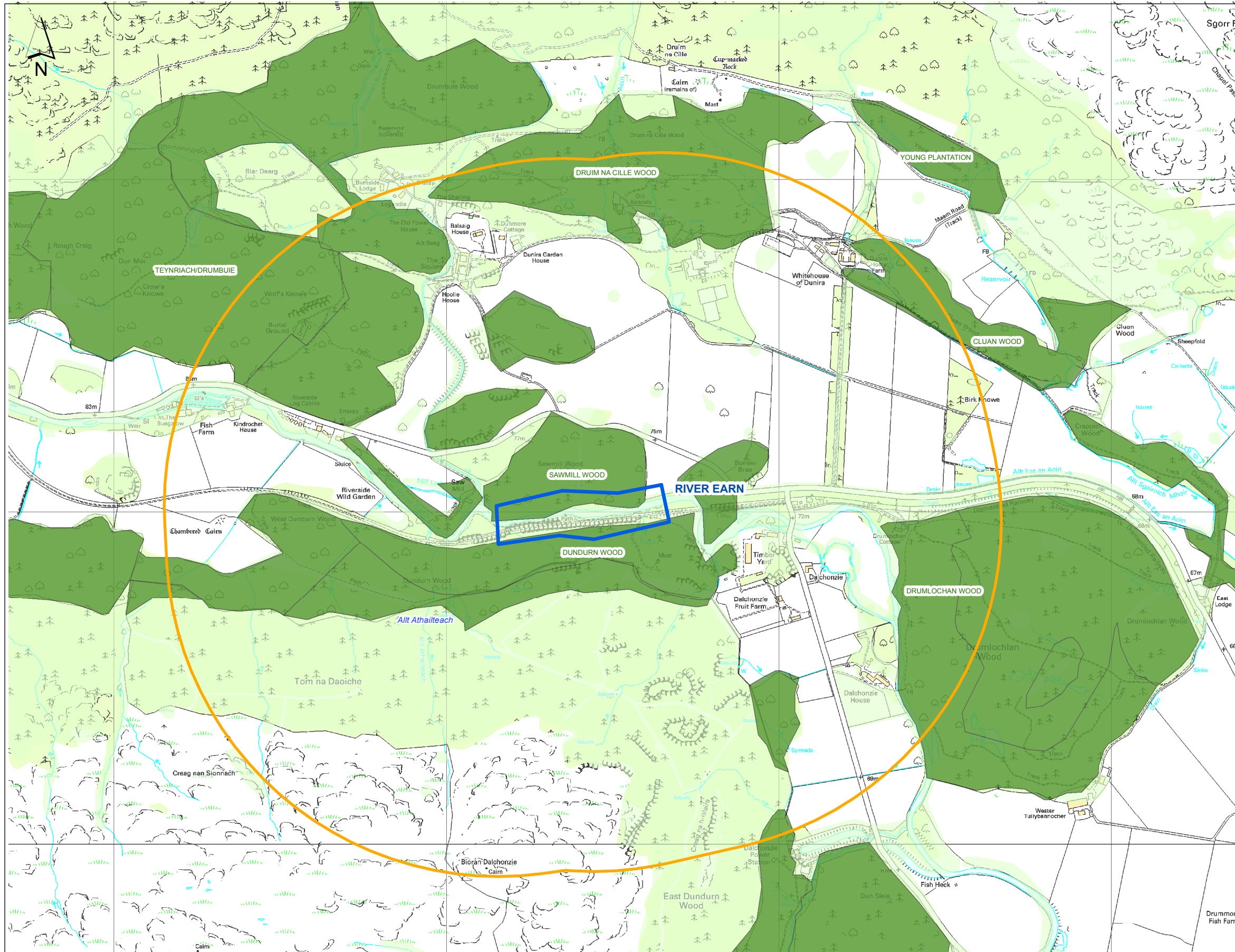
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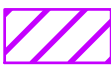


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**Legend**

-  Potential Flood Storage Area
-  1km Study Area
-  Site of Special Scientific Interest (SSSI)
-  Ancient Woodland
-  Semi Natural Ancient Woodland

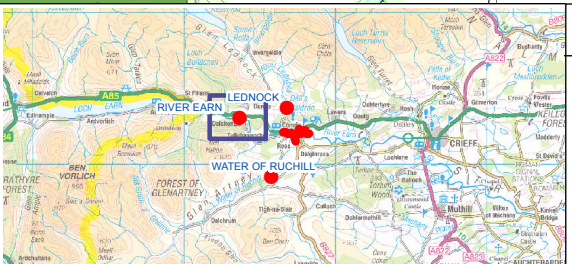
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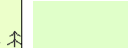
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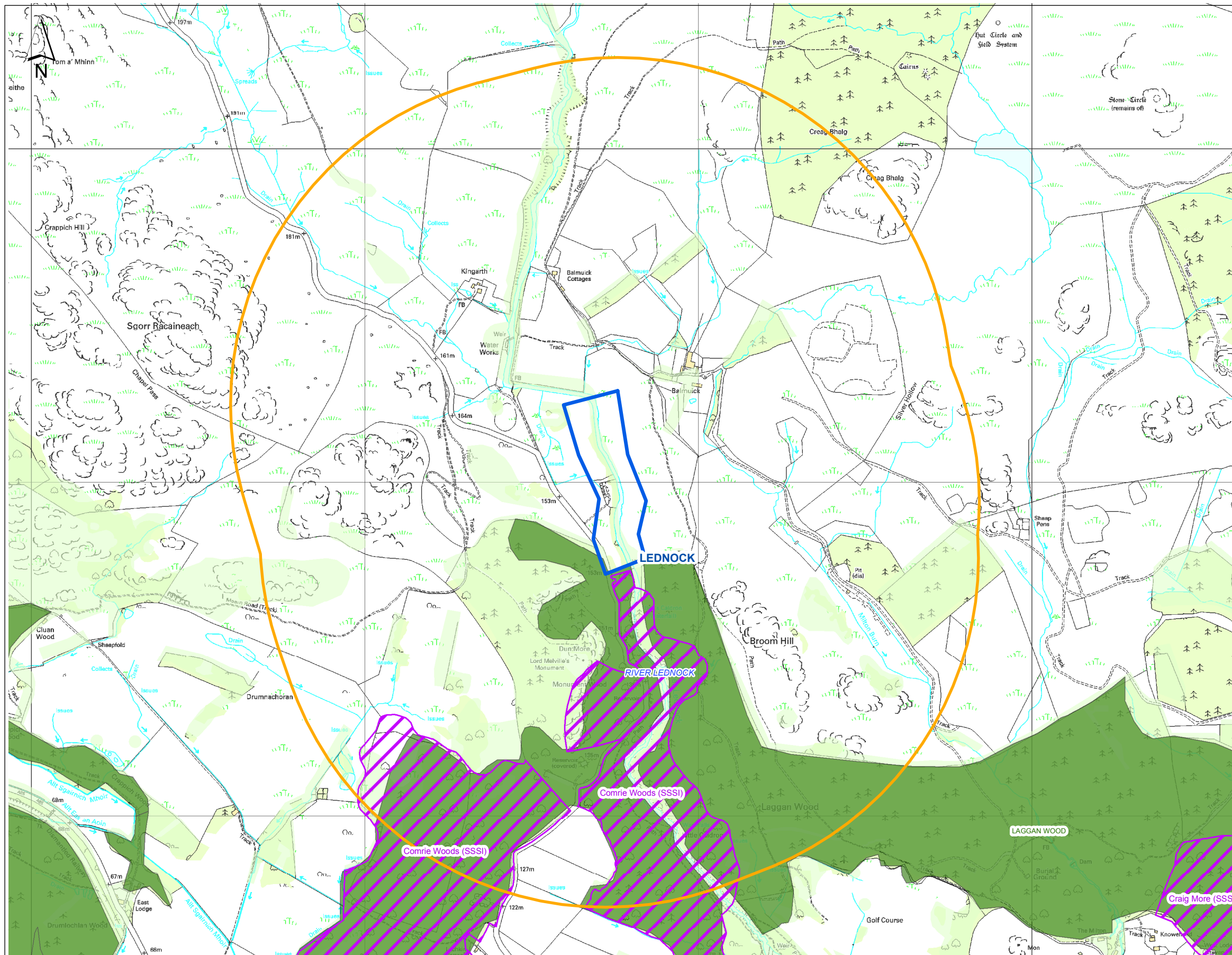
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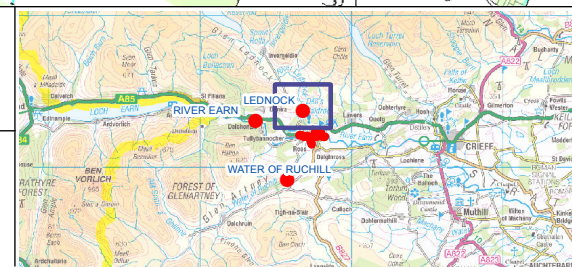
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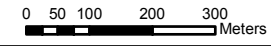
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-  Site of Special Scientific Interest (SSSI)
-  Ancient Woodland
-  Semi Natural Ancient Woodland



