

**ABERDEEN
CITY AND
SHIRE**

*Strategic Development
Planning Authority*

Aberdeen City and Shire Strategic Development Plan

Strategic Environmental Assessment



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Strategic Environmental Assessment Post Adoption Statement 2014

Environmental Assessment (Scotland) Act 2005

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1. Introduction

As required under the Environmental Assessment (Scotland) Act 2005, we (Aberdeen City and Shire Strategic Development Planning Authority) have carried out Strategic Environmental Assessment (SEA) when preparing the Aberdeen City and Shire Strategic Development Plan ('the plan').

The Post Adoption Statement marks the final formal stage in the SEA for the first Aberdeen City and Shire SDP. While monitoring of significant environmental effects will continue and be ongoing, this statement will bring the process to a close and outline how we have taken the findings of the SEA, environmental considerations and consultation comments into account. It also shows how we have integrated the findings into the finalised plan.

2. Strategic Environmental Assessment Process

The SEA process includes a number of stages at which certain actions are required under the Act, these actions are as follows:

- Taking into consideration the views of all 3 Consultation Authorities (The Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Scotland) regarding whether the scope and level of detail was appropriate for the Environmental Report. This was done through the Scoping Report we submitted to the Scottish SEA Gateway in July 2010;
- Preparing an interim Environmental Report alongside the Main Issues Report (October 2011) as well as a Final Environmental Report with Proposed Strategic Development Plan (February 2013) on the likely significant effects on the environment of the proposals the plan puts forward. This includes consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the Plan and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems facing the SDP area;
 - the Plan's likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - measures envisaged for the enhancement of any significant positive effects;
 - an outline of the reason for selecting the alternatives chosen; and
 - monitoring measures to ensure that any unforeseen adverse effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report.
- Taking into account the Environmental Report and the results of the consultation in making final decisions regarding the Plan.
- Committing to monitoring the significant environmental effects of the adopted Plan. This will include unforeseen adverse significant effects.

3. Integration of Environmental Considerations and the Environmental Report

This section focuses on the environmental considerations identified through the Environmental Report, how these were considered and what measures to either enhance positive impacts or mitigate negative impacts were incorporated into the finalised plan. Each SEA topic, environmental issue and method of incorporation is set out in Table 1.

Table 1: Environmental Considerations and the Environmental Report

Environmental Considerations/ Environmental Report	Effects of plan on status of Environmental Issue	Integrated into the Plan? Yes/ No	How integrated? If not considered, why?
<p><u>Biodiversity, flora fauna</u> -</p> <ul style="list-style-type: none"> • Loss of biodiversity through development; • Impacts on locally, nationally and internationally designated sites; • Impacts on protected and non protected species; • Impacts on green space, networks and corridors; • Pressure on River Dee SAC and on species within the habitat of the Dee. 	<p>Mixed/Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • Protection of natural resources is a key consideration of the plan which is built into the central objectives and spatial strategy; • A core aim of the plan is to make sure that the region's valued assets and natural resources are protected and wherever possible enhanced; • The plan maintains that development should not lead to the loss or damage of the natural environment and the impact of development on designated sites should be at the forefront of consideration; • The plan promotes through its objectives the protection and enhancement of green space and green networks within new development; • Pressures on the River Dee are identified throughout the plan and a number of the objectives focus on the protection of it from over exploitation and as a SAC. The requirement for all new developments to use water saving technology is designed to take some of the pressure off the Dee. However; the need for ongoing monitoring of impacts and the need for further HRA's at lower level plans and proposals is identified.

<p><u>Air -</u></p> <ul style="list-style-type: none"> • Poor air quality as a result of increasing traffic flows and congestion, particularly in Aberdeen City. • Increased emissions in city/town centres as a result of unsustainable development patterns. 	<p>Mixed/ Not Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • A central aim of the plan explicitly targets making the most efficient use of the transport network, reducing the need to travel by car and making cycling and public transport more attractive options; • The spatial strategy focuses development in Strategic Growth Areas; this will concentrate development along key transport corridors, making new development more accessible by public transport and reduce dependency on private car.
<p><u>Landscape –</u></p> <ul style="list-style-type: none"> • Loss of diversity in landscape character to development; • Undesirable and unsustainable development patterns; • Pressure on landscape to absorb and adapt to scale and rate of development; • Potential of large scale windfarms to adversely impact on landscape. 	<p>Mixed/Not Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • Objectives and targets built into the plan require the protection of the varied landscape character within the region; • Sustainable development patterns are built into the plan, which focus 75% of future LDP land allocations within Strategic Growth Areas; • Environmental objectives and targets within the plan mean that the landscape capacity to accommodate development should be fully considered when identifying land and considering development proposals; • The plan identifies that while there may still be some capacity for onshore wind, it is likely that a greater mix of renewable energy sources will be required over the plan period.
<p><u>Cultural Heritage –</u></p> <p>Vulnerability and potential loss of cultural heritage assts to development.</p>	<p>Negative/Not Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • A central aim of the plan requires protection of valued assets including the regions cultural heritage; • Objectives and targets built into the plan require that the way in which sites are chosen and the quality of design will make sure development does not lead to the decline of the North East’s built, natural and cultural assets.

<p><u>Climatic Factors</u></p> <ul style="list-style-type: none"> • Greenhouse gas emissions related to transport and energy demands and the need to adapt to climate change; • Coastal flood risk and coastal erosion, development in floodplains and the increased risk associated with predicted climate change; • Sustained reliance on car as the primary mode of transport and growing commuting distances; • Opportunities to support development of renewable energy; • Potential need for strategic waste management facilities. 	<p>Negative/Significant in the long term</p>	<p>Yes</p>	<ul style="list-style-type: none"> • Along with requirements in the plan for more sustainable development patterns in order to reduce car dependence, there is also the targeted requirement for all new buildings within the region to be carbon neutral by 2020, reducing the CO2 emissions associated with construction and energy consumption; • The plan directs development away from land which is at an unacceptable risk of coastal or river flooding; • Through a number of objectives the plan promotes the move to a mix of renewable energy types and advocates harnessing the unique opportunities present in the North East with regard alternative forms of energy production; • The spatial strategy identifies the need for investment in new waste management infrastructure in close proximity to new and existing facilities and requires waste to be managed in line with the waste hierarchy and promotes the move towards energy from waste facilities.
<p><u>Water-</u></p> <ul style="list-style-type: none"> • Adverse effects on water quality resulting from a variety of factors related to transport, agriculture and development; • Over abstraction of water linked to the level of development. 	<p>Negative/Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • The plan targets the requirement to adopt water saving technologies and promotes the increase of water bodies within the region which achieve 'good ecological status'; • Targets in the plan focus on avoiding an increase in the amount of water Scottish Water are licensed to take from the River Dee in relation to new developments; • Requirement for further HRA's to be carried out in relation to lower level plans and proposals.

