

A scenic view 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 atmosphere is natural and serene.

**Comrie Flood Protection Scheme
Environmental Impact Assessment
Report**

**Volume 1:
Non-Technical Summary**

Document Control

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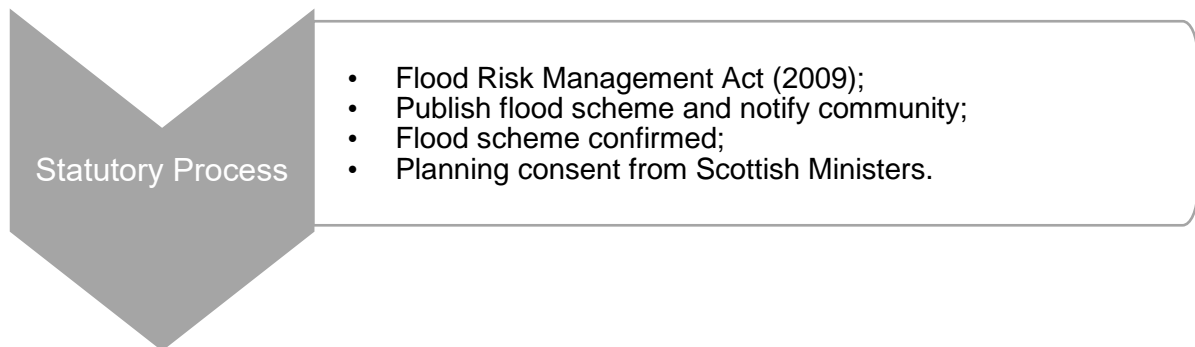
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1 Introduction

- 1.1.1 This document presents a summary of the information from the Environmental Impact Assessment Report. The EIAR has been prepared to assess any potential significant environmental effects which may occur as a result of the Comrie Flood Protection Scheme 2020, hereafter referred to as 'the Scheme'. The EIAR has been prepared to support the Flood Order.
- 1.1.2 A Flood Order is a statutory instrument that can be enacted under Part 4 of the Flood Risk Management (Scotland) Act 2009 to enable local authorities to seek permission from the government to implement flood risk schemes / projects to high flood risk areas.
- 1.1.3 The Scheme will be published in accordance with the **statutory process** under 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.



1.2 Project Need

1.2.1 Comrie has a long history of flooding and most recently experienced severe floods in August and November 2012. The River Lednock and the Water of Ruchill meet the River Earn within the towns of Comrie and Dalginross. Flood waters from these watercourses have historically resulted in flood damage (**Image A**).



Image A: Previous Flooding Events in Comrie



- 1.2.2 SEPA and the Council identify Comrie as a priority area which requires flood protection to help protect people, property (both residential and non-residential), agricultural land and the environment from flood events.
- 1.2.3 Since 2006, the Council have commissioned feasibility studies to investigate options which could provide a flood protection scheme for Comrie. Following the floods in August and November 2012, the Council commissioned further investigations to understand the local flood mechanism.
- 1.2.4 The resultant flood protection scheme proposed for Comrie and Dalginross, reduces the flood risk to people and properties. 189 properties will be brought out of flood risk at the 1:200 year event.

2 The Proposed Scheme

2.1 Outline Design

2.1.1 The proposed flood protection scheme for Comrie (hereafter referred to as ‘the Scheme’) comprises a combination of flood defence walls, earthwork embankments in locations where space is available and erosion protection measures with an approximate length of 2.8km along the River Earn, the Water of Ruchill and the River Lednock.

