

Our ref: PCS/164136
Your ref: Main issues

If telephoning ask for:
Clare Pritchett

9 May 2019

Andy Brownrigg
Aberdeen City Council
Planning & Sustainable Development
Business Hub 4, Marischal College
Broad Street
Aberdeen

By email only to: pi@aberdeencity.gov.uk

Dear Mr Brownrigg

Aberdeen Local Development Plan 2022: Main Issues Report

Thank you for your consultation email which SEPA received on 28 February 2019. We welcome the opportunity to comment on the MIR questions where relevant to our interests and would welcome the opportunity to engage further with you as you move towards policy wording and site allocations prior to publication of the proposed plan.

We have provided comments on the accompanying Interim Environmental Report separately (PCS164582 Dated 9 May 2019).

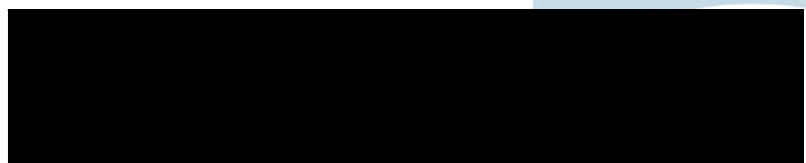
MIR Question 1 – new housing sites - do you agree with our preferred housing sites?
MIR Question 4 – new healthcare facilities – do you have any comments on these sites?

Please see our comments in Appendix 1 below on the individual preferred housing sites and the sites for new healthcare facilities identified in the MIR.

We note that we have not been provided with shapefiles and therefore have not commented on those bid sites which were not preferred/desirable at this stage and we would welcome the opportunity to comment on any additional preferred sites identified at any stage (with shapefile) including prior to publication of the proposed plan.

We note that only the existing opportunity sites identified in the Aberdeen LDP 2017 to be removed have been identified in the MIR and we have not been provided with shapefiles for the sites which will continue to be identified. Therefore we have not provided comments on sites to be carried forward to the proposed plan and would welcome the opportunity to do this as soon as possible and prior to publication of the proposed plan.

MIR Question 9 Out of town retailing – should we direct high footfall uses to existing centres including the city centre?



We agree that this approach would appear to limit impacts on other interests including those relevant to our interests such as the natural environment and blue-green infrastructure.

Question 17 – Natural Environment - do you agree that the proposed list of policies for ‘Natural Environment’ gives a clearer and more coherent structure than at present?

We note that the proposed policies are as follows:

NE1: Green Belt

NE2: Green & Blue Infrastructure (parts of existing NE1 green space network, NE3 urban green space, NE4 open space provision and NE9 access and informal recreation)

NE3: Protecting Our Natural Assets (parts of existing NE5 7 NE8)

NE4: Water Environment (part of existing NE6 flooding drainage & NE7 coastal planning)

NE5: Landscape (parts of existing D2)

We agree that this appears to give a clearer and more coherent structure than at present and we would welcome the opportunity to work with you to provide comments on detailed policy wording (in particular policies NE2: Green and Blue Infrastructure and NE4: Water Environment) as soon as possible and prior to publication of the proposed plan.

In addition, in the light of the potential status of Supplementary Guidance (SG), we welcome consideration of what text from SG now needs to be included in policies. The existing “Supplementary Guidance: Flooding, Drainage & Water Quality” expands on Policies NE6 and NE7. It is proposed to combine these two Policies into Policy NE4 “Water Environment” and it should be ensured that the same principles are maintained. Policy NE6 “*sets a presumption against development that will increase flood risk. It enables the requirement of a Flood Risk Assessment and/or a Drainage Impact Assessment for development proposals*”. Policy NE7 states “*there is a focus on the impacts of flood risk as a result of new development, with a general presumption against this.*” We would look for explicit reference to flood risk and the avoidance of development within flood plains.

Main Issue 5 – Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies?

We support Option 2 – the Preferred Option: to increase the requirement for electrical vehicle charging infrastructure for all new developments that provide parking.

Question 21 – Developer Obligations and Infrastructure Delivery

Do we need to change our approach to securing developer obligations for future development proposals?