<p><u>Population-</u></p> <ul style="list-style-type: none"> • Increasing population and changing demographics resulting in an aging population and continuing trend of losing young educated adults; • Lack of affordable housing and variety of house types; • Place quality 	<p>Positive/Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • The plan targets an increase population within the region of 500,000 by 2035 and in doing so also promotes the need to achieve a balanced age range to help maintain and promote quality of life; • The plan identifies housing and employment land allocations, with a generous supply of housing land identified and an effective 5 year housing supply available at all times throughout the plan period. A requirement for 60 ha of employment land to be available at all times in Aberdeen and in Strategic Growth Areas in Aberdeenshire. Associated infrastructure improvements to accommodate housing and employment allocations is also a targeted objective of the plan; • The need for the region to remain economically competitive in order to retain a younger, skilled workforce is a targeted objective. The plan also identifying the continuing need to plan for an aging population; • The issue of affordable housing is addressed within the plan which requires all new development to contribute to a 25% affordable stock; • An objective in favour of Sustainable Mixed Communities promotes mixed land uses and high quality design within new developments, in order to create better quality places which are more attractive to residents and businesses.
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<p><u>Human Health-</u></p> <ul style="list-style-type: none"> • Access to green space for recreation and active travel and links with new developments in order to reduce car use; • Poor air quality effecting health particularly among the elderly and vulnerable groups 	<p>Mixed/ Not Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • The plan throughout objectives and targets promotes the incorporation of green space and green networks for recreational and active travel purposes; • Promotion of public transport and a decreasing reliance on the private car are targeted objectives throughout the plan; this along with the promotion of more sustainable patterns of development should reduce the need to travel by car which in turn will have a positive effect on air quality.
<p><u>Soil-</u></p> <ul style="list-style-type: none"> • Loss of land resulting from development; • Contamination of land; • Soil erosion and pollution; • Increasing development of land on the fringes of urban areas resulting in soil sealing 	<p>Negative/Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • The plan requires more efficient use of land and re-using previously developed land; • A targeted preference in favour of re-using Brownfield land and giving priority to regeneration; • The plan identifies that Greenfield sites will be required to meet the housing demand however, states that when considering sites for development adverse effects on natural assets, including soil, should be avoided and mitigated wherever possible.
<p><u>Material Assets-</u></p> <ul style="list-style-type: none"> • Opportunities to enhance and improve the regions material assets • Need to integrate and improve efficiency of infrastructure network; • Opportunity to promote sites for renewable energy and the need to upgrade electricity transmission networks 	<p>Positive/ Significant</p>	<p>Yes</p>	<ul style="list-style-type: none"> • The plan identifies the need for considerable economic investment in material assets in order to deliver the scale of development proposed; • Improving infrastructure capacity and consolidating investment in transport and land-use is a central aim and targeted output of the plan; • The plan identifies throughout its objectives the need for high quality developments • Investing in renewable technology is a targeted objective of the plan, as is the need to invest in onshore and offshore electricity transmission.

4. Interim Environmental Report Consultation Responses

As a requirement of the Act consultation on the Interim Environmental Report must take place at the Proposed Plan stage and all consultation responses must be considered during preparation of the final report. The Environmental Report was submitted to the SEA Gateway in February 2013 beyond which time all three Consultation Authorities provided feedback. An additional feedback form was submitted in relation to the Interim Environmental Report during the period of representations to the Proposed Plan. All consultation responses have been given due consideration within preparation of the final report and are presented in Table 2.

Table 2: Consultation Responses

Consultee	Comments	How the comments were taken into account	Changes made to Environmental Report	Changes made to the Final Plan
SEPA = Scottish Environment Protection Agency; SNH = Scottish Natural Heritage; HS = Historic Scotland; CA = Consultation Authority				
SEPA (1)	General Encouraged to note that many of their comments to the scoping have been taken on board. Feel many aspects of the ER are very good, including a strong commentary throughout the chapters.	Noted	No change Required	No change required
SEPA (2)	PPS s List of PPS s is comprehensive.	Noted	No change Required	No change required
SEPA (3)	Baseline information a) Throughout baseline monitoring in flood risk should be identified as an existing problem. b) Reference to content of Strategic Flood Risk Assessment (SFRA) should be made in ER. c) Baseline information should include impacts on peat under the topic of soil.	a) Flood risk has been identified as an existing issue under water and soil Reference to SFRA has been made under water and soil c) Additional reference to peatland in 1.3 and Table 4.2 would provide greater linkage to Mitigation Measures and Appendices in later sections. e) Suggested change of wording in relation to improved ecological status may	Added under environmental problems (Water, Soil and Climatic factors) b) Added under environmental problems (Water, Soil and Climatic factors) c) Impact on peatland to be identified under soil	No change required

	<p>d) Reference in 4.2 to the SDP's role to 'improve water quality</p> <p>e) The wording in 4.2 of 'ensure sustainable use of water' should be broadened to 'improve the ecological status of water'</p>	<p>be unnecessary as the plan itself refers to 'good ecological status' of water bodies. However, for consistency the change is acceptable within the ER.</p>	<p>section in 1.3 and table 4.2.</p> <p>e) Table 4.2 Replace 'improve water quality' to 'improve ecological status of water'</p>	
SEPA (4)	<p>Alternatives</p> <p>Assessment of the alternative option as well as the preferred is welcomed.</p>	Noted	No change required	No change required
SEPA (5)	<p>Assessment Methodology</p> <p>a) We note that the assessment has been carried out against the SEA topics rather than the SEA objectives.</p> <p>b) We are pleased with the assessment of cumulative effects.</p> <p>c) Welcome the inclusion of the CA's responses and how they were considered in the Interim ER.</p>	Noted	No change required	No change required
SEPA (6)	<p>Assessment of Spatial Strategy</p> <p>Detailed explanation noted</p>	Noted	No change required	No change required
SEPA (7)	<p>Assessment of Housing and Employment Allocations</p> <p>Detailed explanation noted</p>	Noted	No change required	No change required
SEPA (8)	<p>Assessment of SDP Objectives</p> <p>In General satisfied with the assessment.</p>	Noted	No change required	No change required

SEPA (9)	<p>Assessment of Cumulative effects of preferred options</p> <p>Question as to why the cumulative effects of the preferred option has led to such significantly negative impacts on soil being envisaged? Further explanation sought.</p>	<p>Appendix 6.4 of the ER sets out a description of why the cumulative impacts of the preferred option on soil are predicted to be significantly negative, this is in large part to do with the effects on peat soils and contamination. This prediction is based on the assumption that the extensive scale of development proposed in the plan and population projections will be realised .While the plan has some scope to mitigate negative impacts with regard soil, it is relatively limited in its ability to enhance positive impacts, therefore the precautionary approach has been adopted in relation to soil.</p>	No change required	No change required
SEPA (10)	<p>Mitigation</p> <p>a) Approach to mitigation welcomed.</p> <p>b) Identification of policies within LDP's acting as mitigating measures for negative effects from allocations also welcomed</p>	Noted	No change required	No change required
SEPA (11)	<p>Monitoring</p> <p>Inclusion of monitoring plan (table 5.3) welcomed. Requirement for issues to be reported in SDP monitoring report and remedial actions carried through to SDP and LDP's noted.</p>	Noted	No change required	No change required
HS (1)	<p>General</p> <p>Overall found the revised ER clear and adequately informed by the development of the SDP and further consultation</p>	Noted	No change required	No change required