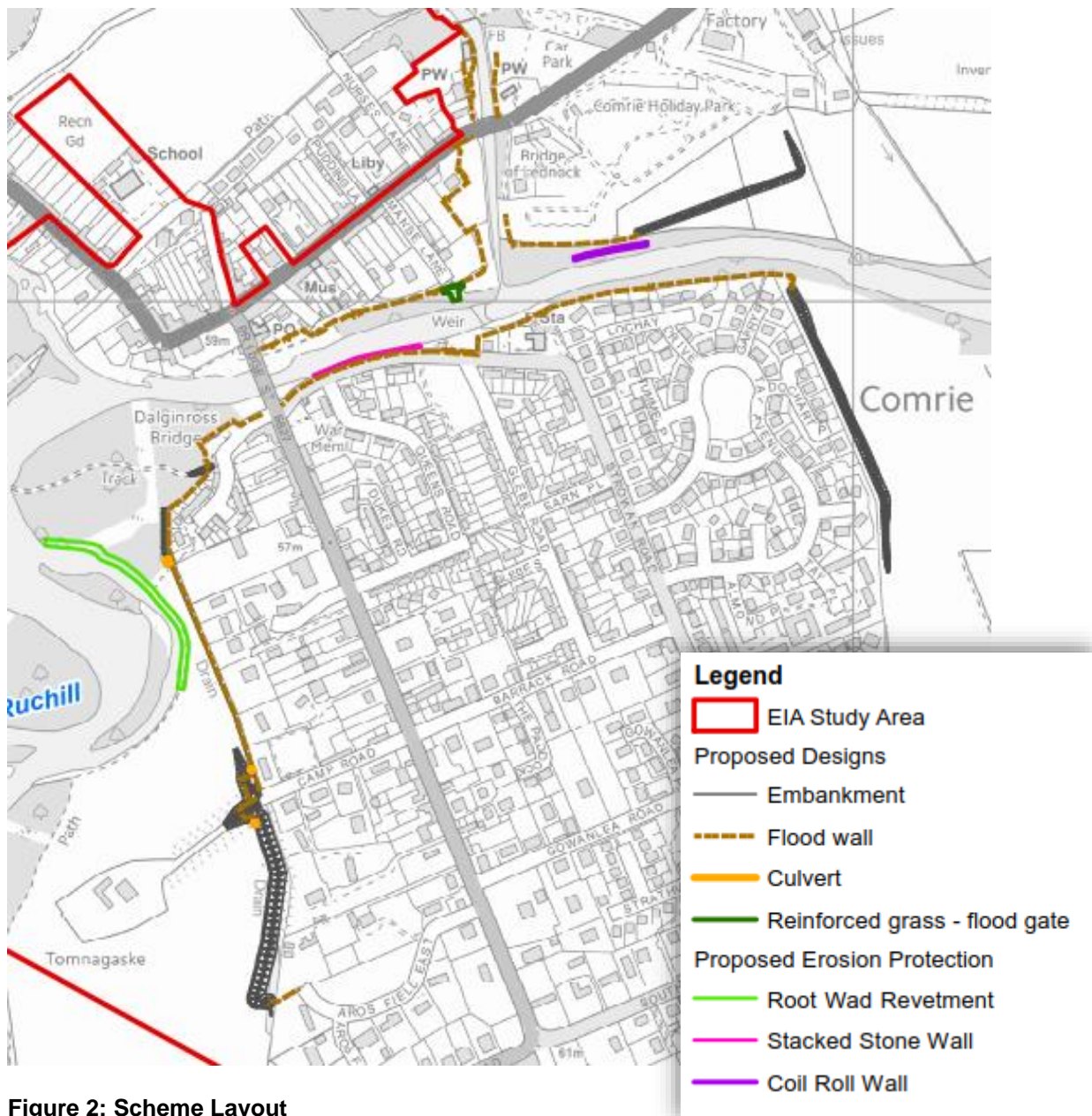


Figure 2: Scheme Layout

- 2.1.2 The Scheme also incorporates access (ramps and stairs), landscaping (hard and soft) and utility and service diversions.
- 2.1.3 The Scheme will provide a minimum 1:200 year standard of protection across the entire town.
- 2.1.4 The decision to construct a flood wall or earthwork embankment has been sensitive to the landscape setting and seeks to preserve the towns visual character.
- 2.1.5 Erosion protection measures have been incorporated into the Scheme design in areas where bank erosion is expected to increase as a result of the proposed flood defences and in areas of steep bankside. The use of green bank protection as opposed to hard bank protection has been included where possible to limit any impact on the physical habitat condition for the waterbodies across the Scheme.
- 2.1.6 Public access has been maintained where possible with the provision of new accessible up and over ramps and stairs and a floodgate. The location of these access points has been selected to ensure that access is not limited but maintained where possible for public and private use.
- 2.1.7 The Scheme will also include the construction of new vehicle entrance and multi-use car park at Legion Park, including events space with seating and soft landscaping. This is to provide community benefits and an alternative location for community events such as 'Comrie Fortnight' amongst others.
- 2.1.8 The EIA has informed the outline design and environmental constraints including public access, landscape character and cultural heritage assets have been taken into consideration during the design process with embedded mitigation provided wherever possible.
- 2.1.9 Extensive studies across the scheme extents have been undertaken including the re-evaluation and updating of the hydraulic model.

