

## Post-adoption Statement for Aberdeen Local Development Plan 2023

### PART 1

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### PART 2

A Post-adoption Statement for the plan entitled

Aberdeen Local Development Plan

The Responsible Authority is:

Aberdeen City Council

### PART 3

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|-------------|-----------------|
| <b>Date</b> | 17 October 2023 |
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## 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.

## 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:

<http://www.aberdeencity.gov.uk/localdevelopmentplan>

### **Office Address**

The Full 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 principle office of the Responsible Authority.

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

8.30am – 5pm Monday to Friday or online at

<http://www.aberdeencity.gov.uk/localdevelopmentplan>

## Table of Contents

|    |  |     |
|----|--|-----|
| 1. | <b>Key Facts</b> .....   | 4   |
| 2. | <b>Strategic Environmental Assessment Process</b> .....              | 5   |
| 3. | <b>Effects of the Environmental Considerations on the Plan</b> ..... | 7   |
| 4. | <b>Effects of the Environmental Report on the Plan</b> .....         | 10  |
| 5. | <b>Taking Consultation Opinions into Account</b> .....               | 25  |
| 6. | <b>Reasons for Adopting the Local Development Plan</b> .....         | 102 |
| 7. | <b>Monitoring Measures</b> .....                                     | 102 |
| 8. | <b>Conclusion</b> .....  | 109 |

## 1. Key Facts

|                                      |  |
|--------------------------------------|--|
| Name of Responsible Authority        | Aberdeen City Council  |
| Title of the PPS                     | Aberdeen Local Development Plan 2023   |
| What Prompted the PPS                | Planning & etc. (Scotland) Act 2006  |
| Subject                              | Land Use   |
| Period Covered by the PPS            | To 2040  |
| Frequency of Updates                 | Every five years   |
| Area covered by the PPS              | Aberdeen City  |
| Purpose and/or objectives of the PPS | To set the framework for the development of land in Aberdeen City  |
| Date Adopted                         | 19 June 2023   |
| Contact Point                        | Abigail Burrows / Donna Laing<br>Strategic Place Planning<br>Aberdeen City Council<br>Business Hub 4, Ground Floor North<br>Marischal College, Broad Street<br>Aberdeen AB10 1AB<br>01224 053746 |

## **2. Strategic Environmental Assessment Process**

The Aberdeen Local Development Plan (LDP) has been subject to a process of strategic environmental assessment (SEA). This process allowed us to include the views of the Scottish Environment Protection Agency, Scottish Natural Heritage (now NatureScot) and Historic Environment Scotland regarding the scope and level of detail that were appropriate for the environmental report and the findings of the Environmental Report.

The Environmental Report was prepared in two stages; firstly an Interim Environmental Report was produced to assess the impact of the LDP Main Issues Report. Following consultation on the Main Issues Report and Interim Environmental Report a Proposed Local Development Plan was prepared with an accompanying Environmental Report. The Environmental Report that supports the Proposed Plan has evolved from the Interim Environmental Report. The Environmental Report has also taken into account comments during the consultation on the Interim Environmental Report and the Main Issues Report. These comments have also influenced the development of the spatial strategy and policies contained in the Proposed Local Development Plan. The Environment Report has been assessed in light of modifications made by the Reporter's in the Reporter's Report of the Examination into the Proposed Local Development Plan, and the Scottish Ministers Direction Letter.

We consulted on the Interim Environmental Report and the Main Issues Report at the same time for a period of 10 weeks from 4 March 2019 to 13 May 2019. Similarly, we also consulted on the Environmental Report and the Proposed Local Development Plan for a period of 12 weeks from 20 May 2020 to 31 August 2020. Both the Interim Environmental Report and the Environmental Report were made available online, in local libraries, and at the Council's headquarters. The Examination in Public took place between November 2021 and August 2022, while a Direction was received from the Scottish Ministers on 10 May 2023.

The first step in preparing the Environmental Report was to collate the relevant baseline data relating to the current state of the environment and to identify what links exist between the LDP and other relevant policies, plans, programmes and environmental objectives. We then assessed the effects of options of the strategy, policies and sites on the environment. The assessment took into account all the baseline information, any existing environmental problems and the effects that future developments are likely to have on all environmental topics considered. Where we identified significant negative impacts from any aspects of the LDP, we devised mitigation measures to remove, reduce or compensate for the impacts on the environment. In almost all cases, that meant rejecting the policies, options or sites likely to have significant negative environmental effects. A monitoring plan forms part of the Environmental Report. It indicates the commitment of the Council to identify unforeseen adverse effects arising from the LDP at an early stage and to undertake appropriate remedial actions. This has been integrated into plans for monitoring the Local Development Plan itself.



### 3. Effects of the Environmental Considerations on the Plan

Table 3.1 summarises how environmental considerations have been integrated into the Local Development Plan. This includes the measures that were taken to offset adverse effects or enhance positive effects, details of how the cumulative and other indirect effects of the plan have been considered and how these protection objectives were taken into account in the Local development Plan.

**Table 3.1: Environmental Considerations**

| SEA Topic | Environmental Considerations  | Integrated into the Plan? | How integrated/Taken into Account or Reason for not being Taken into Account  |
|-----------|---|---------------------------|---|
| Air       | <ul style="list-style-type: none"> <li>• The need to address the link between traffic congestion and air pollution with a focus on Air Quality Management Areas and have consideration of the Air Quality Management Plan.</li> <li>• The necessity of addressing the relationship between construction and burning of biomass on the one hand and the release of particulate matter.</li> </ul>                            | Yes                       | <ul style="list-style-type: none"> <li>• The Strategic Development Plan sets the requirements for housing and economic growth. The strategy is to create sustainable communities that reduce the need to travel and minimise the impact on air quality.</li> <li>• The Aberdeen Planning Guidance on Air Quality and Policy T2: Sustainable and Active Travel in the LDP seeks in part to address air quality issues in the City.</li> <li>• The LDP makes SEA a material consideration for future planning applications and requires the submission of EIAs for projects likely to have significant effects on any environmental receptor.</li> </ul>            |
| Water     | <ul style="list-style-type: none"> <li>• The importance of maintaining and improving water quality and water environment resulting from run off or the release of pollutants.</li> <li>• The need to ensure that water abstraction does not have negative effects on water quality.</li> <li>• The necessity of avoid development on land at risk from flooding and the need to adapt to future climate impacts.</li> </ul> | Yes                       | <ul style="list-style-type: none"> <li>• Policy NE4: Our Water Environment and Aberdeen Planning Guidance on Flooding and Drainage, and Water Quality have been designed with water quality in mind. In addition mitigation measures in the SEA will be taken into account when applications are considered.</li> <li>• The capacity of the River Dee was considered in the Strategic Development Plan allocations. Thus the River Dee can accommodate additional abstraction whilst avoiding negative impact on water quality.</li> <li>• The Plan avoided allocating development located on land at risk from 1 in 200 year flood events or greater.</li> </ul> |
| Soil      | <ul style="list-style-type: none"> <li>• The need to avoid contamination of land through development and support development that remediates existing contaminated land.</li> <li>• The necessity of recycling waste and reducing the amount of waste that goes into the landfill.</li> </ul>   | Yes                       | <ul style="list-style-type: none"> <li>• The Plan, through Policy R2: Degraded and Contaminated Land positively promotes the redevelopment of contaminated site subject to remediation.</li> <li>• Additional facilities for recycling have been identified in the Plan through Policy R3: New Waste Management Facilities and Opportunity Site 13 and Opportunity Site 107.</li> </ul>   |

| SEA Topic                          | Environmental Considerations   | Integrated into the Plan? | How integrated/Taken into Account or Reason for not being Taken into Account  |
|------------------------------------|--|---------------------------|---|
| Biodiversity<br>Flora and<br>Fauna | <ul style="list-style-type: none"> <li>• The necessity of reversing the decline in biodiversity as a result of land use, development and climate change.</li> <li>• The need to avoid development within the catchment of sensitive sites.</li> </ul>  | Yes                       | <ul style="list-style-type: none"> <li>• Generally, options in the Spatial Strategy and sites that are likely to have significant effects on designated sites have been rejected. Those options and sites that are within close proximity of sensitive sites will be subject to additional assessments such as Habitats Regulations Assessment and Strategic Environmental Assessment and through Policy NE3: Our Natural Heritage,</li> <li>• The Plan retains existing areas of green space in the urban area that support biodiversity, and a green space network has been identified to support improvements in biodiversity i.e. Policy NE2: Green and Blue Infrastructure</li> </ul>  |
| Climatic<br>Factors                | <ul style="list-style-type: none"> <li>• The relationship between increased burning of fossil fuel and climate change</li> <li>• The necessity of minimising Aberdeen's global footprint.</li> <li>• The link between our contributions to the changing climate and potential future unpredictable weather events, hotter summers and wetter winters.</li> <li>• This link between climate change and increased risk of flood events.</li> <li>• The necessity of protecting land and properties vulnerable to future flood risk through adaptation</li> </ul> | Yes                       | <ul style="list-style-type: none"> <li>• The strategy has policies/Aberdeen Planning Guidance on sustainable communities aimed to reduce the need to travel and minimise the global footprint i.e. Policy LR1: Land Release Policy, LR2: Delivery of Mixed Use Communities, Policy D1: Quality Placemaking, Policy T2: Sustainable Transport, Policy NE5: Trees and Woodland, Aberdeen Planning Guidance: Flooding, Drainage and Water Quality, Policy R4: Energy from Waste, Policy R7: Renewable and Low Carbon Energy Developments</li> <li>• The plan also sets requirements for low and zero carbon generating technologies to be included in all new development to reduce the predicted carbon emissions as per Policy R6: Low and Zero Carbon Buildings, and Water Efficiency and the Aberdeen Planning Guidance: Resources for New Developments.</li> <li>• The Plan does not permit allocating development on land at risk from 1 in 200 year flood events or greater.</li> </ul> |
| Cultural<br>Heritage               | <ul style="list-style-type: none"> <li>• The need to protect and, where appropriate, enhance or restore the historic environment</li> <li>• The necessity of improving the enjoyment and understanding of the historic environment</li> <li>• The need to recognise that future development could damage some historical features.</li> </ul>  | Yes                       | <ul style="list-style-type: none"> <li>• The Plan safeguards historic assets and incorporates guidance set out in the former Scottish Historic Environment Policy now Historic Environmental Scotland Policy for Scotland 2019, identifying Conservation Areas and considering the effects of new development areas on the historic environment and its setting.</li> <li>• The plan supports the appropriate development or use of historical buildings.</li> <li>• Policy D6: Historic Environment and Policy D7: Our Granite Heritage, Policy D4: Landscape, Aberdeen Planning Guidance on Repair and Replacement of Windows and Doors, Shopfronts</li> </ul>  |