	responses. Found it to be focused on the significant issues and the mitigation framework reflects this.			
HS (2)	<p>Non Technical Summary</p> <p>The predicted environmental impacts on the historic environment in the interim ER at the MIR were for 'mixed significant impacts', while in the in interim ER at the Proposed Plan stage these were for 'negative but not significant impacts'. HS would like further clarification for the reasoning behind this.</p>	<p>The scope of the MIR is wider than the Proposed Plan (PP) therefore, more alternatives must be considered. This results in a wider range of environmental impacts both positive and negative requiring consideration at the MIR stage. The PP is considering a relatively narrower and more specified set of aims, objectives and proposals; which results in the scope for considering the magnitude of environmental impacts on receptors likewise narrowing. This means the predicted impact on a particular receptor may change between MIR and PP based on a more specified or different set of circumstances being defined.</p>	No change required	No change required
HS (3)	<p>Monitoring</p> <p>Welcome the proposal to incorporate the monitoring of significant environmental effects into the monitoring framework for the SDP.</p>	Noted	No change required	No change required
SNH (1)	<p>Non Technical Summary</p> <p>Recommend the simplification of the second paragraph in the NTS by removing reference to pre-screening and screening as they are not relevant for the SEA.</p>	<p>Given the content and level of the plan it is recognised that the SEA was likely to go straight to scoping. However, the different stages of SEA are set out here more for general information. Including information on screening here provides further SEA context and removing it would</p>	No change made	No change required

		have little bearing on the environmental outcomes.		
SNH (2)	Non Technical Summary Recommend that the second paragraph of 1.1 identifies the role of SEA in: assessing alternatives; identifying significant effects and mitigating them.	Addition to 1.1 para 2 of the role of assessing alternatives. Section 1.1, paragraph 2 identifies the role of SEA and in particular the ER in identifying environmental effects and mitigating them - <i>“we show how we assess the [significant] effects of a plan on the environment; how we could address those effects through a process called mitigation”</i> . For clarity the word ‘significant’ could be inserted here where indicated in brackets. An additional comment on alternatives could also be included in the context of this statement.	Addition to 1.1 para 2 of reference to alternatives and insert the word ‘significant’.	No change required
SNH (3)	Non Technical Summary Table 1.1 should be headed ‘Assessment of likely effects’ as it is pre-mitigation.	Suggested amendment made	Addition to heading of Table 1.1 of the word ‘likely’	No change required
SNH (4)	Non Technical Summary There is no mention in Table 1.2 under soils for the need to focus development on brownfield land where possible and away from good quality agricultural land	Addition to table 1.2 under soils.	Addition of focusing development on brownfield land where possible in Table 1.2	No change required
SNH (5)	Non Technical Summary and Table 5.2 – Landscape Although landscape is not included here because effects are not considered to be	Reference to high quality design and respecting local landscape character is made throughout the SDP. As the impact on landscape was not considered significant it was not included in table 1.2,	No change made	No change required

	significant, reference could be made in some part of the SEA to LDP's requiring a high standard of development vis-à-vis landscape within locally designated landscape areas and structural landscaping being a requirement for large scale development.	which deals with mitigation measures for significant effects. However, part of this issue will be covered under material assets where there is a requirement for lower tier plans to have policies which promote high quality development. Both Local Development Plan's Interim SEAs identify the effects on landscape to be significant and propose policy based mitigation measures to protect sensitive and valued landscapes. They also identify the need for masterplanning to ensure high quality design and landscaping within large scale developments.		
SNH (6)	Timing Correction is needed in table 2.2 for the timing of the publication of the Environmental Report alongside the Proposed Plan	Timings in table 2.2 updated	Amended Table 2.2 to reflect correct dates.	No change required
SNH (7)	Preferred Option Paragraph 3.3 identifies the preferred option as having the least effect on the environment. It is suggested that cross reference is made here to Appendix 6.2 to help readers identify where in the report this conclusion is reached. Alternatively insert further explanation into this paragraph.	Cross reference inserted.	Cross reference added to Appendix 6.2 in paragraph 3.3	No change required
SNH (8)	Preferred population target	The preferred option is based on the population projections and migration	Additional explanatory text to Table 3.3 outlining	No change required

	An explanation is required in table 3.3 as to why the preferred population target is 500,000 and alternative 480,000	assumptions used in the HNDA (2011). These envisaged a probable population growth in the region of 498,439 by 2033. This along with the predicted housing completions on the basis of Structure Plan allocations formed the basis of the preferred population. Additional text added to outline this position.	the reason for the preferred population target	
SNH (9)	Relationship with other PPSs (International) Table 4.1 should include reference to the Ramsar Convention and the European landscape Convention under the 'International' heading.	Inclusion of these additional PPSs to table 4.1	Inclusion of Ramsar and European Landscape Convention to Table 4.1.	No change required.
SNH (10)	Relationship with other PPSs (National) Suggested addition of following to table 4.1: <ul style="list-style-type: none"> • Land Reform (Scotland Act) 2003; • Wildlife and Natural Environment (Scotland) act 2011; • Land Use Strategy (2011); • Scottish Government Policy on Control of Woodland Removal; • Countryside (Scotland) Act 1967; • Environmental Liability (Scotland) Regulations 2009; • Marine Strategy Regulations 2010 	Inclusion of additional PPSs.	Inclusion of additional PPSs to Table 4.1.	No change required.
SNH (11)	Relationship with other PPSs (Local) Suggested addition of following to table 4.1: <ul style="list-style-type: none"> • South and Central Aberdeenshire Landscape Character Assessment (1998); 	Inclusion of additional PPSs	Inclusion of additional PPSs to Table 4.1	No change required

	<ul style="list-style-type: none"> • Banff and Buchan Landscape Character Assessment (1994); • Aberdeen Landscape Character Assessment (1997); • Natural Heritage Futures – North East Coastal Plain 2002 updated 2009 			
SNH (12)	<p>Table 4.2- Biodiversity Flora and Fauna:</p> <p>The SDPAs role should be expanded under Biodiversity, Flora and Fauna in table 4.2 by including:</p> <p>a) Identification, protection and enhancement of green networks;</p> <p>b) Identification of high risk of invasive species exploiting green space and this needs to be avoided through designs and management of policies in lower level plans;</p> <p>c) Give mention to the Moray Firth SAC and bottlenose dolphins which can be found around NE harbour mouths.</p>	<p>a) A recommendation which came out of the SDP examination was to include as further proposal for the identification and development of a strategic green network. The inclusion of this proposal in the plan will give much more weight to this issue. Inclusion of this within the SEA to provide consistency;</p> <p>b) With regard the SDP's role in identifying the high risk that invasive species poses to greenspace, this issue is covered at the appropriate strategic level within both table 4.2 of the ER and within objectives in the plan which identify the SDPs role in protecting and promoting green space, green networks and all forms of biodiversity. Any further detail would not be appropriate in a strategic document;</p> <p>c) Mention made to the SAC status of bottlenose dolphins.</p>	<p>a) Addition under Table 4.2 of the identification and enhancement of a strategic green network.</p> <p>b) No change made</p> <p>c) Reference to SAC status of bottlenose dolphins in Table 4.2 under Biodiversity.</p>	<p>Examination recommendation resulting in an additional proposal within the plan for identification and development of a strategic green network.</p>

