

**ABERDEEN  
CITY AND  
SHIRE**

*Strategic Development  
Planning Authority*

# Aberdeen City and Shire Structure Plan



Strategic Environmental Assessment  
Post-Adoption Statement

October 2009

## POST-ADOPTION SEA STATEMENT – COVER NOTE

### PART 1

To: [SEA.gateway@scotland.gsi.gov.uk](mailto:SEA.gateway@scotland.gsi.gov.uk)

or

SEA Gateway  
Scottish Executive  
Area 1 H (Bridge)  
Victoria Quay  
Edinburgh EH6 6QQ

### PART 2

**A Post-Adoption SEA statement is attached for the PPS entitled:**

Aberdeen City and Aberdeenshire (excluding the Cairngorms National Park) Structure Plan

**The Responsible Authority is:**

Aberdeenshire Council

### PART 3

**Contact name** David Jennings

**Job Title** Strategic Development Plan Manager

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AB24 5AA

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**Signature & date** 2 October 2009

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## POST-ADOPTION SEA STATEMENT

### Post-Adoption SEA statement for:

Aberdeen City and Aberdeenshire (excluding the Cairngorms National Park) Structure Plan

### Adopted on:

14 August 2009

### Responsible Authority:

Aberdeenshire Council

## POST-ADOPTION SEA STATEMENT INTRODUCTION

This document (referred to here as the Post-Adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

## POST-ADOPTION SEA STATEMENT AVAILABILITY OF DOCUMENTS

### WEBSITE

The full PPS as adopted, along with the Environmental Report and Post-Adoption SEA Statement are available on the Responsible Authority's website at:

[www.aberdeencityandshire-sdpa.gov.uk](http://www.aberdeencityandshire-sdpa.gov.uk)

### OFFICE ADDRESS

The PPS, as adopted, along with the Environmental Report and Post-Adoption SEA Statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at the principal office of the Responsible Authority:

### Contact name, address and telephone number

Aberdeen City and Shire SDPA  
Archibald Simpson House  
27 – 29 King Street  
Aberdeen  
AB24 5AA

01224628210

### Times at which the documents may be inspected or a copy obtained:

Monday – Friday (0900 – 1700)

**POST-ADOPTION SEA STATEMENT  
KEY FACTS**

**Name of Responsible Authority**

Aberdeenshire Council

**Title of PPS**

Aberdeen City and Aberdeenshire  
(excluding the Cairngorms National  
Park) Structure Plan

**Purpose of PPS**

The purpose of the plan is to provide  
a framework for the strategic  
development and use of land in  
Aberdeen City and part of  
Aberdeenshire.

**What prompted the PPS**

Town and Country Planning  
(Scotland) Act 1997

**Subject (e.g. transport)**

Town Planning

**Period covered**

2007 - 2030

**Frequency of updates**

Every five years

**Area of PPS**

The whole of Aberdeen and  
Aberdeenshire excluding the  
Cairngorms National Park

**Summary of nature/content**

The PPS is a high-level strategic plan setting out a long-term vision for the future of the area. It broadly identifies how much development should happen and where it should take place.

The plan aims to:

- deliver a robust framework for investment decisions to deliver economic growth and diversification;
- address the urgent challenges of sustainable development and climate change;
- ensure the region has enough people, homes and jobs to support the level of services needed to enhance quality of life;
- protect and enhance the area's natural and built environment;
- create sustainable mixed communities in growth corridors, regeneration areas and in existing shire settlements, employing the highest standards of design and construction; and
- make the most efficient use of the transport network to ensure travel is minimised, and make walking, cycling and public transport attractive choices.

The PPS has a vision, aims and spatial strategy which are supported by a series of objectives (each with their own targets, associated actions, delivery mechanisms and monitoring arrangements).

**Date adopted**

14 August 2009

**Contact name & job title  
Address, email, telephone number**

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**Date**

2 October 2009

## **POST-ADOPTION SEA STATEMENT STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS**

Aberdeen City and Aberdeenshire (excluding the Cairngorms National Park) Structure Plan has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking into account the views of the Consultation Authorities regarding the scope and level of detail that was appropriate for the Environmental Report
- Preparing an Environmental Report on the likely significant effects on the environment of the draft PPS which included consideration of:
  - the baseline data relating to the current state of the environment;
  - links between the PPS and other relevant strategies, policies, plans, programmes and environmental protection objectives;
  - existing environmental problems affecting the PPS;
  - 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;
  - an outline of the reasons for selecting the alternatives chosen;
  - monitoring measures to ensure that any unforeseen environmental 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 consultation in making final decisions regarding the PPS
- Committing to monitoring the significant environmental effects of the implementation of the PPS. This will also identify any unforeseen adverse significant environmental effects and to enable taking appropriate remedial action.