| SEA Topic       | Environmental Considerations  | Integrated into the Plan? | How integrated/Taken into Account or Reason for not being Taken into Account  |
|-----------------|---|---------------------------|---|
|                 |   |                           | and Signs, and Stonecleaning and Technical Advise Notes on Conservation Areas Character Appraisals, are some of the initiatives in the LDP  |
| Landscape       | <ul style="list-style-type: none"> <li>• Recognising the link between increased development and negative changes to the landscape features, their context, patterns of past use, and how they are valued and enjoyed by many people.</li> </ul>   | Yes                       | <ul style="list-style-type: none"> <li>• The Plan aims to facilitate positive change whilst maintaining and enhancing the distinctive character of Aberdeen's landscape. In particular proposals have been avoided in prominent sites that will have a detrimental impact on the landscape.</li> <li>• Policy NE1: Green belt and Policy D4: Landscape, Aberdeen Planning Guidance on Landscape seeks to protect Aberdeen's landscape.</li> </ul>   |
| Material Assets | <ul style="list-style-type: none"> <li>• The need to protect and enhance existing material assets and to be aware that development will put pressure on existing infrastructure but also create opportunities for acquisition of assets</li> <li>• Linking development to existing infrastructure network does not only maximise resources but also addresses climate change problems</li> <li>• The link between recycling and use of material assets,</li> <li>• The potential for re-using recycled construction material</li> </ul> | Yes                       | <ul style="list-style-type: none"> <li>• The plan identifies the required investment in material assets to support new development.</li> <li>• Policy I1: Infrastructure Delivery and Planning Obligations , Supplementary Guidance: Planning Obligations, Policy CF1: Existing Community Sites and Facilities and Policy CF2: New Community Facilities.</li> </ul>   |
| Population      | <ul style="list-style-type: none"> <li>• The need to support development that meets the needs of a future population, including jobs, homes and facilities.</li> <li>• The need to meet the needs of a increasing, ageing and diverse population in the City</li> </ul>   | Yes                       | <ul style="list-style-type: none"> <li>• The plan makes significant housing and employment allocations to support the population. It also makes clear how and when these will be delivered to ensure a five year effective supply of housing land and supply of 60 hectares of employment land at all times.</li> <li>• Policy LR1: Land Release Policy, Policy LR2: Delivery of Mixed Use Communities, VC3: Network of Centres, VC5: City Centre Living , Policy B1: Business and Industrial Land, Policy B2: Business Zones, Policy H1: Residential Areas, Policy H2: Mixed Use Areas, Policy H4: Housing Mix and Need, Policy H5: Affordable Housing, Policy H6: Gypsy and Traveller Caravan Sites, Policy CF1: Existing Community Sites and Facilities and Policy CF2: New Community Facilities.</li> </ul> |

| SEA Topic    | Environmental Considerations   | Integrated into the Plan? | How integrated/Taken into Account or Reason for not being Taken into Account   |
|--------------|--|---------------------------|--|
| Human Health | <ul style="list-style-type: none"> <li>• The link between urban green space and human well being</li> <li>• The link between sports and recreational facilities and active lifestyle of the population</li> <li>• The link between multiple deprivation and worsening human health</li> <li>• The link between, diabetes, high blood pressure, cardiovascular diseases and inactivity</li> </ul> | Yes                       | <ul style="list-style-type: none"> <li>• The plan does not permit allocating development on sites where there would be a loss of urban green space or sports pitches unless improvements to existing facilities or new facilities are provided as per Policy NE2: Green and Blue Infrastructure.</li> <li>• The plan supports implementation of open space strategy and nature conservation strategy.</li> </ul> |

#### 4. Effects of the Environmental Report on the Plan

The Local Development Plan sets the strategy for future development in Aberdeen City and sets the policy framework to determine the suitability of proposals. A significant part of the strategy is the identification of specific sites for housing, employment, community uses and transport proposals. To allow for full consideration of the environmental impact, assessments for all of the 165 alternative housing and employment sites and all other proposals were undertaken. The environmental assessment has shown that the preferred sites are not likely to have significant, individual or cumulative, impact on the environment. Where some strategic options have been assessed to show likely significant effects on the environment, they were rejected or fully mitigated.

Table 4.1 summarises how the Environmental Report has been taken into account within the Local Development Plan in accordance with Section 18 (3) (a-b) of the Environmental Assessment (Scotland) Act 2005. This table describes how the Environmental Report has been taken into account in the adopted Local Development Plan and what specific changes were made particularly where significant negative and cumulative effects were identified. It also highlights when the mitigation is to be considered if there is the need for a more detailed assessment at a later stage in the planning process.

**Table 4.1: Environmental Report**

| SEA Issue | Plan Impact (++) | Mitigation Measures | When should mitigation be considered? | Who is responsible for undertaking the mitigation? |
|-----------|------------------|---------------------|---------------------------------------|--|
|-----------|------------------|---------------------|---------------------------------------|--|

|         |   |   |  |  |
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| General | Owing to the very significant scale of development on both greenfield and brownfield sites released and supported by this plan, there is likely to be a very significant impact on all of the indicators. | The LDP ensures that development is phased in accordance with policies LR1 and LR2 Land Release, so the effects of development can be managed over time. Development is also programmed, for example through masterplanning, to ensure development does not proceed unless required infrastructure is in place. |  |  |
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| <p><b>Impact on European sites</b><br/>Development may have a negative impact on the qualifying interests of a European site, including the River Dee SAC but also the Moray Firth SAC, Ythan Estuary, Sans of Forvie &amp; Meikle Loch and Loch of Skene. Development sites, especially greenfield sites that are on a direct pathway to the site (e.g. a tributary) may have a negative impact on the conservation objectives and biodiversity of the site due to pathway effects of pollution (--).</p> <p>Greenfield development across the whole city will increase demand for water which is likely to be abstracted from the River Dee, which may have effects on the conservation objectives of the SAC (--).</p> | <p>Policy NE3 Natural Heritage includes a statement requiring an HRA Appropriate Assessment where a proposal is likely to affect European sites. Where necessary, each Appropriate Assessment will outline site-specific mitigation measures.</p> <p>Appropriate Assessment will also trigger a requirement for EIA to further address any negative impacts arising from a specific project.</p> <p>Policy NE3 also allows for Construction Environmental Management Plans to be required, to address the environmental impact of construction on the environment.</p> <p>Policy R6 Low and Zero Carbon Buildings and Water Efficiency requires all new developments to install water saving technologies to help minimise abstraction from the River Dee which will help to minimise any negative effects.</p> | <p>When producing LDP policy and Aberdeen Planning Guidance</p> <p>Through the Development Management process, including EIA and HRA as appropriate</p> <p>HRA of the LDP</p> <p>Masterplanning</p> | <p>LDP Team</p> <p>Environmental Planners</p> <p>Development Management Team;</p> <p>Developers</p> <p>Masterplanning, Design and Conservation Team</p> |
|---|---|---|---|

|                     |   |  |  |  |
|---------------------|---|--|--|--|
| <b>Biodiversity</b> | <p><b>Impact Designated Sites and Protected Species</b><br/> Development is likely to have a negative effect on any designated nature conservation sites or populations of protected species which may be present, or their habitats and resting places (--).</p> | <p>Policy NE3 Natural Heritage requires Ecological Assessments to be completed where a development is likely to affect a designated site or protected species, with specific mitigation measures identified where necessary.</p> <p>Bat surveys will also be required where there is sufficient likelihood that bats will be present and in accordance with relevant Aberdeen Planning Guidance.</p> <p>Policy NE3 also states that all developments should seek to enhance biodiversity in general.</p> <p>Appropriate buffer zones are required to be incorporated into major transport projects, for example new roads.</p> |  |  |
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|--|--|--|--|--|
|  | <p><b>Severance of Habitat Networks</b><br/> In developing some sites, particularly greenfield sites, barriers to species movement will be created and existing networks lost resulting in habitat fragmentation (--).</p> <p>However, the masterplanning, design and development of greenfield sites provides an opportunity to enhance green networks and habitat networks where these were previously absent or poor quality. This may also be especially the case for brownfield sites (++).</p> | <p>The LDP identifies and protects a large network of green space network, comprising sites of important natural habitat and links between these.</p> <p>Policy NE2 Green &amp; Blue Infrastructure states that masterplanning of new developments will determine the location, configuration and extent of GSN in these areas, which provide connection between habitats. GSN aspect of this policy will be applied so that proposals ensure habitat links are maintained and enhanced.</p> |  |  |
|--|--|--|--|--|

|  |  |  |  |
|--|--|--|--|
| <p><b>Impact on Watercourse and Waterbodies</b><br/>Where watercourses are present on a site, proposals may physically impact upon the channels and result in the release of waterborne pollution, which may affect biodiversity and water quality (--).</p> | <p>Policy NE4 Our Water Environment states that watercourses will be maintained as naturalised channels with riparian buffer strips, and not subject to excessive engineering work or unnecessary culverting. It also notes that where there are existing culverts, opportunities to reinstate them as open watercourses will be explored, which would enhance their biodiversity value.</p>   |  |  |
| <p><b>Impact on Trees and Woodlands</b><br/>Development of greenfield areas may result in the loss of trees or woodland, including ancient woodlands of particular biodiversity importance and hedgerows (--).</p>   | <p>Some trees and woodlands are protected by law (TPO, Conservation Areas) and the LDP policies reflect and support our statutory duties.<br/>Important areas of woodland are zoned as NE2 Blue and Green Infrastructure (Green Space Network).<br/>Policy NE5 Trees &amp; Woodlands states a policy presumption against all development that will lead to the loss or damage of established trees and woodland, including ancient woodland. It also requires a Tree Protection Plan to be agreed before development commences to ensure no damage is inflicted against established trees.</p> |  |  |
| <p><b>Bay of Nigg</b><br/>The development of a new harbour at</p>  | <p>A draft masterplan has been developed for the harbour development and the wider area. This addresses opportunities to</p>   |  |  |

