

# **1/2010** STRATEGIC ENVIRONMENTAL ASSESSMENT OF DEVELOPMENT PLANS

## **Planning Advice Note**

**PAN 1/2010**

# **Strategic Environmental Assessment of Development Plans**

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# CONTENTS

	Page
<b>1. Introduction</b>	1
How to use this Planning Advice Note	1
<b>2. Aims of Strategic Environmental Assessment</b>	2
<b>3. Key Principles</b>	3
<b>4. Integration</b>	4
Development plan scheme / participation statement	4
The development plan monitoring statement	6
The main issues report and the environmental report	6
Consultation	11
The proposed plan	11
Action programme	12
Examination	13
Approval and adoption	14
Monitoring	14
Supplementary guidance	14
Other guidance	15
<b>5. Proportionality</b>	16
Smarter scoping	16
Early consultation	17
Selective reporting	18
Assessment methods that are fit for purpose	19
Identifying significant environmental effects	20
Identifying cumulative effects	21
Mitigation	21
<b>6. More Efficient Resourcing</b>	22
Joining up SEAs	22
SEA and other assessments	23
SEA, Masterplans and EIA	23
Minimising demands on resources	23
Who should undertake the SEA?	23
<b>7. Conclusion</b>	25
Help and advice	25

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## 1. INTRODUCTION

**Key point:** All development plans are likely to require an SEA under the Environmental Assessment (Scotland) Act 2005

- 1.1 Strategic Environmental Assessment (SEA) has a key role to play in delivering sustainable economic growth. Strategic development plans (SDPs), local development plans (LDPs) and formal supplementary guidance fall within the scope of the Environmental Assessment (Scotland) Act 2005<sup>1</sup> ('the 2005 Act') and are therefore likely to require a SEA.
- 1.2 SEA is an important and statutory step that must be built into the plan preparation process. It has a positive role to play within this, reflecting the aspirations for the new development planning system within Scotland. SEA can add value to development planning, by stimulating creative and lateral thinking, helping to challenge traditional views and facilitating fuller consideration of the environmental effects of policies and proposals.
- 1.3 Linking the principles of plan preparation and the requirements of the 2005 Act can be viewed as challenging, but the new process of development planning has been designed to accommodate the SEA process.

### HOW TO USE THIS PLANNING ADVICE NOTE

**Key point:** This advice is tailored to Scottish development plans. For further information on SEA more generally, including the SEA Tool Kit, visit <http://www.scotland.gov.uk>

- 1.4 This Planning Advice Note (PAN) aims to help those who are undertaking a SEA of a strategic or local development plan. Expertise in SEA is growing quickly within some sectors, including planning. This advice draws on this experience to encourage innovation in the assessment of development plans. It outlines the principles of SEA within the planning context and provides key pointers. The advice is specifically aimed at development planners who are embarking on the preparation of new development plans, and who may already have some prior knowledge of the SEA process. For those who are undertaking SEA for the first time, a basic introduction to the principles and procedures for SEA is available on the Scottish Government's website: <http://www.scotland.gov.uk/Resource/Doc/921/0088528.pdf>
- 1.5 More detailed guidance on SEA is provided in the Scottish Government's SEA Tool Kit.

<sup>1</sup> The 2005 Act transposes the requirement of EC Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment.



## 2. AIMS OF STRATEGIC ENVIRONMENTAL ASSESSMENT

- 2.1 SEA can proactively contribute to the plan preparation process by ensuring that the environmental effects of development strategies and proposals are fully understood. The SEA provides information to support the development of the plan, but is not a part of the plan itself.
- 2.2 The central aim of SEA is to help ensure that the environment is given the same level of consideration as social and economic factors within the plan. It can do this by promoting:
- integration of environmental information into the plan preparation and adoption process;
  - early dialogue with consultees, particularly those with environmental expertise, but also the wider public;
  - full and objective consideration of alternatives to ensure that the best environmental options are identified and taken on board as far as possible; and
  - transparency of decision-making, through the publication of the post-adoption SEA statement.

### 3. KEY PRINCIPLES

3.1 The following key principles should underpin the SEA of development plans, and are considered in detail within this Planning Advice Note (PAN):

**Key point:** *Better integrated SEAs can reduce resources required and increase their contribution to the plan making process.*

- **Integration (Section 4):** Meeting the requirements of the legislation should form the starting point for any SEA, and timing and delivering SEA outputs at appropriate stages in the process are key to achieving this. At the same time, SEA has to form an integral part of the development plan preparation process. It should not duplicate work undertaken to develop the plan, but should help to interpret and inform the assessment of plan options and proposals. There are opportunities for planning authorities to achieve efficiencies by exploiting the overlap between development plan preparation and SEA activities.
- **Proportionality (Section 5):** SEAs should be streamlined and fit for purpose. To facilitate more meaningful stakeholder engagement, SEA reports should be clear and succinct. This can best be achieved by paying attention to the scope of the assessment from the outset, and by focusing on the significant environmental effects of the plan. The SEA should reflect the character and length of the plan which it is assessing. As development plans become more spatial, there will be greater opportunities for more geographically defined SEA analysis and assessment.
- **Efficiency (Section 6):** Concerns about the resource implications of SEA were repeatedly raised by planning authorities during the preparation of this PAN. The recommendations set out here aim to significantly improve efficiency by reducing duplication and complexity within the SEA process. Assistance is available to minimise the need for additional resources and outsourcing of SEAs by planning authorities.

**Key point:** *SEAs of development plans must be in proportion to the plan they are assessing.*

3.2 The following sections focus on each of these key principles in turn.



## 4. INTEGRATION

- 4.1 Development plans are, by their nature, almost certain to be qualifying plans for the purpose of Directive 2001/42/EC ('the SEA Directive') as transposed by Sections 1 and 5(3) of the 2005 Act. A SEA of the plan must therefore be carried out before it is adopted. Accordingly, a development plan that is considered likely to have significant environment effects does not require screening: the SEA should commence with scoping.
- 4.2 However, where the likelihood that a plan will have significant environmental effects is less clear, for example where it is considered to determine the use of small areas at local levels, or is a minor modification of a previous plan, screening by the Responsible Authority is required. Some supplementary guidance that has not already been assessed as part of the main body of the development plan, for example detailed development briefs, may fall into this category.
- 4.3 Consultation is a key statutory requirement under the 2005 Act. Consultation with the Consultation Authorities (CAs) at screening and scoping stages has a statutory duration period of 28 days and five weeks respectively. Consultation at the environmental report stage is statutory and the consultation period must be agreed with the CAs at the scoping stage. The periods chosen must provide those with an interest an early and effective opportunity to express their opinion.
- 4.4 It is essential that the consultation takes place as required by the 2005 Act. A timing error spotted late in the SEA process could prove to be costly and difficult to correct, and could ultimately render the adopted plan unlawful.
- 4.5 Key milestones in the new development plan process, and the links between the plan and the SEA are shown in Figure 1. There are opportunities to overlap tasks at key stages. Development of stronger links between the collection of baseline environmental information, evaluation of options, consultation and monitoring requirements for both the development plan and the SEA can improve efficiency in the process. More detailed diagrams showing the fit between SEA and specific stages of the development planning process are provided in Circular 1/09 Development Planning.<sup>2</sup>

**Key point:** Care should be taken early on to ensure that key stages of the development plan process are supported by appropriate SEA outputs.