Carbon Reduction

- 2.1.10 During the outline design of the Scheme, value engineering has been a key focus and 'smart design' has been applied where possible reducing material requirements. During design, assumptions have been made regarding the wall design, construction and its associated visual impact in the surrounding environment (taking account of the Comrie Conservation Area). These assumptions have fed into the Carbon Assessment.
- 2.1.11 Current calculations indicate that if built as proposed, the scheme would generate 6200 tonnes of embodied Carbon.

2.2 Construction

- 2.2.1 Construction is currently expected to commence in 2021/2022 and will be phased over an expected period of 2-3 years.
- 2.2.2 Construction is expected to commence with advance works comprising site clearance and accommodation works before construction of flood defence walls and earthwork embankments begins. Erosion protection measures and hard and soft landscaping will be phased throughout the duration of the construction activities.
- 2.2.3 Reasonable assumptions have been made with regards to likely construction methods, construction compound requirements and lay down areas within the EIA. Construction methods will be developed further by the appointed Contractor and include further liaison with statutory consultees, landowners, key environmental stakeholders and the Council.
- 2.2.4 Appropriate pollution prevention measures will be required given the proximity of construction activities on riverbank and waterbodies. The sensitive nature of the Scheme setting has also be taken into consideration during consultation with SEPA and SNH and when preparing the required mitigation.
- 2.2.5 A Construction Environmental Management Plan (CEMP) will be prepared by the appointed Contractor to ensure that all works are undertaken in accordance with regulatory guidance.
- 2.2.6 An Outline CEMP has been prepared as part of the EIA. This document provides a template for the final CEMP that will be prepared, it also importantly includes all the mitigation measures that were recommended as part of the EIA process for the Scheme.

2.3 Major Accidents and Disasters

- 2.3.1 The Scheme has been designed in line with current best practice and it is expected that the detailed design stage and construction will also follow best international current practice and, as such, reduce the vulnerability of the proposed Scheme to risks of major accidents and/or natural disasters.
- 2.3.2 The Scheme is also being built to protect the town of Comrie from major flooding incidents. By its very nature it is increasing the resilience of the local area to the most likely major weather event.

3 Consultation and Scoping

3.1 Consultation

3.1.1 Consultation has been undertaken by Perth & Kinross Council and Sweco as part of the EIA process. The organisations that have been consulted include;

- Perth & Kinross Council (Planning, Greenspace, Access, Conservation, Biodiversity, Environmental Health, Transport Planning)
- Forestry Commission Scotland
- Scottish Environment Protection Agency (SEPA)
- Scottish Natural Heritage (SNH)
- Historic Environment Scotland (HES)
- Scottish Water
- Perth & Kinross Heritage Trust
- British Horse Society

3.1.2 The objective of consultation and engagement 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 both environmental and engineering requirements.

3.1.3 Consultation with statutory and non-statutory bodies has been undertaken during the course of the EIA by the Council and 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.

3.1.4 Three Value Management (VM) meetings have been held by the Council and Sweco to present the proposals to key stakeholders at key stages in the outline design process. Two of these meetings comprised workshop formats with a presentation followed by group led sessions to obtain opinions and feedback. The third meeting comprised a client design review session held on the 25th June 2018 between the Council and Sweco only.

3.1.5 The workshop led VM meetings were held on 16th April 2018 in the Councils Civic Office in Perth and on the 25th April 2019 at the North Inch Community Campus and were attended by representatives from the Council; SEPA; the Fire Department; Perth & Kinross Countryside Trust; Scottish Water; Tayside Biodiversity; and Comrie Community Council. The feedback obtained from these workshops has informed the design process and stakeholder requirements detailed at these meetings is incorporated where possible.