|  |  |   |  |   |
|--|--|---|--|---|
|  | <p>Bay of Nigg will have a significant temporary and permanent impact on part of the Balnagask to Cove Local Nature Conservation Site. Part of the bay is also a Site of Special Scientific Interest, mainly due to its geological interest, although the built proposals do not include this area. Building and dredging operations could affect bottlenose dolphins and Atlantic salmon. These are qualifying species for the Moray Firth SAC and the River Dee SAC respectively. There is also the potential for development to have an adverse impact on the extent, quality and use of green space in the vicinity. There may also be an impact on habitats and species of biodiversity value (--).</p> | <p>open space and green networks.</p> <p>Policy NE3 Natural Heritage includes a statement requiring an HRA Appropriate Assessment where a proposal is likely to affect European sites. Where necessary, each Appropriate Assessment will outline site-specific mitigation measures.</p> <p>Appropriate Assessment will also trigger a requirement for EIA to further address any negative impacts arising from a specific project.</p> <p>Policy NE3 also allows for Construction Environmental Management Plans to be required, to address the environmental impact of construction on the environment.</p>  |  |   |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Air</p> | <p><b>Air Pollution</b></p> <p>Development of a greenfield site is likely to increase traffic into the built up area and therefore have a long term impact negatively on air quality through vehicle emissions (--).</p> <p>Additional traffic generated by new development, especially in the city centre or at the harbour, may have a negative impact on existing Air Quality Management Areas, where present which may lead to the AQMA being extended (--).</p>   | <p>Policy WB2 Air Quality states that planning applications which have the potential to have a detrimental impact on air quality will not be permitted unless measures to mitigate the impact of air pollutants can be agreed.</p> <p>Policy T2 promotes sustainable and active travel, including public transport provision, and walking and cycling routes which will reduce the level of air-polluting vehicles on the roads.</p> <p>Developer contributions will be sought towards public transport and roads infrastructure improvements to help mitigate the traffic impact.</p> <p>A Sustainable Urban Mobility Plan (SUMP) has been prepared for the city centre to promote more sustainable modes of transport, reduce congestion and improve air quality in the city centre. This is being delivered as part of the City Centre Masterplan and Delivery Programme. There is also a Low Emission Zone being prepared in the city centre. This will help to further improve air quality in the city centre.</p> | <p>When producing LDP policy and Aberdeen Planning Guidance</p> <p>Through the DM and Planning Agreements processes</p> <p>Masterplanning</p> <p>When producing the Local Transport Strategy, SUMP</p> | <p>LDP Team</p> <p>Development Management Team</p> <p>Transport Team</p> <p>Developers</p> <p>Projects Team (City Centre Masterplan and Delivery Programme)</p> |

|                |  |   |   |   |
|----------------|--|---|---|---|
| <b>Climate</b> | <p><b>Increased resource use</b><br/>The operation and management of new buildings will also increase resource use and energy consumption, although may also promote renewable energy and efficient use of energy and water. The cumulative impact is significant considering the allocations that are promoted are both greenfield and brownfield (--).</p>   | <p>Policy R6 Low and Zero Carbon Buildings and Water Efficiency requires all new buildings to install low and zero carbon generating technologies. It also requires all new buildings to use water-saving technologies and techniques.</p>  | <p>When producing LDP policy and Aberdeen Planning Guidance</p> <p>Through the DM and Planning Agreements processes</p> | <p>LDP Team</p> <p>Development Management Team</p> <p>Transport Team</p> <p>Developers</p> <p>Building Standards</p> <p>Flooding Team</p> |
|                | <p><b>Flood Risk</b><br/>There are areas around Aberdeen that are at risk from flooding and there are smaller watercourses that could result in a flood risk. As more land is developed in Aberdeen, there is greater pressure to build on sites that may be affected by flooding. Development in these areas will increase vulnerability to climate change and will reduce ability to introduce flood prevention measures, particularly upstream (--).</p> <p>Sites close to areas currently identified as being at risk of flooding on SEPA's flood maps may be vulnerable to the effects of future changes in climate, for example increased rainfall or more extreme weather events (-).</p> | <p>Development will not be permitted in areas at risk of flooding or where it would increase the risk of flooding elsewhere. Through masterplanning, any parts of sites at risk of flooding will be maintained as green space network, with watercourses maintained as naturalised channels with riparian buffer strips.</p> <p>Policy NE4 Our Water Environment and Aberdeen Planning Guidance requires Flood Risk Assessment and Drainage Impact Assessment, to help planning officers assess flood risk and which identify mitigation measures as appropriate.</p> | <p>Masterplanning</p> <p>Through the production of Local Transport Strategy and SUMP</p>                                |   |
|                | <p><b>Increased Surface Water Run-off</b><br/>Development on green space may also increase surface water run-off, and increase vulnerability to flooding (-).</p>  | <p>Policy NE4 Our Water Environment requires a Drainage Impact Assessment to be submitted for proposals of 5 or more homes or over 250m<sup>2</sup> non-residential floorspace. It also requires SuDS to be incorporated into all new development to help manage surface water run-off sustainably, helping to reduce the impact of new development on flood risk.</p>  |   |   |

|      |  |   |   |   |
|------|--|---|---|---|
|      | <p><b>Increased Greenhouse Gas Emissions</b><br/>The scale of the housing and employment proposals in the LDP are likely to lead to an increase in traffic movements, which will result in increased greenhouse gas emissions. The cumulative impact is significant considering the allocations that are promoted are both greenfield and brownfield (--).</p> | <p>Policy T2 Sustainable Transport helps to encourage modal shift away from private car transport, by requiring that new developments are accessible by walking, cycling and public transport. It also encourages alternative fuel vehicles i.e. electric and hydrogen.</p> <p>Policy LR2 Delivery of Mixed Use Communities aims to deliver mixed communities where people can live, work and access shopping and services within their communities, reducing the need to travel long distances.</p> <p>Policy H3 Density also requires a minimum of 50 dwellings per hectare, in the interests of efficient use of land and reducing urban sprawl, helping to reduce the need to travel.</p> |   |   |
|      | <p><b>Promotion of Renewable Energy Developments</b><br/>Some developments and policies, e.g. Ness Solar Farm, will directly promote the generation and use of renewable energy, thus significantly reducing the climatic impact of greenhouse gases and other pollutants. Others direct waste away from landfill, reducing methane emissions (++).</p>        | <p>In principle, the LDP supports the development of renewable heat and energy-generating facilities (Policy R7 Renewable and Low Carbon Energy Developments).</p> <p>Policy R4 supports the principle of Energy from Waste Developments which reduces the amount of waste going to landfill, reducing methane emissions.</p> <p>OP site has been identified and will be safeguarded specifically for an Energy from Waste facility.</p>  |   |   |
| Soil | <p><b>Ground Contamination</b><br/>It is likely that soil quality, structure and morphology will be damaged by development. Redevelopment of a brownfield site may also have a positive effect on soil quality through remediation or decontamination works undertaken prior to development (++).</p> <p>However, development may also result</p>              | <p>Policy R2 Degraded and Contaminated Land states that all land which is degraded or contaminated will be restored or remediated to a level suitable for its proposed use. Where contamination is suspected, a site investigation will be carried out and any contamination remediated as appropriate.</p> <p>With regards to Ness Solar Farm and any future development on the landfill site, these facilities will be subject to strict environmental health/building standards regulations; therefore, this is not a matter for planning.</p>   | <p>Through the Development Management process</p> <p>EIA and other investigations required as appropriate</p> | <p>Development Management Team</p> <p>Contaminated Land Officer</p> <p>Developers</p> |



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| <p>in the release of substances during construction that could potentially contaminate the soil (--).</p> <p>Use of and spills of chemicals at the proposed Ness Solar Farm present the risk of contamination. There may also be contamination risks associated with development on the former landfill site (--).</p>   |  |  |  |
| <p><b>Waste Directed from Landfill</b><br/>More development will also lead to increased waste generation (including construction waste), some of which is likely to be sent to landfill which pollutes the soil (-).</p> <p>Some developments will promote modern waste management facilities which will direct waste away from landfill, which will have a long-term positive effect on soil quality in these areas (++).</p> | <p>Policy R5 Waste Management Requirements for New Developments requires the provision of recycling facilities to help reduce waste going to landfill. Site Waste Management Plans may also be required to demonstrate recycling and reuse of materials.</p> <p>The LDP identifies sites for modern waste management facilities, which have been identified as necessary by the Council to deal efficiently with Aberdeen's waste.</p> |  |  |
| <p><b>Peat Soils</b><br/>It is possible that some development may take place on peat soils, even though these are very limited in extent in Aberdeen. This would have the negative effect of releasing greenhouse gas into the atmosphere (-).</p>   | <p>Policy NE3 Our Natural Heritage states that development will not be permitted if it would result in the development of peatland or carbon-rich soils.</p>   |  |  |

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|       | <p><b>Soil Sealing, Compaction and Erosion</b><br/> Very large developments, including tall and bulky buildings, will have a significant impact on soil sealing, erosion and compaction; some large developments also require significant underground infrastructure (--).</p>   | <p>Policy D3 Big Buildings directs these types of development to the most appropriate city centre locations, which are likely to be brownfield sites. LDP policies on waste, and policy NE3 Our Natural Heritage requires Construction Environmental Management Plans to be submitted with planning applications will also help to mitigate any impact on soil.</p>   |   |   |
| Water | <p><b>Pollution of Watercourses</b><br/> The development of a greenfield site is likely to release water borne pollution into watercourses, groundwater and reservoirs, particularly during the construction phase, if present (--).</p> <p>Sites at risk of flooding will have a negative effect on water quality in the event of a flood (--).</p> | <p>The Council will liaise with SEPA where there is the potential for the pollution of the water environment.<br/> Policy NE3 Our Natural Heritage requires watercourses to be maintained as naturalised channels, and for riparian buffer strips to help protect watercourses from pollution.<br/> Policy NE4 Our Water Environment states that drainage solutions on all sites must be the most appropriate in terms of SuDS, which are highly beneficial to water quality.</p> | <p>When producing LDP policy and Aberdeen Planning Guidance</p> <p>Through the DM and Planning Agreements processes</p> <p>Masterplanning</p> | <p>LDP Team</p> <p>Development Management Team</p> <p>Transport Team</p> <p>Developers</p> <p>Building Standards</p> <p>Flooding Team</p> <p>SEPA</p> |
|       | <p><b>Water Abstraction from the Dee</b><br/> (--).</p> <p>New development may increase the need for Scottish Water to abstract water from the River Dee for the public supply, with water abstraction licence requirements set by SEPA (-)</p>  | <p>Acceptable rates of water abstraction from the Dee are agreed between SEPA and Scottish Water.<br/> Policy R6 Low and Zero Carbon Buildings, and Water Efficiency states that all new development is required to install or utilise water saving technologies or techniques to help minimise the requirement for water abstraction to serve the city.</p>  |   |   |