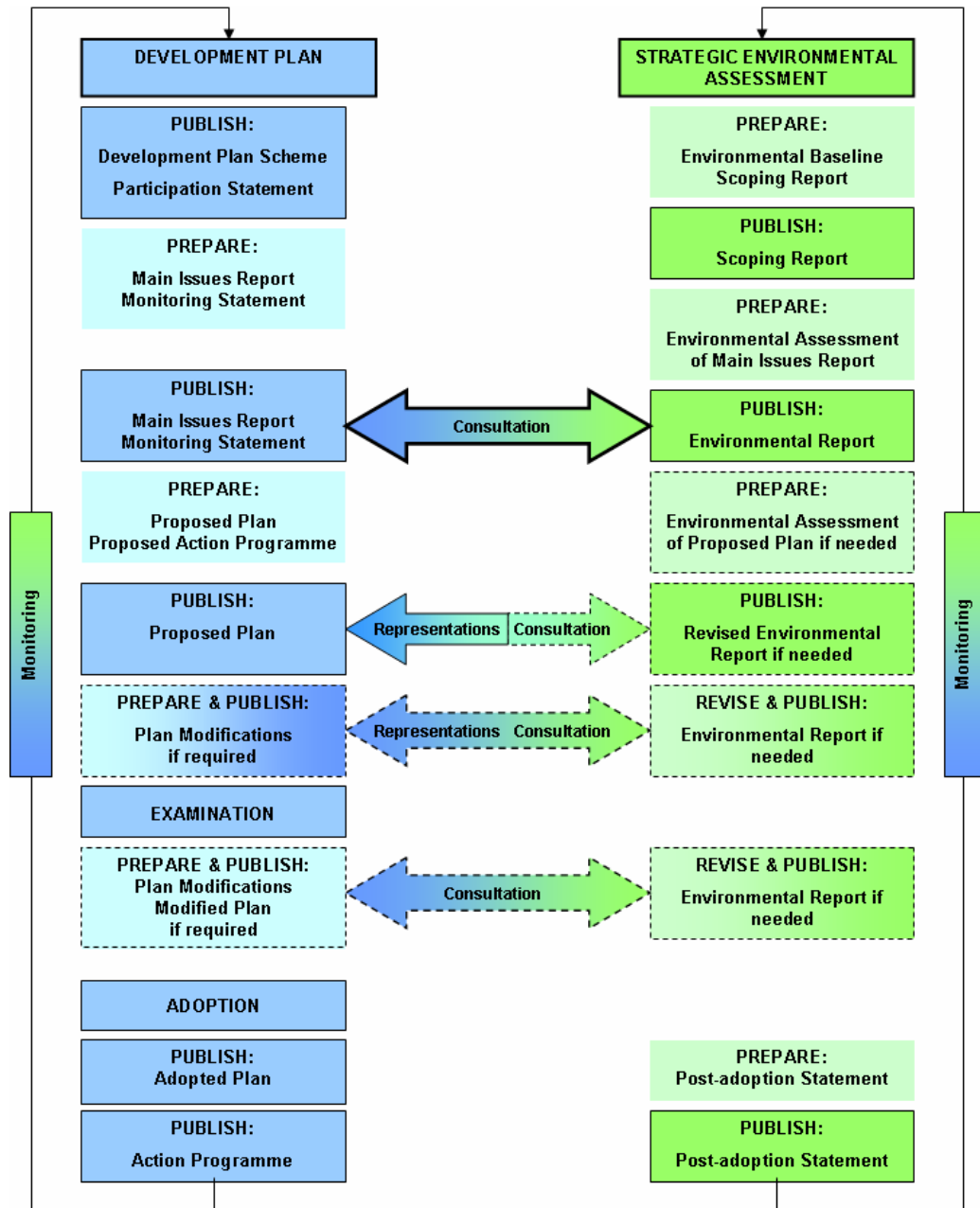
### DEVELOPMENT PLAN SCHEME / PARTICIPATION STATEMENT

- 4.6 Planning authorities are required to prepare a development plan scheme, which includes a participation statement. This document includes the authority's plans for consultation, as well as details of when consultation is likely to take place, with whom, its likely form, and the steps to be taken to involve the public in the stages of plan preparation or review.

**Key point:** Consultation is a statutory requirement. Link consultation on the SEA with consultation on the plan.

<sup>2</sup> <http://www.scotland.gov.uk/Resource/Doc/261030/0077887.pdf>

Figure 1 – Relationship between the Development Plan Process and SEA



- 4.7 The SEA process is expressly intended to ensure that the CAs and the public have an early and effective opportunity to express their opinion on both the plan and the environmental report (see Section 16 of the 2005 Act). The planning authority may therefore wish to develop a combined plan and SEA consultation process at this early stage, ensuring of course that the statutory requirements of the 2005 Act are met. For example, where a planning authority intends to explore innovative ways of gaining early input from the public into the plan, then applying those methods to the SEA will also help gain input on the environmental assessment. Experience suggests that a wide approach to engagement helps the public to take a full part in the development planning and assessment processes.

### THE DEVELOPMENT PLAN MONITORING STATEMENT

- 4.8 The preparation of a monitoring statement for the development plan is a statutory requirement under the Planning etc. (Scotland) Act 2006. It must be published alongside the main issues report. The statement should examine the changes in the principal physical, economic, social and environmental characteristics of the area, and the impacts of the policies and proposals in the plan as a whole. It should consider the wider impact of the existing plan on the plan area and identify how far the objectives and vision of the existing plan have been realised. This should inform the content of the main issues report.

- 4.9 Overlaps between the data collected for the monitoring statement and the SEA are anticipated, and awareness of this within work programming should help to reduce unnecessary duplication of effort. This could include environmental baseline information and identification of key environmental problems and/or issues. Ideally, when the monitoring statement is being prepared, the SEA scoping should be well underway and monitoring information should be fed into the scoping process.

### THE MAIN ISSUES REPORT AND THE ENVIRONMENTAL REPORT

- 4.10 The main issues report is central to the Scottish Government's aspirations for a modern development planning regime. It aims to stimulate genuine debate on the proposed approach and its alternatives, and front-load the system to avoid delays later. The main issues report will be the focus for the SEA, allowing for full exploration of the proposals and alternatives at an early stage. The environmental report must therefore be published alongside the main issues report, although it may need to be revised and re-published at later stages, to take account of any material changes in the plan, as shown in Figure 1.