3.1.6 A series of public consultation events have also been undertaken by the Council during the full period of the Comrie Flood Protection Scheme development. The first events were held during the feasibility stage held in Comrie Community

Centre on the 1st & 8th September 2016 between 2pm – 8pm. Further exhibition events were then held to present the outline design on 30th April and 8th May 2019 between 2pm – 8pm in Comrie Community Centre with an estimated 120-150 people attending over the two days.

3.1.7 Early consultation with affected landowners and residents has informed the development of the outline design which considers the opinions of those directly affected.

3.1.8 Generally, a positive response has been received from the community with regards to the proposed design and where possible their concerns have been addressed in the outline design (**Image B**).

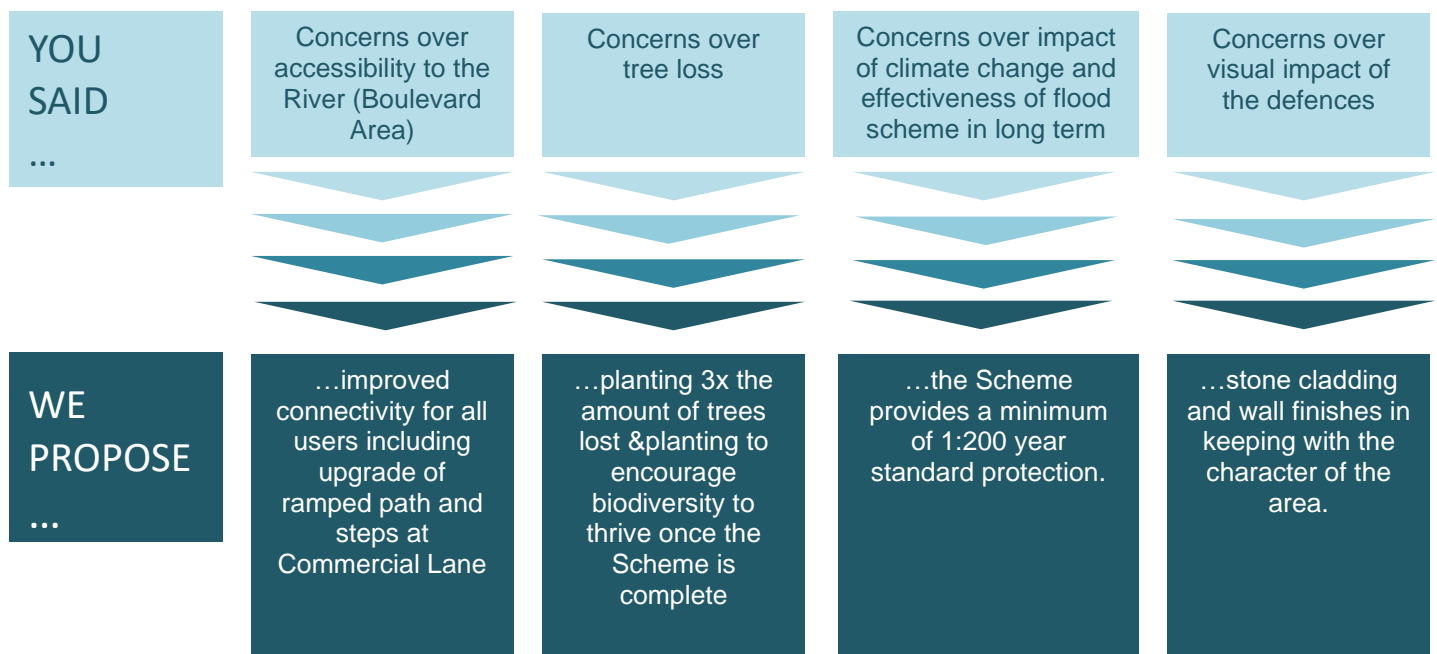


Image B: Feedback from Public Consultation and Actions

3.1.9 Along with the public events, a significant level of consultation has been undertaken with the local community, landowners, statutory consultees and affected parties. This has included the following;

- Email, telephone and in-person meetings with statutory, non-statutory and interested parties since September 2017;
- Regular updates on the Council’s dedicated website as the project has progressed; and
- Regular newsletters providing development updates distributed to the local community.