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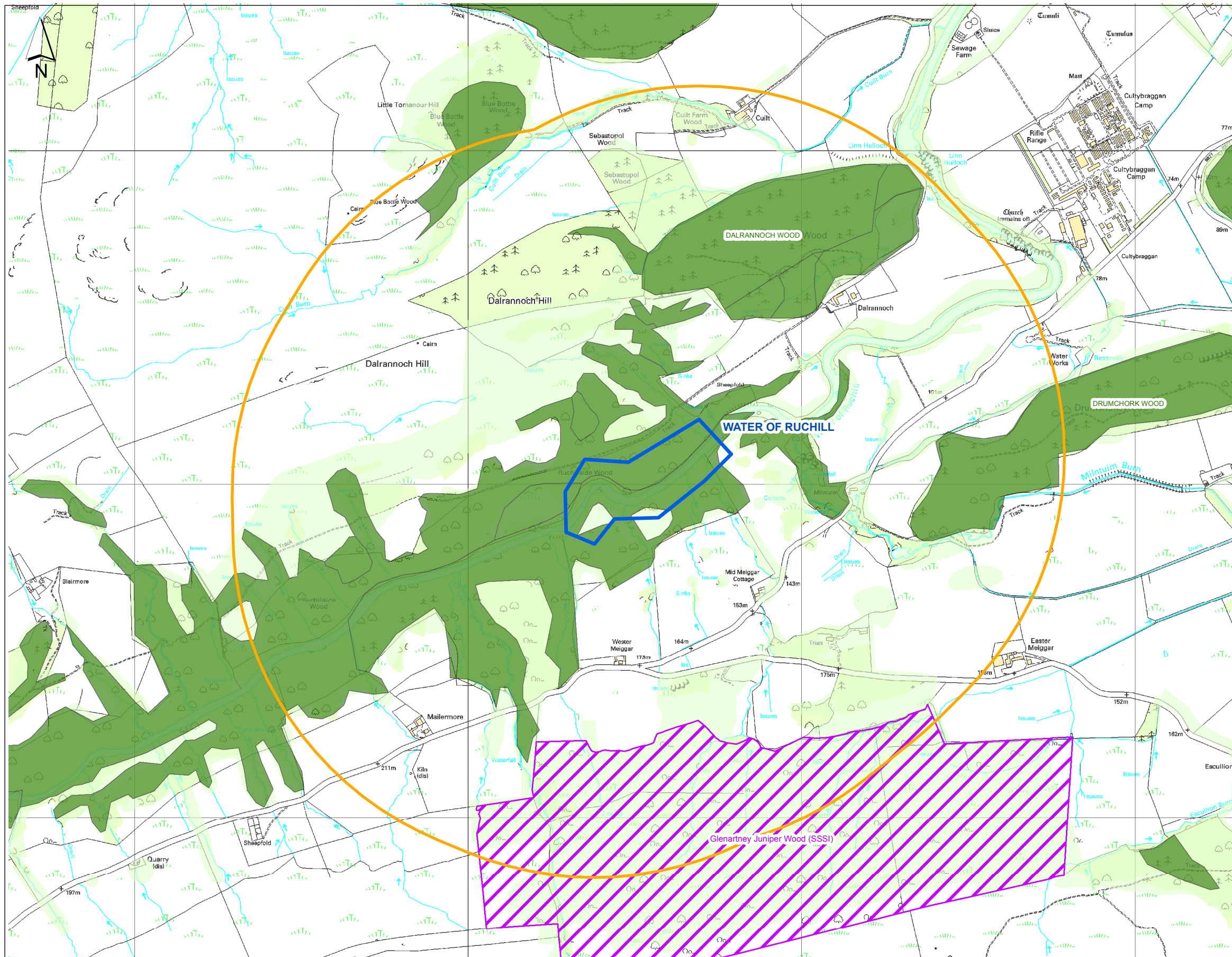
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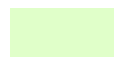
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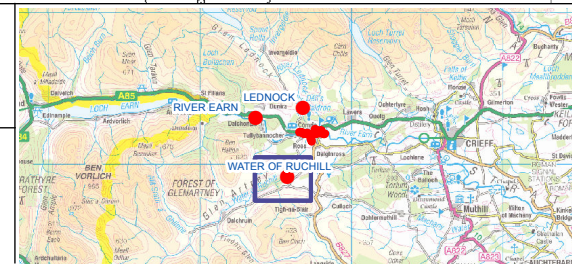