SNH (13)	<p>Table 4.2- Landscape:</p> <p>Reference should be made in table 4.2 to the Aberdeenshire and Angus Wind Energy Capacity Study</p>	<p>An additional statement added to the end of the final bullet in the second column in 4.2 under landscape: <i>“Potential for large scale windfarms to adversely impact on the landscape in light of the findings of the Aberdeenshire Wind Energy Capacity Study”</i>.</p>	<p>Amendment to Table 4.2 under landscape.</p>	<p>No change required</p>
SNH (14)	<p>Table 4.2- Climatic Factors:</p> <p>An additional issue under ‘climatic factors’ should be added to table 4.2 relating to the reduction in water availability and the SDP’s role in ensuring that conservation measures are put in place.</p>	<p>The SDP’s role in ensuring the sustainable use of water is identified (as SNH recognise) under ‘water’ in table 4.2. Additional mention made under ‘climatic factors’ in order to recognise the climatic impacts on the availability of water.</p>	<p>Addition to Table 4.2, column two under ‘climatic factors’ of the potential reduction in water availability. And mention in column four of table 4.2 the SDP’s role in ensuring the sustainable use of water.</p>	<p>No change required</p>
SNH (15)	<p>Table 4.2-Soil</p> <p>a) Soil disturbance to carbon rich soils (peat) should be noted in table 4.2 under soil along with the SDP’s role in directing development away from peaty soils and possibly mitigating/restoring sites which have been damaged;</p> <p>b) The Role of the SDP of directing development away from prime agricultural land and focusing on brownfield sites should be identified.</p>	<p>a) The ER addresses in Table 5.2 ‘mitigation measures’ and throughout the appendices, the potential impact of development on carbon rich soils, the SDP’s role in directing development away from such land is stated. Table 4.2, column two identifies, as an issue, the loss of soil which acts as a carbon store, the mention of the SDP’s role with regard avoiding and mitigating the impact of this added to column 4;</p> <p>b) The ER in table 1.2 under ‘biodiversity’ and in table 4.2 under ‘landscape’ identifies the need to see brownfield development as preferable and to direct development away from greenfield land where possible. The plan itself also</p>	<p>a) Addition to column 4 of table 4.2 under soil of the SDP’s role to direct development away from peat soils.</p> <p>b) Additional reference in Table 4.2 under soil for the need to direct development away from</p>	<p>No change required</p>

		identifies a requirement to see brownfield development as preferable; this provides significant weight to the issue. A further inclusion of this issue under 'soil' would really not alter the outcome of greenfield/brownfield considerations in light of the requirements already built into the SEA and the Plan. However, an additional mention to this has been added here for consistency.	greenfield land and prime agricultural land, where possible.	
SNH (16)	Table 5.1 Clarification is required in paragraph 5.1 as to whether the statement <i>"We have also not assessed the proposals as each project has been assessed through EIAs in other plans or projects"</i> . Is in fact referring to SEA not EIA? If the plans are included in other PPSs they should be included in table 4.1 and appendix 6.5, with the latter cross-referencing the relevant PPS.	Paragraph 5.1 should be referring to both SEAs, which will have been carried out on other plans and strategies, and EIA's which will be required at the point the proposals come forward. These are listed in table 4.1 and appendix 6.5. The links between the proposals and SEA's carried out for other plans to be identified in the 'Relationship with PPS' column.	Identify the relationship between the SEA's of different PPSs with regard the proposals in Appendix 6.5	No change required
SNH (17)	Table 5.2 - Water In table 5.2 under water – we welcome these proposed mitigation measures given the overall likely significant negative effects of the plan on water, in particular with regard to quality and quantity in the River Dee (SAC). We believe the key mitigation measures should be carried across into the plan itself by inclusion for example	Through correspondence with SNH with regard the HRA an agreement was reached for additional mitigation measures being built into the HRA, one which specifically relates to the River Dee. In addition to this, through the examination of the plan, a recommendation was made that cross	No change made	Examination recommendation resulting in an additional sentence at para 5.2 requiring cross reference to the HRA for later stage plans and

	<p>under 'How to meet the targets' in the relevant section. Another implicit mitigation measure that we believe should be added here is that LDPs will be subject to Habitats Regulations Appraisal which will enable more specific and updated consideration of likely effect of water demand from housing proposals on the SAC.</p>	<p>reference be made to the HRA of the SDP at the point lower level plans or proposals are being considered. The ER in table 5.2 states that LDP's will be required to carry out HRA's for proposals which have the potential to impact on the River Dee SAC. Furthermore, the plan in para 5.6 already requires lower level plans and proposals to carry out HRA for sensitive sites, including the River Dee. The HRA, SEA and plan itself have various layers of mitigation built in; this affords appropriate protection to the River Dee at different stages.</p>		<p>proposals.</p>
<p>SNH (18)</p>	<p>Table 5.2 - Soil</p> <p>Topics under soil in Table 5.2 relate to waste management which is more related to material assets. Additional entries under soil would have been expected:</p> <p>a) Reference to LDPs steering development to brownfield sites;</p> <p>b) Reference to LDPs protecting prime agricultural land;</p> <p>c) The need for LDPs to include a specific policy on soil, including the need for soil management plans for larger development;</p> <p>d) Measures stated above should be carried forward into the plan itself to provide a specific policy direction on soil.</p>	<p>a) The ER within a number of sections and the SDP itself state the need to focus development on brownfield sites, where possible. An additional entry included here for consistency.</p> <p>b)The need to protect prime agricultural land where possible could be mentioned in this context, there is currently LDP policy direction with regard this.</p> <p>c) Soil is an issue which will be present through a number of LDP policies. Given the very different geographic and land use issues both LDPs will be dealing with, it would not be the most appropriate action to require a blanket policy on soil, this is something which would be most accurately determined at the LDP stage</p> <p>d) The impact of development on soil will likewise cut across many of the SDP</p>	<p>a) Additional reference in Table 5.2 under soil for the need for LDPs to direct development away from greenfield land where possible.</p> <p>b) Additional reference in Table 5.2 under soil for the need for LDPs to direct development away from prime agricultural land, where possible.</p> <p>c)No change made</p>	<p>No change required</p>

		objectives. The plan in a number of sections states the requirement to protect the regions natural assets (which will include soil) this is an appropriate measure of protection at the strategic level. For such changes to have been made to the plan, representations with regard this would have been required to the plan itself.	d)No change made	
SNH (19)	<p>Table 5.2 - Biodiversity</p> <p>Table 5.2, Biodiversity - we welcome the reference to future LDPs considering the need to protect or enhance existing green networks, but believe this should be a stronger commitment, given the positive emphasis on green networks say in paragraphs 130 and 150 of Scottish Planning Policy Also, while we welcome the need for policies protecting the natural environment and open space, there is also a need for policies to restore and enhance through mitigation, design, planning etc. This is especially important given the plan’s aspiration to a high quality environment – i.e. it needs to be more than “no more damage” and has to include “repairing former damage”.</p>	<p>Recommendations which emerged through the examination of the SDP require additional measures to promote and enhance green networks throughout the region, with further incorporation into strategic walking and cycling routes. The final bullet point under mitigation measures in the Biodiversity section of Table 5.2 could be changed to be worded more strongly to read – <i>“Future LDP’s will be required to protect, restore and enhance existing and proposed green networks”</i></p>	<p>Changed wording under Biodiversity within Table 5.2</p>	<p>Examination recommendations which resulted in additional measure around strategic green networks being built into the plan.</p>
SNH (20)	<p>Table 5.2 – Climatic Factors</p> <p>a) As part of the mitigation regarding vehicle GHG emissions, we believe reference should be included here to the role green networks can play within future LDPs by incorporating active travel routes,</p>	<p>a) Based on the afore mentioned examination recommendation relating to green networks a reference to green networks in this context to be made within Table 5.2 under climatic factors.</p>	<p>a)Additional mention of the role of green networks in mitigating GHG emissions in Table 5.2 under climate change.</p>	<p>No change made.</p>