3.2 Screening and Scoping

- 3.2.1 The Flood Risk Management (Flood Protection Schemes, Potentially Vulnerable Areas and Local Plan Districts) (Scotland) Amendment Regulations 2017 make provision that the local authority must prepare an environmental impact assessment report if a screening opinion states that the scheme is required to be subject to such an assessment.
- 3.2.2 The requirement for an EIA was confirmed in writing by Perth & Kinross Council (the Councils) Planning Service in November 2016. Following this screening opinion, a baseline environmental report was submitted to the Council’s Development Management Section in December 2016 by the Council’s Structures & Flooding Team in support of an EIA Scoping Request.
- 3.2.3 Whilst EIA Scoping is not required under the Flood Regulations, the process of scoping can be undertaken to determine the extent of issues to be considered in an environmental assessment and reported in the EIAR.
- 3.2.4 A Scoping Opinion was provided by the Councils Planning Service in June 2017. The Opinion included comments from statutory consultees that the Planning Service had consulted with Upon review of the baseline environmental report.
- 3.2.5 The baseline environmental report outlined topic areas for inclusion in an EIA but did not contain detailed information on the proposed scope or methodology required for EIA. An updated EIA Scoping Report was prepared by Sweco on behalf of the Council and submitted directly to the Council’s Planning Service and statutory consultees in November 2017. The Council’s Planning Officer provided their Scoping Opinion on 1st June 2018. This opinion has been used to inform the appropriate level of scope and methodology of assessments undertaken for this EIAR.



4 The EIA

4.1 Introduction

- 4.1.1 An EIA is a means of drawing together, in a systematic way, an assessment of the likely significant environmental effects (both positive and negative) arising from a proposed development.
- 4.1.2 The EIA process also provides an opportunity to minimise potential environment effects through design refinement.
- 4.1.3 Environmental constraints and opportunities have been identified through consultation, environmental surveys and assessments. The information gathered has informed the design process and where possible has been used to avoid or reduce potential impacts or improve or enhance potential benefits.
- 4.1.4 The topics considered are;
- Landscape & Visual Impact
 - Water Environment & Fluvial Geomorphology
 - Hydrogeology & Contamination
 - Ecology & Nature Conservation
 - Cultural Heritage
 - Socio-economics, Public Access, Amenity and Health
- 4.1.5 Air quality, Noise and Traffic were scoped out due to the lack of potentially significant effects associated with the Scheme. Potential effects that could be generated during construction that could affect these topics are to be dealt with in the CEMP that the appointed Contractor will develop. This will include best practice measures to reduce noise/air quality emissions to ensure that amenity of local residents is protected. With regards to potential effects from increased traffic, this will be managed appropriately with the Construction Traffic Management Plan and this will also be prepared by the appointed Contractor. Both documents will be agreed and approved by Perth & Kinross Council prior to works commencing.



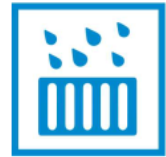
4.2 Landscape & Visual Impact Assessment

- 4.2.1 A landscape and visual impact assessment has been undertaken which considers the potential landscape (including townscape) and visual effects of the Scheme.
- 4.2.2 The construction phase of the Scheme is not considered to have a Significant effect. The presence of construction activities, site hoarding and machinery will temporarily reduce the landscape condition, quality and tranquillity but construction activities would be phased over a duration of three years and are temporary and reversible in nature.
- 4.2.3 Once built, the proposed flood walls and embankments would form a relatively small-scale addition to the town of Comrie. Careful detailing and the use of natural stone in the most sensitive locations would ensure that the proposals are in keeping with the specific landscape and townscape character areas.
- 4.2.4 **Moderate (significant) adverse** effects would be experienced at year 1 in the majority of the area due to large numbers of trees that will be lost along the rivers Earn and Lednock. This impact will however reduce over time as the trees that will be planted as replacements will start to establish and grow. Tree cover would not be completely lost and therefore, it is considered that there would be a **minor (not significant)** adverse residual effect across the Scheme due to tree loss.
- 4.2.5 The visual effects of the scheme largely correspond to those areas where tree loss is the greatest within short range views i.e. immediate views within the town. Effects from medium range (to the east and west of Dalginross) and long range viewpoints were assessed to be **minor (not significant)** adverse due to the relatively small scale of the proposals and tree loss seen in the context of the wider view of a well wooded landscape.
- 4.2.6 Large-scale tree loss seen across a large extent of the view would result in **moderate (significant)** adverse effects from closer range viewpoints located on the River Earn and Lednock, however as replacement tree planting matures over time and the flood structures weather, the significance of effects is considered to reduce to a **minor (not significant)** adverse effect. This is because the reduced tree cover would remain perceptible in views compared to baseline levels.
- 4.2.7 The greatest effects of the scheme would be experienced by a small number of residential receptors located to the west of Dalginross at Kintail and Dunmore Lodge and to the east of Dalginross at No. 5 Garry Place. These properties currently experience medium to long-range views across farmland. The introduction of the flood embankment at Kintail and Dunmore Lodge would introduce a screening element leading to a **major (significant)** adverse impact