**Legend**

-  Potential Flood Storage Area
-  1km Study Area
-  Site of Special Scientific Interest (SSSI)
-  Ancient Woodland
-  Semi Natural Ancient Woodland

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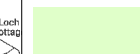
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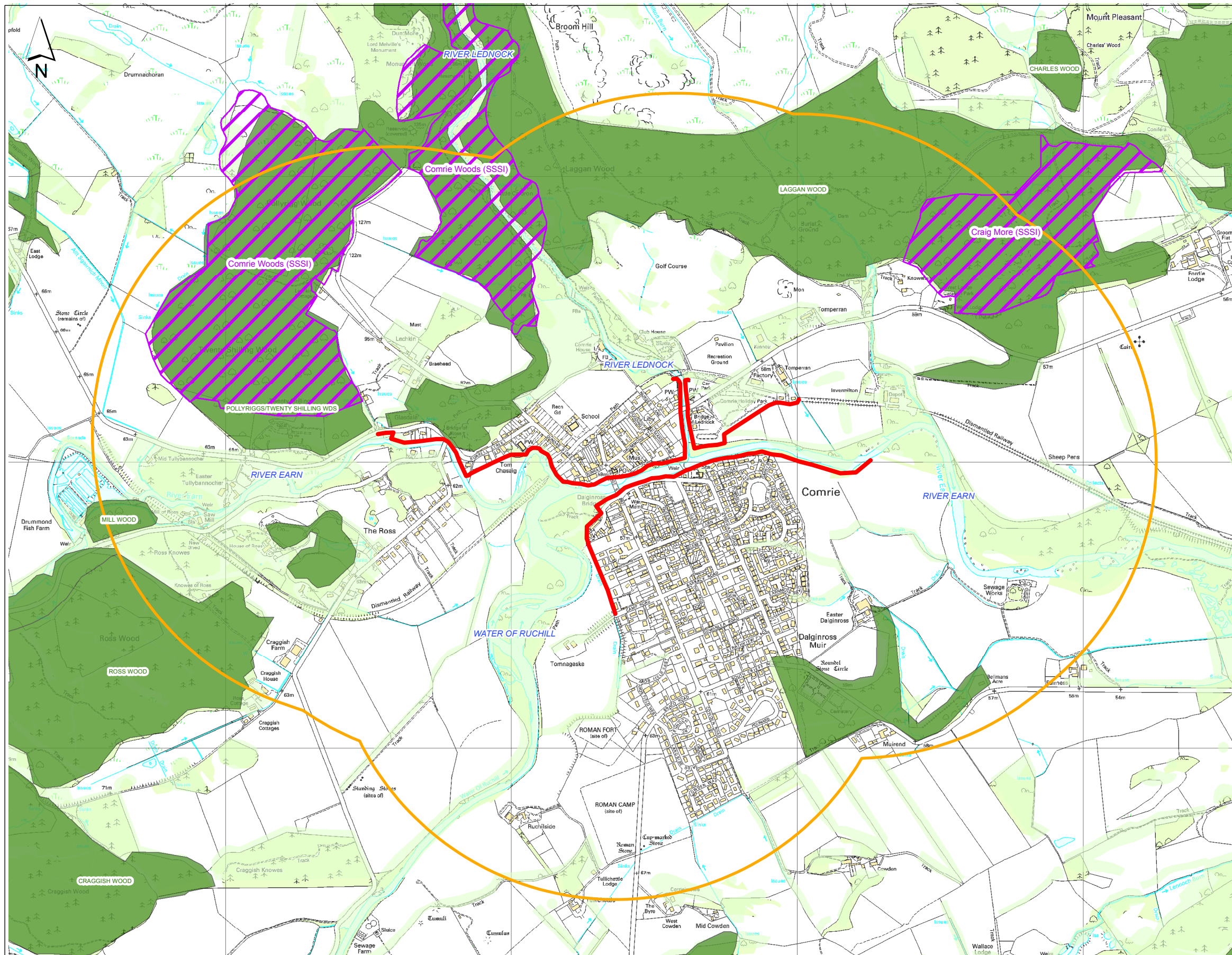


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Drawing No. <b>FIGURE 4c</b>					Issue 1
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**Legend**

-  Potential Flood Defence Wall
-  1km Study Area
-  Site of Special Scientific Interest (SSSI)
-  Ancient Woodland
-  Semi Natural Ancient Woodland



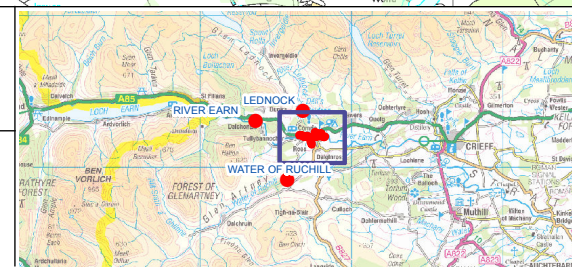
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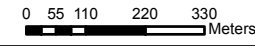
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Title **SITES OF SPECIAL SCIENTIFIC INTEREST AND ANCIENT WOODLAND**



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Date **JUNE 2016** Approved **RMc** Date **JUNE 2016**