## 1) Effects of Environmental considerations & the environmental report on the plan

The following table summarises how environmental considerations have been integrated the PPS and how the environmental report has been taken into account in accordance with Section 18 (3)(a-b).

**Table 1: Environmental Considerations & the Environmental Report**

<b>Environmental considerations and findings from Environmental Report</b>	<b>Integrated into Plan (Yes/No)</b>	<b>How integrated/taken into account or reason for not being taken into account</b>
<b>Air</b> - Deteriorating air quality in the City and rise in car usage	Yes	A key objective of the plan is to make sure all new developments contribute towards the need to reduce the need to travel, especially by car. New homes, places of employment and services should be located so that walking, cycling and the use of public transport are easy.
<b>Biodiversity, flora and fauna</b> - Pressures on Natura 2000 qualifying features in relation to the Dee River and its tributaries	Yes	Measures built into the plans objectives, aims and targets will ensure that the way in which sites are chosen, and high-quality design, will make sure that development does not lead to the decline of the North East's natural assets. New water-efficient technologies will be employed to protect the River Dee – the region's main source of drinking water – from over-exploitation.
<b>Biodiversity, fauna and flora</b> - Fragmented habitats/open space networks/wildlife corridors loss of habitats	Yes	The plan emphasises the vital need to secure development which enhances the environment. Measures built into the plans objectives, aims and targets will ensure that the way in which sites are chosen, and high-quality design, will make sure that development does not lead to the decline of the North East's built, natural and cultural assets.
<b>Climate change</b> - High ecological and carbon footprints	Yes	The plans strategy has been developed to promote environmentally sustainable development in the locations which best cater for business needs. The plan sets targets for new developments to use resources more efficiently and reduce the region's global footprint – with the aim of all new buildings achieving zero net carbon dioxide emissions by 2016
<b>Climate Change</b> - High dependence on fossil fuels to provide heat and electricity and potential incidence of flooding from the effects of climate change.	Yes	The plan sets targets for no new development to be built on land at risk from flooding. Additionally sustainable energy sources must be tapped more effectively and the environmental

		performance of new buildings will have to demonstrate a step change from older structures.
<b>Climate Change</b> - Pressures on water flow in the Dee River and its tributaries due to water abstraction.	Yes	New water-efficient technologies will be employed to protect the River Dee – the region’s main source of drinking water – from over-exploitation. Both Councils will also take part in River Basin Management Planning, particularly in relation to new development.
<b>Cultural Heritage</b> - Pressure on cultural heritage caused by vandalism, proposed and new developments, ploughing, forestry, activities of utility companies and coastal erosion.	Yes	Measures built into the plans objectives, aims and targets will ensure that the way in which sites are chosen, and high-quality design, will make sure that development does not lead to the decline of the North East’s built, natural and cultural assets.
<b>Landscape</b> - Extensive use of land and cumulative impact is putting pressure on the landscape.	Yes	Three Strategic Growth Areas have been pinpointed as the prime focus for 75-80% of development by 2030 thus concentrating growth in specific areas. The structure plan envisages modest growth in existing settlements, with a focus on mixed housing, smaller homes for sale or rent, and high levels of affordable homes – respecting at all times the character of each area. The finalised structure plan does not pinpoint specific sites for development. Detailed land allocations and localised development policies will be contained in Local Development Plans.
<b>Population and human health</b> - Evidence of poor architectural design, a loss of sense of place and poor developments in the region.	Yes	The plan focuses the development of mixed housing. Providing affordable housing is critical to the delivery of sustainable mixed communities. The plan puts measures in place to ensure that future communities will offer mixed house types, sizes, tenures and prices – on greenfield, brownfield and regeneration area sites.
<b>Population and human health</b> - Ageing population potentially putting pressure on services for the aged in the future.	Yes	The structure plan maps out mechanisms to boost the North East population by 40,000 by 2030 – because a falling and ageing population deters investment, impacts on service quality and delivery, and depresses the local economy.
<b>Population and human health</b> - Shortage of affordable housing.	Yes	The plan addresses the need for higher levels of affordable housing.
<b>Population and human health</b> - Pockets of deprivation exists through low job opportunities and income which may result in mental health problems.	Yes	Further growth and economic renewal is proposed in three Regeneration Priority Areas to ensure they realise their potential. Measures to improve transportation access to these areas will assist in creating better linkages to the