We support the consideration of developer obligations as a policy requirement to include contributions at a strategic scale for all supporting infrastructure relevant to the proposed development including all water infrastructure including blue-green infrastructure and regional SUDS.

We recognise that this may require the early identification of strategic/regional blue-green infrastructure required to support development and manage fluvial and pluvial flood risk and maintain and upgrade waterbody status under the Water Framework Directive.

The Scottish Borders Local Development Plan Policy IS2: Developer Contributions may assist with wording and the [City of Edinburgh Adopted Local Development Plan](#) and [Edinburgh City Council - Finalised Developer Contributions and Infrastructure Delivery Supplementary Guidance](#). For

example see [City of Edinburgh Adopted Local Development Plan](#) Section 1, part 4 para 104. Part of this approach will include the establishment of cumulative contribution zones.

We note proposed policy NC12: Public Art Contribution has a fixed percentage to public art for those projects with construction costs over £1million. Consideration should be given to a percentage contribution to blue-green infrastructure.

**Main Issue 6 – Low and Zero Carbon Generating Technologies and Water Efficiency
Should the requirements of Policy R7 be changed?**

We support the Preferred Option to follow the targets set out in the current Supplementary Guidance (Resources for New Development) and transcribe these into the Local Development Plan.

We highlight that the challenges of sustainable development and climate change are far more than just reduction of travel and avoiding long-term flood risk. We would welcome an update from the Council on the success of the existing Policy R7 and SG in achieving a carbon reduction and lower water demand/water efficiency in new development and whether this policy wording requires further consideration. We would welcome an update from Scottish Water on their plans for drinking water supplies and waste water treatment in the City over the proposed plan period.

**Question 22 – Low and Zero Carbon Generating Technologies and Water Efficiency
What methodology should the Council use in calculating carbon compliance with policy R7 specifically how should the target of reducing carbon dioxide levels be calculated?**

We have no specific advice on the calculations required.

Question 23 – Solar Farm Developments

Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy Developments and should specific guidance be included within Policy R8?

We agree that solar farm developments should be supported but have no specific guidance that we consider should be included.

Main Issue 7- Heat Networks

Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?

We support Option 2 - the Preferred Option to include a policy supporting the development of heat networks across the city where the policy would identify key areas of the city where existing networks exist – presumably with a requirement to connect into and expand – or where new networks should be developed – presumably where existing/potential heat sources are identified such as the Energy from Waste plant.

We would also support wording that includes the requirement for new developments to be future proofed to enable heat networks to be developed in the future either within the development itself or to enable heat networks to pass through the development where appropriate.

If you have any queries relating to this letter, please contact me by telephone on 01224 266609 or e-mail at planningaberdeen@sepa.org.uk.

Yours sincerely

Clare Pritchett
Senior Planning Officer
Planning Service

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).

Appendix 1

Individual preferred housing sites and the sites for new healthcare facilities identified in the MIR.

Flood Risk and Waterbodies

There are several sites where the information we hold suggests that, although part of the site is highly likely to be developable, there is a risk of flooding to part of the site and as such development may be constrained. Proposals for development would have to be accompanied by a satisfactory Flood Risk Assessment. The outcome of the FRA could reduce the area of the site that is developable, the capacity of the site or the appropriate design or layout for the site. Using mitigation measures to enable development in flood risk areas is only appropriate in exceptional circumstances or where flood defences exist (or are under construction) and meet the appropriate standard for development. For these sites, we would object to their inclusion in the Local Plan **unless** wording is included that highlights that flooding is a potential constraint and a FRA will be required. This ensures that developers are aware from the earliest stage of the possible implications and of the additional costs that will be incurred in bringing development forward for the site.

In Section 3 of the MIR the relationship between the City Centre Masterplan (CCMP) and the LDP are considered. We welcome the objective of *“revealing waterfronts by reconnecting the city centre with the harbour, beach and rivers”*. Within “Intervention area – North Dee” some new development is proposed beside the River Dee. Similarly in the “Intervention Area-Torry Waterfront” a new residential community as well as retail, a hotel and eateries are proposed. Under Section 3.6 “Living in the City Centre” the CCMP identifies proposals for residential accommodation within five of the Intervention Areas. We note that if any of these proposals for development lie adjacent to a watercourse or river and within the functional floodplain they would have to be accompanied by a satisfactory Flood Risk Assessment. If there is a risk of flooding to part of the site then development may be constrained.