at year 1 and year 20 of operation. The introduction of the flood embankment would partially screen the lower section of the open view from No 5 Garry Place resulting in a **moderate (significant)** adverse effect year 1 and year 20 of operation.

- 4.2.8 The Scheme would result in a **minor (not significant)** beneficial effect on views from the representative viewpoint located on Strowan Road at years 1 and 20 of operation. This is due to longer range views of the conservation area becoming available because of riverside tree removal and the improvement in the public realm.
- 4.2.9 Improvements include the replacement of post and wire fencing located along the riverside with high quality vernacular style stone clad flood walling and the introduction of street trees set in ornamental planting.
- 4.2.10 The impacts from the Scheme have been minimised as far as possible through sympathetic design but with the required tree loss to construct the various flood walls and embankments, however due to the nature of the Scheme and the introduction of new hard structures, there will be residual **moderate** landscape and visual effects within the town, and these will decrease with time. There will however also be **beneficial effects** for some viewpoints as the changes in tree cover will open up longer range views of the conservation area.

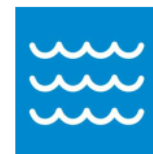




4.3 Water Environment & Fluvial Geomorphology

- 4.3.1 No significant residual hydrological effects have been identified during the construction. With implementation of mitigation including adherence to good practice guidance, the CEMP and construction method statements, impacts are predicted to be either neutral or slight. Most importantly for this Scheme it will require careful sequencing of construction to ensure flood risk isn't increased during works and that any in-channel works are not during the salmon spawning period.
- 4.3.2 During operation, the assessment has considered how the Scheme could impact upon the riverbanks due to changes in the natural flow during extreme flood events. Suitable mitigation has been incorporated into the proposed design to ensure that there is bank and scour protection to ensure that these impacts are not significant.
- 4.3.3 Once completed, the Scheme will take an estimated 189 properties in Comrie and Dalginross out of existing flood risk at the 0.5% AEP (1:200 year) event, a significant positive benefit of the scheme.
- 4.3.4 With careful design, appropriate construction phasing and suitable mitigation measures the negative effects on water environment are predicted to be **not significant**. The scheme will in fact have a **positive effect** by reducing the number of flood events and the potential impacts that these events have on the Rivers and their water quality.





4.4 Hydrogeology & Contamination

- 4.4.1 An assessment of the potential impacts associated with construction and operational phases of the Scheme has been undertaken in relation to geology, soils and hydrogeology (including land contamination). The assessment identified potential effects that the Scheme may have on geology, soils and hydrogeology within site and surrounding area. Mitigation measures have been proposed to minimise the scale of the impacts identified where necessary. These measures will be predominantly implemented via a CEMP and the Remediation Strategy for the former gas works.
- 4.4.2 With the implementation of suitable mitigation measures the effects on geology, soils and hydrogeological environment (including contamination) is predicted to be **not significant**.