- 4.11 The following paragraphs set out the Scottish Government's expectations for the content of main issues reports prepared for SDPs, LDPs within city regions, and LDPs outwith city regions, and explain how these should be assessed in the SEA.

**Key point:** Data collected during plan and SEA monitoring could be used for scoping.

**Key point:** Start scoping early.

**Key point:** The main issues report is the opportunity for the SEA to assess and report on the environmental effects of alternative development scenarios.

**Vision Statements (SDPs; LDPs outwith city regions)**

- 4.12 Although this is a legal requirement for inclusion in the proposed plan, rather than the main issues report, it is expected that it would be good practice for the main issues report to set out the intended vision for the plan area. The overarching vision for the area may have been set elsewhere in wider corporate statements, so the main issues report should consider and interpret this spatially, e.g. planning for growth, planning for stability and protection, planning for regeneration. An alternative to the vision is not necessarily required.
- 4.13 The SEA should assess the vision in broad terms, and consider any reasonable alternatives from a purely environmental perspective. This could include questioning whether a vision focused primarily on economic development has considered its environmental effects, or exploring whether a different balance can be struck within a draft vision, to better reflect environmental sensitivity within the plan area.

**Spatial strategy (SDPs; LDPs within city regions; LDPs outwith city regions)**

- 4.14 Planning authorities are required to set out general proposals for development in the area, and reasonable alternatives to them, in the main issues report. This will inform the final choice of spatial strategy in the proposed plan. The alternatives must be reasonable, and in some cases this may mean that there are no genuine alternatives. It is expected that the spatial strategies will include the following information:
- *SDPs*: high-level spatial strategy including key development areas but not necessarily specific sites. For example, it could explore the scale of new development and general direction of growth, plus reasonable alternatives to it, e.g. growth in the west of the plan area as a whole, rather than the north. This should focus on the key issues and be suitably strategic without getting into too much detail. This is particularly important for elements of the spatial strategy which will be interpreted by site-specific proposals at LDP level.
  - *LDPs outwith city regions*: high-level spatial strategy (as explained for SDPs above) and site-specific proposals.
  - *LDPs within city regions*: site-specific proposals.
- 4.15 The SEA would assess high-level and significant effects of the spatial strategy from an area-wide perspective, looking at the impact of different spatial options on the area's key environmental features. Site-specific elements of the development plan and assessment are addressed in paragraphs 4.20 – 4.22.

**Policies (SDPs; LDPs within city regions; LDPs outwith city regions)**

4.16 It is not expected that the main issues report will include the wording of all the policies that are likely to appear later in the proposed plan. Instead, it should:

- Identify the new or changed issues that require a policy response.
- Explain the proposed changes to policies or policy areas, without necessarily setting out their detailed wording.
- Briefly explain which policies or policy areas are rolling forward unchanged and why, without listing all of the policies in full (as these can be seen in the current adopted plan). This allows parties to comment on continuing policies, for example, to make the case that a policy or policy area should in fact be changed.
- Explore the reasonable alternatives to the policies that have been considered during the plan preparation process.
- Discuss topics that may be suitable for supplementary guidance that may follow, for example, asking consultees to comment on whether the detailed requirements for the design and layout of housing allocations at a specified area should be set out in supplementary guidance.

4.17 While most significant environmental effects will come from the spatial strategy and proposals, the SEA may also need to assess the effects of some policies. If other parts of the plan are predicted to have environmental effects, the SEA could usefully explore the extent to which a policy might help to mitigate them.

4.18 Where policies are rolling forward without change, the SEA could include a simple screening exercise to assess their effects, and go on to explore any potential significant effects in more detail. It could also identify cumulative effects of the plan as a whole by collectively assessing the effects of policies which are not changing.

4.19 If significant effects are assessed at main issues report stage to an appropriate level of detail, there may be no need for further SEA of supplementary guidance. This will require further consideration as detailed in paragraphs 4.50 to 4.55.

**Proposals (LDPs within city regions; LDPs outwith city regions)**

4.20 The Planning etc. (Scotland) Act 2006 requires planning authorities to set out proposals for where development should and should not occur within LDPs. Proposals should be site-specific, clearly set out on a map base showing the location and intended use of proposed sites. Depending on the area, authorities could make a judgement not to include very small sites in the main issues report and hence the assessment, bearing in mind that the cumulative environmental effect of a number of small allocations could be significant. It is important that authorities get across the message that this is the time for developers and others to put forward suggestions for sites, so that they can be properly assessed in the

context of the wider spatial strategy. Therefore, where sites are to be included, it is expected that the main issues report would outline all possible development sites (the preferred sites plus all the reasonable alternatives to them) which have emerged from survey work and / or developer bids.

- 4.21 The SEA should assess the significant environmental effects of all the sites. For SEA purposes, a comprehensive approach will help to avoid further assessment and delay at a later stage. If all of the sites are being evaluated in a systematic way to define whether they should be included in the plan, **and** that assessment fully assesses their environmental effects (i.e. covers the topics that are highlighted in the Directive), then there should be no need to duplicate this with a separate additional environmental assessment (see paragraph 5.9 below). The assessment findings will still need to be set out in the environmental report.
- 4.22 To structure and streamline this part of the assessment, there may be opportunities to combine or group sites, to provide a settlement or area-wide perspective on their likely significant environmental effects. This could improve the conciseness of the environmental report, and better inform the strategy within the plan as a whole, although it will be important to avoid inadvertently eliminating good sites that lie within a poorly performing group. Sites which already have development consent should be viewed as part of the baseline, but taken into account within the assessment of cumulative effects. Otherwise, sites which are being 'rolled forward' from previous plans should be included in the assessment.

**General principles**

- 4.23 The main issues report should identify not only what reasonable alternatives are available, but also the preferred option. It is nevertheless essential that options are left sufficiently open at this stage to allow the public to have full and meaningful participation in the SEA process. The SEA should highlight the likely significant environmental effects of the alternatives and this information should be taken into account in the selection of the preferred option.

**Key point:** *Be succinct. Think carefully about the information that needs to be in the environmental report. Use Schedule 3 of the 2005 Act to check the environmental report for compliance, but also to identify where superfluous information can be removed. Use summaries and appendices wisely.*

- 4.24 The SEA environmental report has to be published for consultation alongside the main issues report. The environmental report needs to contain the results of the assessment of the preferred option and the reasonable alternatives to it. The contents of the report must comply with Schedule 3 of the 2005 Act.
- 4.25 The environmental report should not just be a compilation of all of the work undertaken within the SEA. This approach can make the report too long, impenetrable and result in loss of definition. Instead, the environmental report should take a step back from the assessment to provide a clear and succinct insight into the process and its key outcomes. For example, matrices may be used to undertake the assessment but the results could be reported using a narrative approach. Any reader should be able to identify the significant environmental effects of the plan by making quick reference to its environmental report. Further advice on proportionate scoping and assessment to help achieve this is provided in Section 5.

- 4.26 Plan preparation and SEA should be integrated. Undertaking the main part of the environmental assessment when the main issues report is being prepared will allow the early identification of significant adverse effects resulting from the preferred option and facilitate mitigation. This could include recommending changes to the preferred option as it emerges or identification and assessment of alternatives.
- 4.27 Where changes to the preferred option have been made during the preparation of the main issues report as a result of the SEA, this should be highlighted in the environmental report. In some instances the environmental report may recommend the best environmental option to be taken forward in the proposed plan. Choices that are made in response to the assessment findings should be recorded as the SEA progresses to help provide an audit trail and facilitate production of the post-adoption SEA statement at a later stage. However, these do not need to be detailed in full - a summary can suffice.

**Key point:**

*Exploring all reasonable alternatives at the main issues report stage can reduce the need to revisit the environmental report at a later stage and help to streamline the plan making process.*

**Working with alternatives at the main issues report stage**

- 4.28 The main issues report is the key driver for the generation of reasonable alternatives, rather than the SEA. Alternatives need only be assessed within the main issues report and the SEA if they are reasonable alternatives. The starting point for deciding on possible reasonable alternatives should be the objectives and geographical scope of the plan. For example, an alternative that is not within the scope of the higher-level policy with which the plan itself has to accord is unlikely to be 'reasonable.' A reasonable alternative will be realistic, deliverable, consistent with other aspects of the plan (e.g. the high-level spatial strategy), and consistent with higher-level plans and policies such as the National Planning Framework and the Scottish Planning Policy. It is advisable to record the criteria which have been applied to identify reasonable alternatives during the assessment.
- 4.29 It is not acceptable to artificially generate more environmentally damaging alternatives within the assessment to try to gain support for the preferred option. The 'business as usual' or 'do nothing scenario' need only be assessed if they are considered reasonable having regard to the objectives and scope of the plan.
- 4.30 A well-executed SEA provides an opportunity to explore planning options in a more rigorous and imaginative way than may have been achievable previously. SEA can help to stimulate creative thinking in spatial terms, adding value to the planning process. For example, the varying environmental consequences of progressing different locational strategies or making specific land allocations could be explored within the assessment framework that SEA provides. Different responses to key challenges for the plan, such as meeting renewable energy targets or accommodating housing growth in a sustainable way, can also be tested and informed by relevant environmental information that is compiled during the SEA. Put simply, the SEA can help to avoid inappropriate development in particularly environmentally sensitive areas, steering growth towards locations where there is more capacity.

**Key point:**

*Reasonable alternatives are those which have been seriously considered as part of the plan making process.*

**Key point:** *Site-specific options should generally be assessed within SEAs of LDPs.*

4.31 Alternatives can be identified and tested for a range of different components of the plan, to different levels of detail. A robust approach will include a thorough examination of all reasonable alternatives. However, an unnecessary proliferation of alternatives should nevertheless be avoided where possible, in the interests of transparency and conciseness.

**Key point:** *Use the SEA at the main issues report stage to help eliminate options which are not feasible as a result of environmental 'showstoppers'.*

4.32 At the main issues report stage it could also be useful to undertake a high-level comparative assessment or sifting of the plan options to identify the sites or locations that raise particularly significant environmental issues. Although the evaluation exercise in the SEA will inevitably focus on the effects of the plan on the environment, this work should ultimately aim to inform choices about the plan's content. This is a basic point but one which can easily be overlooked when practitioners are primarily focused on the legislative requirements of the SEA process and its prescribed outputs, and lose sight of the actual outcomes from the plan. However, the main purpose of the SEA is to provide information on the environmental effects of plan options, and it cannot be expected to decide which one is ultimately adopted into the plan.

**Key point:** *The environmental report should be recognised as a consultation tool, but not be the only means of involving the public in the SEA.*

**CONSULTATION**

4.33 The environmental report on the main issues report may be the first time that the general public has sight of any outputs from the SEA. A non-technical summary is mandatory, and good practice has shown that producing summaries in different formats, using simple language and being fully aware of the range of stakeholders who are expected to read them, can make them more user-friendly.

**THE PROPOSED PLAN**

4.34 Following consultation on the main issues report and SEA, responses are taken into account and the proposed plan can be prepared. The comments received on the SEA should be recorded and responses noted. This will provide a helpful point of reference during preparation of the post-adoption SEA statement (paragraph 4.46).

4.35 If the proposed plan contains new material that was not previously assessed and consulted upon in the main issues report (at least as options), this must be given careful consideration for SEA purposes, prior to finalising the proposed plan.

4.36 A planning authority has to judge for itself the significance of the new material in the context of the whole plan, and whether the likely environmental effect (including the effect of reasonable alternatives) has been properly assessed. It is important to note that a failure to properly assess new material in the context of the plan may lead to the plan, or policies that form part of the plan, being ruled unlawful by the courts.

**Key point:** *Revision of the environmental report is not automatically required.*

4.37 If the new material in the proposed plan is not expected to have significant environmental effects, then it is likely to be safe to include it in the adopted plan, and note the change in a concise update to the environmental report. This is not, however, a stated requirement of the legislation and no additional public consultation on the environmental effects of minor changes would be required by the 2005 Act. In such cases, it is acceptable to proceed directly to the post-adoption SEA statement stage.



**Key point:**

*Consultation on a revised environmental report at the proposed plan stage needs to extend beyond the provisions of the Town and Country Planning (Scotland) Act 1997, as amended, to meet the requirements of the 2005 Act.*

- 4.38 New material that could have a significant environmental effect is likely to include the introduction of any new proposals or sites, or major changes to the policies analysed in the main issues report, that were not covered in earlier iterations of the environmental report.
- 4.39 If the 'significant' new material and its environmental effects have not previously been explicitly assessed and consulted upon, then the environmental report will need to be updated and an additional consultation undertaken. To maximise transparency, reduce duplication of earlier work and help consultees understand the outputs better, it is recommended that this supplementary assessment is presented as an annex to the environmental report (as opposed to a redraft of the report as a whole). This reduces the time required to edit the original report and can help consultees to identify the additional findings without having to trace changes back to the original environmental report.
- 4.40 One way to avoid this scenario and associated delays is by undertaking a thorough scoping exercise and front-loading the assessment and plan preparation at the main issues report stage, to ensure that all the reasonable alternatives are identified and assessed in the process. This should minimise the potential for late changes to arise.
- 4.41 The revised or supplemented environmental report should be publicly consulted on at the same time as the proposed plan. As noted in Figure 1, the consultation on the environmental report will need to go beyond simply inviting representations on the plan and allow for broader comments, in order to meet the requirements of the 2005 Act. The views expressed by consultees at this stage must be taken into account by the planning authority before the plan is adopted. There may be more than one way in which to show, if challenged, that this requirement (Section 17, 2005 Act) has been met. It could, for example, either be taken into account through modifications to the proposed plan, or could be considered during the course of the Examination and taken into account as appropriate. As the environmental report is not a part of the proposed plan, any comments on the revised environmental report at this stage should be made in the form of representations on the plan itself, to allow the appointed person (e.g. a Reporter) to take them into consideration during the Examination.

**ACTION PROGRAMME**

- 4.42 The action programme for the proposed plan is not expected to trigger the need for a further SEA, as it implements the content of the plan which has already been assessed. Instead, action programmes can play an important role in ensuring that any mitigation or monitoring proposals from the SEA are delivered alongside the plan.

## EXAMINATION

**Key point:** *Late changes to the plan may trigger a need for further environmental assessment and consultation, generating delays. This underlines the importance of comprehensive evaluation of all reasonable alternatives at the main issues report stage.*

- 4.43 The new planning system aims to front-load the process as far as possible, and full consideration of reasonable alternatives at the main issues report stage should reduce the need to re-open the SEA at a later stage. However, if representations on the proposed plan include new sites or approaches<sup>3</sup> that have not been previously assessed, it may prove helpful if those who are bringing proposals forward could provide the planning authority with environmental information on the proposal and its wider context. This could include a brief summary of the relevant aspects of the baseline environment and a simple summary or screening of the likely significant environmental effects of the proposal on its own, and when considered in relation to the rest of the plan. Whilst the planning authority would have to check this information for consistency with its own findings, this could facilitate a swift and accurate assessment of the proposed changes and amendment of the environmental report should the representation be supported in the examination report. This cannot be considered a statutory requirement, given that responsibility for the SEA lies with the planning authority but, where appropriate, may allow late proposals to be assessed alongside the options considered by the planning authority earlier in the process. If they were not included as options in the environmental report, the sites and the additional environmental information could require an additional consultation period if they are to be brought into the plan.
- 4.44 The examination of the plan may result in recommendations to modify the plan. Modifications that have not previously been considered in SEA (e.g. an option that was rejected prior to the main issues report) will need to be reviewed for their environmental implications. Potentially significant environmental effects would have to be assessed and the findings presented as an annex to the environmental report, which would then trigger an additional period of consultation on the modifications and the environmental report. The planning authority will undertake any further assessment in the case of LDPs (as provided for by Section 19(11) of the Planning etc. (Scotland) Act 2006), whilst the Scottish Government would become the responsible authority for any proposed modifications to SDPs.
- 4.45 Fundamental changes at this stage have the potential to result in significant delays. This underlines the importance of including a comprehensive assessment of all reasonable alternatives at the main issues report stage. Section 19(11) of the Planning etc. (Scotland) Act 2006 allows planning authorities not to accept modifications to LDPs that have been recommended in an examination report, where these are not acceptable with regard to SEA.

<sup>3</sup> Note that effective main issues reports will render such modifications less likely. See paragraph 78 of Circular 1/09 Development Planning for further guidance.

## APPROVAL AND ADOPTION

4.46 Section 18(2) of the 2005 Act requires a post-adoption SEA statement to be prepared 'as soon as reasonably practicable' following adoption of the plan. The Act requires the SEA statement to set out how the findings in the environmental report and the associated consultation responses were taken into account during the preparation of the plan, before the final decision was taken to adopt it. It should explain any changes that have been made to the SDP or LDP as a result of the SEA, and the reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered. It should also provide consultees with a final opportunity to comment informally on arrangements for monitoring. The statement need not be long or overly detailed.

## MONITORING

4.47 To meet the requirements of Section 19 of the 2005 Act, monitoring must be undertaken:

- to identify significant environmental effects arising from implementation of the development plan; and
- to identify any unforeseen environmental effects, in order to allow remedial action to be taken where required.

4.48 Monitoring will also enable the planning authority to gauge the effectiveness of any mitigation measures employed, and to manage any uncertainty about the plan's environmental effects. Monitoring should therefore focus on the significant environmental effects of the development plan. It can make use of appropriate indicators that are linked to the SEA baseline and may also focus on the identified environmental problems within the plan area.

4.49 There is potential for overlap between the monitoring carried out for the SEA and the broader monitoring undertaken for the development plan. In the interests of efficiency, the planning authority may take the opportunity to integrate these monitoring requirements. Issues could be reported in the monitoring statement and used to directly inform the preparation of the next development plan and its SEA.

## SUPPLEMENTARY GUIDANCE

4.50 The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 state that the topics for supplementary guidance must be anchored within the content of the plan itself<sup>4</sup> and be limited to the provision of further information or detail in respect of policies or proposals in the LDP or SDP.

4.51 If supplementary guidance is available at the time of the first formal preparatory act, or becomes available before the plan is adopted then, for the purposes of SEA, it should be treated as an integral part of the plan and assessed accordingly.

**Key point:** SEA monitoring can be integrated with plan monitoring.

**Key point:** There is no need to undertake separate monitoring for the development plan and its SEA.

<sup>4</sup> Section 22 of The Town and Country Planning, (Scotland) Act 1997, as amended, and regulation 27 of the Development Planning (Scotland) Regulations 2008 refer

- 4.52 If it is proposed to adopt supplementary guidance after the 'parent' plan is adopted, then the guidance is itself a plan under Section 5(3) of the 2005 Act for SEA purposes.
- 4.53 In most cases the parent plan will have been subject to a SEA. It is likely that the guidance will also need an assessment, and the next step is to proceed directly to scoping. It is however possible that some guidance can be exempted through screening:
- Supplementary guidance in some circumstances may be no more than a minor modification to the parent plan, and so exempted if it is not likely to have a significant environmental effect.
  - Supplementary guidance may relate to a small area at a local level and so exempted as above.
- 4.54 If screening out for these reasons is not feasible, it is sensible to anticipate the likely scope and content of supplementary guidance when the parent plan is being prepared, both in the plan and in the environmental assessment. If the environmental impact of the guidance has been assessed in that context, and the guidance is in fact as anticipated, then it is possible that it can be screened out on the grounds of duplication.
- 4.55 If required, a new SEA could use the original assessment as a starting point, and not duplicate the information that has already been gathered. Findings can be presented as an annex to an existing environmental report, to allow for cross referencing and to reduce the need for further reporting. In such cases, it is important to note that the amended environmental report would need to be republished in full as a single package for consultation alongside the draft supplementary guidance, to be fully compliant with Schedule 3 of the 2005 Act.

#### **OTHER GUIDANCE**

- 4.56 Other guidance which is more tenuously linked with the plan and which should not therefore be termed 'supplementary guidance'<sup>5</sup>, may fall under Section 5(4) of the 2005 Act. If so, it might be exempted through pre-screening or may need to be screened. Further information is provided in Section 4 (Figure 4.1) of the SEA Tool Kit.

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<sup>5</sup> See para 99 of Circular 1/09: Development Planning

## 5. PROPORTIONALITY

### SMARTER SCOPING

**Key point:** Use scoping more effectively to help focus the assessment.

5.1 Comprehensive scoping of the SEA forms the foundation for a focused assessment. A combination of careful consideration of the hierarchy within which the plan sits (tiering), good use of information and timely consultation can help to make better use of the scoping stage to inform the assessment as a whole. The SEA Tool Kit provides guidance on the content of scoping reports. The analysis within them does not need to be lengthy or exhaustive: a comprehensive scoping exercise need not necessarily generate a lengthy scoping report. As with environmental reports, it is important to focus on the most relevant issues.

5.2 A more proportionate and focused approach to scoping itself can be achieved in the following ways:

**Key point:** Focus on what this review of environmental objectives actually means for the assessment.

- **Review of wider environmental objectives.** Schedule 3(5) of the 2005 Act requires the environmental report to identify the environmental protection objectives which are relevant to the development plan, and explain the way those objectives and any environmental considerations have been taken into account during its preparation. Often, Responsible Authorities begin this part of the assessment at the scoping stage, and reviews can be exhaustive and lack focus. It is important that the purpose of the review remains clear throughout: apart from meeting the requirements of the 2005 Act, it ensures that the SEA and the plan it is assessing are properly set within the broader existing framework of environmental objectives. Therefore, reviews should be closely guided by the geographical extent of the plan and the topics it covers, and objectives should be excluded if there are no clear connections between them and the plan which is being assessed. There are opportunities to learn from and roll forward similar reviews which have been undertaken in other SEAs. It is acceptable to simply summarise or refer to this work in the scoping report and to cross-refer or extract key points, as opposed to fully duplicating them in each assessment.

**Key point:** SEA baseline information can be just as useful for the preparation of the plan.

- **Environmental baseline:** As with the wider review of environmental objectives, this is often commenced at scoping, but there is no requirement to include a detailed assessment within the scoping report itself. It is clear that many early SEAs were hindered by excessive data collection and descriptive baselines which did not inform the findings of the assessment in a meaningful way. Baseline information should only be gathered and referred to in SEA reports where it is really relevant. Some planning authorities have benefited from the preparation of area-wide state of the environment reports, which can be used in a range of different SEAs. Such information can be as valuable for the preparation of the development plan as it is for the SEA. It is important to ensure that in addition to generic information (that applies council-wide) the reports include information that is specific to the effects of the development plan in question. If there proved to be no plan-specific information, then this should be explained in the report.

Baseline data can be presented in many different forms, but development plans can be well served by information which is organised and presented spatially, using GIS where possible. This information can be collected and used corporately.

- **Identification of environmental problems:** This part of the SEA can help to focus the assessment on relevant aspects of the environment and potentially significant effects, and can also usefully inform the content of the development plan (particularly the monitoring statement and the main issues report).
- **Defining potential significant environmental effects and building in 'assumed mitigation'.** Particularly in the SEA of development plans, there is a tendency to scope environmental topics in, rather than exclude them. Assumed mitigation refers to those factors that can reasonably be taken into account when potential effects are being identified at the scoping stage. For example, it may be assumed that certain activities affecting the water environment would be subject to approval via the Controlled Activities Regulations (CAR).<sup>6</sup> Used with care, such mitigation could be taken into account at the scoping stage, to differentiate between generic effects from a typical development plan, and the really significant environmental effects that are expected within a specific geographic area. However, authorities must be confident that the mitigation is appropriate, robust and will be implemented as expected.

## EARLY CONSULTATION

5.3 There is a statutory requirement to consult on the scope of the SEA with the three CAs: the Scottish Environment Protection Agency, Scottish Natural Heritage, and Historic Scotland. However, it is not necessary to wait until the scoping report is written before contacting them. The CAs are also key agencies<sup>7</sup> within the planning process, and there should therefore be significant opportunities for combining consultation on the SEA and the plan itself. It may be useful, for example, to retain SEA as a standing item on all development plan-related meetings with these agencies. Early engagement in SEA has been shown to have a number of advantages. Discussions can explore whether:

- the key environmental issues are correctly identified;
- there are significant gaps in the contextual or baseline analysis (including recent updates to environmental policy);
- crucially, the methods proposed are appropriate and reflect the scale and level of detail within the plan; and
- the proposed consultation is considered to be sufficiently early and effective.

<sup>6</sup> For more information on the Controlled Activities Regulations see <http://www.sepa.org.uk/water/regulations.aspx>

<sup>7</sup> The key agencies are SNH, SEPA, Scottish Water, Scottish Enterprise, Highlands and Islands Enterprise, Regional Transport Partnerships, the Crofters Commission (in crofting counties only) and Health Boards.

**Key point:** *Spatial analysis of the baseline (e.g. constraints mapping) can provide a clearer picture of the existing situation.*

**Key point:** *Try to scope out effects which, regardless of the findings of the SEA, are clearly subject to existing mitigation mechanisms.*

**Key point:** *Make informal contact with the Consultation Authorities early in the process.*

- 5.4 Primary data collection, e.g. site survey work, is not normally required within SEA. There will usually be opportunities to draw on studies undertaken to inform the evidence base for the development plan (e.g. landscape character assessments). The CAs are an excellent source of advice on data availability and this should be sought early in the process.
- 5.5 Consultation on the scoping report should form one strand of the pre-main issues report involvement required of the key agencies by the Planning etc. (Scotland) Act 2006. The statutory five-week consultation period for the SEA scoping report should be built into the plan-making timescale, to avoid unnecessary delays.

### SELECTIVE REPORTING

- 5.6 The excessive length of environmental reports is a common concern. This may have been exacerbated recently by growing concerns about achieving legal compliance in SEA.
- 5.7 To improve transparency and ensure that the SEA outputs better match the aspiration for concise development plans, the following measures are recommended:

- Focus only on reporting the significant environmental effects, whilst recognising that synergistic and cumulative effects can be generated from minor effects (see further advice on significant effects in paragraphs 5.12 to 5.17).
- Use appendices to present more detailed work and the environmental report to focus on key results. Such appendices could be more accessible and of greater use to others if they can also be made available electronically.
- Be selective about the use of matrices to present results. Used appropriately, matrices can help with consideration of synergistic and cumulative effects and can reassure the reader that the assessment has been systematic and comprehensive. However, they can also appear repetitive, be difficult to follow and lengthy. There are ways to streamline the presentation of information within matrices. For example, as mentioned previously, the assessment can be undertaken for a group of policies covering the same topic, thereby avoiding the production of a matrix for each individual policy or proposal. It is also possible to use matrices to undertake the assessment and to report the results using a narrative format.
- Use of summaries and highlighting of key points throughout the report.

- 5.8 Proportionality in SEA reporting has a key role to play in making better use of resources (see Section 6).

**Key point:** Long environmental reports can undermine the transparency of the SEA process.

**Key point:** Use techniques to ensure that the significant effects of the plan can be clearly identified from the environmental report.

## ASSESSMENT METHODS THAT ARE FIT FOR PURPOSE

5.9 It is for the planning authority to define the scope and level of detail to be included in the assessment, and this has to be discussed at the scoping stage. Any assumptions that underpin assessments should be made explicit in the environmental report. To undertake the assessment itself, the following methods are commonly applied:

- The use of SEA objectives to assess the plan can help to articulate the direction in which the plan should be moving from an environmental perspective, but can be difficult to define and apply in a meaningful way. Qualitative judgements of the performance of the plan in relation to SEA objectives can be significantly strengthened by the application of baseline evidence to the findings.
- A thematic approach can provide a reasonable impression of the environmental performance of a plan as a whole and be particularly helpful for considering strategic aims. However, it may be too “broad brushed” for Local Development Plans.
- Research has demonstrated that there is significant untapped potential for map-based analysis in the SEA of development plans, for example the use of constraints mapping and overlay analysis. Such map-based analysis can be used in the assessment of sites in the main issues report or, alternatively, as part of the site selection process.
- Planning authorities often use checklists for the assessment of sites from a planning perspective. These checklists routinely include planning, economic and social criteria. Some environmental criteria (e.g. proximity to nature conservation sites) are often included. Planning authorities may wish to consider widening the environmental criteria contained in these checklists to include all of those set out in Schedule 3(6) of the 2005 Act, thereby integrating SEA into the planning appraisal of sites (see paragraph 4.21).

5.10 Early consideration and discussion of the most appropriate approach for the plan in question at the scoping stage will benefit subsequent assessment.

5.11 Topics that those undertaking SEA have often struggled to interpret include: *climatic factors, population and human health, and material assets*. As a quick guide to these headings, the following issues are likely to be most relevant to development plan SEAs:

- **Climatic factors:** greenhouse gas emissions and mitigation; effects of future climate change (e.g. habitats, landscape, flood risk); long-term adaptation to climate change impacts.
- **Population and human health:** proximity to pollution, noise, vibration and environmental problems (e.g. derelict and contaminated land); outdoor access.
- **Material assets:** existing land use (including recreation and access); environmental infrastructure such as flood defences, minerals (including sterilisation of resources and secondary effects arising from extraction and transport).



## IDENTIFYING SIGNIFICANT ENVIRONMENTAL EFFECTS

5.12 Identifying significant environmental effects is crucial. These are the effects of actual outcomes from the plan, as opposed to judgements on the alignment between the policies of the plan and the SEA objectives. SEA objectives should not be confused with those of the plan. They may overlap, but have different functions.

**Key point:** Define significance criteria early in the process and apply them consistently.

5.13 Whether or not an environmental effect is significant depends on a number of factors. It is a judgement to be made in each case. Schedule 2 of the 2005 Act identifies the key characteristics of plans, environmental effects and the area likely to be affected in determining significance. These include *inter alia*:

- *Probability of effects.* Greater likelihood of effects is likely to increase significance.
- *Frequency, duration and reversibility.* Will an effect occur only once? Will it be temporary or permanent?
- *Magnitude and spatial extent.* How large an area is affected? Will the effect comprise loss or damage of a feature?
- *Sensitivity of the plan's environment.* Does the area have environmental value (e.g. protected status)? Are there environmental issues identified by the environmental baseline, e.g. decline in quality or quantity of resources?

5.14 Significance will therefore depend on, amongst other things, the nature, scale and duration of the effect, whether the effect will be reversed (and if so, how quickly), how sensitive to change or recovery the environmental factors affected (e.g. wildlife or landscapes) may be and how important they are. Significance can also depend, in some cases, on the type of development or land use change that is proposed and its location. For example, the effect of a proposed use of land for a noisy recreation or sport would be more significant if located near to housing areas or a hospital, or in an area enjoyed for its tranquillity. If located next to a site of heavy industry, the increase in noise may not have a significant effect.

5.15 In practice, combining some or all of these criteria should help to identify the most significant environmental effects of the plan. In some circumstances large-scale effects may not necessarily be significant, whereas some small-scale effects could become a concern if they are impacting on a particularly sensitive environment. Equally, multiple minor negative effects may become much more significant when considered cumulatively within a certain area or in relation to a specific aspect of the environment.

5.16 Clear criteria or decision rules for characterising effects and assessing significance should be defined early in the process and consistently applied to the SEA findings. Planning authorities may wish to consult the CAs on the definition of significance criteria at the scoping stage.

5.17 Trying to capture the characterisation of effects in a matrix can become complicated and may be best achieved after the initial assessment has been undertaken.

## IDENTIFYING CUMULATIVE EFFECTS

**Key point:**  
*Identification of cumulative effects can be challenging but may add particular value to the assessment of development plans.*

5.18 Cumulative effects can be particularly important within a development plan SEA, given the breadth of issues that plans address and their emphasis on providing a spatial vision for an area.

5.19 The analysis of cumulative effects is often presented in the form of a summary matrix that brings together the results from the assessment of individual policies and proposals. Similar assessment findings from different parts of the plan on the same environmental topic can sometimes, but do not automatically, indicate the presence of a cumulative effect. For development plans, possible cumulative effects could be identified by:

- considering how effects might work together in a single geographic area to establish, for example, whether the development strategy is placing too much pressure on the environment to the point that capacity may be breached; or
- identifying whether specific environmental assets (e.g. areas of ancient woodland, specific habitats or certain species, specific soils or landscape character types) that are distributed across the plan area might be affected by different policies from within the plan; or
- thinking beyond the confines of the plan to identify how it might add to effects from other plans or strategies (e.g. the local transport strategy, and local biodiversity action plan).

5.20 Time should be built into the SEA to allow for a good assessment of cumulative effects. It is essential to consider how significant negative cumulative effects might be avoided or mitigated.

5.21 Synergistic effects arise where two or more effects from multiple policies combine to create an effect that is greater than that which would arise from the single policy or proposal. An example within a development plan might include synergistic positive effects arising from a concerted approach within a plan for regeneration, or could arise as a result of the interrelationships between different environmental effects.