Pluvial flooding has been identified at several sites within the MIR. SEPA would wish to ensure that a pluvial hazard is recognised and considered by the relevant bodies to ensure no adverse impact on the built environment, particularly taking account of pluvial overland flows on to the site, related drainage exceedance design and flood flow routing from the site. Solutions that involve on-site engineering design considerations for SUDS will be a matter for the local authority to consider in conjunction with Scottish Water.

We have indicated in the sites spreadsheet where any site falls into a Potentially Vulnerable Area (PVA) within the national Flood Risk Assessment published in 2011 by SEPA under the Flood Risk Management (Scotland) Act.

B01/06 B01/11 Former Cordyce School

The site is within the current 1 in 200 year Flood Map. Parts of the site have flooded previously and we have an approximate flood extent for the December 2015 - January 2016 event and it is estimated that this flood event has an approximate 1 in 200 year return period. There is some surface water flooding indicated along the line of the small watercourse which runs through the site. The presence of surface water flooding on a minor watercourse can be seen as an indication of fluvial flood risk.

Requirement for Flood Risk Assessment and will require an appropriate buffer strip to watercourse. Maintain the area at risk of flooding as Green Space Network designation in the plan, to be protected against development, and/or identify that an area will not be permitted to be developed for a hard use but will be naturalised green space.

B03/19 Woodend Hospital

Aberdeen City Council have a hydraulic model for the Den Burn and flood levels have recently been provided by ACC for a proposed development immediately to the south-east of this site (application 181744/DPP , SEPA PCS/161745). We also have records of a FRA for the residential development of Woodend Hospital (4.12.1997). We will require environmental enhancements, including an appropriate buffer strip, to the Den Burn to be investigated and implemented as a developer requirement. We would welcome a meeting with the site proposer and Aberdeen City Council to discuss further as soon as possible.

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B02/08 WTR Site Dubford (Scotstown Moor Base) Bridge of Don

Prior to identification in proposed plan, detailed topographic information may demonstrate the site is sufficiently elevated above nearby areas of higher risk if not *Requirement for Flood Risk Assessment*.

B02/25 Balgownie Area 4

Requirement for Flood Risk Assessment (to assess flood risk from small watercourse) However may demonstrate that all development is outwith any flood risk areas.

001 Former Bucksburn Primary School

Requirement for Flood Risk Assessment (to assess flood risk from Bucks Burn) However may demonstrate that all development is outwith any flood risk areas.

B06/01 152 Don Street

From post flood survey data we are highly confident that Seaton Park, to the west of the site, was flooded during the December 2015- January 2016 flood event. This event has an approximate 1 in 200 year return period. However, it would appear that this site is considerably elevated above the functional floodplain of the River Don. Therefore, prior to identification in proposed plan, detailed topographic information may demonstrate the site is sufficiently elevated above nearby areas of higher risk if not *Requirement for Flood Risk Assessment*.

B03/13 Summerfield House

Potential surface water flood risk – this is a matter for Aberdeen City Council in consultation with relevant internal specialists in the Flood Prevention Unit. Surface water management measures to be considered in detail to ensure no increased risk downhill of the site,

B04/02 Former Factory, Granitehill Road

Potential surface water flood risk - – this is a matter for Aberdeen City Council in consultation with relevant internal specialists in the Flood Prevention Unit. Surface water management measures to be considered.