	b) This should be reflected in the plan itself.	b) A similar representation was made to the plan itself and was considered through the examination process. Given that no modification was required, it would not be appropriate to carry this suggestion over to the plan, particularly in light of suggested amendments that were made.	b) No change made	
SNH (30)	<p>Table 5.3 – Water</p> <p>a) We welcome the intention to carefully monitor the effects of the plan on water, particularly in respect of water levels in the River Dee. We suggest the first sentence in the second column is amended to ‘Ability of River Dee to support future allocations re water supply and wastewater discharge without adversely affecting the integrity of its designation as a SAC’;</p> <p>b) We suggest DSFB is added to the third column;</p> <p>c) We suggest the sentence in the fourth column is amended to ‘Knowledge of likely frequency, duration and magnitude of periods of low water flow, allowing for climate change as well as increased demand, and tolerance of qualifying features to reduced flows; knowledge of tolerance threshold to pollutants of juvenile as well as adult species’;</p>	<p>a) It is felt that the current wording covers all the necessary aspects of SNH’s comment;</p> <p>b) Inclusion of Dee Salmon Fisheries Board (DSFB);</p> <p>c) Suggested amendment made;</p>	<p>a) No change made</p> <p>b) Inclusion of DSFB to Table 5.3 under water in column 3;</p> <p>c) Wording amendments to Table 5.3 under water in column 4;</p>	No change required

	<p>d) We suggest the first sentence of the fifth column is amended to read 'As advised by SEPA, SNH and Dee Salmon Fishery Board in liaison with Scottish Water in the light of ongoing data and research, and in terms of seeking to improve the current unfavourable status of freshwater pearl mussel in the River Dee';</p> <p>e) We suggest the second sentence here is amended to read 'When SEPA raises concerns about the ability to approve a licensable level of water abstraction in relation to maintaining ecologically acceptable flow levels';</p> <p>f) We suggest the DSFB is added to the sixth column;</p> <p>g) We suggest that sentences be added to the eighth column as follows – 'Habitats Regulations Appraisal of LDPs. Large scale housing applications to be screened for more detailed Habitats Regulations Appraisal. Implementation of alternative measures as agreed between relevant parties'</p>	<p>d) Suggested wording amendment made;</p> <p>e) Added suggested amendment as a preceding statement to second sentence;</p> <p>f) Inclusion of Dee Salmon Fisheries Board (SSFB);</p> <p>g) Suggested amendment made</p>	<p>d) Amendment to Table 5.3 under water in column 5;</p> <p>e) Additional first sentence to Table 5.3 under water in column 5;</p> <p>f) Inclusion of DSFB to Table 5.3 under water in column 6;</p> <p>g) Amendment to Table 5.3 under water in column 8;</p>	

<p>SNH (31)</p>	<p>Table 5.3 – Soil</p> <p>a) We suggest monitoring includes development on brownfield v. greenfield sites (especially good quality agricultural land);</p> <p>b) Also suggest monitoring extent of development on peat soils or where past development has left damaged/deteriorating peat soil.</p>	<p>a) This addition included in light of amendments outlined above;</p> <p>b) Policies within the Aberdeenshire Local Development Plan direct development away from carbon rich soils. Through monitoring the implementation of these polices it will be possible to establish the number of applications on peaty land which are being approved in the future.</p>	<p>a) Amendment to Table 5.3 under soil, information will be obtained from both councils, the information is collected annually so no gaps, remedial action should be considered when monitoring shows a significantly high level of prime Greenfield land is being lost and brownfield development opportunities are not being identified; monitoring will be presented through both LDP's the SDPA and the housing and employment land audits; remedial action could take place through revising policy direction with regard balance of Greenfield brownfiled development.</p> <p>b) Amendments to Table 5.3 under soil. Information will be obtained from both councils and the SG where relevant. There may be gaps relating to historic data on development on peat</p>	<p>No change required</p>
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			soils. Remedial action will be taken when a significant amount of peat soil is being developed on without due mitigation being considered. Monitoring will be presented through Aberdeenshire Council's LDP and the SDP. Remedial action would take the form of a revised policy direction	
SNH (32)	<p>Table 5.3 – Biodiversity</p> <p>a) Monitoring should also include the SSSIs as well as European sites;</p> <p>b) The condition and robustness of green networks (including local wildlife sites) should be monitored in terms of any incidences of loss or fragmentation;</p> <p>c) Protection of protected species could be monitored by recording the need for any development to obtain a derogation licence from SNH in order to proceed.</p>	<p>a) Suggested addition made;</p> <p>b) Suggested addition made;</p> <p>c) This is not something most appropriately monitored at a strategic level.</p>	<p>a) Amendment to Table 5.3 under biodiversity;</p> <p>b) Amendments to Table 5.3 under biodiversity, information will be obtained from both councils and SNH, no gaps identified, remedial action should be taken when a decrease in the quantity or quality of green space/ networks is identified, the information should be presented as part of the LDP and SDP monitoring arrangements, remedial action could be a change of policy direction;</p> <p>c) No change made</p>	No change required

<p>SNH (33)</p>	<p>Table 5.3 – Climatic factors</p> <p>Given that the Economic Growth preferred option depends upon the greater availability across the region of high-speed broadband, we recommend the rate of roll-out of this technology across the plan area should be monitored.</p>	<p>Suggested addition made</p>	<p>Addition to Table 5.3 under Climatic Factors. The Information will be obtained from BT, there are some gaps in data relating to the availability and speed of broadband at the site specific level, this work will be ongoing, BT and both councils will be responsible, this will be monitored as part of monitoring for a number of plans and strategies including the SDP.</p>	<p>No change required</p>
<p>SNH (34)</p>	<p>Table 5.4 - This needs amending for the more up-to-date time frames.</p>	<p>Updated table.</p>	<p>Update to Table 5.4 to reflect changed timetable.</p>	<p>No change required</p>
<p>SNH (35)</p>	<p>Appendix 6.1 –</p> <p>a) There is a mis-print in the first column ('General impacts of each of the three impacts') which should presumably read 'General impacts of each of the three options/alternatives';</p> <p>b) 'Housing and industry or retail facilities' development could potentially have short-term negative impacts on water through a change in water table, stream flows, site water budgets, localised</p>	<p>a) Amended to "<i>general impacts of each of the three options</i>";</p> <p>b) Amended to read '<i>long term negative impacts</i>';</p>	<p>a) Amendment to Appendix 6.1, column 1;</p> <p>b) Amendment to Appendix 6.1 under 'comment' to read 'long term negative impacts'</p>	<p>No change required</p>