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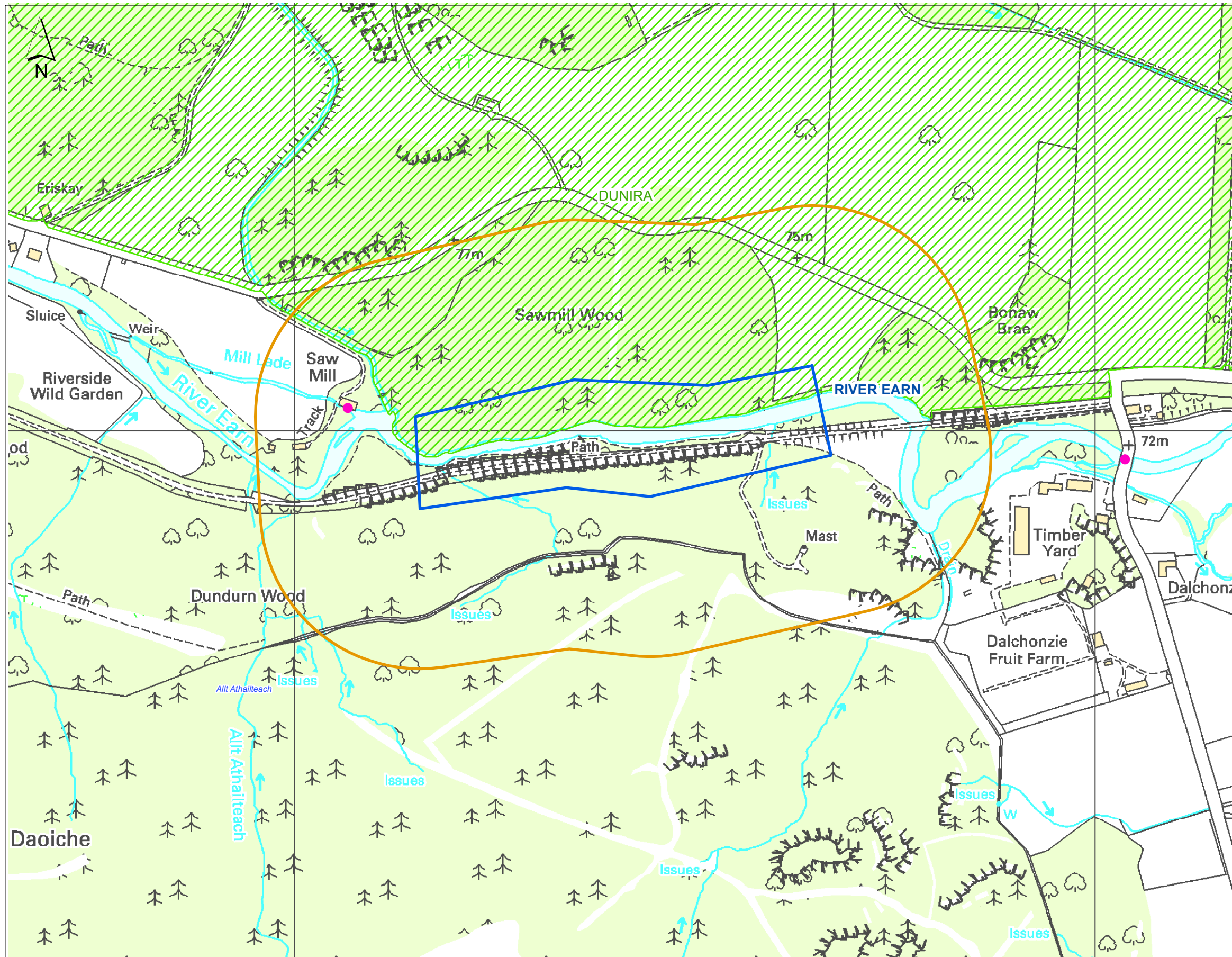
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**Legend**

-  Potential Flood Storage Area
-  200m Study Area
-  Listed Building
-  Scheduled Monument
-  Conservation Area
-  Garden and Designated Landscape

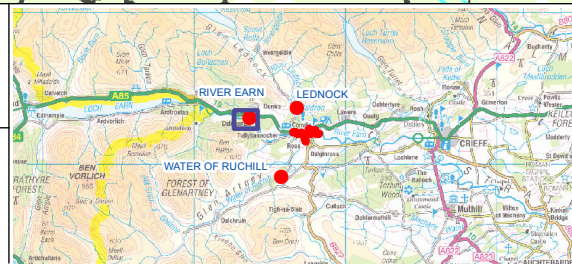
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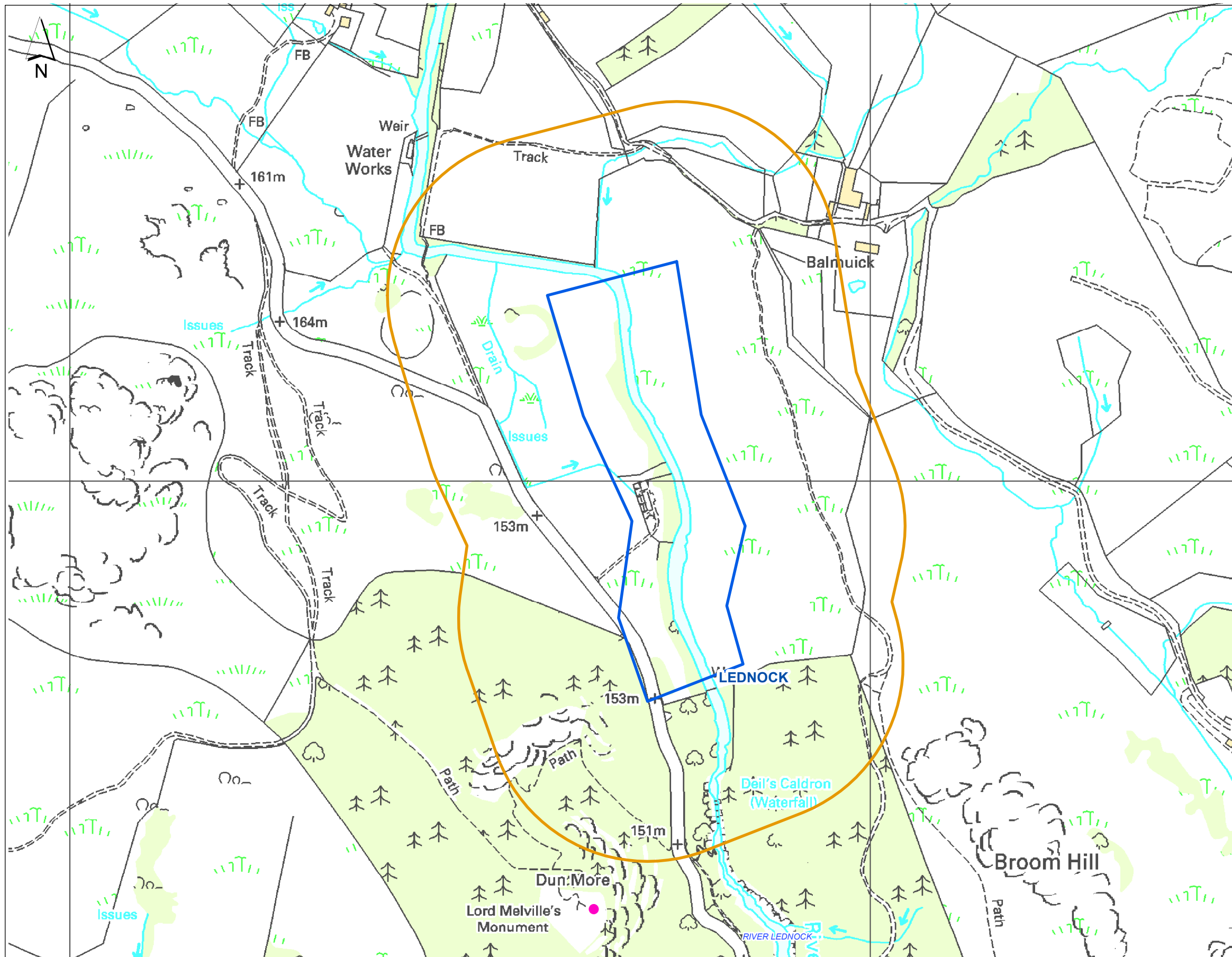
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**Legend**