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| <p><b>Physical Impacts on Watercourses &amp; Coastline</b></p> <p>In some instances, watercourses or coastlines may be physically impacted through the development of a site; this is highlighted in the general assessments (--).</p> <p>Aberdeen Harbour expansion will have an impact on the local coastal water environment (-).</p> | <p>Policy NE4 Our Water Environment includes a presumption against excessive engineering or culverting, with natural treatment preferred where possible. There is also a presumption against developments which would require new or strengthened flood defences.</p> <p>LDP includes two zonings for the coast, developed and undeveloped, with a presumption against new development in the undeveloped coast.</p> |  |  |
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| <b>Landscape</b> | <p><b>Intrusion onto the Landscape Setting of the City</b><br/>It is likely that development of a general greenfield site, especially for very large structures or those in prominent locations within the context of the whole city, will have a permanent and negative affect on the landscape setting of the city or would negatively affect the aspect from local beauty spots (--).</p> | <p>Landscape impact will be mitigated through screening or sensitive siting, design and layout of buildings within the site.<br/>Policy D4 Landscape states that new development should not adversely affect the character of landscapes and seascapes which are important for the setting of the city.</p>   | <p>When producing LDP policy and Aberdeen Planning Guidance<br/><br/>Through the DM Process<br/><br/>Liaison with Conservation Officer</p> | <p>LDP Team<br/><br/>Masterplanning, Design and Conservation Team</p> |
|                  | <p><b>Impact on Landscape Features</b><br/>Greenfield development is likely to have a negative effect on important landscape features, setting and character, including any geological features which may be present (--).</p>   | <p>Policy D5 Landscape Design expects development to ensure a sense of place is maintained and enhanced through an assessment of place and consideration of its surrounding landscape/seascape/townscape character. Developments must also mitigate any negative landscape and visual impacts.</p>  | <p>Masterplanning Process</p>  |   |
|                  | <p><b>Coalescence and Urban Sprawl</b><br/>In general, greenfield development has the potential to result in coalescence of settlements and/or urban sprawl (--).</p>  | <p>Policy NE1 exists to protect areas of open and green space around Aberdeen and settlements around the city to protect against gradual infilling, coalescence and sprawl.<br/>Several policies, including LR2 Mixed Communities and H2 Density also aim to promote communities where people can live, work, shop and access services, discouraging sprawling single-use developments.</p> |  |   |
|                  | <p><b>Restoration of Derelict Sites</b><br/>Redevelopment of brownfield sites that were previously derelict or poor quality is likely to have a significant positive effect if development is sensitive and of high quality design (++).</p>   | <p>The principle of brownfield redevelopment is strongly encouraged by the LDP Spatial Strategy.<br/>Policy R2 Degraded and Contaminated Land requires that all land that is degraded, including visually, is restored or remediated to a level suitable for its proposed use.</p>  |  |   |

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| <b>Population</b> | <p><b>Affordable Housing and Housing Choice</b><br/>LDP has the potential to impact positively on population by providing affordable housing and greater choice of housing types and sizes, as well as employment opportunities and community facilities (++).</p> <p><b>Support Regeneration</b><br/>Redevelopment of certain sites will support regeneration of Regeneration Areas, including Tillydrone, Northfield and Torry (++).</p> <p><b>Meeting Retail Needs</b><br/>The plan also identifies sites specifically for retail use to help meet the additional floorspace needs identified by the Aberdeen City and Shire Retail Study 2019 (++).</p> <p><b>Facilities for the Population</b><br/>Sites for the development of dedicated new services and facilities for the population, such as the football stadium at Kingsford, will have a positive effect for the population (+).</p> | <p>Policy H2 Mixed Use Areas requires large developments to accommodate an appropriate mix of house types and sizes to provide choice and flexibility in meeting needs and demands.</p> <p>Policy H5 Affordable Housing requires the equivalent of 25% affordable housing in every new development. It provides flexibility in how these are delivered, to ensure greater overall delivery.</p> <p>Policy H7 Student Accommodation Developments supports proposals for student accommodation.</p> <p>Policy WB4 Specialist Care Facilities supports proposals for residential care facilities.</p> | <p>When producing LDP policy and Aberdeen Planning Guidance</p> <p>Through the DM and Planning Agreements Process</p> | <p>LDP, DM and Developer Obligations Teams</p> <p>Environmental Policy Team</p> |
|                   | <p><b>Open Space</b><br/>There is the potential for the loss of open green space, including parkland or playing pitches, as a result of some developments (--).</p> <p>In some cases, adopted and aspirational Core Paths may also be</p>   | <p>Policy NE2 Green and Blue Infrastructure states that development will not be permitted that would result in the loss of green space or playing pitches, unless replacement pitches/green space can be laid out in an equally accessible location nearby.</p> <p>Core paths and aspirational core paths are protected through LDP Policy T2 Sustainable Transport and NE2 Green and Blue Infrastructure which state that Core Paths and rights of way should be protected and enhanced.</p>  |   |   |

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|                     | lost or severed (--)  |  |  |  |
|                     | <b>Residential Amenity</b><br>Residential development close to Aberdeen International Airport where noise levels are high could create an unacceptable environment where health is affected (--). | Policy B3 Aberdeen International Airport states that residential development within the airport exclusion zone, or within certain noise levels, will not be permitted.   |  |  |
| <b>Human Health</b> | <b>Health and Well-being</b><br>Development of certain sites will have a positive impact on health and well-being of the population (++).   | Policy WB1 Health Developments requires national and major proposals to provide healthy environments, reduce environmental stresses, facilitate physical activity and promote mental well-being.<br>Policy WB2 Air Quality does not permit developments that will have a detrimental impact on air quality unless measures to mitigate the impacts are proposed and agreed with the Planning Authority.<br>Policy WB3 Noise has a presumption against noise generating developments and requires Noise Impact Assessments where there will be significant exposure to noise.<br>Policy WB5 Changing Places requires major developments open to the public to provide free publicly accessible changing places toilets. | When producing LDP policy and Aberdeen Planning Guidance<br><br>Through the DM and Planning Agreements Process | LDP, DM and Developer Obligations Teams<br><br>Environment Policy Team to provide advice |
|                     | <b>Urban Green Space and Open Space</b><br>There is the potential for the loss of urban green space and open space as a result of development (--).   | Policy NE2 Green and Blue Infrastructure states that development will not be permitted that would result in the loss of green space or playing pitches, unless replacement pitches/green space can be laid out in an equally accessible location nearby.<br>Policy WB1 Health Developments requires national and major proposals to provide healthy environments, reduce environmental stresses, facilitate physical activity and promote mental well-being.   | Masterplanning   |  |
|                     | <b>Amenity</b><br>Residential development close to Aberdeen International Airport where noise levels are high could create an unacceptable environment where health is affected (--).             | Policy B3 Aberdeen International Airport states that residential development within the airport exclusion zone, or within certain noise levels, will not be permitted.   |  |  |

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| <p style="writing-mode: vertical-rl; transform: rotate(180deg);"><b>Cultural Heritage</b></p> | <p><b>Built and Cultural Heritage Assets</b><br/>Development may affect the historic environment. There could be long-term and permanent negative effects on the site/setting of designated heritage assets such as scheduled monuments, listed buildings, Conservation Areas, Designed Landscapes and archaeological sites. These effects may weaken the sense of place, the identity of existing settlements and landscape character in places (--).</p> <p>However, if the design of developments is sensitive and high quality there could be a significant positive impact on the condition, site and setting of heritage assets (++)</p>  | <p>Proposals affecting Conservation Areas or Listed Buildings require prior consent. These will only be permitted where they comply with policies protecting the historic environment, cultural heritage and archaeological sites including policies D6 Historic Environment, D7 Our Granite Heritage and D8 Windows and Doors.</p> <p>Conservation Area Character Appraisals and Management Plans are already adopted as Council documents, highlighting the most important characteristics of conservation areas and how to protect them, including area-specific policies where relevant.</p>  | <p>When producing LDP policy and Aberdeen Planning Guidance</p> <p>Through the DM and Planning Agreements Process</p> <p>Masterplanning</p>   | <p>LDP, DM Masterplanning, Design and Conservation Teams;</p> <p>Conservation Officer</p> <p>Tree Officers</p> |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);"><b>Material Assets</b></p>   | <p><b>Impact on Existing Infrastructure</b><br/>There is likely to be an impact on existing infrastructure such as schools, medical facilities, open spaces of recreational value, roads, sewerage and other utilities. This impact is likely to be negative, in terms of placing strain on capacity (--).</p> <p>In the case of schools, there may also be an impact upon school rolls associated with new residential development. This may be positive in terms of supporting schools with low rolls (++)</p> <p><b>Vulnerability to Flood Risk</b><br/>On sites which are identified as being at risk of flooding there is likely to be a significant negative impact on material</p> | <p>Where there will be a negative impact on existing infrastructure, developer contributions will be required as appropriate to mitigate this impact and contribute to the expansion or upgrading of provision. This is set out in Policy I1 Infrastructure Delivery and Planning Obligations.</p> <p>Flood Risk Assessment will be required for sites at risk of flooding in accordance with Policy NE4 Our Water Environment.</p> <p>Policy T1 Land for Transport safeguards land for transport proposals which have been identified as being of strategic importance to the city.</p> <p>The LDP supports the principle of modern new facilities, including waste management, energy generation, telecommunication facilities and new schools. Where appropriate land is safeguarded for these purposes.</p> | <p>When producing LDP policy, Developer Obligations Supplementary Guidance and Aberdeen Planning Guidance</p> <p>Through the DM and Planning Agreements Process</p> <p>Masterplanning</p> | <p>LDP, DM and Developer Obligations Teams</p>   |

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| <p>assets through the loss or damage of buildings, property and infrastructure (-).</p> <p><b>Strategic Infrastructure Improvements</b><br/>Some developments, particularly those identified under Land for Transport, will provide strategic infrastructure improvements which will have direct positive impact on congestion for the whole city (++).</p> <p><b>Modern New Facilities</b><br/>Some developments will create significant new material assets in the form of modern and high technology facilities, e.g. waste management and energy generation (++).</p> |  |  |  |
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## 5. Taking Consultation Opinions into Account

As required by Section 18 (3) (c) and (d) of the Environmental Assessment (Scotland) Act 2005, the opinion expressed during the consultation were given due consideration. Table 4.2 summarises how opinions expressed during the consultation have been taken into account

**Table 5.1: Analysis of Comments from Key Agencies on Scoping Report, consultation May 2018**

| Organisation              | Section                                       | Comment   | Aberdeen City Council Response   |
|---------------------------|---|---|--|
| Scottish Natural Heritage | Scope of assessment and level of detail       | Suggest a clear link between the SEA for the higher-level Aberdeen city/shire Strategic Development Plan (SDP) and this assessment, ensuring the requirements which the SDP ER identifies for LDPs are addressed i.e. mitigation measures referred to for LDPs. | Noted. The Environmental Report has taken into consideration the Proposed SDP requirements identified in its ER.               |
|                           |   | Convey key findings of the SEA, including developer requirements, in the Main Issues Report for each site and policy.   | Each development bid has been subject to a site assessment and SEA. Reference to this has been made in the Main Issues Report. |
|                           | Habitats Regulation Assessment (HRA)          | Expect the HRA will be published alongside the Proposed Plan. HRA should be included as a separate appendix to the ER.  | HRA will be included as a separate appendix to the ER at Proposed Plan stage.  |
|                           | 4.1 Plan, Programme or Strategy (PPS) Context | Additional PPS to be included:<br>Human Health:<br>Let's Get Scotland Walking – The National Walking Strategy<br>Cycling Action Plan for Scotland 2013<br>A Long-Term Vision for Active Travel in Scotland 2030<br><br>Landscape: Fitting Landscapes            | Additional PPS have been included.   |