09 May 2019

Sandra Omondi
Local Development Plan Team
Aberdeen City Council
Strategic Place Planning
Place Business Hub 4
Ground Floor
Marishal College
Aberdeen
AB10 1AB

By email only to: [REDACTED]

Dear Ms Omondi

Environmental Assessment (Scotland) Act 2005
Aberdeen City Council - Local Development Plan SEA - Environmental Report

Thank you for your Environmental Report consultation submitted under the above Act in respect of the Local Development Plan SEA. This was received by SEPA via the Scottish Government SEA Gateway on 28 February 2019. We have used our scoping consultation response to consider the adequacy of the Interim Environmental Report (ER) and this is used as the framework for detailed comments which can be found in Appendix 1. For convenience, these comments have been structured to reflect that of the ER. Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the Aberdeen Local Development Plan Main Issues Report itself will be provided separately.

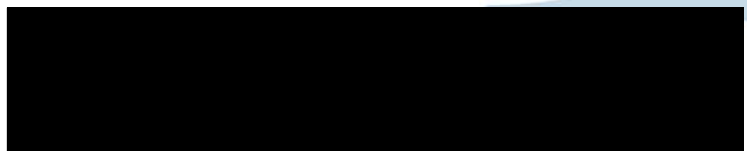
We understand that this is an interim report and a final Environmental Report will be published for consultation in due course (in 2020) with the Proposed Aberdeen Local Development Plan. As the Aberdeen Local Development Plan is finalised, Aberdeen City Council as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the [Scottish Government SEA Guidance](#). A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this environmental report consultation, please do not hesitate to contact me on [REDACTED] or via our SEA Gateway at [REDACTED]

Yours sincerely

Clare Pritchett
Senior Planning Officer

Ecopy: [REDACTED]



Appendix 1: Comments on the Environmental Report (ER)

General comments

We consider that the Interim ER provides a good summary of the Strategic Environmental Assessment (SEA) process to date in identifying all the potential effects that the Aberdeen Local Development Plan may have on the environment.

Detailed comments

1. Introduction

- 1.1 We note that the Interim Environmental Report (December 2018) provides an assessment of the preferred and alternative policy and site options as set out in the Main Issues Report. We note that it is proposed that most of the policies and some of the land allocations included in the 2017 LDP will be carried forward to the next Plan, and the Main Issues Report reflects this. The Main Issues Report also includes preferred options for change (or continuity), as well as alternatives and draft policies where new policies or significant changes to existing policies have been proposed.

2. Key Facts and Description of the PPS Content

- 2.1 No comments.

3. SEA Activities to Date

- 3.1 No comments.

4. Description of PPS – Content of LDP Main Issues Report

- 4.1 We have provided comments on the LDP Main Issues Report by separate response (PCS164136 Dated 13 May 2019).

- 4.2 We note that the Interim Environmental Report sets out an assessment of the preferred option and alternative for the 12 main issues identified. Those relevant to our interests are:

Issue 6: Low and Zero Carbon Generating Technologies and Water Efficiency

This issue is concerned with reducing energy use and a fabric first approach to construction and a cleaner energy sector.

Preferred option: Follow the targets set out in the supplementary guidance and translate these into the Local Development Plan

Issue 7: Heat Networks

This issue is concerned with moving heat networks in Aberdeen in a coherent planned way by possibly having a specific policy.

Include a policy supporting the development of heat networks across the city. The policy would identify key areas of the city where existing networks existing or where new networks should be developed.

- 4.3 New allocations for the proposed LDP 2022 – 2040 which have been identified from the new development bids (submitted during the pre-Main Issues Report consultation in May 2018) are at Appendix 5.1 – desirable sites. We have assessed and comment on these

sites below (also provided as Appendix 1 of our separate response to the Main Issues Report PCS164136 Dated 9 May 2019).