		trunk road network and competitiveness for business opportunities.
<b>Population and human health</b> – changes in the oil and gas industry affecting the economy	Yes	One of the plans 6 objectives is Economic Growth and identifies targets to promote the regions economy and further develop and retain a skilled and innovative workforce.
<b>Soil</b> - Soil erosion and flooding can occur in some coastal or low lying areas.	Yes	In addition to laying out a requirement for all new developments to be designed and built to use resources more efficiently the plan states that they will also be located in places where they will have as little effect on the environment as possible. This includes avoiding building on land which is at an unacceptable risk from coastal or river flooding.
<b>Soil</b> - Land contamination.	Yes	The plan states a preference towards development on brownfield sites. Opportunities to redevelop brownfield sites will vary in numbers and locations however this may play an important role in the regeneration priority areas and in Aberdeen City's community regeneration areas.
<b>Soil</b> – Loss of Greenfield land	Yes	The plan promotes a high growth strategy and identifies the requirement to build on Greenfield land however the plan states that a green belt boundary and policy review will be required to be undertaken by both Councils as part of their local development plan processes.

## 2) Consultation responses

The following table summarises how opinions expressed during consultation have been taken into account (including any consultation required with other EU member states) in accordance with Section 18(3)(c-d).

Consultee / Respondent	Summary of Comments	How The Comment Was Taken Into Account in Making the Decision to Adopt The Final Plan/Programme	Changes made to Environmental Report	Changes made to The Final Plan
Scottish Environment Protection Agency	<p>1. General Comments</p> <p>The Environmental Report (ER) is well presented and seems to cover well all the aspects required by the Act. SEPA welcomes the fact that all aspects of the Plan seem to have been clearly assessed.</p>		No change required.	No change required.
Scottish Environment Protection Agency	<p>1. SEPA is satisfied that all the relevant background information is provided.</p> <p>2. SEPA is satisfied that all relevant plans, programmes, strategies and environmental protection objectives have been identified and notes that those which SEPA identified as missing at the scoping stage have now been included.</p> <p>3. SEPA considers that Table 5, presenting the linkages between SEA topics, is a useful and interesting exercise.</p> <p>4. SEPA is satisfied with the information presented on significant environmental problems. This seems suitably specific to the area but wide ranging in the types of issues it considers.</p>		No change required.	No change required.
Scottish Environment Protection Agency	<p>5. Comment on SEA Objectives</p> <p>5.1 SEPA notes the second SEA Objective on water has changed since the scoping stage. SEPA notes that it only relates to the marine environment, but in</p>	While the wording of objective 2 (p29) was amended following the scoping report, the scope of the objective has not and it does relate to the whole water environment and not just	Page 29, 199, 228 and 260 – Replace 'marine environment'	No change required.

	<p>view of the additional comments provided in the text, presumes that this is a mistake and that it relates to the whole water environment.</p> <p>5.2 SEPA is disappointed to note that its request that a SEA Objective specifically covering sustainable waste management has not been acted upon. As a result the impacts of the Plan on waste management may have been underassessed.</p>	<p>marine issues.</p> <p>SEPA were informed in 2007 that its request to include waste as a separate SEA objective was not supported and that its inclusion in the soil objective was appropriate.</p> <p>The plan recognises waste as an issue, as well as the need to make significant changes to the way waste is managed. However, it is unable to go beyond these general statements at the current time. The plan does identify the need for strategic supplementary guidance on the issue of waste management facilities and it will be the SEA of this guidance that will be the appropriate process to address this issue.</p>	<p>with 'water environment' in objective 2. Page 374 also requires a consequential amendment.</p>	
<p>Scottish Environment Protection Agency</p>	<p>6. Alternatives</p> <p>6.1 The section on alternatives makes it clear how difficult and involved the process of plan-making can be.</p> <p>6.2 SEPA considers it a practical approach to have only fully assessed those alternatives which were truly considered for inclusion in the Plan. Table 19, highlighting the general types of strategies which were rejected and the reasons for doing so is helpful to explain the early process.</p> <p>6.3 SEPA is satisfied with the assessment of the eight strategic options as presented in Appendix 5, Table C and the summary of it given in paragraph 5.22 and Table 20. SEPA agrees that it seems reasonable to suggest that the least negative effects</p>		<p>No change required.</p>	<p>No change required.</p>

	<p>will be found if development is concentrated into already developed areas (i.e. Aberdeen City and the existing transport corridor).</p> <p>7. SEPA is pleased to note that all aspect of the current Plan that could have significant effects has been assessed. ie. the vision, aims, spatial strategy and strategic objectives.</p>			
<p>Scottish Environment Protection Agency</p>	<p>8. Assessment of Vision and Aims</p> <p>8.1 SEPA understands that rather than assessing the vision and aims directly these were broken down into 12 principles and these principles were assessed instead. Such an approach is useful for determining whether the vision and aims cover all the principles which the Authority consider are important, however, it may limit the ability to use the assessment as a way to improve the wording of the individual aims and vision.</p> <p>8.2 Notwithstanding the comments in 8.1 above SEPA considers that the assessments presented in Appendix 5 Table A seem reasonable. SEPA notes that paragraph 5.35 identifies that the economic growth principle is the only principle which is likely to impact negatively on the SEA Objectives. SEPA agrees that there will be negative effects from this principle and considers that they may have been under-recorded in the current assessment. SEPA previously raised this issue when given the opportunity to comment on the draft assessments. For example:</p> <p>8.2.1 No explanation is provided as to why the economic growth principle may have both positive and negative effects on the first air SEA Objective;</p> <p>8.2.2 Similarly economic growth is assessed as having no (i.e. 0) effect against the second SEA Objective on water, yet the supporting text identifies</p>	<p>The limitations of the approach adopted are recognised but the recognition that the assessment seems reasonable is welcomed.</p> <p>In relation to air quality, it is accepted that there are potentially negative effects of economic growth although it is reasonable to summarise the impacts as mixed. The positive effects will come about through the replacement of employment with less polluting uses (centred around the knowledge economy), encouraging growth on a scale which makes higher environmental standards possible and locations which make communities more sustainable.</p> <p>Table 22 records a '+/-' against the economic growth principle for its impacts on the water SEA topic. This is an appropriate summary of the (0),(-),(?),(+/-) recorded against objectives 2-5 (pages 199-202).</p> <p>Economic growth will generally have the effect of reducing the area of contaminated land as sites are</p>	<p>No change required</p>	<p>No change required.</p>

	<p>both positive and negative effects relating to this; and</p> <p>8.2.3 The economic growth principle is assessed as having a positive effect on reducing the area of land contamination (SEA Objective 6), yet the supporting text identifies that there might be an increase in potential contaminated sites.</p>	<p>brought back into use of redeveloped. However, there is the potential for new contamination issues to arise (although modern environmental standards will reduce this possibility).</p>		
<p>Scottish Environment Protection Agency</p>	<p>9. Assessment of the Spatial Strategy</p> <p>9.1 Generally the assessments presented in Appendix 5 Table B also seem reasonable. SEPA takes the opportunity to highlight the following.</p> <p>9.1.1 SEPA understands that the Western Peripheral Route will be delivered no matter the subsequent development proposed by the Plan. If this is the case it is not clear how development in Aberdeen City will have a positive effect against the first air quality SEA Objective.</p> <p>9.1.2 It is not clear why development in Aberdeen City would have no effect on the marine / water environment SEA Objective (objective 2). SEPA agrees that the other spatial strategy element are likely to have negative or significantly negative effects against this SEA Objective and this should be considered when determining appropriate mitigation.</p> <p>9.2 Summary Table 27 is perhaps expressed more positively than the associated detailed assessments in the appendix. For example, the City is assessed as positive (i.e. + ) against the Water SEA Topic in the summary table yet the individual assessments are (0),(-),(+) and (+). SEPA would consider that a summary of this would be better expressed as mixed.</p>	<p>The general recognition that the assessment seems reasonable is welcomed.</p> <p>Development in Aberdeen will encourage walking, cycling and the use of public transport rather than car-based journeys into the City. The impacts will be mixed but the nature of that mix will be determined by the way the plan is implemented through local development plans.</p> <p>It is agreed that development in Aberdeen would probably have a negative effect in the same way as other elements of the strategy on objective 2.</p> <p>It is recognised that the summary may over-state the positive and a mixed summary would be more appropriate.</p>	<p>Page 228 – change column 1 from ‘0’ to ‘-’ and column 8 from ‘0/-’ to ‘-’</p> <p>Page 50 – change City/Water to ‘+/-’ from ‘+’</p>	<p>No change required.</p>
<p>Scottish</p>	<p>10. Assessment of Strategic Objectives</p>	<p>The recognition of the comprehensive</p>	<p>No change</p>	<p>Flooding &amp;</p>