	<p>flooding, silt deposition and water-borne pollution' – we are unclear why such effects are considered short term, since the drainage and therefore flood risk caused by the additional non-porous surfaces will be long term;</p> <p>c) While the Plan Proposals have been screened out of this SEA as being covered by other SEAs/EIAs, there is an issue about whether these should be considered as part of the assessment of cumulative effects.</p>	<p>c) The Environmental Assessment (Scotland) Act 2005 states the need to identify the most appropriate level for assessment to take place in order to avoid duplication. The cumulative impact of the proposals will take place in SEAs and EIAs for alternative PPS and lower level proposals. These will be identified and cross referenced in Appendix 6.5 as stated in response to SNH (16) comment above.</p>	<p>c) No change required</p>	
<p>SNH (36)</p>	<p>Appendix 6.2</p> <p>We note there is little difference between the assessments of the three options, although the preferred option is considered to have less negative effects in terms of air quality and climatic factors. In terms of biodiversity the +/- score for the preferred option and the alternatives seems appropriate, given that whatever the distribution of housing between the three corridors, some designated areas and elements of the green network may experience pressure from nearby development. This is particularly the case for the Ellon-Blackdog and Portlethen-Stonehaven corridors.</p>	<p>Noted</p>	<p>No change required</p>	<p>No change required</p>

<p>SNH (37)</p>	<p>Appendix 6.3 – Economic Growth</p> <p>Economic Growth – the preferred option is scored ++/- for Climatic factors as opposed to +/- for the main alternative because of the support in the Proposed Plan for digital and broadband technology to reduce the need to travel. However it could perhaps be noted that development plans of themselves are unable to bring about faster rolling-out of high-speed broadband. The anticipation of greater availability and use of digital/broadband technology leading to a more sustainable economic growth outcome emphasises the need to monitor this from Plan to Plan (see comment under Table 5.3 above). Otherwise, this and other Plans could be advocating a strategic approach which has higher environmental effects than predicted.</p>	<p>Change to sentence two under economic growth to, <i>“In addition it seeks to <u>aid</u> in the roll out of high speed broadband....”</i></p>	<p>Amendment to Appendix 6.3 under Economic Growth.</p>	<p>No change required</p>
<p>SNH (38)</p>	<p>Appendix 6.3 - Population Growth</p> <p>It would be helpful if a short explanation was included of where the alternatives of 500,000 and 480,000 came from.</p>	<p>An explanation, as set out in SNH (8) above included here for clarity,</p>	<p>Addition of explanatory text to Appendix 6.3 under Population Growth.</p>	<p></p>
<p>SNH (39)</p>	<p>Appendix 6.3 - Sustainable Mixed Communities</p> <p>The preferred option is scored ++ for climatic factors as opposed to + for an alternative because it places more</p>	<p>Impacts of each objective should not be seen in isolation. The description in Appendix 6.3 under SMC identifies the cross over of impacts between this</p>	<p>No change made</p>	<p>No change required</p>

	<p>emphasis on the use of Combined Heat and Power (CHP) schemes in larger buildings.</p> <p>However this is not actually mentioned in the Sustainable Mixed Communities chapter of the SDP, instead being mentioned in the Sustainable development and climate change chapter.</p>	<p>chapter and the Sustainable Development and Climate Change chapter.</p>		
SNH (40)	<p>Appendix 6.3 - Quality of Environment</p> <p>a) Scoring here is based on the urban environment but this section of the SDP is broader than that – it covers the natural heritage, e.g. designated areas, biodiversity, landscape, green belt, green networks. So the 0/- scores for SEA issues of Biodiversity and Landscape appear understated;</p> <p>b) As for Water, we would suggest a + score for each should be aspired to. Otherwise environmental ‘policies’ of a plan that did not score particularly well against SEA objectives would be a cause for concern in terms of their adequacy;</p> <p>c) The preferred option is based on implementation of the Strategic Transport Fund to construct roads and hence encourage/facilitate car use. As a result it scores very negative for environmental effects. However, the Accessibility section of the SDP is quite rightly more balanced in terms of working towards modal shift by requiring</p>	<p>a) The wording in Appendix 6.3 under Q of E, sentence 2 changed to “It will place emphasis on improving the quality of the built, natural and cultural assets.....” The 0/- changed to a ‘+’ in order to reflect the potential positive implications for landscape;</p> <p>b) While it is recognised that a + score for water should be aspired to, Appendix 6.3 is assessing the actual predicted impacts on environmental topics based on the different policy options;</p> <p>c) Allocated a scoring of +/- to climatic factors based on an emphasis being placed on public transport and cycling and allocate a +/- to biodiversity based on the development of core paths, cycleways and green networks.</p>	<p>a) Suggested amendments to Appendix 6.3 under Q of E section;</p> <p>b) No change made;</p> <p>c) Amendment to Appendix 6.3 under accessibility</p>	<p>a) No change required</p>

	developments to be linked to public transport, cycleways and the core paths network as well as providing for major road works, this should result in amore balanced score.			
SNH (41)	<p>Appendix 6.4</p> <p>a) This cumulative assessment looking across all the themes of the SDP identifies potential significant negative environmental effects for water, soil, biodiversity (part) and climatic factors (part). This makes mitigation measures very important, which should if possible be included within the plan. Please see comments under Table 5.2 above re proposed mitigation measures;</p> <p>b) While for landscape the cumulative assessment is negative (part) as opposed to significantly negative, this is on the presupposition that development includes structure planting. Landscaping is not included as one of the factors for Sustainable Mixed Communities, and SDP text here could be amended to include reference to this.</p>	<p>a) Please refer to comments and response made to table 5.2 above;</p> <p>b) The requirement for landscaping within development is an issue which is being adequately addressed at the LDP level. The requirement of the SDP for high quality of layout and design within new developments is the appropriate approach at the strategic level.</p>	<p>a) No change made;</p> <p>b) No change made.</p>	No change required
SNH (42)	<p>Appendix 6.5 – suggested addition to International PPSs</p> <ul style="list-style-type: none"> • (Nature Conservation) -The Ramsar Convention should be added; • (Landscape) -We suggest the European Landscape Convention should be added. 	Inclusion of additional PPSs	Inclusion of additional PPSs to Appendix 6.5.	No change required.