- 4.4 There are several sites where the information we hold suggests that, although part of the site is highly likely to be developable, there is a risk of flooding to part of the site and as such development may be constrained. Proposals for development would have to be accompanied by a satisfactory Flood Risk Assessment. The outcome of the FRA could reduce the area of the site that is developable, the capacity of the site or the appropriate design or layout for the site. Using mitigation measures to enable development in flood risk areas is only appropriate in exceptional circumstances or where flood defences exist (or are under construction) and meet the appropriate standard for development. For these sites, we would object to their inclusion in the Local Plan **unless** wording is included that highlights that flooding is a potential constraint and a FRA will be required. This ensures that developers are aware from the earliest stage of the possible implications and of the additional costs that will be incurred in bringing development forward for the site.
- 4.5 In Section 3 of the MIR the relationship between the City Centre Masterplan (CCMP) and the LDP are considered. We welcome the objective of “*revealing waterfronts by reconnecting the city centre with the harbour, beach and rivers*”. Within “Intervention area – North Dee” some new development is proposed beside the River Dee. Similarly in the “Intervention Area-Torry Waterfront” a new residential community as well as retail, a hotel and eateries are proposed. Under Section 3.6 “Living in the City Centre” the CCMP identifies proposals for residential accommodation within five of the Intervention Areas. We note that if any of these proposals for development lie adjacent to a watercourse or river and within the functional floodplain they would have to be accompanied by a satisfactory Flood Risk Assessment. If there is a risk of flooding to part of the site then development may be constrained.
- 4.6 Pluvial flooding has been identified at several sites within the MIR. SEPA would wish to ensure that a pluvial hazard is recognised and considered by the relevant bodies to ensure no adverse impact on the built environment, particularly taking account of pluvial overland flows on to the site, related drainage exceedance design and flood flow routing from the site. Solutions that involve on-site engineering design considerations for SUDS will be a matter for the local authority to consider in conjunction with Scottish Water.

B01/06 B01/11 Former Cordyce School

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Requirement for Flood Risk Assessment and will require an appropriate buffer strip to watercourse. Maintain the area at risk of flooding as Green Space Network designation in the plan, to be protected against development, and/or identify that an area will not be permitted to be developed for a hard use but will be naturalised green space.

TEXT in Interim Environmental Report (page283) does not correctly identify that a part of the identified site is at risk of fluvial flooding, that no details have been provided of where development would occur at this stage, that a FRA will be required and no development in the floodplain with an appropriate buffer strip to the watercourse.

B03/19 Woodend Hospital

Aberdeen City Council have a hydraulic model for the Den Burn and flood levels have recently been provided by ACC for a proposed development immediately to the south-east of this site (application 181744/DPP , SEPA PCS/161745). We also have records of a FRA for the residential development of Woodend Hospital (4.12.1997). We will require environmental enhancements, including an appropriate buffer strip, to the Den Burn to be investigated and implemented as a developer requirement. We would welcome a meeting with the site proposer and Aberdeen City Council to discuss further as soon as possible.

Requirement for Flood Risk Assessment and will require an appropriate buffer strip to watercourse. Maintain the area at risk of flooding as Green Space Network designation in the plan, to be protected against development, and/or identify that an area will not be permitted to be developed for a hard use but will be naturalised green space.

TEXT in Interim Environmental Report (page 203) does not correctly identify potential to upgrade waterbody status of North Burn of Rubislaw/Den Burn, risk of flooding to site and requirement for FRA and no development in the floodplain with an appropriate buffer strip to the watercourse.

B02/08 WTR Site Dubford (Scotstown Moor Base) Bridge of Don

Prior to identification in proposed plan, detailed topographic information may demonstrate the site is sufficiently elevated above nearby areas of higher risk if not *Requirement for Flood Risk Assessment*.

TEXT in Interim Environmental Report (page 172) appears to be missing section on flood risk.

B02/25 Balgownie Area 4

Requirement for Flood Risk Assessment (to assess flood risk from small watercourse) However may demonstrate that all development is outwith any flood risk areas.

TEXT in Interim Environmental Report (page 188) appears to be missing section on flood risk.

001 Former Bucksburn Primary School

Requirement for Flood Risk Assessment (to assess flood risk from Bucks Burn) However may demonstrate that all development is outwith any flood risk areas.

TEXT in Interim Environmental Report (page 316) does not identify requirement for FRA.

B06/01 152 Don Street

From post flood survey data we are highly confident that Seaton Park, to the west of the site, was flooded during the December 2015- January 2016 flood event. This event has an approximate 1 in 200 year return period. However, it would appear that this site is considerably elevated above the functional floodplain of the River Don. Therefore, prior to identification in proposed plan, detailed topographic information may demonstrate the site is sufficiently elevated above nearby areas of higher risk if not *Requirement for Flood Risk Assessment*.