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| 4.4 Characteristics of Areas likely to be significantly affected | Short narrative in the main body of the ER identifying any significant baseline changes since the first LDP SEA would be helpful.  | This will be our third LDP. A narrative of significant changes since the second LDP have been included within Section 4 of the Interim ER.   |
|  | Appendix 7.2.5 – some information is not available (biodiversity, flora and fauna information). Baseline gaps/trend should be acknowledged where possible and how it is proposed to obtain this.   | Appendix 7.2.5 (biodiversity, flora and fauna) comprises the most recent available baseline figures. Data will be obtained from the Centre for Ecology and Hydrology 'Land Cover Map'. Link to this has been provided in the Appendix. |
|  | Recommends the Scotland-wide maps (e.g. soils mapping) be replaced with location-specific maps for Aberdeen. SNH may be able to provide this data if required.   | The report has been amended to reflect the location-specific map for peat soils in Aberdeen.   |
|  | Water (7.2.3): suggest a baseline of water flow would be useful if information is available, especially given the abstraction considerations for the River Dee SAC. For example: water flow – the quantity of water being affected (e.g. by abstraction, increase or impoundment). | Appendix 7.2.3 (water) comprises the most recent available baseline figures.<br><br>Aberdeen City Council are in regular contact with SEPA and Scottish Water regarding abstraction levels.  |
|  | Soils (7.2.4): suggest the 'carbon rich soil' deep peat and priority peatland habitats 2016 dataset combined digital soil information is used, and the % and type of carbon rich soils is provided.  | Digital link in the Appendix has been updated with the information reflecting this.  |
|  | Biodiversity, flora and fauna (7.2.5): are there any geodiversity sites in the local authority area?   | Bay of Nigg (Balnagask to Cove) is the only geodiversity site in Aberdeen. SEA includes a question in relation to this.  |

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|                                |  | Landscape (7.2.9): recommend inclusion of a baseline on green networks – e.g. number of km.   | The Appendix reflects the latest information that is readily available.  |
| 4.5 Environmental Problems     |  | Welcome the recognition of the pressures on the natural environment associated with increased development.  | Noted.   |
| 5 Scope and Level of Detail    |  | Support the scoping in of the SEA issues for the Plan (Table 5.1).  | Noted.   |
|                                |  | Pg 17: SNH expect the SEA will assess the significant environmental effects of the sites technically capable of being delivered.  | All sites are capable of being delivered, even though this may be at a delayed timescale. Significant environmental effects of all sites have been assessed through the SEA process. |
|                                |  | Welcome inclusion of those sites with planning consent in the baseline and support the assessment of those sites which do not have consent. Support the intent to include carried forward sites as part of the overall cumulative assessment. | Noted.   |
| Proposed assessment frameworks |  | Welcome the intent to assess all aspects of the plan. Examples of the proposed assessment for each part of the LDP are helpful. SNH are content with more generic assessment proposed for the spatial strategy, main issues and draft policy. | Noted.   |
|                                |  | Table 5.4 proposes to assess existing policies with minor policy amendments, and Table 5.5 new policies and alternatives. Does the latter also need to state that   | Existing policies with significant amendments will be classified as new policies. These have been assessed,  |

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|  | it includes all other amendments (i.e. not minor) to existing policies?  | together with any new policies and are included in Appendix 9.   |
| Site Assessments (proposed Tables 5.8 and 5.9) | Welcome pre-LDP discussions including the SEA process.   | Noted.   |
|  | SEA Consultation Authorities have recently produced a LDP: Site Assessment and SEA Checklist. Scoping Report proposes a format for site assessments which follows that of SEA in LDP1 rather than the combined checklist. If this format is proceeded with, SNH recommend the comments column is expanded to separate out the assessment of the individual SEA topics and their scoring. | Proposed site assessment format has been updated to include the most recent LDP: Site Assessment and SEA Checklist recommended by SEA Consultation Authorities. The checklist will be completed on a site by site basis. |
|  | Scoping Report states that “all site-specific alternatives will be assessed against the SEA objectives” but we cannot locate these objectives – please advise where these can be found.  | SEA objectives have been included in Table 6.1 within the Interim ER.  |
|  | For scoring, SNH recommend that the system (key) proposed for recording of cumulative effects (pg.29) is also used for the other elements of the assessment as this provides the scope to better reflect which environment effects are most significant.   | Noted. All other elements of the assessment will be assessed using the key on Table 5.5.   |
| 5.6 Proposed mitigation measures               | Table 5.11 only proposes generic mitigation in relation to the overall impact of the Plan. In order to be meaningful it is expected that mitigation be provided for each specific site. SNH refer to the specific mitigation column in the combined site/SEA checklist and seek inclusion of this for the individual site assessments,   | The Combined site/SEA checklist recommended by the SEA Consultation Authorities has been used. It includes a mitigation for each specific site.  |

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|                                      |   | along with a separate column for residual effects post-mitigation. Specific mitigation measures can be included as developer requirements for sites in the Plan to provide a clear audit trail of how the SEA findings inform the LDP. Consideration of environmental enhancement measures can also be included at this level. |  |
|                                      | 5.8 Monitoring                                | Support continuation of monitoring from the adopted plan's SEA for this SEA for consistency.   | Noted.   |
|                                      | 6 Next Steps                                  | Table 6.1 Note the 10-week consultation period proposed for the ER and the Plan. For avoidance of doubt, we would expect the interim ER to be submitted at the MIR stage. Suggest the interim and ER stages are made more explicit in the table.   | This has been amended to include the word 'interim ER'. The interim ER will be submitted to SEA Gateway Consultation Authorities at the MIR stage. |
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| <b>Historic Environment Scotland</b> | Scope and level of detail                     | Content and satisfied that the historic environment has been scoped into the assessment.<br><br>Welcome the opportunity to comment on any changes to policies for the historic environment.  | Noted.<br><br>As a key agency HES will be consulted on any changes made to policies relating to the historic environment.                          |
|                                      | Framework for assessing environmental effects | Welcome the example frameworks provided to report the findings of the assessment. It's unclear why the cumulative assessment is the only one to ascribe significance to effects. Would advise that significant positive/negative scores should be available for these tables.  | Noted. All other assessments have been amended to include significant positive/negative effect scores.   |

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|  | <p>It is beneficial to the delivery of identified mitigation that actions that have been put forward to mitigate/enhance specific issues for the spatial strategy are brought through to plan itself in the form of developer requirements. This process adds clarity to all stakeholders as to what is required to deliver the aspirations contained within the plan.</p>                   | <p>Mitigation actions put forward within the SEA would be brought through in the form of developer requirements through Policy and Supplementary/Non-Supplementary Guidance.</p> |
|  | <p>The Consultation Authorities have produced a site assessment pro forma with the aim of bringing together the site assessment and SEA in order to streamline the process. The questions contained within the pro forma can help focus the assessor when considering sites and the questions may be utilised to underpin the finding to be presented in the assessment tables provided.</p> | <p>Noted. The Combined site/SEA checklist recommended by the SEA Consultation Authorities has been used.</p>   |
| Environmental baseline                           | <p>The environmental baseline identified in Section 7.2.8 is appropriate for the assessment. The data source address for spatial information on designated historic environment assets is no longer in use. These downloads are available here<br/> <a href="https://portal.historicenvironment.scot/spatialdownloads">https://portal.historicenvironment.scot/spatialdownloads</a></p>      | <p>Noted. Where relevant, the web address has been updated on Table 7.2.8.</p>   |
| Consultation period for the Environmental Report | <p>Section 6.1 in the Next Steps Chapter states that the Council intends to consult on the ER for a minimum of 8 weeks while Table 6.1 states that the consultation period will be for 10 weeks. HES are content with a minimum of 8 weeks consultation.</p>   | <p>Noted. For clarity, Section 6.1 has been amended to read 10 weeks, to correspond with Table 6.1.</p>  |
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| Scottish Environment Protection Agency | 4.1 Relationship with other Plans, Policies and Strategies (PPS) | Some of the PPS included have been subject to SEA. Where this is the case it may be useful to prepare a summary of the key SEA findings that may be relevant to the ALDP. This may assist with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.   | The Proposed Aberdeen City and Shire Strategic Development Plan ER has been considered and reviewed in the preparation of this Interim ER. |
|  | Baseline information   | SEPA holds significant amounts of environmental data which may be of interest in preparing the environmental baseline, identifying environmental problems, and summarising the likely changes to the environment in the absence of the PPS.  | Noted. Where necessary, we will endeavour to contact SEPA to gather any additional data required to update the baseline information.       |
|  | 4.5 Environmental problems                                       | <p>The following issues are also of relevance to the environmental problems section of the assessment.</p> <p>Air &amp; climatic factors/Population &amp; human health</p> <ul style="list-style-type: none"> <li>energy consumption with respect to transport – including consideration of alternative fuels to petrol &amp; diesel;</li> <li>energy consumption of new development – including consideration of district heating;</li> </ul> <p>Material assets</p> <ul style="list-style-type: none"> <li>new infrastructure – WPR/other infrastructure improvements;</li> <li>major developments not identified in the development plan – including Kingsford Stadium;</li> <li>public water supply requirements &amp; infrastructure including impacts on the River Dee;</li> </ul> | Table 5.3 has been amended to include the issues raised for air & climatic factors/population & human health, and material assets.         |

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|   |  | rainwater and waste water infrastructure including impacts on water environment and flooding.   |   |
| 5.1 Alternatives                                    |  | Reasonable alternatives should be considered as part of the Plan preparation. These should be assessed as part of the SEA process and the findings should inform the choice of the preferred option. This should be documented in the ER. Such alternatives may include alternative strategic directions, policies or proposals that are being considered as part of the plan-making process. | As part the Plan preparation, alternative policies and sites will be considered, and assessed as part of the SEA process. The ER will document all alternative sites/policies that have been assessed during the plan-making process. |
| 5.2 Scoping in/out of environmental topics          |  | SEPA agree that in this instance all environmental topics should be scoped into the assessment.   | Noted.  |
| 5.3 Methodology for assessing environmental effects |  | Including a commentary section within the matrices in order to state the reasons for the effects cited and the score given helps to fully explain the rationale behind the assessment results.  | The Combined site/SEA checklist recommended by the SEA Consultation Authorities has been used. Each SEA includes a commentary highlighting reasons for the effects and the scores.  |
|   |  | Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects, this should be clearly set out in the ER.   | Noted.  |
|   |  | SEPA expect all aspects of the PPS which could have significant effects to be assessed.   | All aspects of the local development plan that could have significant effects have been assessed (policy and strategy, site-specific and cumulative).   |