- Potential Flood Storage Area
- 200m Study Area
- Listed Building
- Scheduled Monument
- Conservation Area

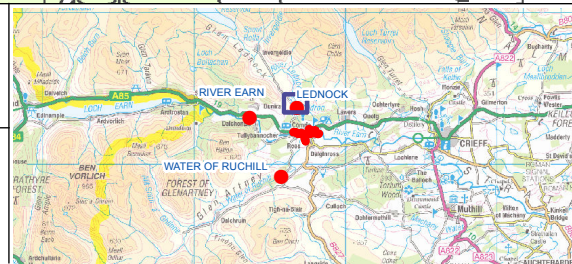
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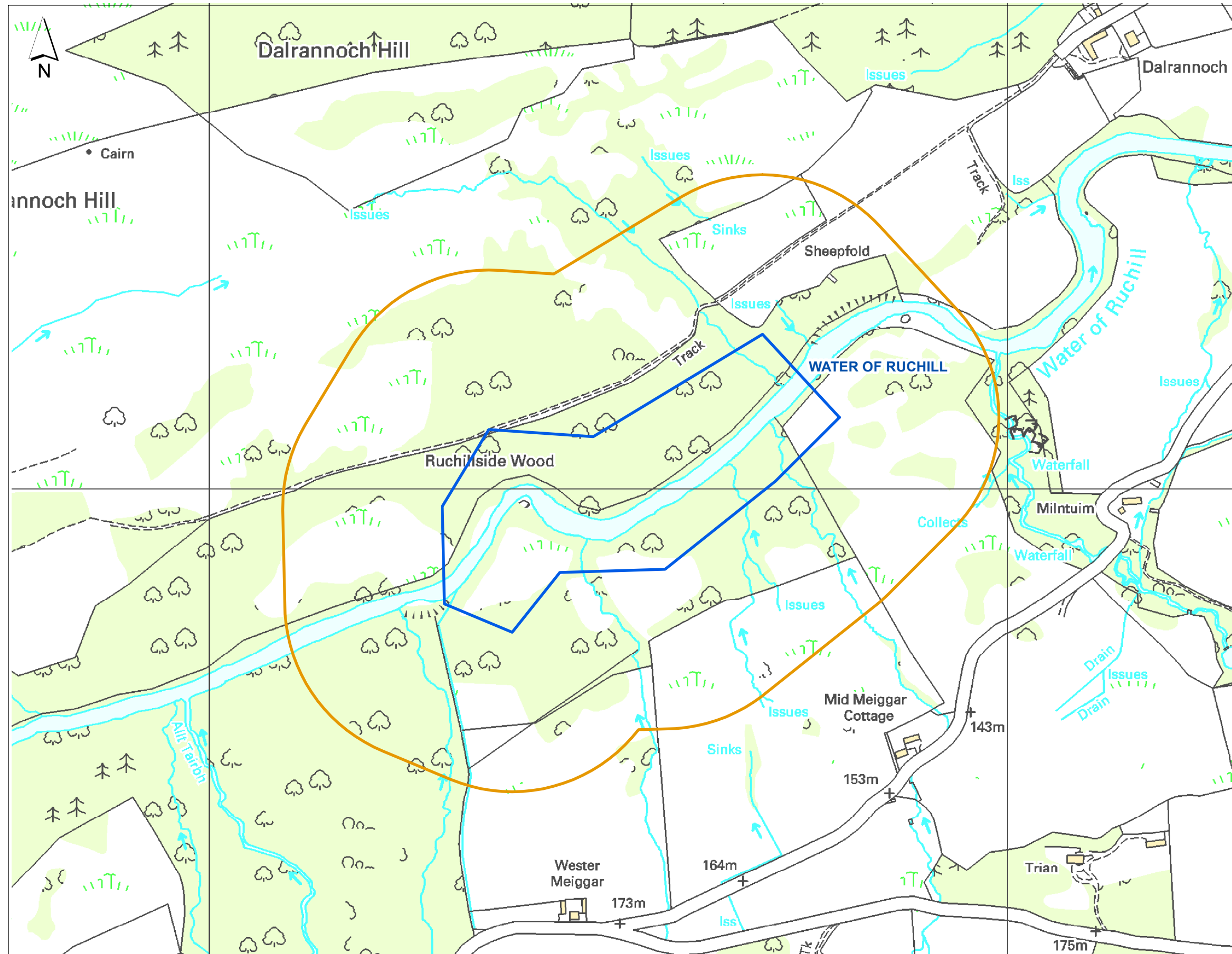
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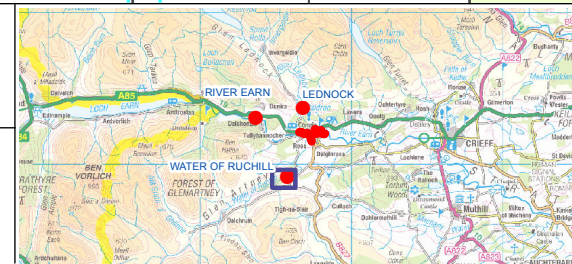
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-  200m Study Area
-  Listed Building
-  Scheduled Monument
-  Conservation Area