<p>SNH (43)</p>	<p>Appendix 6.5 – Suggested addition to National PPSs</p> <ul style="list-style-type: none"> • (Cross sectoral) – We suggest the Scottish land Use Strategy (2011) should be added, e.g. ecosystems approach re: natural resources; • (Cross sectoral) N-RIP should be added (development of certain ports and harbours to serve offshore renewable development); • (Landscape soil) we are not sure why these topics are combined here, but 1) we suggest under Scottish Soil Framework reference is added to protection of peatland; 2) we recommend the reference later under Nature Conservation & Biodiversity to Scottish Landscape Forum is moved to here; 3) we then suggest adding the Countryside (Scotland) Act 1967 (duty on public bodies re natural beauty and amenity); • (Nature Conservation & Biodiversity) - we suggest adding the Wildlife and Natural Environment (Scotland) Act 2011 (re biodiversity duty reporting); 2) also the Environmental Liability (Scotland) Regulations 2009 (re prevention and remediation of environmental damage); 3) also the Scottish Government Policy on Control of Woodland Removal (re protection of inventoried woodland 	<p>Inclusion of additional PPSs</p>	<p>Inclusion of additional PPSs in Appendix 6.5</p>	<p>No change required</p>
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	<p>and need in all cases for compensatory planting);</p> <ul style="list-style-type: none"> (Water) - We suggest adding the Marine Strategy Regulations 2010 (re good ecological status for marine waters). 			
SNH (45)	<p>Appendix 6.5 – suggested addition to Regional PPSs</p> <p>We suggest adding the Landscape Character Assessments for Banff & Buchan (1994), Aberdeen (1997) and South & Central Aberdeenshire (1998).</p>	Inclusion of additional PPS	Inclusion of additional PPSs in Appendix 6.5 .	No change required.
SNH (46)	<p>Appendix 6.6 – Soil</p> <p>a) baseline data could be added here re geodiversity, e.g. un-notified GCR sites, RIGS sites, Local Geodiversity Sites</p> <p>b) Re peat soils, the table states “With respect of the rest of Scotland Aberdeen City and Shire seem to be at the fringes of peat soils”. It would be helpful to quantify this, e.g. % of plan area that comprises peaty soils.</p>	<p>a) Addition of baseline data for geodiversity under soil;</p> <p>b) Additional information added with regard the percentage of Aberdeenshire land cover which is peaty soil.</p>	a, b) Addition of baseline data for geodiversity under soil in Appendix 6.6 under soil.	No change required
SNH (47)	<p>Appendix 6.6 – Biodiversity</p> <p>a) Site Condition information for SACs, SPAs and SSSIs is available via our website (SNHi) – including SSSI Site Management Statements - and can be included for monitoring purposes in the</p>	Suggestion additions and amendments made to maps.	Amendments and additions to Appendix 6.6 under Biodiversity.	

	<p>column for comparators and targets;</p> <p>b) Both Councils have reviewed their suite of local natural heritage sites since 2009 and will have much more up to date information on numbers/area;</p> <p>c) With up to date information, it may be necessary to modify the maps at the end of the ER;</p> <p>d) The Issues/Constraints text for Ramsar sites should be cross-referenced from the entries for other designated sites;</p> <p>e) There is no entry for protected species; we suggest some data could be added from the LBAP regarding the occurrence of key protected/priority species and habitats in the area.</p>			
SNH (48)	<p>Appendix 6.6 – Human Health</p> <p>Baseline data could be added here with respect to the extent of core paths, and perhaps the distance of households from core paths.</p>	<p>Core path data is being addressed and monitored within both local authorities, this would seem the most appropriate place for this to happen.</p>	<p>No changes made.</p>	<p>No changes required.</p>
SNH (49)	<p>Appendix 6.6 – Landscape</p> <p>a) If the coastline has been classified into developed, undeveloped and isolated (SPP para 100) this could be added to the baseline data here;</p>	<p>a - d) Suggested additions made.</p>	<p>a – e) Additions to Appendix 6.6.</p>	<p>No change required</p>

	<p>b) Current landscape capacity work in respect of wind energy;</p> <p>c) Local landscape designations (Areas of Landscape Significance) should be included here;</p> <p>d) Reference to the Aberdeen Green Belt should be added here;</p> <p>e) The green network in the Aberdeen City area should be noted here.</p>	e) Suggested additions made with regard Strategic Green Network Proposals.		
SNH (50)	<p>Appendix 7.3.4</p> <p>It would be helpful to add a sentence to this map pointing out that bottlenose dolphins from the Moray Forth SAC are frequently found at the mouth of Aberdeen Harbour and still receive the SAC protection while they are there.</p>	Suggested addition made.	Addition to Appendix 7.3.4.	
Barratt East Scotland and Dunecht Estates	<p>General document</p> <p>The SEA has failed to consider the advantages of:</p> <p>a) Designating Westhill and Kirkton of Skene as a separate additional Strategic Growth Area;</p> <p>b) allocating some 250 dwellings at Kirkton of Skene which is a highly sustainable location;</p> <p>c) Limiting development in unsustainable</p>	a-d) In accordance with the Environmental Assessment (Scotland) Act 2005 an Environmental Report is required to assess the environmental impacts of the plan and any reasonable alternatives. The suggested considerations were neither part of the plan nor identified as a reasonable alternative therefore, it would be inaccurate and misleading to consider them through the SEA process.	No change made	No change required.

	and unpopular locations in the RHMA; d) Reflecting the latest NRS population projections by increasing housing allowances in the AHMA.			
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5. Reasons for Adopting the Strategic Development Plan

Through preparation of the Main Issues Report and engagement with the SEA process from the outset the plan has been prepared in a way which identifies and as far as is practicable mitigates significantly negative environmental effects. Significantly positive environmental effects will be enhanced where possible. Consistent with S18(3)(e) of the Act the Strategic Development Plan has been adopted in light of all reasonable alternatives identified in the Environmental Report, the following reasons provide justification for this decision:

- The preferred option provides greater consistency with the relevant international, national, regional and local plans, programmes and strategies;
- The negative environmental impacts of the preferred option are less than those identified for the reasonable alternatives;
- Potential for positive environmental impacts are increased through the preferred option;
- The SDP takes into consideration and delivers benefits against the 3 key pillars of sustainability i.e. the economy, society and the environment;

No additional significant environmental effects have resulted from changes to the plan following consultation or examination. Attached as Appendix 1 is the screening determination prepared by the Scottish Government for the modifications to the Proposed Plan. The report was submitted to the SEA Gateway and responses from the consultation authorities state that modifications are not likely to have significant environmental effects and therefor an SEA is not required. The appendix also contains the notice published on 1 April 2014 for this screening determination.

6. Monitoring Measures

In accordance with S19 of the Environmental Assessment (Scotland) Act 2005 Aberdeen City and Shire SDPA are required to monitor the significant environmental effects of the plan on an ongoing basis. Monitoring will be carried out at a variety of levels and will involve measuring a set of environmental indicators along with a broader set of indicators in order to identify predicted or unforeseen adverse effects, so that appropriate remedial action may be taken. The monitoring plan for the SEA is set out in Table 3 below. Environmental monitoring of the SDP will focus, in the main, on the environmental indicators identified in Section 5.5 of the Environmental Report. There will be a clear focus on addressing key issues and identifying when and how remedial action should be taken. There will be a number of stages in the monitoring framework for the Aberdeen City and Shire SDPA:

- The plan will be monitored on an ongoing basis and a monitoring report will be prepared in order to keep baseline information up to date. New

environmental information will feed into the next plan preparation stage and will inform ongoing work;

- A Monitoring Statement will be prepared during the preparation of the Main Issues Report for the next plan to allow for clear alignment between updated environmental baseline data and policy direction;
- Many of the environmental indicators are being collected and collated through both councils and a number of the key agencies, who have their own monitoring arrangements and in turn these will feed into the monitoring of the SDP and action programme;
- The high level nature of the SDP means that further assessment of environmental impacts will be required for lower level plans and proposals to establish and plan for any additional or unforeseen impacts.