TEXT in Interim Environmental Report (page 233) does not correctly identify fluvial flood risk and requirement for FRA.

B03/13 Summerfield House

Potential surface water flood risk – this is a matter for Aberdeen City Council in consultation with relevant internal specialists in the Flood Prevention Unit. Surface water management measures to be considered in detail to ensure no increased risk downhill of the site,

B04/02 Former Factory, Granite hill Road

Potential surface water flood risk - – this is a matter for Aberdeen City Council in consultation with

relevant internal specialists in the Flood Prevention Unit. Surface water management measures to be considered.

4.7 We have not reassessed and provided comments at this stage on existing allocations in the adopted LDP which are proposed to be carried forward into the next LDP 2022-2040. We will do this when we are provided with the shapefiles for these sites and would like to do this prior to publication of the Final Environmental Report and Proposed Plan.

5. Plan, Programme or Strategy Context

5.1 We consider that all the following PPS relevant to our interests should be identified in Appendix 5.1 and included in the SEA.

- The Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended
- Scottish Climate Change Adaptation Programme (SCCAP) Progress Report 2018
- Climate Change Plan: third report on proposals and policies 2018-2032 (RPP3)
- The Heat Policy Statement: Towards Decarbonising Heat: Maximising the Opportunities for Scotland
- Scottish Energy Strategy 2017
- New Climate Change Bill
- Getting the best from our land: A Land Use Strategy for Scotland 2016 – 2021

5.2 It would be helpful if the ER could identify key infrastructure projects for water – including surface water (pluvial), flooding (fluvial), regional SUDS, waste water and drinking water. The ER should also identify key transport infrastructure projects – including any associated with the new harbour and football stadium and key waste infrastructure projects – including the new energy from waste plant.

6. Assessment, Mitigation and Monitoring

6.1 To provide coverage of the issues the question Climate Change Mitigation: Does the development promote the use of renewable energy and the efficient use of energy and water? Should include an assessment as to whether the development promotes the efficient use of water (as well as energy).

6.2 We note that it is proposed to apply the policy requirement for all new developments to install water saving technologies to help minimise abstraction from the River Dee in the next LDP.

6.3 We consider that further work should be done with Scottish Water to understand their infrastructure proposals over the period of the plan to provide drinking water supplies to existing and new development.

6.4 We consider that further monitoring should be done of new development to understand whether water saving technologies have been successfully implemented resulting in a reduction in water demand.

6.5 We note the proposal to maintain the policy to require all new buildings to install low and zero carbon generating technologies to reduce the predicted carbon dioxide emissions against 2007 building standards in the next LDP, with more ambitious targets. We consider that monitoring should be done of new development to understand whether low and zero

carbon generating technologies have been successfully implemented resulting in a reduction in carbon dioxide emissions.

- 6.6 Table 6.5 Monitoring: We suggest that the column identifying who is responsible for undertaking the monitoring is reviewed and updated and ideally only one lead party is identified as responsible with possibly other parties identified as interested/in supporting roles.
- 6.7 Biodiversity: Impact on the qualifying features of the River Dee SAC. We suggest that updated information on water abstraction from the River Dee should be obtained direct from Scottish Water and reviewed, along with SEPA and SNH
- 6.8 We would welcome the opportunity to be involved in the Open Space Strategy and Greenspace Network review.
- 6.9 We welcome the provision of the “Aberdeen City Council Local Development Plan 2022. Strategic Flood Risk Assessment (version 2 November 2018)”. The SFRA collates all the existing flood risk information to identify areas which are free from the risk of flooding and therefore suitable for future development, and provide support for flood risk policies and any supplementary planning guidance. Within the SFRA we welcome the inclusion of a detailed spreadsheet of possible development sites with a summary of the flood risk and possible mitigation. The Maps of indicative flooding of various annual probabilities provide a useful representation of the wider flood risk, as does Map 9 which represents the recorded flood incidents within Aberdeen and the surrounding area.

7. Next Steps

- 7.1 We have no comments.