4.5 Ecology and Nature Conservation

- 4.5.1 A desk study, consultation exercise and suite of field surveys has been undertaken during 2018-19 in order to describe the ecological baseline and carry out an assessment of the predicted effects on biodiversity receptors from the proposed Comrie Flood Protection Scheme.
- 4.5.2 In accordance with standard guidance the significance of effects was determined based on the ecological importance of each habitat or species and the nature and magnitude of the impact, characterised in terms of Major, Moderate or Minor significance in EIA terms.
- 4.5.3 Key ecology receptors within the ecological study area include broadleaved woodland and river habitats, bats, beaver, breeding birds, otter, aquatic ecology (including fish) and invasive, non-native species including plant species, American signal crayfish and American mink.
- 4.5.4 The potential impacts on ecological receptors (i.e. without mitigation) is associated with the construction and operation (maintenance) of the Scheme relate to habitat loss, potential pollution, loss and disturbance to bat roosting habitat and breeding bird habitat, fragmentation of river habitats affecting fish passage, beaver and otter populations; loss of/disturbance to otter resting sites and spread of invasive, non-native species.
- 4.5.5 To minimise and avoid these impacts, a suite of mitigation measures have been included in the design including;
- the provision of an artificial otter holt within proposed root wad revetment on the Water of Ruchill;
 - In-channel works will be avoided during the period of November to May to avoid the sensitivity spawning period for Salmonoids
 - implementation of a Construction Environmental Management Plan to ensure compliance with best practice in relation to working in and near water;
 - Typical working hours will be between the hours of 07.00 – 19.00 to avoid the need to work in the dark/low light levels when protected species such as otters and bats are likely to be most active; and
 - specific mitigation including tree planting, provision of bat boxes, targeted avoidance of disturbance in proximity to bat roosts and otter/beaver habitat and control of invasive species will also be included.
- 4.5.6 To provide further ecological enhancement, a bat roost habitat is to be installed on the disused railway bridge close to the confluence of the Water of Ruchill and the River Earn.
- 4.5.7 With the implementation of these mitigation measures the effects on all important ecological receptors is predicted to be **not significant**.



4.6 Cultural Heritage

- 4.6.1 A desk-based study and site visits have been carried out in order to identify heritage assets that may be affected by the Scheme and to establish their current condition. The desk-based study has also informed an assessment of the potential for currently unknown archaeological remains within the Study Area.
- 4.6.2 Listed Building Consent will be required before works can commence next to the garden wall of Earnside and Dalginross Bridge. Both structures are Category C Listed Buildings. An appropriate programme of archaeological works will be identified in the Listed Building Consent.
- 4.6.3 There is also potential for construction impacts on previously unrecorded cultural heritage assets. This potential is considered to be low at riverside locations and medium on the flood plains near known cropmark sites. This potential impact will be mitigated through a programme of archaeological works to be agreed with the Perth and Kinross Heritage Trust as advisors to Perth & Kinross Council.
- 4.6.4 Operational impacts on Comrie Conservation Area and the Dalginross Roman Forts have also been considered. No significant operational effects on these cultural heritage assets were identified.
- 4.6.5 With the implementation of the suggested mitigation measures the effects on all important cultural heritage receptors is predicted to be **not significant**.





4.7 Socio-economics, Public Access and Amenity

4.7.1 An assessment of the potential socio-economic effects, the disruption to public access, amenity resources and impacts to human health and safety associated with the construction and operation of the flood protection scheme has been undertaken.

4.7.2 This assessment has identified a number of potentially significant effects. Following the implementation of mitigation, the assessment of effects can be summarised as follows:

- **Construction (short term impacts)**
 - During construction, a **minor adverse** impact to health, safety, and wellbeing due to the disruption of noise and nuisance. However, once the Scheme is constructed, the impact would result in a moderate beneficial due to the decrease in flood risk.
 - Potential **minor significant** impacts were identified due to the loss of agricultural land during construction. However through the design process for the Scheme, the loss of agricultural land has been kept to the minimum necessary for safe construction and operation and all temporary land take will be returned to use after construction is completed.
 - During construction, due to the disturbance and nuisance impacts, it is anticipated there would be a **minor adverse** impact to designated routes in the study area. The exception of this is the moderate adverse impact to Core Path and PRow 35 along the right bank of the River Earn and the Boulevard which are anticipated to remain closed during construction. This would be a short term impact and would cease once the Scheme is constructed.
 - It is anticipated there would be a **minor adverse** impact to the greenspace in St Margaret and St Serfs church and Comrie Fire Station due to disturbances caused by construction work.
- **Operation (long term impacts)**
 - Flood protection is anticipated to **benefit 189 properties** which are currently at risk of flooding from a 1 in 200 year flood event. This will reduce stress levels within the local community and would be expected to have an overall beneficial impact upon health and well-being.
 - The design of the proposed scheme has improved connectivity to the Boulevard area and includes landscape planting and seating resulting in a **minor benefit**. There is also capacity to consider additional features that would result in some additional community benefits.