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|  |                                | SEPA support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.   | Noted.  |
|  |                                | When setting out the results of the assessment in the ER please provide enough information to clearly justify the reasons for each of the assessments presented. Setting out assumptions that are made during the assessment and difficulties and limitations encountered would also be helpful. It is helpful if the assessment matrix directly links the assessment result with the proposed mitigation measures such as in the tabled example given.                                  | The Combined SEA site/checklist used makes provision for enough information to clearly justify the assessment results. It also includes a column for the assessment result and one covering specific mitigation measures. |
|  |                                | SEPA recommend that the proposed SEA objectives to be used in the assessment are clearly identified.   | SEA objectives have been included in Table 6.1 within the Interim ER.   |
|  |                                | On assessment of the effects of allocations or sites, SEPA advocate a rigorous methodology which clearly assesses potential effects on all environmental topics. It can be a much easier and useful exercise for the plan-maker if the assessment is made against a range of related questions, rather than directly against the environmental topics. The joint SEA and development plan site assessment proforma sets out the issues which are required to be assessed in more detail. | The site assessment pro forma has been used to help inform the SEA checklist that was used as part of the site assessments.   |
|  | 5.6 Mitigation and enhancement | Encourage using the assessment as a way to improve the environmental performance of individual aspects of the final option. SEPA support proposals for   | Noted.  |

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|                         | enhancement of positive effects as well as mitigation for negative effects.   |  |
|                         | It is useful to show the link between potential effects and proposed mitigation/enhancement measures in the assessment framework. Encourage the ER to be very clear about mitigation measures proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).   | Table 6.2 - Proposed Mitigation Measures links the potential Plan impact and to the mitigation measures. Mitigation hierarchy has been followed. |
|                         | An important way to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so significant effects are avoided. The ER should identify any changes made to the plan as a result of the SEA.  | Changes made to the plan as a result of the SEA have been identified within Table 6.2 -Proposed Mitigation Measures.                             |
|                         | Where the mitigation proposed does not relate to modification to the plan itself then proposed mitigation measures should be set out in a way clearly identifying: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. Inclusion of a summary table in the ER such as the example provided will help to track progress on mitigation through the monitoring process. | Noted. Table 6.2 has included this.  |
| 5.8 Monitoring          | Monitoring is a requirement of the Act. It would be helpful if the ER included a description of the measures envisaged to monitor the significant environmental effects of the Plan.  | Noted. This has been included within the Interim ER.   |
| 6.1 Consultation period | SEPA is satisfied with the proposal for an 8-week consultation period for the Environmental report.   | Noted. The consultation will be for 10-weeks – the relevant section has been   |

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|  |                                  |  | updated to reflect this.  |
|  | Outcomes of the Scoping exercise | It would be helpful if the ER included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account. | A summary of Aberdeen City Council's response to comments from the Consultation Authorities have been included in the Interim ER. |

**Table 5.2: Analysis of Comments from Key Agencies and Public on Interim Environmental Report, consultation from 4 March – 13 May 2019**

| Organisation                     | Section   | Comment  | Aberdeen City Council Response   |
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| <b>Scottish Natural Heritage</b> | Non-Technical Summary                             | Include sentence on what the assessment focused on i.e. the 12 Main Issues, 12 new policy areas and the site allocations.  | Noted. This section of the Environmental Report now includes detail on what the assessment is focused on.  |
|                                  |   | In describing the environmental challenges, note the pressure from all new development on the River Dee as a result of water abstraction.  | A point has been added noting pressure from all new development on the River Dee within the State of the Environment Subsection in the Non-Technical Summary. Each development proposal has been subject to a site assessment and SEA. A note on the assessment of water has also been added in Section 6.4. |
|                                  | Relevant State of the Environment – Baseline Data | Wording under biodiversity topic in Table 5.2 may contain a typo. If not, an explanation is needed for what unplanned development is likely to be promoted by the Strategic Development Plan and Local Development Plan. | Sentence has been amended to read ‘...unplanned developments not promoted by the Strategic Development Plan and Local Development Plan.’   |

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|                           | Appendix 3.5 – four SSIs in Aberdeen City should be named.  | This has been added.  |
|                           | Appendix 4, Map 5 – it would be better to retitle as ‘European sites’ and include both the River Dee SAC and the Ythan Estuary, Sands of Forvie and Meikle Loch (extension) SPA.  | This has been amended to include maps from the SNH website.   |
|                           | Table 5.3 – Welcome recognition in both the Water and Material Assets topics of the potential challenge of additional development increasing the need for abstraction.  | Noted.  |
| Assessment of Main Issues | Happy with identification of alternatives in terms of the Main Issues. The framework for assessing the environmental effects is thorough.   | Noted.  |
| Assessment of Policies    | Notes there may be minor updates to existing policy areas however the wording for Natural Environment policies have not been provided making it difficult to provide comments on their likely significant effects.  | Noted. Proposed wording for all policies has been included as part of the Proposed Plan.                                  |
|                           | Appendix 9 – repeats the same narrative for policies relating to NE2: Green and Blue Infrastructure, NE3: Protecting our Natural Assets and NE4: Water Environment. Questions whether such repetition is intended/correct.<br>Suggest the benefits of improved green and blue infrastructure will have positive <i>direct</i> and indirect impacts. | Final policies have been drafted and their respective assessments have been updated. They are included in the Appendix 8. |

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|  |                              | Positive biodiversity effects reported for policies NC1: Town Centre and NCX(11): Visitor Attractions and Facilities are overestimated and should be recorded as neutral. Where in terms of NC1 for example, there may be some opportunities for enhancement of green networks, there would need to be specific measures included in the mitigation column, such as developer requirements to incorporate good design principles for enhanced green networks into their development proposals in order for this to be recorded as positive. | Final policies have been drafted and their respective assessments have been updated. They are included in Appendix 8. |
|  | Site assessments             | There are occasions where the read between the SEA findings and reporting in the bid assessment is not clear or inconsistent. For example, sites B0313, B0401, B0402 and B1101 have no reference to landscape or cultural heritage considerations but these elements were picked up in the bid assessments.   | All SEAs have been cross-checked to ensure they are consistent with the updated bid assessments.                      |
|  |                              | There are some inconsistencies in the treatment of landscape considerations in the bid site assessments.  | All bid assessments have been reviewed and any inconsistencies have been amended.                                     |
|  | Proposed mitigation measures | Welcome measures in Section 6.4 of the ER detailing proposed mitigation measures to address plan impacts. Expect the Council will ensure that there is a good read between mitigation (as set out in Table 6.2) and the more specific proposed mitigation measures that are tied to allocation sites.   | Specific mitigation measures for allocated sites have been included as part of the Proposed Plan, as appropriate.     |
|  |                              | Recommend that it will be important that mitigation measures for site allocations are incorporated into the   | Where appropriate, mitigation measures have been included   |

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|                                      |  | Proposed Plan as specific developer requirements.  | as specific developer requirements for site allocations.   |
| Monitoring                           |  | Table 6.3 is helpful, but to be effective, the proposed remedial actions that could be taken if monitoring reveals problems need to be more attributable and actionable. Recommend that remedial action could include a hierarchy of possible responses, from requiring an immediate response as part of the development management process to short/long term review of guidance.   | The table includes both short term actions i.e. review of the supplementary guidance or Aberdeen planning guidance and long term actions i.e. the review of the local development plan. The development management process would form part of a short term response were there to be another material consideration that is substantially different to the LDP or APG. Therefore, in most of the cases, short and long term actions would stem from either the planning guidance or LDP. |
| Habitats Regulation Assessment (HRA) |  | Note the HRA will be published alongside the Proposed Plan. Concerned about the potential effect of increases in physical abstraction on the River Dee. Encourage early commencement of the HRA and refer to SNH responses to Aberdeenshire Main Issues Report and the Aberdeen City and Shire Proposed Plan HRA. Consideration should be given to the Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area – the proposed marine extension of the | HRA has been included as part of the overall ER. It considers Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area. The HRA covers concerns over water abstraction in the River Dee.   |

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|                                      |   | site extends down to Aberdeen, just north of the Dee.   |   |
|                                      | Cumulative, synergistic and secondary environmental effects | Unclear from the narrative why it is considered that the infrastructure topic will have a neutral effect on biodiversity.   | The scoring has been amended to reflect both positive/negative effects.   |
|                                      |   |   |   |
| <b>Historic Environment Scotland</b> | Policies carried forward from the existing LDP              | The new Historic Environment Scotland Policy Statement 2019 together with Scottish Planning Policy should be taken into account during the preparation of the Local Development Plan. | Scottish Planning Policy and Historic Environment Policy for Scotland have been considered in the preparation of the Proposed Plan. |
|                                      | Relationship with PPS and environmental objectives          | Reference should be made to the new Historic Environment Policy for Scotland and Our Place in Time: The Historic Environment Strategy for Scotland.                                   | Noted. PPs has been updated.  |
|                                      | Potential environmental changes without the LDP             | Welcome recognition of the opportunity to enhance policies on design and cultural heritage as a result of the plan review.  | Noted.  |
|                                      | Alternatives to which SEA was applied                       | Satisfied with approach taken to the assessment in terms of preferred options and reasonable alternatives of both the Main Issues and spatial strategy.                               | Noted.  |
|                                      | Framework for assessing                                     | The framework utilised for the assessment is sound however, often effects have been scored as neutral (0)   | The framework was adopted from the combined SEA   |



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| environmental effects                  | whereas a scoring of +/- or uncertain would have been more appropriate with the mitigation attempting to resolve the score.   | site/checklist recommended by SEA Gateway. Where appropriate we have now included +/- scoring with mitigation.  |
| Environmental objectives and questions | Site assessment questions used within assessment are appropriate. Canmore Database website is out of date. This should now read <a href="https://canmore.org.uk/">https://canmore.org.uk/</a> .   | Noted. The web address has been amended.  |
| Proposed mitigation measures           | Proposed mitigation suggested for the historic environment in Table 6.2 is high-level in nature and should serve to flow through decision making at all levels. It is beneficial for the successful delivery of mitigation for predicted effects for specific mitigation to be written into the developer requirements for individual sites where effects are predicted. Such sites within the emerging spatial strategy as Woodend Hospital would be a case in point here. | The mitigation measures for historic environment will be undertaken by both the local development plan team, development management and masterplanning, design and conservation teams, thus flowing through various decision levels. Where appropriate, mitigation measures have been included for allocated sites within the Proposed Plan. The nature of the listed buildings part of Woodend Hospital have been included in the OP site description. |
| Monitoring                             | Welcome recognition of the need to monitor the impact of development on listed buildings and conservation areas. Little information is provided at this stage on how this monitoring will be carried out.   | There will be monitoring of the Historic Environment policies in the plan – looking at how often they have been   |

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|  | <p>It would be beneficial to consider how the effects of issues such as residential use in the city centre are performing against historic environment objectives and to find a way of capturing this information. We would also note that the Scottish Civic Trust are no longer responsible for the Buildings at Risk Register for Scotland, rather this is now maintained by Historic Environment Scotland. In terms of using the number of buildings 'at risk' as an indicator we would remind you that such figures can be affected by a number of factors outwith the development planning sphere and as such may not be fair reflection of the performance of the plan.</p> | <p>used. There is a Masterplanning, Design and Conservation team who work together with Local Development Plan, Development Management and Building Standards teams. There is a document currently being prepared looking at how to convert upper floors of Union Street to residential uses. Aberdeen City Council is aware that Historic Environment Scotland maintains the Buildings at Risk Register for Scotland. We agree that buildings at risk figures may not be a fair reflection of the Plan's performance however it does provide some indication.</p> |
| Proposed consultation timeline                   | Content with the proposed 10-week consultation on the proposed plan and revised environmental report.  | Noted.   |
| Appendix 5 – Desirable sites – new housing sites | B0319 – Woodend Hospital: Welcome assessment provided. Assessment notes the site has potential for both negative and positive effects; mitigation should seek to capitalise on the opportunity that these historic environment assets offer in terms of their contribution   | Noted. Mitigation now includes sentence noting the opportunity development of the listed building will bring.  |