Client 

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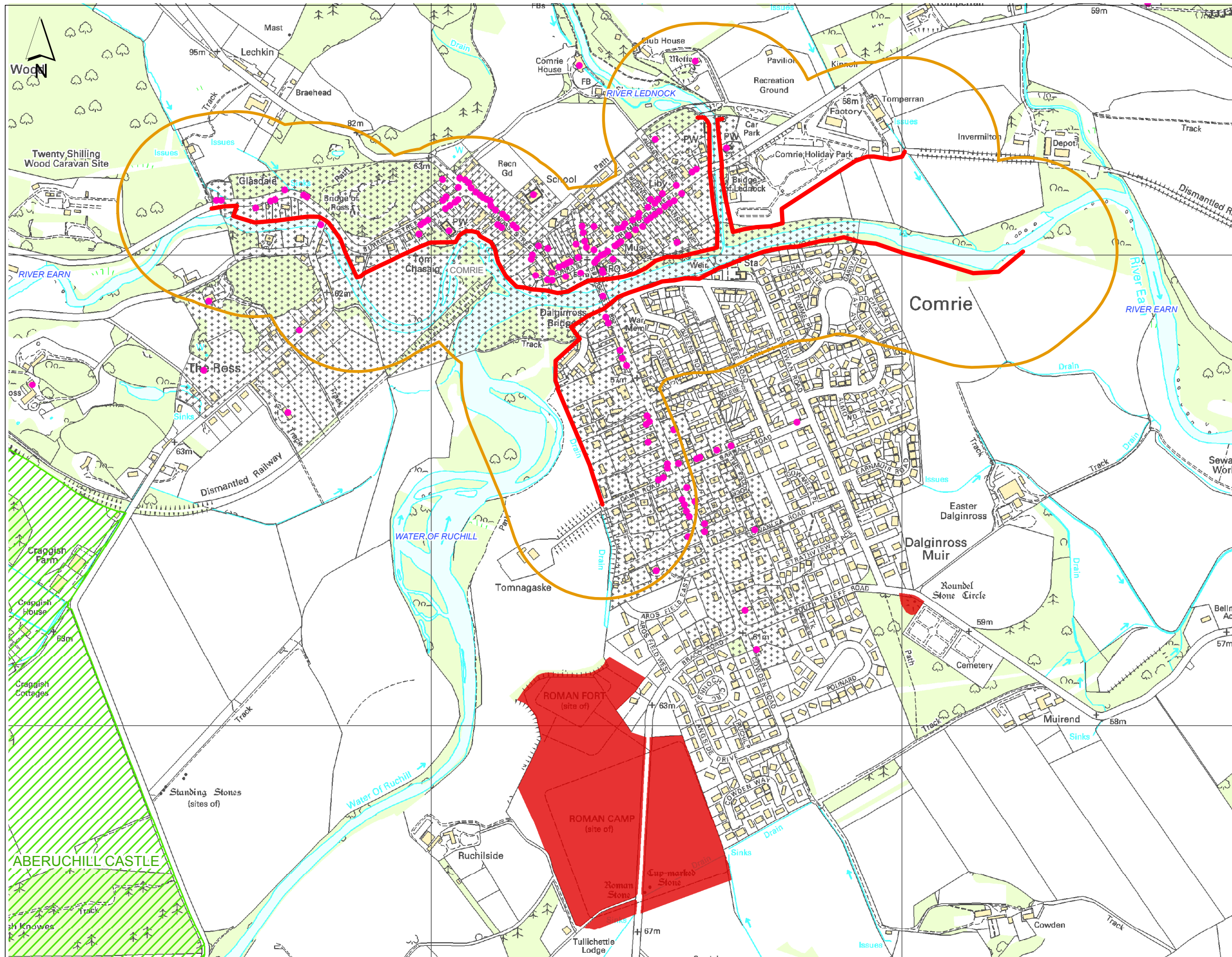
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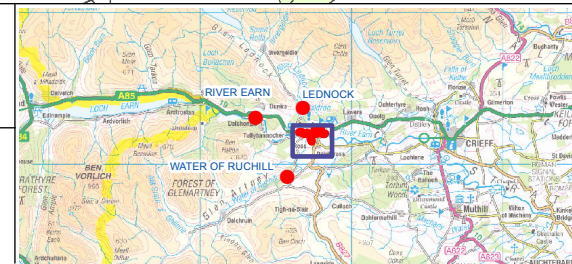


**Legend**

-  Potential Flood Defence Wall
-  200m Study Area
-  Listed Building
-  Scheduled Monument
-  Conservation Area
-  Garden and Designated Landscape

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**CULTURAL HERITAGE ASSETS**



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Drawing No. <b>FIGURE 5d</b>					Issue 1
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# APPENDIX C: EIA SCOPING OPINION (2017)



## Environmental Impact Assessment (Scotland) Regulations 2011

### EIA SCOPING OPINION

#### Part I - Particulars of Scoping Request/Planning Application

<b>Applicant's Name &amp; Address</b>	<b>Agent/Applicant's Name &amp; Address</b>
Structures and Flooding Team	N/A
<b>Date Request/Application received</b>	<b>Application Ref. (if applicable)</b>
Dec 2016	16/02210/SCOP
<b>Site Location</b>	<b>Description of Proposal</b>
Comrie Village, Comrie	Scoping Opinion for the formation of a flood protection scheme in and around the watercourse at Comrie. This follows a positive screening decision 16/01863/SCRN

#### Part 2 - Particulars of Scoping Opinion

##### Introduction and Context

Under the terms of Regulation 14 of the Environmental Impact Assessment (Scotland) Regulations 2011, Perth and Kinross Council, Structures and Flooding Team has sought a scoping opinion for a proposed flood protection scheme associated in and around the village of Comrie. The scoping request was accompanied by an environmental baseline report prepared by consultants Mouchel (dated June 2016), which outlines the proposed topic areas of an Environmental Statement (ES) in this context.



The EIA Regulations require that the Planning Authority consults the following bodies before adopting a scoping opinion: relevant adjoining planning authorities; Scottish Natural Heritage (SNH); Scottish Water (SW); Scottish Environmental Protection Agency (SEPA); Health & Safety Executive (where the development is within an area which has been notified to the planning authority by the Health and Safety Executive) and Scottish Ministers (including Transport Scotland (TS), and Historic Environment Scotland (HES). These bodies, along with relevant internal consultees were consulted on 10 January 2017.

Details of those consulted are provided in **appendix 1**. The received consultation responses have been incorporated into the scoping opinion below as and when appropriate, copies of the full consultation responses are included in **appendix 2**.

Consultation responses were not received from the following consultees: -

Scottish Water  
Perth and Kinross Council Community Greenspace Team  
Perth and Kinross Council Development Plans Team

## **The Scoping Opinion**

The baseline report from Mouchel sets out the background to the project and a range of topic areas covered within. Perth and Kinross Council as Planning Authority generally agrees with the broad topics that are suggested to be covered as within the ES submission.

It is considered appropriate that given a fresh planning application will be required, the Environmental Statement (ES) should continue to identify all possible environmental impacts that a development project might cause.

It is recommended that the ES is compiled as a single document and accompanied by a Non-Technical Summary (NTS), a Supporting Statement and Technical Assessments as required. The NTS should summarise the key points and recommendations arising from the EIA and seek to present the main findings and proposed mitigation measures in a non-technical and easily understandable manner.

## **Suggested Environmental Statement Contents**

1. Introduction & Project Description
2. Flooding Act Remit & Policy Background, Land Uses
3. Landscape & Visual Amenity
4. Geology, Hydrology & Water Quality
5. Ecology & Nature Conservation
6. Cultural Heritage
7. Socio-economy, Public Access & Amenity

8. Noise & Air Quality
9. Traffic
10. Construction Environmental Management
11. Summary of Effects

It is anticipated for the introduction and background to include an overview of the site and detail the format/structure of the Environmental Statement (ES). In line with good practice, the experience and qualifications of all those involved in collating, assessing or presenting technical information within the ES should be included at this stage.

Information within the ES relating to impacts and their prediction should include,

- Impact prediction:
  - methods;
  - assumption and underlying rationale;
  - fact, interpretation of facts, opinions, judgments based on facts;
  - confidence limits associated with the prediction; and
  - the characteristics and dimensions of the impacts – i.e.: nature, magnitude, extent, timing, duration, reversibility, likelihood and significance.
- Impact uncertainty:
  - worst case;
  - impact range; and
  - risk assessment

Establishing the significance of impacts can inevitably be contentious as it often involves value judgments and expert interpretation. It is therefore prudent that any significance criteria is established on a transparent methodology based on official standards, legislation, policy and expert opinion, which would allow the reader to reach their own conclusions.

The technical assessments to inform any new or updated sections of the ES should be designed to determine the impact of potential effects identified during the scoping stage. These assessments will determine the current baseline environmental conditions, predict environmental impacts deriving from the proposed development, and assess their significance, taking into account the sensitivity of the surrounding environment, any potential receptors and cumulative effects arising from similar developments in the immediate area. Proposals to avoid or reduce these impacts should be made.

It is important that potential positive and negative residual effects remaining after mitigation measures have been identified and accounted for within the ES in order to assess their significance and acceptability. Consequently, each environmental chapter should contain a '**Residual Effects Table**'.

It is suggested that the Structures and Flood Risk Team adopt a hierarchical approach to a suite of mitigation measures, by:

- avoiding adverse impacts;
- minimising or reducing impacts to as low as possible; and
- remedy or compensate adverse impacts that are avoidable.

## **1. Introduction & Project Description, including Land Use**

The Planning Authority considers the background, baseline report as a good starting point for introductions, project description and land uses.

## **2. Flooding Act Remit & Policy Framework Background**

Whilst being considered under the terms of the Flooding Act and not the Planning Act, I believe it would still be beneficial for the ES to include a chapter to set out current planning policies and guidance relevant to the status of the proposals. The adopted local development plan is available on the Councils Website: - <http://www.pkc.gov.uk/article/15041/Adopted-Local-Development-Plan>

## **3. Landscape and Visual Assessment**

No response was received from Community Greenspace colleagues. SNH agreed that the proposals were not passing through any areas particularly designated for landscape value alone, although part of the wider study area is within the River Earn National Scenic Area. A landscape and visual assessment will still however be appropriate, tying back with the cultural heritage section. Good practice advice can be found at:

<http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/lca/>

If visualisations such as photomontages are to be used, they should ideally be a full image size (A3 or A4) for a single frame picture, with an image height of 20cm (approx.) to give a realistic impression. Levels of impact significance should be used to standardise the results of the assessment.

## **4 Flood Risk, Surface Water and Groundwater**

SEPA provide a comprehensive detailed commentary within their consultation response which is contained in **appendix 2**.

Summary points arising include consideration for:

- the impact of the proposed flood protection scheme on flood risk and sediment transport, erosion and deposition should be considered within the EIA
- The flood impacts on receptors outwith the proposed scheme should be identified and any proposed mitigation measures to address these should be identified

- The potential increase in the risk of flooding to a few properties in The Ross area should be considered to determine if mitigation might be required, taking account that the Ruchill Water is a mobile watercourse and the modelled scenario is based on a snap shot of the channel location at one point in time.
- Some parts of Comrie and Dalginross will temporarily be at an increased risk of flooding during construction work therefore phasing of the works should be planned to minimise this risk.
- Details should be provided of how ongoing access, following scheme construction is to be provided, to allow for the removal of large debris (such as trees) from the watercourses
- On completion of the scheme there should be a programme of regular inspection of the channels within and upstream and downstream of the engineering works and any undesirable impacts, for example erosion, should be addressed at an early stage

## 5. Ecology & Nature Conservation

SEPA, RSPB and the Councils biodiversity officer have provided detailed responses, contained in **appendix 2**. RSPB, SEPA and PKC biodiversity officer have included known species background information to assist in the preparation of the chapter.

Invasive non-native species such as Japanese knotweed, identified along the stretch, as have North American signal crayfish within the river earn. As per the SEPA response, it is also brought to your attention that the Tay District Salmon Fisheries board (TDSFB) were not consulted directly in undertaking this Scoping Exercise and it is recommended that it would be beneficial for the applicant or the consultant producing the ES to do so, particularly as the TDSFB are likely to have up to date information on fish population in the burn, key fish migration periods, spawning areas etc.

## 6 Culture & Heritage

Perth and Kinross Heritage Trust (PKHT) advised that an historic environment and archaeological desk based assessment and walkover survey of the proposed affected areas be carried out to inform the cultural and heritage chapter, fully assessing the impact of the proposals on both listed and non-listed buildings, the general historic fabric, bridges, the wider conservation area and the affected archaeology. Historic Environment Scotland (HES) reinforced this position and made reference to the old parish church at Dunira Street (A-listed) and Dunira Garden and Designed Landscape (GDL). In summary, the starting point in the baseline report produced by Mouchel identifies the extent of the potential impact and significant impact on the cultural heritage as a result of any flood mitigation proposals and will have to be comprehensively covered in this chapter section (see appendix 2).

## **7 Socio Economy, Public Access & Amenity**

Economic impact is a material consideration, as set out in the SPP. The ES should include relevant economic information connected with the project, including job creation and economic activity associated with the procurement, construction operations, alongside any adverse impact on tourism. The impacts on paths, access and wider amenity should also be factored in and addressed at this stage.

## **8. Noise & Air Quality**

A response from PKC Environmental Health Section clarified that as there was no change to predicted noise levels following the completion of the construction elements, but noise should be considered and addressed within the ES pertaining to construction noise (see **appendix 2**). Environmental Health also considered no adverse impact was likely with regards to air quality long term but advised that dust should be considered at the construction stages.

## **9. Access and Traffic**

A response from the Transport Planning Section did not identify any significant implications in relation to motorised transport, which cannot be covered as a construction traffic management plan as part of a Construction Environment Management Plan. Maintenance and suitable access diversions will have to be fully considered and mitigated to ensure no significant effects.

## **10. Construction Environmental Management Plan (CEMP)**

This chapter section is self-explanatory, endorsed by SEPA. It is fully acknowledged that on the whole, the construction element of the development has arguably the most potential to result in significant impact, making a well-considered CEMP chapter section crucial to be adequately covered in the ES.

## **11. Summary of Effects**

The elimination of adverse environmental impacts or their reduction to an acceptable level is at the heart of the EIA process. By definition all EIA projects are likely to have significant environmental effects and the potential for mitigation ought therefore to be considered at every stage of the EIA process.

This chapter should draw all the other chapters together and report on the findings, with an effective '**Schedule of Environmental Commitments**' to clarify which mitigation measures should be adopted and implemented.

## Limitations

It should be noted that the issuing of this scoping opinion does not necessarily set out absolutely everything which should be considered and consultee authorities may well seek further details. As previously identified, it is recommended to separately consult the fisheries board and the Scottish Canoe Society.

A handwritten signature in black ink, appearing to read 'Call', with a horizontal line underneath.

pp

Development Quality Manager  
Planning & Regeneration  
The Environment Service  
Perth and Kinross Council  
Dated: 22 June 2017

## **Appendix 1:-**

### **CONSULTATIONS –**

(All undertaken via e-mail with electronic attachment)

#### **Externals**

Scottish Environmental Protection Agency  
Broxden Business Park  
Lamberkine Drive  
Perth  
Perthshire  
PH1 1RX

Scottish Natural Heritage  
Battleby  
Redgorton  
Perth  
PH1 3EW

Historic Environment Scotland  
Longmore House  
Edinburgh

RSPB  
Tayside & Fife Office  
Ground Floor, Robertson House  
1 Whitefriars Crescent, Perth.  
PH2 0PA

Scottish Water  
Customer Connections  
419 Balmore Road  
Glasgow  
G22 6NU

## **Internals**

Sarah Malone  
Perth and Kinross Heritage Trust  
The Lodge  
4 York Place  
Perth  
PH2 8EP

Mrs Jane Pritchard  
Community Greenspace  
Perth and Kinross Council  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

Mr David Williamson  
Bio Diversity Officer  
Perth and Kinross Council  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

Kirsty Steven  
Environmental Health  
Perth and Kinross Council  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

Forward Planning  
Perth and Kinross Council  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

Mr Niall Moran  
Transport Planning  
Perth and Kinross Council  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD



# APPENDIX D: LIST OF PROPOSED ADDITIONAL CONSULTEES

- Perth and Kinross (P&K)
- Perth and Kinross Heritage Trust
- Historic Environment Scotland (HES)
- SEPA
- Scottish Natural Heritage (SNH)
- Scottish Government – Rural Protectorate
- SW
- RSPB Scotland
- Archaeology Scotland
- Architectural Heritage Society of Scotland
- Association of British Riding Schools
- Association for Protection of Rural Scotland
- Bat Conservation Trust
- Byways and Bridleway Trust
- British Horse Society
- Centre for Inclusive Living Perth & Kinross (CILPK)
- Comrie Angling Club
- Comrie Community Council
- Comrie Development Trust
- Comrie Millennium Footpath Association
- Cycling UK
- Forestry Commission
- James Hutton Institute
- Loch Lomond & The Trossachs National Park Authority
- Mobility and Access Committee Scotland (MACS)
- National Farming Union Scotland (NFU Scotland)
- Paths for all
- Perth and District Anglers Association
- Perth & District Hillwalking Club
- P&K Countryside Trust
- P&K Cycle Campaign / By-cycle
- P&K Heritage Trust
- Perth & Kinross Red Squirrel Group
- Ramblers Association
- Scotways
- Scottish Badgers
- Scotland's Bird Club
- Scottish Canoe Association
- Scottish Civic Trust
- Scottish Disability Equality Forum
- Scottish Endurance Riding Club
- Scotland's Garden and Landscape Heritage
- Scottish Orienteering Association
- Scottish Wildlife Trust
- Scotland Outdoor Access Network (SOAN)
- Strathearn Ramblers
- Sustrans
- TACTRAN
- Tayside Bat Group
- Tayside Biodiversity Partnership
- Tay District Salmon Fisheries Board
- Three Saints Way Group
- Transport Scotland
- Visit Scotland

A photograph of a river flowing through a lush green forest. The river is the central focus, with water that appears slightly turbulent. The banks are lined with dense, vibrant green trees and bushes. In the background, rolling hills or mountains are visible under a cloudy sky. The overall scene is a natural, scenic landscape.

**Comrie Flood Protection Scheme**

**Appendix 4.3**

**Consultation Summary**

## Appendix 4.3 Consultation Summary

### List of Environmental Consultees

This appendix presents a list of the environmental consultees who were contacted as part of the environmental assessment for the Comrie Flood Protection Scheme.

The baseline data and responses received have been taken into account in the development of the Scheme and the subsequent Environmental Assessment. Table A3.1 lists who responded with information and how this fed into the design process.

Specific detail on how the consultees information / data informed the environmental assessment is noted in the relevant EIAR chapters.

**Table A3.1: Consultees and Design Input**

Organisation	Data / information provided	Design discussion
<b>Statutory Consultees</b>		
Perth & Kinross Council		
<i>Planning and Development</i>	✓	
<i>Conservation</i>	✓	Wall finishes in keeping with the character of the town – see <b>technical chapter 5</b>
<i>Biodiversity</i>	✓	Ecological mitigation – see <b>technical chapter 8</b>
<i>Greenspace / access</i>	✓	Planting, tree felling, and access proposals - see <b>technical chapters 5 and 10</b>
<i>Transport</i>	✓	Traffic calming measures discussed
Historic Environment Scotland (HES)	✓	
Scottish Environment Protection Agency (SEPA)	✓	Discussion on CAR licensing and flood modelling – see <b>technical chapter 6</b>
Scottish Natural Heritage (SNH)	✓	
<b>Non-Statutory Consultees</b>		
Archaeology Scotland		
Architectural Heritage Society of Scotland		

Organisation	Data / information provided	Design discussion
Association of British Riding Schools		
Association for Protection of Rural Scotland		
Bat Conservation Trust		
Blyways and Bridleway Trust		
British Horse Society	✓	Bridle gate provided to ensure accessibility – see <b>technical chapter 10</b>
Centre for Inclusive Living Perth & Kinross (CILPK)	✓	
Comrie Angling Club	✓	
Comrie Community Council	✓	
Comrie Development Trust	✓	
Comrie Millennium Footpath Association		
Crieff Angling Club		
Crieff Community Trust		
Cycling UK (previously Cycle Touring Club)		
Forestry Commission	✓	Planting proposals - see <b>technical chapter 5</b>
James Hutton Institute	✓	
Loch Lomond & The Trossachs National Park	✓	
Mobility and Access Committee Scotland (MACS)		
National Farming Union Scotland (NFU Scotland)		
Paths for all		
Perth & District Hillwalking Club		
P&K Countryside Trust	✓	
P&K Cycle Campaign / By-cycle		
Perth Museum Biological Records Centre		
P&K Heritage Trust	✓	
Ramblers Association		
RSPB		
Scotways	✓	
Scottish Badgers		
Scotland's Bird Club		
Scottish Canoe Association		
Scottish Civic Trust		
Scottish Disability Equality Forum		
Scottish Endurance Riding Club		
Scotland's Garden and Landscape Heritage	✓	
Scottish Government		
Scottish Orienteering Association		

Organisation	Data / information provided	Design discussion
Scottish Hydro Electric/SSE	✓	
Scottish Water		
Scottish Wildlife Trust		
Scotland Outdoor Access Network (SOAN)		
Strathearn Ramblers		
Sustrans	✓	
TACTRAN	✓	
Tayside Bat Group	✓	
Tayside Biodiversity Partnership	✓	
Tay District Salmon Fisheries Board		
Three Saints Way Group		
Transport Scotland		
Visit Scotland		