- 4.7.3 Overall, the impacts during construction will be short term and reversible. Once completed, the Scheme is anticipated to result in a **moderate beneficial** impact due to the reduced flood risk and indirect impacts on reduced risk to health and safety and damages to properties. The design of the Scheme will also improve connectivity to the Boulevard area and include landscape planting and seating.
- 4.7.4 With the implementation of suitable design and mitigation the negative effects on Socio-economics, Access and Amenity (including health) are predicted to be **not significant** and the Scheme will benefit the local community by removing 189 properties from being currently at risk.

4.8 Summary

- 4.8.1 The EIA undertaken for the Scheme provides an assessment of all potential construction and operational impacts which may result due to the proposed Scheme and adequately assesses the effects these may have on the environment.
- 4.8.2 Appropriate mitigation measures have been embedded into the design solution so that negative effects are reduced, managed or minimised as far as possible. Where impact remain, additional mitigation has been recommended.
- 4.8.3 Environmental Enhancement and Community Benefits have also been included where possible including provision of bat roost habitat to be installed on the disused railway bridge close to the confluence of the Water of Ruchill and the River Earn and the construction of new vehicle entrance and multi-use car park at Legion Park, including events space with seating and soft landscaping. This is to provide community benefits and an alternative location for community events such as ‘Comrie Fortnight’ amongst others.
- 4.8.4 Most importantly, the main positive benefit from the Scheme will be reducing the number of properties at risk of flooding and protecting the Town.



5 How to comment....

5.1.1 In accordance with Section 60 and Schedule 2 of 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, the Comrie Flood Protection Scheme will be published by the Council.

5.1.2 The EIA will support the Flood Order and will be publicly accessible on the Councils Comrie Flood Protection Scheme website: <https://www.pkc.gov.uk/article/15455/Comrie-flood-protection-scheme>.

5.1.3 A printed copy of the EIAR will also be available for public at the following locations:

Perth & Kinross Council Office
 Pullar House,
 35 Kinnoull Street
 Perth
 PH1 5GD

Comrie Library
 Drummond Street
 Comrie
 PH6 2DS

Opening Hours

Monday to Friday: 8.45-5.00*
**Please note that the Council office will not open until 11.00 am on the first Thursday of every month.*

Thurs: 14:00-16.30: 18:00-20.00
 Fri: 10:00-12.30
 Sat: 09.30-12.30
Closed Mon, Tues, Wed & Sun

5.1.4 Representations to the EIA will be accepted for a period of 30 days from the date of Flood Order publication. Objections to the Flood Order will be accepted for a period of 28 days from the date of Flood Order publication.

5.1.5 The most straightforward way to submit comments, is in writing to the Councils Legal team at the following address:

Lisa Simpson
 Head of Legal Services
 Perth & Kinross Council
 2 High Street
 Perth
 PH1 5PH

5.1.6 Alternatively, comments can be submitted via the following email address: ComrieFloodScheme@pkc.gov.uk

5.1.7 Any objection to the proposed Scheme must be accompanied by a statement of reasons for the objection. Where an objector has an interest in any land on which the proposed operations are to be carried out or which may be affected by any of the proposed operations or by any alteration in the flow of water caused by any of the operations, that person’s objection must include details of the land in which the objector has an interest, disclosure of the nature of the objector’s interest in the land, and details of which aspects of the proposed operations affect the objector.

6 Next Steps

- 6.1.1 Once the consultation period is closed, the Council will consider any objections received and either:
- confirm the proposed scheme without modification;
 - confirm the proposed scheme with modifications; or
 - reject the proposed scheme.
- 6.1.2 Assuming that the Flood Order is confirmed without modification, the following processes will follow:

