

POST ADOPTION STATEMENT

The Environmental Assessment (Scotland) Act 2005

TAYplan
Strategic Development Plan
2012-2032

Perth & Kinross Council
December 2012

Plan	TAYplan, Strategic Development Plan
Responsible Authority	Perth & Kinross Council
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1 Introduction

1.1 This Post Adoption Statement (PAS) has been prepared on behalf of TAYplan the Strategic Development Planning Authority by Perth & Kinross Council in accordance to the requirements of the Environmental Assessment (Scotland) Act 2005. This statement presents a summary of the responses received from the public consultation exercise carried out in 2010 as part of the TAYplan Strategic Environment Assessment (SEA). It also provides a summary as to how the findings from the SEA and public consultation have been taken into account in the Strategic Development Plan.

1.2 It explains:

- how environmental considerations have been integrated into the Strategic Development Plan;
- how the Environmental Report has been taken into account in the preparation of the Strategic Development Plan;
- how opinions expressed in response to the consultations on the Main Issues Report and the Environmental Report have been taken into account in the preparation of the Strategic Development Plan;
- the reasons for choosing the Strategic Development Plan, as approved, in the light of other reasonable alternatives; and
- the measures that are to be taken to monitor the significant environmental effects of implementation of the Strategic Development Plan.

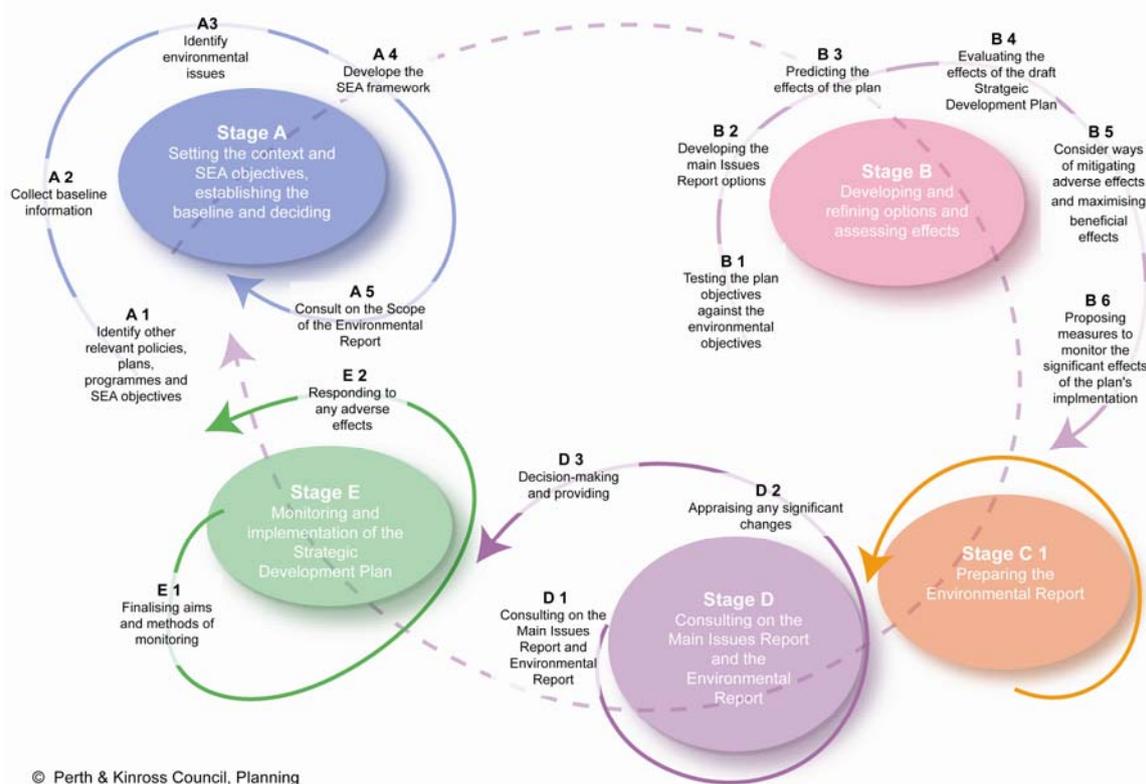
1.3 More specifically:

- **Section 2** summarises the SEA process.
- **Section 3** describes the key issues raised in the environmental report and its annexes, and explains how these have been taken into account in the published Strategic Development Plan (in accordance with Section 18(3) (a) and (b) of the Environmental Assessment (Scotland) Act 2005). It also sets out the findings from consultation on the environmental report at each stage, and explains how these were taken into account (Section 18(3) (c) and (d) of the 2005 Act).
- **Section 4** summarises the reasons for selecting the final, approved version of the Strategic Development Plan in the light of other reasonable alternatives (Section 18(3) (e) of the 2005 Act).
- **Section 5** clarifies the approach to monitoring the environmental effects of the approved Strategic Development Plan (Section 18(3) (f) of the 2005 Act).

2 Overview of the SEA Process

2.1 The SEA formed an integral part of the process of preparing the Strategic Development Plan. The process has ensured the integration of environmental considerations into development of the Strategic Development Plan through assessment at key stages (as shown in Figure 1). In addition the framework, against which the Strategic Development Plan was appraised, comprised 13 environmental objectives and a number of guide questions. At least one objective was developed for each SEA topic to ensure all necessary topics were addressed. Other factors taken into account in developing the environmental objectives included the baseline data, the scope of the appraisal identified for each environmental topic. The appraisal framework against which the Strategic Development Plan was assessed therefore reflected environmental considerations and provided a means of appraising the performance of the Strategic Development Plan in a consistent manner, enabling its potential effects to be identified and mitigated where possible, and enhancements recommended. The appraisal was an iterative process and its findings have been integral to refining the Strategic Development Plan's proposals.

Figure 1: The assessment process



Stage A involved developing the framework for undertaking the appraisal as well as an evidence base to inform the appraisal. The framework and evidence base were presented in a Scoping Report for consultation with stakeholders including the statutory consultees (Historic Scotland, the Scottish Environment Protection Agency and Scottish Natural Heritage). The Scoping Report was prepared in September 2009 and used 13 objectives as the basis for the development of objectives for the assessment.

Stage B involves undertaking the assessment itself. This involved identifying and evaluating the impacts of the different options open as well as the preferred option(s). Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation.

Stage C involves documenting the assessment and preparing the Environmental Report. In this case, several iterations of the Environmental Report were prepared as the Main Issues Report emerged.

Stage D involves consulting on the Main Issues Report and the Environmental Report.

Stage E will involve monitoring the adopted Strategic Development Plan including its environmental impacts.

- 2.2 Integral to the appraisal process was the development of mitigation measures that can be used to avoid, reduce or offset any potential adverse effects of the Main Issues Report. Opportunities were also sought to improve and enhance the Strategic Development Plan to benefit environmental and other sustainability receptors. Each of the topic appraisal sections included a mitigation and enhancement section identifying mitigation and enhancement measures that were suggested through the process. As the Main Issues Report was being drafted there was an iterative assessment process, resulting in changes being made to the Main Issues Report and ultimately the Strategic Development Plan. No changes were made by the Environmental Report at later stages in the development of the Plan. The drafting of the Main Issues Report and the preparation of the Environmental Report were carried out in parallel and mitigation and enhancement measures proposed through the Environmental Report were considered on a rolling basis where possible.

3 Consultation

3.1 This section discusses how responses from consultation authorities and the public in the consultation process that was undertaken during the development of both the Strategic Development Plan and the Environmental Report were taken into consideration. 25 responses were received and this section is a summary of the issues raised and how they were taken into account.

Public consultation within the SEA process

3.2 Public consultation is an important part of the SEA process. The Environmental Assessment (Scotland) Act 2005 requires that the public are given an 'early and effective' opportunity to participate in the process. Public consultation was carried out on the Environmental Report in conjunction with the Main Issues Report from 12 April 2010 to 2 July 2010 online and in the following locations:

- Dundee 4 May
- Crieff 5 May
- St John's Centre, Perth 6 May
- Overgate, Dundee 11 May
- Cupar 12 May
- Arbroath 17 May
- St Andrews 18 May
- Perth 20 May
- Montrose 24 May
- Pitlochry 25 May
- Kinross 27 May
- Forfar 2 June
- Blairgowrie 3 June
- Dundee 8 June

Consultation with the Consultation Authorities

3.3 Policy makers are also required to involve the statutory Consultation Authorities at key stages, and to publish the environmental report alongside a draft of the plan, programme or strategy, to allow the public to comment on both. Meetings with the Consultation Authorities to discuss and agree the scope and approach to the SEA in detail were also held at key stages throughout the process.

The consultation responses

3.4 The consultation responses received can be split into three key areas:

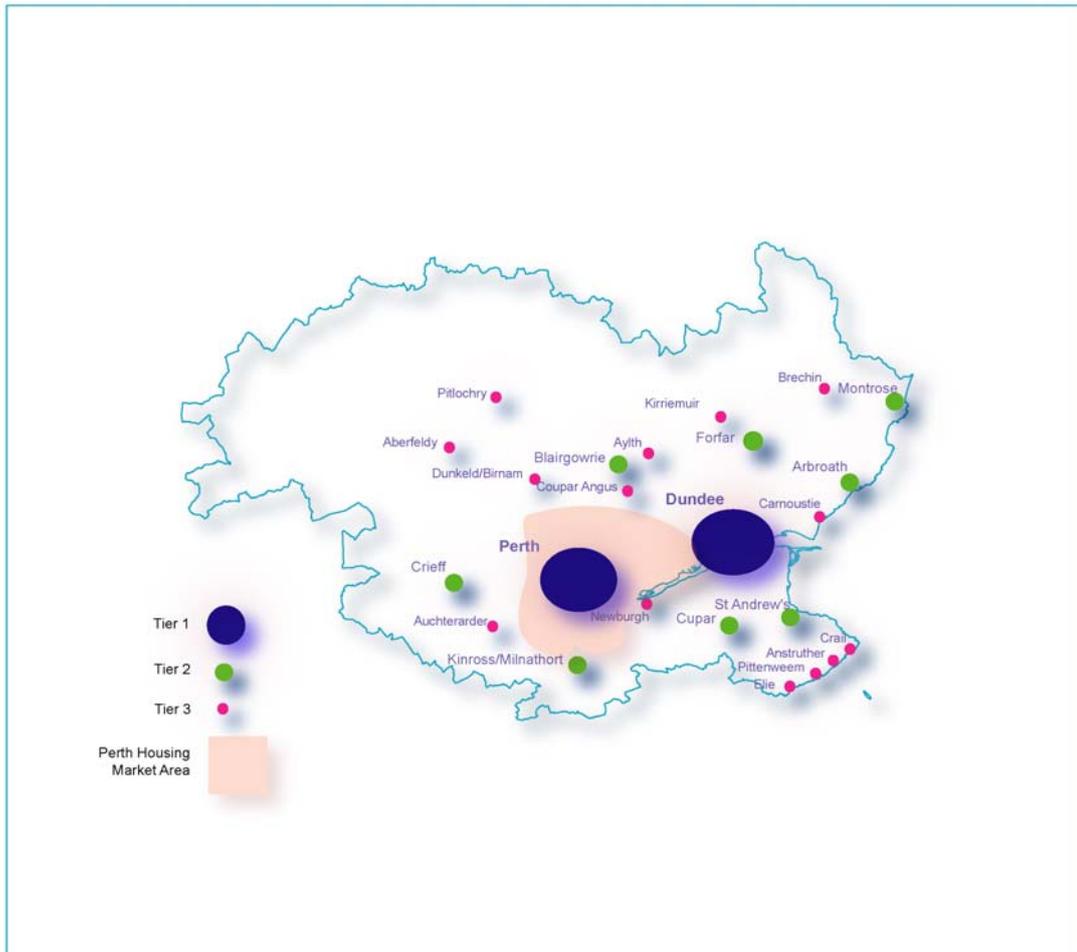
- General comments on the SEA as a whole;
- Detailed technical comments on specific chapters;

- Recommendations or suggestions for using the SEA to inform the development and implementation of the Strategic Development Plan.
- 3.5 In total, 25 written consultation responses were received, in addition to the comments received from the consultation events. The content of these responses varied considerably in terms of the issues raised and overall reaction to the Environmental Report. Many comments focused on the approach to the SEA and the assessment methods that were adopted. Specific comments on the detail presented within individual SEA sections were also received. A number of responses also included recommendations or suggestions as to how the Environmental Report could be taken forward and used to inform the development of the Strategic Development Plan.
- 3.6 The majority of comments received were constructive. However, a number of comments received highlighted that there are still significant differences of opinion related to what SEA is about, and its purpose. A number of these differences in opinion are to some extent the result of inexperience or misconceptions about the SEA process and its application. For example, some respondents considered that the Environmental Report was the strategy, whereas the purpose of it was to inform the development of the strategy.

4 Alternatives

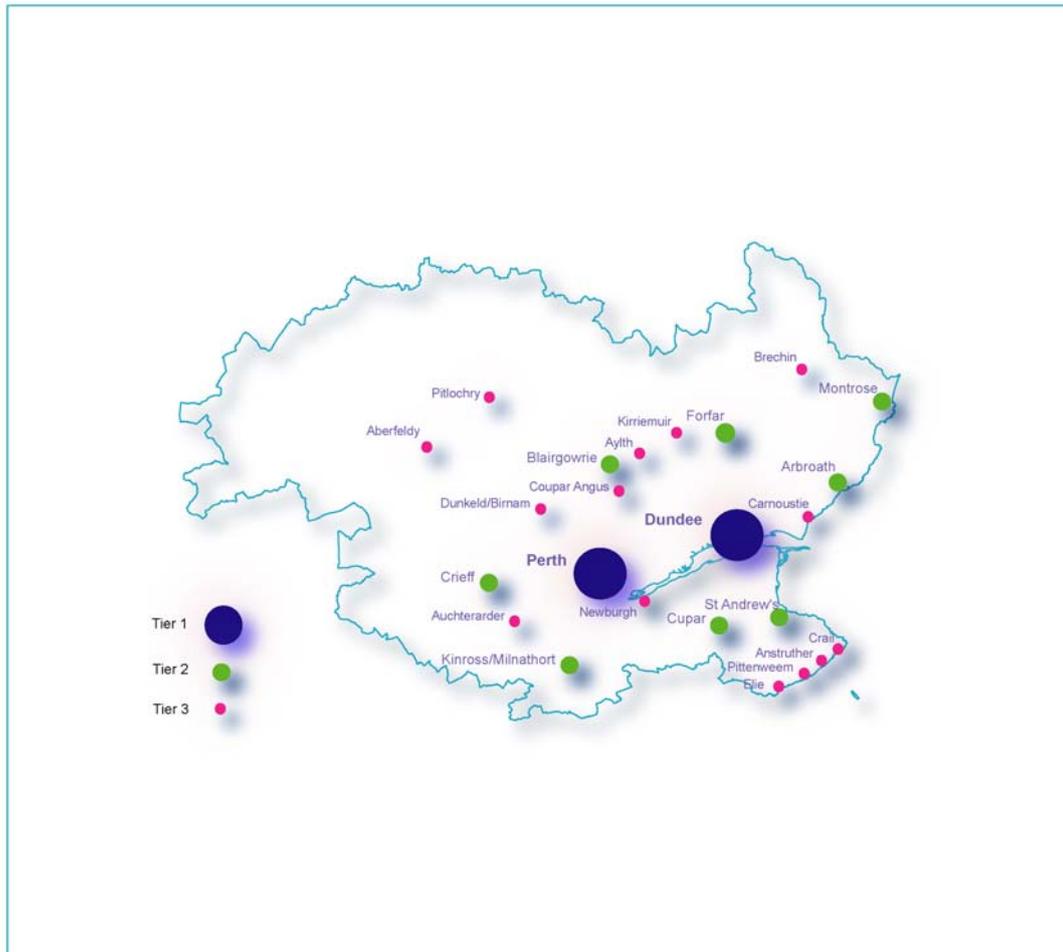
- 4.1 In line with the requirements of the Environmental Assessment (Scotland) Act and the SEA Directive, the likely significant effects of reasonable alternatives to the Strategic Development Plan, taking into account its objectives and geographical scope, were identified, described and evaluated. Strategic alternatives were identified which were further developed following the scoping consultation. The development of alternatives was ongoing with the development of the Strategic Development Plan and alternatives fell into three broad categories:
- 1 Alternatives levels of population growth;
 - 2 Alternative spatial strategy; and
 - 3 Alternative topics or themes for policies to be developed
- 4.2 Early in the SEA process it was apparent that there was scope for the Strategic Development Plan to generate a range of environmental effects, depending on its final content. The high level scenarios demonstrated the environmental benefits and disbenefits of the different approaches that could have been incorporated into the Strategic Development Plan.
- 4.3 Although no significantly adverse environmental impacts were identified, the SEA of the Main Issues Report raised a number of minor environmental issues that could be addressed by amending the content of the Strategy as it evolved. Most minor impacts relating to a specific outcome or theme were addressed by other components of the Strategic Development Plan, as noted in further analysis undertaken during the SEA. Some recommendations were also made on mitigation and enhancement and these were built into the Strategic Development Plan as it was drafted and finalised.
- 4.4 Perhaps unsurprisingly, the alternative which focused on ‘sustainability’ (i.e. concentrating development in the major settlements) performed more positively against the SEA objectives. The SEA emphasised the benefits of this scenario for a range of environmentally driven objectives, particularly biodiversity, water, soil, air, cultural heritage and landscape. However, it also demonstrated the need for careful management to ensure that solutions that would benefit one part of the environment would not be delivered at the cost of others. This included potential tensions between the globally driven climate change agenda, and more local environmental characteristics and sensitivities, as demonstrated by aims such as decentralised renewable energy generation and sustainable waste management. The ‘sustainability’ scenario illustrated the way in which a conservative approach may inadvertently lead to displacement of development pressure and unplanned outcomes for the environment.

TAYplan Preferred Strategy



4.5 An alternative scenario explored the form and effects of a more dispersed population. However, while there were some possible community benefits identified within the scenario it was more difficult to reconcile with environmental aims. Dispersing the population evenly throughout the region would not coincide with longer term environmental and climate change objectives. Effects on landscape were predicted to be mixed, as they would depend on the compatibility of community aspirations with landscape protection and enhancement. It was also considered possible that this approach risked reinforcing environmental problems in areas close to communities which were at highest risk of deprivation. Overall, this scenario raised questions about how far a bottom up, disaggregated approach to the Strategic Development Plan could help to deliver equitable and sustainable economic growth.

Strategy A



4.6 In broad terms, the Consultation Authorities and other who commented on the Main Issues Report considered that the Strategic Development Plan should play a key role in promoting sustainable settlement patterns. It was suggested that this should include locating development alongside sustainable transport routes, and taking flood risk into account.

4.7 The assessment prompted further comments on the role of the Strategic Development Plan in protecting and enhancing biodiversity, landscape and cultural heritage. SNH emphasised the importance of understanding and reflecting landscape capacity and distinctiveness, as well as the links between landscape enhancement and biodiversity networks. SNH also stated that landscape protection and enhancement are important for both new and existing development areas. Historic Scotland similarly highlighted priorities for cultural heritage protection, and explained that enhancement would not necessarily be appropriate for all archaeological sites. Consequently, the Strategic Development Plan developed policies and an approach which recognised the importance of protecting and enhancing these assets.

4.8 The Strategic Development Plan was likely to generate both positive and negative effects on biodiversity, as it reiterated a commitment to

safeguarding biodiversity through planning, and recognised the role of the natural environment in contributing to quality of life. The Main Issues Report also discussed the potential for strategic green networks and environmental enhancement for the long term, which could improve links between important ecological sites.

4.9 There was extensive iteration between the SEA process and the preparation of the Main Issues Report. This enabled the strength of environmental weighting to be brought through in the content and of the Main Issues Report. Discussions sharpened the text of the Main Issues Report, and have allowed for enhancements to the proposed Vision Framework to be incorporated at an early stage. This process involved the tightening and reshaping of summary main issues and associated objectives to provide a framework that could be assessed, and proposing a number of enhancements to the framework. These enhancements have seen:

- The inclusion of the 'built environment' into the objective which aims to:
 - *'Protect & enhance the natural & built environment, biodiversity & natural resources'*, which ensures consideration of the historic environment, which was initially lacking.
- The inclusion of 'zero waste' into the objective which aims to:
 - *'Provide for new or improved infrastructure capable of supporting a low/zero carbon economy and zero waste'*, which ensures that waste management is considered at the strategic level in the TAYplan area.
- The replacement of 'some urban places' with 'some places (cultural, built, natural heritage)' to the first key challenge of the plan:
 - *'Recognising that some places (cultural, built, natural heritage are of international and regional significance and respect their quality and character in how they develop'*. This point was also pursued by consultation authorities, and ensures that recognition is afforded for environmental significance as well as for economic significance.

4.10 The consideration of alternatives undertaken during the SEA and the preparation of the Strategic Development Plan, including feedback from the consultation, influenced the shape of the final document. The feedback assisted in a strengthening and clarifying policy aims and objectives and to ensure an appropriate social, economic and environmental balance was struck.

4.11 With regard to the specific alternatives explored during the SEA process, it was concluded that the approved Strategic Development Plan represents each of the potential policy 'drivers' as far as possible, and in a sustainable

way. As demonstrated above, the consultation process also allowed for competing priorities to be rigorously discussed and tested in relation to one another. Consequently, the Strategic Development Plan strikes as sustainable a balance as possible between environmental, social, economic and community priorities and aspirations.

Additional Assessment

4.12 In order to determine whether there are any significant effects likely to result from the Proposed Strategic Development Plan that were not identified by the assessment of the Main Issues Report, an additional stage of assessment was undertaken. This consisted of verification of the findings of the initial assessment that had been documented in the Environmental Report. Having taken into consideration the assessment related consultation comments, and based on an assessment of the changes to the Strategic Development Plan it is considered that all of the potentially significant effects identified in the original assessment remained valid. It was agreed by the Consultation Authorities that no further assessment was necessary as all significant environmental effects had been identified and addressed in the Strategic Development Plan.

Screening by Scottish Ministers

4.13 Scottish Ministers screened their modifications for any significant environmental effects, and in doing so consulted with the SEA Gateway. Scottish Ministers concluded that there were no significant effects and this was agreed by the consultation authorities. Scottish Ministers advertised the determination that the modifications to the Strategic Development Plan raised no significant environmental effects that had not already been considered through the Environmental Report.

Amendments to the Environmental Report

4.14 Some of the consultation responses identified information gaps and amendments needed to methodologies within the Environmental Report. Examples related to:

- More up to date baseline information now being available;
- Recommendations for changes to SEA objectives; and
- Recommendations for other plans, policies and programmes that should be reviewed.

In response to these comments no change was made to the Environmental Report. However, the most up to date evidence base was used to finalise and inform the Strategic Development Plan.

4.15 Recommendations from the Environmental Report were incorporated into the Action Programme. Many of the actions required to mitigate or enhance the effects of the Plan will be taken forward by TAYplan's 4 constituent Councils Local Development Plans.

5 Monitoring

- 5.1 This section sets out the measures to be taken to monitor the significant environmental and other effects of the implementation of the Strategic Development Plan and to enable appropriate action to be taken on adverse effects. The monitoring process will focus on the significant environmental effects (both positive and negative) that are predicted through the Environmental Report. Effects that will be monitored include those:
- that are likely to breach international or national legislation, guidelines or standards
 - that could potentially result in irreversible damage, with the aim being to identify such trends before the long-term damage is caused
 - where there is uncertainty linked to the prediction and, therefore, monitoring is needed to determine whether the prediction was correct and if further mitigation may be needed in the future
- 5.2 The monitoring process will draw as far as possible upon existing monitoring programmes. TAYplan will be responsible for overseeing monitoring of the implementation of the Strategic Development Plan, including the significant environmental and other effects. They will undertake a review of the monitoring data for each effect approximately every 4 years. This approach should coincide with reviews of the Strategic Development Plan. This will enable a sufficient body of data to be developed that can be used to monitor trends and performance over a number of years.
- 5.3 If monitoring highlights any unforeseen adverse effects, or adverse effects that are more significant than predicted, the Strategic Development Plan Authority will take remedial action in consultation with stakeholders and the consultation authorities. Remedial actions could be taken through monitoring reports and may involve:
- identifying the effect in question and whether or not the effect is likely to result in lasting significant harm;
 - the relevant decision maker taking relevant action under the appropriate regulatory regime or;
 - discussing with those responsible means of arresting the adverse effects or;
 - if the activity cannot be stopped or effects reversed, further measures to mitigate and potentially compensate for the damage;

- reviewing the need for a policy revision, a change to the Plan or new or improved monitoring indicators/measures; and
- updating the evidence base and commissioning further research if necessary.

5.4 The Monitoring Framework below is based around the Environmental Report's Objectives and includes the following elements:

- the potentially significant effect that may need to be monitored;
- a potential monitoring measure/indicator;
- the potential data source and frequency of monitoring, where known.

5.5 Where appropriate monitoring will make use of information that will be reported as part of the monitoring of the Strategic Development Plan. However, there remain some effects for which suitable monitoring indicators have yet to be identified leaving some gaps which will need to be filled when suitable indicators become available.

Table 1: Monitoring Framework

Environmental Report Objective	Effect to be monitored	Monitored Measure	Source (frequency)	Guidance for Monitoring
To conserve and enhance the diversity of species and habitats	Increase or loss of biodiversity (protected and non-protected) within the TAYplan area due to development.	% area of land designated as Biological or Mixed SSSI in favourable condition Open Space Strategy and Greenspace Network reviews	SNH, SEPA, 4 Councils	Long-term monitoring may not highlight any significant issues of regional concern in the short term. However, any emerging trends should be reviewed to establish whether there are direct or indirect links with the TAYplan strategy or strategic sites.
To improve the quality of life for communities in the TAYplan area To maximise the health and well-being of the population through improved environmental quality	Improvement in the quality of life for the TAYplan population	% resident population that travel to work/school by a) private car b) public transport c) cycle or by foot Life expectancy at birth (male and female)	Scottish Household Survey	The long-term nature of this problem and effects on it to an extent limits scope for meaningful monitoring at a regional level. Nevertheless, any emerging national trends should be reviewed within the TAYplan monitoring process with a view to defining where TAYplan is contributing positively or negatively to quality of life.
To safeguard soil quality and quantity through restoration, and the reduction of soil sealing or contamination	Loss of prime quality agricultural land together with the amount of land remediated or brought back into productive use.	Area (ha) of prime quality agricultural land used for development. Area (ha) of 'potentially' contaminated land remediated	4 Councils	Monitoring of the Scottish Soil Framework should be reviewed in order to establish any possible issues and their links with any elements of TAYplan.
To protect and where appropriate, improve waterbody status within or related to the TAYplan area To maintain catchment	Impact (positive and negative) on water environment due to development	% of rivers and surface water bodies classified as 'not at significant risk'	SEPA classification of water bodies.	Long-term monitoring may not highlight any significant issues of regional concern in the short term. However, any emerging trends should be reviewed to establish whether there are direct or indirect links with the TAYplan strategy or associated strategic

Environmental Report Objective	Effect to be monitored	Monitored Measure	Source (frequency)	Guidance for Monitoring
processes and hydrological systems within the TAYplan area				sites.
To protect and enhance air quality	Number of people that live in AQMAs and therefore subject to poorer air quality	Number of days air quality exceeds legislative limits in AQMAs	4 Councils	The findings from the additional assessment will be built into the TAYplan monitoring process. As well as monitoring negative effects, it is important that the positive effects of sustainable transport and green network developments are taken into account within further quantitative assessment.
To reduce emissions of greenhouse gases	Potential greenhouse gas emissions from new development	Carbon emissions per annum (per capita)	4 Councils	This should be linked with monitoring of the 4 Council's Climate Change Declaration Commitments and their Carbon Management Plans. This should be revisited to establish whether action is needed to secure emissions reductions.
To ensure climate change adaptation	Socio-spatial vulnerability needs to be considered alongside measures of hazard exposure.	Number of properties in 1:200 year flood zone % of vulnerable population in area of flood risk	Social deprivation indices are useful indicators for some aspects of socio-spatial vulnerability.	Long-term monitoring may not highlight any significant issues of regional concern in the short term. However, emerging trends should be reviewed to establish whether there are direct or indirect links with the TAYplan strategy or strategic sites.
To promote and ensure high standards of sustainable design and construction	Energy usage in buildings	Total domestic energy consumption per capita (kWh) for the TAYplan area	DECC	It will be necessary to monitor the effectiveness of this indicator as energy usage is also linked to the number and type of appliances in homes.

Environmental Report Objective	Effect to be monitored	Monitored Measure	Source (frequency)	Guidance for Monitoring
To minimise waste	Change in the amount of waste produced and capacity of waste treatment facilities.	Waste recycling rates by household. Waste generated per capita for TAYplan area	4 Council, SEPA	This should be linked with monitoring driven by the Zero Waste Plan This should be revisited within the next round to establish whether further action is needed to secure appropriate facilities in support of zero waste objectives. This should be linked with monitoring driven by the Zero Waste Plan.
To protect and enhance the character, diversity and special qualities of the TAYplan area's landscape	Key features that contribute to the special qualities of the landscape and monitor changes in these	Landscape change. Monitoring methodology in development	Future national and regional level information on landscape trends as available.	It will be important to determine whether developments are impacting on vulnerable and valued landscape resources and to establish whether landscape mitigation measures are effective.
To protect and where appropriate enhance the cultural and built environment	Incremental loss of historic environment	Change in historic landscape Number of listed buildings and Scheduled Ancient Monuments (SAMs)	Information on the historic environment gathered in relation to project level planning and development	It will be important to establish whether the potential impacts of strategic developments and consequent mitigation measures to safeguard protected sites are being taken forward at the Local Development Plan and project level.