## MITIGATION

5.22 Schedule 3 of the 2005 Act requires authorities to identify appropriate mitigation measures to prevent, reduce or offset any negative effects from the plan. To ensure that these measures are robust and provide assurance that they will be taken forward, it is useful to define each action, explain the reasons for them, and identify responsible partners. Timescales for taking forward mitigation and expected outcomes should also be defined where possible, and measures should be linked with monitoring.

**Key point:**  
*Remember cumulative effects are different from multiple or large-scale effects. There are different ways of defining cumulative effects.*

## 6. MORE EFFICIENT RESOURCING

### JOINING UP SEAS

**Key point:** *Link your SEA with others that have already been undertaken to give a clearer view of the 'bigger picture' and minimise resource requirements.*

- 6.1 The 2005 Act extends across most public sector plans, programmes and strategies that could generate significant environmental effects. The broad coverage of the legislation in Scotland provides an opportunity to better link SEAs and thus reduce potential duplication. As SEA practice develops and experience grows, this should provide significant opportunities for streamlining. Greater integration may be horizontal or vertical. Within the SEA of development plans, screening plans out in their entirety is unlikely to be a valid option, but hierarchical awareness could allow for:
- transferring information, such as relevant baseline, between assessments.
  - scoping specific issues out on the grounds that they have been adequately covered in the SEA of another plan at the same level or in a higher-tier plan or policy document;
  - scoping some issues out on the grounds that they can be more meaningfully assessed in the SEA of a lower-tier plan, programme or strategy;
  - being clear about the limitations of the assessment for higher-level plans. Whilst problems should not be simply passed from higher to lower-level plans, it is important that SDP SEAs in particular do not over-anticipate LDPs and their SEAs by embarking on a detailed assessment which is dependent on numerous assumptions;
  - as mentioned previously, positioning the assessment of supplementary guidance within the broader SEA of the plan can minimise duplication of efforts. This could streamline the SEA by reducing the need for supplementary assessments at a later stage.
- 6.2 The National Planning Framework (NPF2) sets out Scottish Ministers' strategic development priorities. Its SEA provides a useful starting point for those who are undertaking SEAs of SDPs and LDPs. Proposals for further assessment, mitigation and monitoring have been built into the NPF Action Programme.
- 6.3 Where a development plan is taking forward a National Development, it is important to recognise that the NPF2 SEA has already tested the environmental effects of the development in principle, from a national perspective. However, there remains scope for further consideration of more detailed alternatives (e.g. siting, design, layout, construction or operational specifications) at the development plan level as the proposals are taken forward and project specifications become more clearly defined.

## SEA AND OTHER ASSESSMENTS

**Key point:** *It is not realistic to expect SEA and HRA to be fully integrated.*

- 6.4 It is possible, and may seem beneficial, to integrate SEA with an appropriate assessment conforming with regulation 85B of the Habitats Regulations,<sup>8</sup> but this can be difficult to achieve and may cause confusion. It is important that planning authorities continue to differentiate between the requirements of, and outcomes from, the two processes and reflect this in relevant reports. However, some of the data gathered to inform the assessments might be combined or integrated, and there may be a requirement to consider further alternatives in both processes.

## SEA, MASTERPLANS AND EIA

- 6.5 The transition from SEA to Environmental Impact Assessment (EIA) takes place as plans move forward to become site-specific projects. In general, masterplans that form supplementary guidance or are adopted in some way by a public authority may require a SEA, whilst those that are simply developed by the private sector to accompany planning applications may be subject only to EIA. Experience indicates that, if the masterplan covers something greater than a single application, for example a framework for multiple consents by different developers which is to be adopted by a planning authority, a SEA is more likely to be triggered.

**Key point:** *A robust LDP SEA could help to streamline subsequent EIAs.*

- 6.6 There is an opportunity for SEA to strengthen and streamline subsequent EIAs by identifying potential effects early in the process. SEAs can be used to address strategic issues such as the location of developments, before they progress to the project level and are assessed in more detail within an EIA.

## MINIMISING DEMANDS ON RESOURCES

- 6.7 The resource requirements associated with SEA should not be underestimated, but can be substantially reduced by taking forward many of the measures identified in this advice. The recommendations on proportionality and integration should help to make better use of existing resources and ensure that duplication of efforts is avoided.
- 6.8 SEA can also incur direct costs, including as a result of its statutory advertising requirements. To minimise these costs within the consultation process, it is possible for planning authorities to amalgamate statutory notices relating to the plan and the SEA, providing the requirements of the 2005 Act are met.

## WHO SHOULD UNDERTAKE THE SEA?

- 6.9 It is acceptable, and in many cases preferable, that those who are responsible for preparing a development plan also undertake its SEA. Many of the skills required to prepare a development plan are also relevant to SEA. Therefore, where resources allow, planning authorities should aim to carry out SEA in-house.

<sup>8</sup> Conservation (Natural Habitats &c.) Regulations 1994 as amended

- 6.10 However, in some instances there are advantages in involving external support in the SEA process: to gain a fresh perspective on the plan's content or ensure that the assessment is a rigorous test that does not take any policy assumptions for granted. Such third parties may be officers working in other parts of a local authority or a neighbouring authority, or could be consultants.
- 6.11 Where consultants are involved, it is likely that planning authorities would benefit from more focused inputs that make use of specialist expertise, as opposed to contracting out the SEA as a whole. This might take the form of training and capacity building, assistance with preparatory information gathering, or undertaking an informal review or a more formal independent verification of an in-house SEA.

## 7. CONCLUSION

7.1 This Planning Advice Note has set out advice for carrying out SEA of development plans. It has identified areas of overlap between the development plan preparation and SEA processes, to facilitate efficient SEA which does not unduly hinder the planning process or result in additional resourcing requirements. As well as reducing costs, the further development of proportionate and innovative approaches to environmental assessment will help to ensure that SEA realises its potential to add considerable value to development plans.

### HELP AND ADVICE

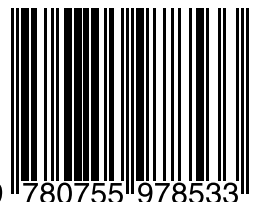
7.2 The Scottish Government's Environmental Assessment Team includes a Technical Support Unit, which specifically aims to streamline and secure added value from the SEA process by providing practical support to the public sector. Technical specialists can be contacted through the SEA Gateway.

7.3 All formal correspondence on SEA and questions relating to SEA procedures should be directed through the Scottish Government's SEA Gateway:

The Scottish Government SEA Gateway  
Directorate for the Built Environment  
The Scottish Government  
2-H South Victoria Quay  
Edinburgh  
EH6 6QQ

SEA Gateway Helpline: 0131 244 1704 or [SEA.Gateway@scotland.gsi.gov.uk](mailto:SEA.Gateway@scotland.gsi.gov.uk)

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