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|  |  | to placemaking.   |  |
|  |  | B0601 – 152 Don Street, Old Aberdeen: The potential for positive or negative effects are identified in the comments section yet scored as neutral. A more appropriate scoring would be +/- or uncertain pre-mitigation with a post mitigation score that reflects the deliverability of identified mitigation. Notwithstanding this the mitigation identified is appropriate. | The framework was adopted from the combined SEA site/checklist recommended by SEA Gateway. Where appropriate we have now included +/- scoring with mitigation. |
|  |  | B0702 – Raeden (eastern part): Agree with the findings and mitigation. Beneficial for this mitigation to be transposed into developer requirements within the plan itself in order to aid delivery.   | Noted. Proposed plan includes policy on the historic environment, which any development on site would be required to conform to.                               |
|  |  | B0802 – Frederick Street: Welcome recognition of historic environment resource and the potential effects on these. Do not consider the scoring (0) reflects the commentary and should be more appropriately scored +/- or uncertain.  | The framework was adopted from the combined SEA site/checklist recommended by SEA Gateway. Where appropriate we have now included +/- scoring with mitigation. |
|  |  | B0804 – Urquhart Building, City Hospital: Agree with the findings and mitigation. Beneficial for this mitigation to be transposed into developer requirements within the plan itself in order to aid delivery.  | Noted. Proposed plan includes a historic environment policy that any development on site would be required to conform to.                                      |
|  |  | B1101 – Garthdee Road: Assessment should note that the site lies within the Pitfodels Conservation Area and   | This site is no longer desirable and does not form   |

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|  | ensure mitigation is identified.  | part of the Proposed Plan.   |
| Appendix 5.2 –<br>Bids: other<br>proposals | City Centre Masterplan Intervention Area 1 – Denburn: Content with assessment. It should note that the site lies wholly within the Union Street conservation area.  | This has now been included.  |
|  | City Centre Masterplan Intervention Area 2 – Heart of the city: Content with assessment. It should note that the site lies partly within the Union Street conservation area.  | This has now been included.  |
|  | City Centre Masterplan Intervention Area 3 – Queens Square: Content with assessment. It should note that the site lies wholly within the Union Street conservation area. It is unclear which element of the masterplan is being referred to when the assessment notes ‘proposal includes demolition and redevelopment of an extension to part of a listed building’ and how this has been factored into the assessment. | This has now been included. The listed building being referred to is the Council Town House on Broad Street. The assessment notes the redevelopment of the demolished extension. |
|  | City Centre Masterplan Intervention Area 4 – Union Street West: While the assessment notes that one Category A listed building (presumably the Music Hall) will be refurbished as part of the proposal, effects on the large number of other listed buildings within the masterplan intervention area and the conservation area designation that covers the site are not outlined.                                      | The assessment refers to parts of the site that will be affected by development.   |
|  | City Centre Masterplan Intervention Area 5 – Station Gateway: content with the high-level assessment.   | Noted.   |
|  | City Centre Masterplan Intervention Area 6 –  | Noted.   |

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|   | Castlegate/Castlehill: content with the high-level assessment.   |  |
|   | City Centre Masterplan Intervention Area 7 – North Dee/Torry Waterfront: content with high-level assessment. Retention and refurbishment of the listed smokehouses is a positive outcome for the historic environment.                                       | Noted.   |
| Appendix 5.3 – Bids: existing opportunity sites submitted as bids | Content with assessment findings in relation to these sites.   | Noted.   |
| Appendix 5.4 – Existing opportunity sites rolled forward          | OP42: Kennerty Mill – Assessment notes the development could have a positive or negative impact on the category B listed building depending on the proposal. We would therefore have expected the assessment to be scored either uncertain of +/-.           | This site has not been carried forward as an opportunity site in the Proposed Plan.  |
|   | OP88: Shore Porters Warehouse - Assessment notes the development could have a positive or negative impact on the category B listed building depending on the proposal. We would therefore have expected the assessment to be scored either uncertain of +/-. | The framework was adopted from the combined SEA site/checklist recommended by SEA Gateway. Where appropriate we have now included +/- scoring with mitigation. |
|   | OP96: Upper/Basement Floors, 73-149 Union Street – Various listed buildings here are category C listed, not A as reported in the assessment.   | This site is now part of OP96 Castlegate & Castlehill CCMP Intervention Area. Assessment has been  |

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|                                |  |  | amended to reflect the comments.             |
|                                |  | OP63: Prime Four Phase 5 Expansion – the consumption dyke referred to as category B listed was delisted on 09/08/2016 as part of our dual designation review project. The consumption dyke remains a schedule monument (SM108).  | Assessment has been amended to reflect this. |
|                                |  | OP64: Former Ness Tip - assessment here should be updated to consider the potential effects on the scheduled monuments immediately to the south and west of the site. These are Crab's Cairn (SM 4060) and Tullos Cairn (SM 4055).   | Assessment has been amended to reflect this. |
| Appendix 6 – Undesirable sites |  | B0107 – Mains of Dyce: Bid assessment notes that the Category C listed Mains of Dyce lies adjacent to the site however there is no consideration of this in the environmental assessment. The presence of the listed building should be noted, and the assessment updated with appropriate mitigation identified in the event the site is brought forward. | Assessment has been amended to reflect this. |
|                                |  | B0311 – Prime Four North: Content with significant adverse effect predicted for the historic environment in relation to this proposal.   | Noted.                                       |
|                                |  | B0701 – Land adjacent to Cornhill Road: Assessment should note that the site lies within the Rosemount and Westburn Conservation Area and consider appropriate mitigation in the event the site is brought forward.  | Assessment has been amended to reflect this. |

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|                             | <p>B0917: Land east of Inchgarth Mews: Bid assessment notes that the Category C listed Inchgarth House lies directly to the east of the site however there is no consideration of this in the environmental assessment. The presence of the listed building adjacent to the site should be noted as well as the recognition that the site lies within the Pitfodels conservation area. The assessment should therefore be updated, and appropriate mitigation identified in the event the site is brought forward.</p> | <p>Assessment has been amended to reflect this.</p>   |
|                             | <p>B0944: Inchgarth Road: Bid assessment notes that the site lies within the Pitfodels conservation area. The environmental assessment should therefore be updated, and appropriate mitigation identified in the event the site is brought forward.</p>  | <p>Assessment has been amended to reflect this.</p>   |
| Appendix 7 – Possible sites | <p>No comments to offer on the assessment of these sites.</p>  | <p>Noted.</p>   |
| Appendix 8 – Main issues    | <p>MI1 – Residential use in the city centre: Welcome recognition of the potential effects of this policy on the historic environment. Suggest that work carried out sensitively should be considered mitigation. For example, the effect of conversion of upper floors to residential accommodation is unknown at the policy stage (either uncertain or +/-) with the delivery of sensitive proposals being the mitigation of that effect.</p>   | <p>Agreed. This has been considered in the preparation of the final policy included in the Proposed Plan. The SEA has been amended and is included in Appendix 8.</p> |
|                             | <p>MI3 – Visitor attractions and facilities: Assessment does not consider that the policy would have any effect on cultural heritage. Tourism can have positive and</p>  | <p>Agreed. This has been considered in the preparation of the final policy included in</p>  |

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|                              | <p>negative effects on the historic environment, through increased understanding and appreciation as well as pressure on the fabric of the historic environment resource through increased usage.</p>   | <p>the Proposed Plan. The SEA for this policy is included in Appendix 8.</p>  |
|                              | <p>MI4 – Minimum internal space standards for new residential development: Welcome consideration given to the implications of minimum internal space standards and conversions within the context of the historic environment. Would welcome the flexible approach that has been put forward as mitigation and would be happy to offer comments on policy wording/guidance as it is being developed. Recently released new Managing Change Guidance Note on the Use and Adaptation of Listed Buildings has further advice in this area.</p> | <p>Noted. The issue of minimum internal space standards has been incorporated as part of policy D2 – Design and Amenity. Historic Environment Scotland is a statutory consultee and was consulted as part of the LDP Key Agencies Working Group during the preparation of the Proposed Plan. Consideration will be given to the Guidance Note in the preparation of Aberdeen Planning Guidance on New Residential Developments.</p> |
|                              | <p>MI8 – West End office area: Agree with the findings here in terms of the potential positive outcomes for the historic environment through use and adaptation of vacant historic environment assets. Positive effects on the historic environment will be dependent on the successful delivery of the mitigation.</p>   | <p>Noted.</p>   |
| <p>Appendix 9 – Policies</p> | <p>DX: Windows and doors – Agree that this policy is likely to have a significant positive effect on the historic environment. We would understand that the policy</p>  | <p>Historic Environment Scotland is a statutory consultee and was consulted</p>   |



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|  |   | wording will be finalised for the proposed plan and would be happy to offer comment on this as it is being prepared.  | as part of the LDP Key Agencies Working Group during the preparation of the Proposed Plan. |
|  |   | BX: The West End – Agree that the policy has the potential to bring positive outcomes for the historic environment. Emphasis on the protection of the conservation area is welcomed.                                  | Noted.   |
|  | Appendix 10 – Cumulative, synergistic and secondary environmental effects | Content with the summary assessment provided in this section as it relates to the historic environment.   | Noted.   |
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| Scottish Environment Protection Agency | General comments  | 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. | Noted.   |
|  | Introduction  | Note that the Interim Environmental Report provides an assessment of preferred and alternative policy and site options, and that most policies and land allocations in the 2017 LDP will be carried forward.          | Noted.   |
|  | 4. Description of PPS – content of  | Separate comments have been provided on the LDP Main Issues Report.   | These have been received and assessed.   |

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| LDP main issues report | B01/06, B01/11 Former Cordyce School: Text in Interim Environmental Report (page 283) 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. | Assessment for these sites have been amended.                       |
|                        | B03/19 Woodend Hospital: 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.   | Assessment for this site has been amended.                          |
|                        | B02/08 WTR Site Dubford: Text in Interim Environmental Report (page 172) appears to be missing section on flood risk.   | Section on flood risk has now been included.                        |
|                        | B02/25 Balgownie Area 4: Text in Interim Environmental Report (page 188) appears to be missing section on flood risk.   | Section on flood risk has now been included.                        |
|                        | 001 Former Bucksburn Primary School: Text in Interim Environmental Report (page 316) does not identify requirement for FRA.   | Requirement for FRA has now been included in the mitigation column. |
|                        | B06/01 152 Don Street: Text in Interim Environmental Report (page 233) does not correctly identify fluvial  | Noted. This has been referenced in the site                         |