Table 3: Monitoring Plan

Effects	What sort of information is required? (Indicators)	Where will information be obtained from?	Are there gaps in the existing information and how can it be resolved?	When should the remedial action be considered?	Who is responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
Water	<p>Sufficiency of River Dee to support future allocations</p> <p>Effects of water level on qualifying features such fresh water pearl mussel</p> <p>The amount of water abstracted from the River Dee and the impacts on water quality and flow rate.</p>	<p>Scottish Water, SNH and SEPA, DSFB</p>	<p>Knowledge of likely frequency, duration and magnitude of periods of low water flow, allowing for climate change as well as increased demand, and tolerance of qualifying features to reduced flows; knowledge of tolerance threshold to pollutants of juvenile as well as adult species.</p>	<p>As advised by SEPA, SNH and Dee Salmon Fishery Board in liaison with Scottish Water in the light of ongoing data and research, and in terms of seeking to improve the current unfavourable status of freshwater pearl mussel in the River Dee.</p> <p>When SEPA raises concerns about the ability to approve a licensable level of water abstraction in relation to maintaining ecologically acceptable flow levels</p> <p>When data from SNH indicate that the threshold of water level is being reached</p>	<p>SEPA, SNH. Scottish Water, DSFB and Aberdeen City and Aberdeenshire Councils</p>	<p>As part of SDP monitoring report</p>	<p>Review the action programme of the SDP and LDPs</p> <p>Habitats Regulations Appraisal of LDPs, Large scale housing applications to be screened for more detailed Habitats Regulations Appraisal. Implementation of alternative measures as agreed between relevant parties</p>
Water	<p>No of water bodies (percentage of water bodies) attaining high/good/moderate ecological potential</p> <p>No of water bodies</p>			<p>When the ecological potential of water bodies are becoming poor or bad</p>	<p>SEPA</p>		

	(percentage of water bodies) attaining poor/bad ecological potential						
Soil	Relationship between waste management/industrial activities and land contamination	Waste management licenses	No as SEPA monitors this regularly	When informed by SEPA	Contaminated Land Units, SEPA	As part of SDP monitoring report	Review the action programme of the SDP and LDPs
	Brownfield v. greenfield sites (especially good quality agricultural land)	Aberdeen City and Aberdeenshire Council	No as information is collected annually	When monitoring shows a significantly high level of prime greenfield land is being lost and brownfield development opportunities are not being identified	LDP's the SDPA and the housing and employment land audits		Revised policy direction.
	Extent of development on peat soils	Aberdeenshire Council	May be gaps related to historic data	When a significant amount of peat soil is being developed on without due mitigation being considered	Aberdeenshire Council's LDP and the SDP		Revised policy direction
Biodiversity	Condition of qualifying features and habitats of European sites and SSSIs	SNH SiteLink under site condition	No	When sites/habitats with favourable or unfavourable conditions are likely to worsen	SDP and LDP Teams, SNH	Annually and as part of the SDP Monitoring report	Review management plans for the sites
	Habitat fragmentation The condition and robustness of green networks	Both councils and SNH	No	When a decrease in the quantity or quality of green space/ networks is identified			Change of policy direction.

Climatic factors	Increase in car use and energy consumption in developments	Monitoring reports of regional transport strategy Annual report from DECC	The only gap is that DECC data is released in areas	When DECC data shows that CO2 emissions are consistently rising When transport monitoring report shows increases in congestion and a modal shift is not occurring, i.e. use of the car is increasing.	SDP, LDP and regional transport teams	Annually and as part of the SDP Monitoring Report	Review regional transport strategy and carbon management programmes for the City and Shire.
	The rate of roll out of high speed broadband	BT and both Councils	Gaps in data relating to the availability and speed of broadband at the site specific level	Work will be ongoing	SDP, LDP and Economic Strategies		Work will be ongoing

7. Conclusion

It is our view that the process of SEA has made a positive contribution to the plan making process and in turn has resulted in a more environmentally aware plan which contributes to the central principles of sustainable development. The process has allowed for anticipated and unforeseen significant environmental effects to be identified and mitigation measures to be built into the SEA and the plan. The assessment has also allowed for positive environmental effects to be enhanced where possible.

The process was carried out in line with all relevant plans programmes and strategies. The assessment allowed for individual and cumulative environmental effects to be identified, planned for and mitigated where possible. Monitoring all significant effects on an ongoing basis will continue to be a central part of the plan monitoring process. Alternatives have been considered and the preferred alternative (the SDP) is based on the most positive and least damaging environment option.

The nature of the SDP means that many of the environmental issues and potential mitigation measures will cross over into lower level plans and proposals. Therefore, further assessment and monitoring at these stages will be required. The need for this has been built into the Environmental Report of the SDP, which identifies where lower level PPSs will be subject to further SEA or EIAs.

William Carlin
SEA Gateway Manager
SEA Gateway
The Scottish Government
Area 2J South
Victoria Quay
Edinburgh
EH6 6QQ



Your ref: SEA00915
28 March 2014

Dear William

**Environmental Assessment (Scotland) Act 2005: Section 8(1) Screening
Aberdeen City and Shire Strategic Development Plan: Modifications – Screening
Determination**

I refer to the Screening Report prepared for the modifications to the Aberdeen City and Shire Strategic Development Plan (ACSSDP) and submitted to the SEA Gateway on 24 February 2014. Responses from the Consultation Authorities were received on 19 March 2014, stating their opinion is that the modifications are not likely to have significant environmental effects.

The modifications considered by the Consultation Authorities were those recommended in the ACSSDP examination report. In approving the plan, Ministers have adopted those recommendations with a limited number of minor drafting amendments. These minor amendments help to improve readability and clarity and relate mostly to the Plain English Assessment of the modifications. In no cases are they considered likely to have significant environmental effects.

I am writing to confirm that the Scottish Government has determined, using the criteria set out in Schedule 2 of the Environmental Assessment (Scotland) Act 2005, that the modifications to ACSSDP are not likely to have significant environmental effects, and therefore, a Strategic Environmental Assessment (SEA) is not required.

I enclose a copy of the screening determination advertisement that will be placed in the Edinburgh Gazette and the Press and Journal next week.

Please do not hesitate to contact me should you require any further information.

Yours sincerely,

Victoria Quay, Edinburgh EH6 6QQ
www.scotland.gov.uk



Rosie Leven

Rosie Leven
Principal Planner



Environmental Assessment (Scotland) Act 2005: Section 8(1) Screening Determination

Town and Country Planning (Scotland) Act 1997, as amended: Section 13 Strategic Development Plan Approval

Aberdeen City and Shire Strategic Development Plan

The Scottish Government has determined the modifications to the above plan are not likely to generate significant environmental effects, and that a Strategic Environmental Assessment is not required.

This screening determination can be viewed on the Scottish Government's website at <http://www.scotland.gov.uk/Topics/Environment/environmental-assessment/sea/SEAG> and copies can also be obtained from the SEA Gateway, Area 2-J South, Victoria Quay, Edinburgh EH11 1UR, 0131 2245094 or by email to SEA.Gateway@scotland.gsi.gov.uk

Scottish Ministers hereby approve the above plan, with modifications. The plan shall become operative from 28 March 2014. A copy of the Scottish Ministers' decision letter setting out the modifications to the approved plan can be viewed on the Scottish Government's website: <http://www.scotland.gov.uk/Topics/Built-Environment/planning/Development-Planning/Strategic-Planning/SPA-and-Plans>. Copies can be obtained from Planning & Architecture Division, Scottish Government, Room 2H, Victoria Quay, Edinburgh, EH6 6QQ, 0131 244 7888.

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