<p>Environment Protection Agency</p>	<p>10.1 SEPA notes that the six strategic objectives have been assessed against the SEA Objectives for each of the six growth scenarios. This is a comprehensive approach.</p> <p>10.2 It is not clear, in its own right, how the Economic Growth Objective will have positive effects against the air SEA Objective. In comparison it is clearer why the Objective will have been assessed positively against SEA Objective 24 on assets, as the objective itself states that it will improve essential strategic infrastructure.</p> <p>10.3 SEPA agrees that the Sustainable Development and Climate Change objective will have a positive effect against the SEA objective 4 on flood risk. The SEA Objective itself is more appropriately focused to the issue than the wording of the related target in the Plan; SEPA provides detailed comments on this in its separate response to the Plan. If SEA Objective 7 covers sustainable waste management then SEPA considers that the assessment is less positive than has been recorded. SEPA considers that the Objective and supporting text does not provide clear guidance on how sustainable waste management will be achieved. Again further comment on this is provided in SEPA's response on the Plan.</p> <p>11. The monitoring framework outlined in Table 31 is clear and seems to be well considered.</p> <p>12. SEPA would have welcomed at this stage information on how carrying out the assessment had impacted upon the draft Plan. This should be provided in the Post-Adoption Statement.</p>	<p>nature of the assessment is welcome.</p> <p>Economic growth will have positive as well as negative impacts will come about through the replacement of employment with less polluting uses (centred around the knowledge economy), encouraging growth on a scale which makes higher environmental standards possible and locations which make communities more sustainable.</p> <p>It is likely to be towards the end of 2009 that the Scottish Ministers approve the plan so the SEA Post-Adoption Statement is still some way off. However, this will be noted for future reference.</p>	<p>required</p>	<p>Waste – the text of the finalised plan has been amended in light of SEPA's comments.</p>
<p>The Scottish Ministers (Historic</p>	<p>Welcome that the SEA is clear and very thorough, subject to the following comments:</p>	<p>Recognition of a clear and thorough SEA is welcome.</p>	<p>Pages 5 &amp; 6 will be expanded to</p>	<p>No change required</p>

Scotland)	<p>Non-technical summary This section should summarise the environmental effects of the plan on the historic environment.</p>	The Non-Technical Summary will be expanded and will include a summary of the environmental effects of the plan on the historic environment.	provide a more comprehensive Non-Technical Summary.	
The Scottish Ministers (Historic Scotland)	<p>Relevant aspects of the current state of the environment (baseline data) and additional baseline information.</p> <p>At the scoping stage we suggested the use of maps in relation to the plans proposals and actions. Note that Appendix 3 (Appendix 4 of the Scoping Report) does not include this information.</p> <p>Maps are useful for identifying and / or verifying potential impacts.</p>	Maps will be added to aid the identification and / or verification of potential impacts.	Page 179 – 184 will be amended to incorporate maps.	No change required
The Scottish Ministers (Historic Scotland)	<p>Assessment Framework - SEA Objectives and indicators</p> <p>At the scoping stage asked that "and their settings" was added to Table 17 after "safeguarding archaeological sites" and after "listed buildings, designed landscape". However, note that, mitigation framework measures in Appendix 7 prevents "development adversely affecting historical sites and their setting" and are content.</p>	The recognition that amendments were made following the scoping stage is welcome.	No change required	No change required
The Scottish Ministers (Historic Scotland)	<p>SEA of the draft structure plan</p> <p>The tables in Appendix 5 sometimes have different conclusions for the impacts on the historic environment than those in the summary tables in the main ER (i.e. Table 22 and 29).</p> <p>Assume this is a summary of impacts of the two SEA objectives, but should this be the case, it would be helpful to provide a footnote in the summary to</p>	Tables 22 and 29 do provide a summary of the impacts against the two SEA objectives. A footnote will be added to clarify this.	A footnote will be added to both Tables 22 (p46) and 29 (p55) to clarify this point.	No change required

	explain this.			
The Scottish Ministers (Historic Scotland)	<p>SEA of the draft structure plan</p> <p>Note in Appendix 5, Table B that some of the alternative options for the spatial strategy are not assessed for the historic environment, but are included in the summary Table 27 (alternatives 2b, 2c, 3b and 3c). May be that other information was used to inform the assessment of impacts, would be useful if the reasoning for any gaps was provided in the commentary box.</p>	The options were assessed but the different options were not seen as having differential effects. As a consequence, one symbol was used and the table merged over the alternatives (a/b/c). This was done for a number of the objectives, not just those relating to the historic environment. Objective 8 (page 235) appears to be the odd one out – however, no amendment is required.	No change required	No change required
The Scottish Ministers (Historic Scotland)	<p>Mitigation Framework</p> <p>Welcome the proposed mitigation framework in Appendix 7, which is clear and sets out the measures proposed and identifies who is responsible for ensuring this mitigation is delivered. Would be helpful if the SEA Adoption Statement clearly identifies the potential environmental issues to be explored in lower level plans and includes a commitment to ensuring that this will be taken forward as the plan is implemented.</p>	It is likely to be towards the end of 2009 that the Scottish Ministers approve the plan so the SEA Post-Adoption Statement is still some way off. However, this will be noted for future reference.	No change required	No change required
The Scottish Ministers (Historic Scotland)	Note that Table 31 includes indicators for monitoring changes to the baseline. May also wish to monitor the number of planning applications affecting listed buildings, scheduled monuments, and gardens and designed landscapes.	It is agreed that these indicators are worthwhile in relation to monitoring the environmental baseline. However, it is likely to be more appropriate for these to be monitored and reported through the local development plan SEA rather than the structure plan.	No change required	No change required
Scottish Natural Heritage	Pleased to note that many suggestions offered at the scoping stage have been accommodated in the report. It offers a comprehensive assessment of the likely effects on the environment and a detailed list of measures in the mitigation framework. Note that a	The recognition that amendments were made following the scoping stage and the comprehensive nature of the assessment are welcome.	Pages 61 & 360 – Amendments will be made to clarify the text	No change required

	<p>full appropriate assessment has yet to be undertaken on the 8 spatial options on Natural Sites. If an appropriate assessment has been completed on the preferred options we would be pleased to receive a copy and comment as appropriate.</p>	<p>The Environmental Report (July 2008) contained a screening exercise but not a full appropriate assessment. This has now been completed with the advice of SNH who have made comments as appropriate and the assessment amended in light of them.</p>	<p>in relation to appropriate assessment.</p>	
<p>Scottish Natural Heritage</p>	<p>SEA Topic: Biodiversity – Conserve protect, maintain and enhance biodiversity (including ecosystems, habitats, species and genetics).</p> <p>Establish a green network in and around Aberdeen City and the three strategic growth areas in order to ensure:</p> <ol style="list-style-type: none"> <li>1. A planned approach to creating and protecting wild life corridors;</li> <li>2. Allow for the migration of species affected by climate change</li> <li>3. protect Species and habitats from inappropriate development; and</li> <li>4. Improve public access to the natural environment</li> </ol>	<p>The issue of accessible greenspace and Core Path Plans have been reflected in the text of the Finalised Structure Plan.</p>	<p>No change required</p>	<p>The issue of accessible greenspace and Core Path Plans have been reflected in the text of the Finalised Structure Plan.</p>
<p>Scottish Natural Heritage</p>	<p>SEA Topic: Human Health - Improve accessibility to good quality open greenspace and countryside</p> <p>Establish a green network in and around Aberdeen City and the three strategic growth areas in order to ensure:</p> <ol style="list-style-type: none"> <li>1. A planned approach to creating and protecting wild life corridors;</li> <li>2. Allow for the migration of species affected by climate change</li> <li>3. protect Species and habitats from inappropriate development; and</li> </ol>	<p>The issue of accessible greenspace and Core Path Plans have been reflected in the text of the Finalised Structure Plan.</p>	<p>No change required</p>	<p>The issue of accessible greenspace and Core Path Plans have been reflected in the text of the Finalised Structure Plan.</p>

	4. Improve public access to the natural environment			
Scottish Natural Heritage	<p>SEA Topic: Landscape - Protect and enhance and where appropriate restore the quality and distinctiveness of the area's landscape character and townscapes</p> <p>The development plan should include objectives/policies that discourage large scale windfarms around the periphery of the Cairngorms National Park in Line with the duty to have regard to the park plan. The plan should also set out criteria for assessing areas where wind farms would or would not be likely to be acceptable in relation to achieving this objective.</p>	The issue of the Cairngorms National Park has been reflected in the text of the Finalised Structure Plan.	No change required	The issue of the Cairngorms National Park has been reflected in the text of the Finalised Structure Plan.
Scottish Natural Heritage	<p>SEA Topic: Climatic Factors - Reduce causes of adverse climate change</p> <p>The development plan should include proactive proposals for the requirement for domestic and local scale heating and power generation.</p>	The issue of combined heat and power schemes has been reflected in the text of the Finalised Structure Plan.	No change required	The issue of combined heat and power schemes has been reflected in the text of the Finalised Structure Plan.
Scottish Natural Heritage	<p>Suggested alternative information required to monitor effects of the plan.</p> <p>BIODIVERSITY (please see table 2 of representation for detail of what sort of information is required, where it can be obtained, who is responsible and when).</p>	This level of information is not appropriate for monitoring the effects of the structure plan because it does not determine the use of particular sites.	No change required	No change required
Scottish Natural	Suggested alternative information required to monitor effects of the plan.	This level of information is not appropriate for monitoring the effects	No change required	No change required

Heritage	LANDSCAPE AND BIODIVERSITY (please see table 2 of representation for detail of what sort of information is required, where it can be obtained, who is responsible and when).	of the structure plan because it does not determine the use of particular sites.		
Scottish Natural Heritage	On p.66 the table refers to "the number of notified or qualitative interests (e.g. protected habitats and species) adversely affected by new development". However, the correct terminology for Natura 2000 sites is "qualifying interests" and for SSCI's "natural features".	It is agreed that the text included a typo and this will be corrected.	Page 66 – amend to reflect the correct terminology.	No change required
Aberdeenshire Community Planning Partnership	Road accident statistics appear to be omitted from the EIA. This does not properly recognise key environmental and human problems of existing commuting.	At an early stage, such issues were scoped out of the SEA. Consultation on the SEA Objectives as part of the scoping report did not raise the need to include this data which is more relevant to other plans and strategies	No change required	No change required
Aberdeenshire Community Planning Partnership	Social problems are ignored from the EIA. Problems are arising from family breakdown (following migration) and failures to integrate with more established residents - as a result of lack of social infrastructure and the sheer size and rapidity of poorly designed growth.	The SEA process is distinctly different from the Sustainability Appraisal process required of development plans in England and Wales. Social issues, such as those identified are not covered by SEA.	No change required	No change required
Hargest and Wallace Planning Ltd representing Barratt East Scotland	Does not provide an assessment of a Westhill growth option, as such the reason for exclusion is not apparent.	No settlements were assessed individually as part of the SEA process. A number of spatial options were assessed (p40 of the Environmental Report) and development in Westhill was considered as part of several of these.	No change required	No change required
PPCA Ltd representing Edinmore and Banchory &	The SEA makes some fairly arbitrary assumptions about the potential impacts that different alternatives would have. In that document the councils have come to a view that the preferred housing	The assessment is proportionate, fit for purpose and appropriate for the type of plan being prepared. A number of spatial options were	No change required	No change required

Leggart Estates	allowances split will not be V1 or V2 but will be the one promoted in the draft structure plan. Without spending considerable time and money undertaking an independent SEA or having a clear idea of the logic behind V1 and V2 alternative housing splits it would be a fairly pointless exercise attempting to challenge the preferred housing allowances.	assessed (p40 of the Environmental Report). Table 28 (p52) and Appendix 6, Table B (p226 – 257) provides the detailed assessment of the alternatives identified in Schedule 1.  The consultation authorities (SEPA, SNH and Historic Scotland) have all welcomed the comprehensive nature of the assessment.		
Ray Markham	The SEA is difficult to read. Table in App.5 could be improved. There are internal conflicts (p.27) re. holiday / second homes which will increase house prices and adversely affecting the tourist industry. It is difficult to follow the thinking that leads to the conclusions under 5.52 and 5.53 (p.51), except for the beneficial effects on regeneration areas.	It is recognised that the SEA is not an accessible document. However, the SEA is a technical document which is why it is legally required to be accompanied by a Non-Technical Summary. More effort will be put into improving the NTS and increasing the accessibility of the SEA of the first strategic development plan. Holiday / Second homes – There is no internal conflict because they represent two different problems; (1) a shortage increases house price; and (2) a shortage damages tourist potential.  It is recognised that paragraphs 5.52 and 5.53 are difficult to follow and a revised wording will be provided.	Page 51 – reword paragraphs 5.52 and 5.53 for clarity	No change required
Scottish Government Directorate for the Built Environment	TSC9 - Have some concern with the Cumulative Impact Assessment table within the SEA. On p.323 the statement "Historic environment - concentrated loss or archaeological remains in the Shire from new development and the construction of the AWPR" does not relate to the findings of the AWPR	There is no contradiction here as the table makes it clear that it is identifying cumulative, secondary and synergistic effects. As such, both new development and the AWPR could lead to the loss of archaeological	No change required	No change required

	<p>Environmental Statement in terms of the number of known archaeological sites that may be affected by construction. It is requested that this inconsistency is resolved.</p>	<p>remains and this loss will be concentrated in particular areas. However, the table does not indicate the scale of any loss attributed to the AWPR – this is properly a matter for the Environmental Statement of the project itself.</p> <p>The Non-Technical Summary of the Environmental Statement for the AWPR (August 2007) states that:</p> <p>“There are a number of sites of cultural heritage importance located within the route corridor. The effects on these include direct physical impacts and indirect impacts on their setting.</p> <p>Where possible, the route of the road has been designed to avoid or reduce direct impacts or impacts on the setting. Where this has not been possible, archaeological recording is proposed for known sites where direct impacts are predicted. Works will also be undertaken to identify and record previously unknown sites. In addition landscape design proposals have been developed to reduce impacts on setting.”</p>		
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### **3. Reasons for adopting this plan in the light of other reasonable alternatives**

Consistent with Section 18(3)(e) of the Act, this PPS is adopted in the light of other reasonable alternatives discussed in the Environmental Report on the basis of the following reasons:

- No additional environmental effects have been identified from the additions and changes made to the Draft Structure Plan following formal consultation and when preparing the PPS but the changes (including changes to wordings of existing aims etc) have been made to the Environmental Report Addendum for completeness.
- A number of related plans policies and strategies were identified and have been used to better the content of the final version of the PPS.
- The PPS delivers benefits against environmental, social and economic objectives whilst promoting the environment, community cohesion and improved connections.

### **4. Monitoring Measures**

Section 18(3)(f) of the Act proposes the provision of information on the measures that are to be taken to monitor for any unforeseen environmental effects so that appropriate remedial action may be taken. The following are proposed actions listed in the monitoring framework.

- Plan review – the PPS will be reviewed in accordance with Scottish Planning legislation and will assist in the creation of the first Strategic Development Plan for the Aberdeen City and Aberdeenshire City region which requires to be in place 3 years;
- A number of more detailed plans (primarily local development plans) will be developed with the opportunity to consider impacts in more detail;
- As identified in section 2 above, it is recognised by the consultation authorities that as a high level strategic plan many of the environmental issues identified in the assessment of the Structure Plan will require to be assessed in more detail as it is implemented through various lower level plans, since most, if not all, of the effects are dependant on the implementation of the lower tier PPS.
- A Monitoring Report will be prepared, including environmental indicators and targets and performance which will be reported on a regular basis through annual Monitoring Updates;
- Implementation of the Structure Plan will be monitored by the Aberdeen City and Shire SDPA in conjunction with Aberdeen City and Aberdeenshire Councils, in the course of its regular review, and

performance reporting procedures. This will ensure that mitigation takes place, through the appropriate assessment of underpinning plans and strategies.

- The majority of monitoring for the SEA objectives is already being undertaken by the two councils or by other government bodies or agencies. Any new identified data can be incorporated into the monitoring arrangements for the PPS thus allowing SEA monitoring to be incorporated into the existing performance monitoring;
  - A Monitoring Report will be produced each year to assess our progress in meeting the targets within the PPS in relation to rates of development, location of developments and whether we are meeting our land supply targets;
  - Significant changes in society, the economy, environment and population will become clear over a long period of time but will be monitored to ensure that the plan's objectives are appropriate. This will be a continuous process but this data will inform a Monitoring Statement which will be produced in preparing the next plan.

## **Conclusion**

It is our view that the SEA has made a positive effect on the plan. It will enable Aberdeen City and Shire Strategic Development Planning Authority and the two constituent member Councils to realise their goal of sustainable development, promote evidenced-based culture and transparency as well as supporting the community well-being in the north east of Scotland.

This Post-Adoption Statement demonstrates the link between the potential environmental effects, mitigation and how this will be monitored. The potential environmental effects in need of monitoring have been identified, and will be explored in lower level plans.

It is made clear from the assessment that the PPS is of a strategic high level and therefore many of the environmental issues identified will require to be assessed in more detail as the plan is implemented through various lower level plans, since most, if not all, of the effects are dependant on the implementation of the lower tier PPS (Aberdeen City and Aberdeenshire Local Development Plans for example). The assessment therefore highlights where further assessment is required, and when supporting plans and strategies should be subject to SEA.

This Post-Adoption Statement includes a commitment to ensuring that this will be taken forward as the plan is implemented. Implementation of the Structure Plan will be monitored by the Aberdeen City and SDPA in conjunction with Aberdeen City and Aberdeenshire councils, in the course of its regular review, and performance reporting procedures. This will ensure that mitigation takes place, through the appropriate assessment of underpinning plans and strategies.

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