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|  | flood risk and requirements for FRA.  | 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.   | Noted.   |
|  | 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.   | Noted. This has been referenced in the assessment. |
| 5. Plan, programme or strategy context | <p>The following PPS should be identified in Appendix 5.1 and included in the SEA.</p> <p><b>The Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended</b></p> <p>Scottish Climate Change Adaptation Programme (SCCAP) Progress Report 2018</p> <p>Climate Change Plan: third report on proposals and policies 2018-2032 (RPP3)</p> <p>The Heat Policy Statement: Towards Decarbonising Heat: Maximising the Opportunities for Scotland</p> <p>Scottish Energy Strategy 2017</p> <p>New Climate Change Bill</p> <p>Getting the best from our land: A Land Use Strategy for Scotland 2016 – 2021</p> | The PPS have been included.                        |
|  | It would be helpful if ER could identify key  | If and when key water                              |

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|  |   | <p>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.</p> | <p>infrastructure projects come forward during the lifetime of the Plan, these will be assessed through the appropriate process. The ER includes opportunity sites that have been carried forward from the 2017 Local Development Plan and new sites, of which these include the harbour, football stadium and the energy from waste plant. These have all been assessed.</p>  |
|  | <p>6. Assessment, mitigation and monitoring</p> | <p>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).</p>   | <p>Efficient use of water is covered under the first objective for water: ‘promote sustainable use of water and mitigate the effects of floods and droughts’ and the subsequent question ‘does the development increase the area vulnerable to the effects of changes in climate including increased rainfall and extreme weather events?’. In addition, policy R7 Low and Zero Carbon Buildings and Water Efficiency requires all new development to install water-</p> |

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|  |  |  | <p>saving technologies. This has been included as a mitigation where appropriate for all assessments.</p>  |
|  |  | <p>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.</p>              | <p>Noted.</p>  |
|  |  | <p>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.</p>            | <p>Scottish Water is a statutory consultee and have been involved as part of the LDP Working Group during the preparation of the LDP.</p>  |
|  |  | <p>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.</p>                       | <p>The LDP will monitor policy usage during the course of the Plan period. As part of the development management process, conditions may be included to ensure the successful implementation of water saving technologies. This can also be captured by the Flooding Team.</p> |
|  |  | <p>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.</p> | <p>The LDP will monitor policy usage during the course of the Plan period. As part of the development management process, conditions may be</p>  |

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|  |  |   | included to ensure the successful implementation of low and zero carbon generating technologies. This can also be captured as part of the continual development process through Building Standards procedures. |
|  |  | 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. | Table has been updated and where appropriate includes several parties as they are responsible for different actions which would result in the mitigations being met.   |
|  |  | 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.                                       | For the purpose of the report, the most upto date information has been used. Concerns over water abstraction have been dealt with in the HRA.  |
|  |  | We would welcome the opportunity to be involved in the Open Space Strategy and Greenspace Network review.   | Noted. The Open Space Strategy will be subject to consultation, of which you will be informed at the appropriate time by colleagues in the Environmental Policy team.  |

**Table 5.3: Analysis of consultation of Environmental Report, consultation from 20 May – 31 August 2020**

| Organisation | Section   | Comment  | Aberdeen City Council Response |
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| NatureScot   | Habitats Regulations Appraisal – River Dee Special Area of Conservation | Respondent agrees that the Council can conclude that the Proposed Local Development Plan will not have an adverse effect on the integrity of the River Dee Special Area of Conservation in relation to construction pollution impacts.   | Welcomed and noted.            |
|              | Habitats Regulations Appraisal – Geese                                  | Respondent agrees that the Habitats Regulations Appraisal can conclude that there is no adverse effect on site integrity in relation to loss of foraging habitat for Special Protection Area geese.  | Welcomed and noted.            |
|              | Habitats Regulations Appraisal – Windfall Sites                         | Respondent is also content that, unless any ‘windfall’ development sites are concentrated near particular Special Protection Areas, or unless the goose population trends change markedly, it would be appropriate to wait to consider this issue again through the next Local Development Plan cycle (i.e. rather than carrying out re-appraisal for each proposed windfall development). | Welcomed and noted.            |

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| <p>Habitats Regulations Appraisal – Recreational Disturbance</p>                           | <p>Respondent has considered potential recreational disturbance of qualifying interests at Special Protection Areas. There is a potential impact from development in relation to an assumed increased or redistributed human population causing increased recreational disturbance in the Special Protection Areas themselves. However, taking account of the locations of allocated sites, as well as facilities for visitors and/or visitor management plans, and parking limits, respondent advises that the Council can conclude no adverse effect on the integrity of Special Protection Areas from increased recreational pressure. The Council may wish to also mention this aspect in any update to their Habitats Regulations Appraisal Record.</p> | <p>Welcomed and noted.</p> |
| <p>Habitats Regulations Appraisal – Robust wording of NE3 to support no adverse effect</p> | <p>Respondent agrees with the Council’s conclusions (page 138-140) that the Proposed Local Development Plan will not have an adverse effect on site integrity of the following qualifying interests: Eider (non-breeding) as a qualifying interest of Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area Bottlenose dolphin as a qualifying interest of Moray Firth Special Area of Conservation. Grey seal as a qualifying interest of Isle of May Special Area of Conservation. Respondent states again the importance of having robust wording on European sites at Policy NE3 in order to support these conclusions.</p>   | <p>Welcomed and noted.</p> |



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| <p>Habitats Regulations Appraisal – Water Abstraction Impacts</p>      | <p>Respondent makes comments regarding potential water abstraction impacts. Respondent agrees that based on the Habitats Regulations Appraisal’s reasoning, that the Council can conclude that the Proposed Local Development Plan will not have an adverse effect on the integrity of the River Dee Special Area of Conservation in relation to water abstraction.</p>   | <p>Welcomed and noted.</p> |
| <p>Habitats Regulations Appraisal – Windfall Sites and Abstraction</p> | <p>Respondent also notes discussion of windfall sites, and how these might affect abstraction. Page 134 of the Habitats Regulations Appraisal flags that there is existing headroom for an identified level of windfall development in the plan period without going beyond the licenced limit and that there are also means of keeping track of the cumulative level of windfall development. Respondent advises, therefore, that provided the City and Shire Councils take steps to implement the means of ensuring that the level of windfall development does not exceed the identified headroom, there is unlikely to be a need to consider the abstraction issue afresh (via project level Habitats Regulations Appraisal) for each windfall application.</p> | <p>Welcomed and noted.</p> |

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| <p>Habitats Regulations Appraisal – Policy NE3</p>   | <p>Respondent notes that the Appropriate Assessment conclusions (page 136) are based on the logic that if future development projects were considered likely to cause a likely significant effect, then at that stage project level Habitats Regulations Appraisal would be required as a legislative requirement (as noted under Proposed Policy NE3 - Natural Heritage). Respondent is generally content with this approach, however, in order to support such a conclusion, respondent recommends strengthening wording of Policy NE3 as detailed in separate comments (888/9). Respondent states that proposed changes to NE3 will make the legislative requirements for European sites clearer within the Proposed Local Development Plan, and this will therefore better support the logic the Council use to reach the Habitats Regulations Appraisal conclusions.</p> | <p>The word changes proposed in relation to Proposed Policy NE3 are discussed in Issue 21 Our Natural Heritage where the Council suggest to the Reporter that if they are so minded the Council could agree to the changes.</p>   |
| <p>Habitats Regulations Appraisal – River Dee Special Area of Conservation During Construction</p> | <p>Respondent makes comments regarding potential impacts on the River Dee Special Area of Conservation during construction. Respondent suggests word changes to the first three paragraphs on page 135 of the Habitats Regulations Appraisal record. Respondent feels that these word changes would make it clearer that the Council will take a detailed look at the risk associated with proposals at the project stage and then assess whether there is 'likely to be a significant effect' on the interests of the Special Area of Conservation.</p>  | <p>The Council agree that the word changes to the first three paragraphs on page 135 of the Habitats Regulations Appraisal record would make it clearer that the Council will take a detailed look at the risk associated with proposals at the project stage and then assess whether there is 'likely to be a significant effect' on the interests of the Special Area of Conservation. The Council have included this within the update to their Habitats Regulations Appraisal Record.</p> |

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| <p>Habitats Regulations Appraisal – Word Change</p> | <p>Respondent suggests that the acronym ‘HRA’ is replaced with ‘Appropriate Assessment’ on page 136 in the following sentence, "<i>if future development projects were considered likely to cause a likely significant effect, then at that stage project level HRA would be required as a legislative requirement (as noted under Policy NE3 Natural Heritage)</i>"</p> | <p>The Council agree that changing the acronym ‘HRA’ to ‘Appropriate Assessment’ on page 136 in the following sentence, "<i>if future development projects were considered likely to cause a likely significant effect, then at that stage project level HRA would be required as a legislative requirement (as noted under Policy NE3 Natural Heritage)</i>" would be clearer.</p> |
|   |  | <p>The Council have included this within the update to their Habitats Regulations Appraisal Record.</p>   |
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| Scottish Forestry   | OP9, OP20, OP25, OP63, OP31, OP50, OP53, OP112, OP113, OP46 and OP56 | Requests that a number of Site Assessments be amended in the Strategic Environmental Assessment in order to assert a strong presumption against development due to the presence of woodland                             | For the Opportunity Sites listed it is agreed that greater emphasis should be given to the presence of woodland on site and possible mitigation. This information has been included in the revised version of the Environmental Report.  |
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| Stewart Milne Homes | B0933 Cadgerford   | Disputes the Strategic Environmental Assessment referring to B0933 as a stand-alone development when considering its impact on landscape. The respondent states that the development would be an expansion to Westhill. | Site B0933 Cadgerford was assessed both through the Development Options Assessment Report (CD 184, pages 456-460) and the Strategic Environmental Assessment (CD 159). Both assessments found the site to be unrelated to the settlement of Westhill. The Council are satisfied that this assessment is correct. Each site is considered on its own merits, not alongside future development that may or may not happen in the neighbouring Local Authority area of Aberdeenshire. |

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| Member of the Public | OP56 St Fittick's Park | Makes comments regarding what they believe to be missing information from the Environmental Report at page 87. The current status of St Fitticks Park as a public park should be clearly stated, plus details of links to the appropriate documentation. Details of previous public investment in the area (e.g. East Tullos Burn restoration) should be laid out, plus details of links to the appropriate documentation. The existence of contaminated land (particularly heavy metals) in the area should be mentioned in the list of "issues to be addressed". Any proposal to reduce the size of an existing public park should be matched by Aberdeen City Council designating a suitable and similar sized alternative area within the Torry community area as a new public park. The existence of strong and persistent odours caused by Scottish Water's nearby Waste Treatment should be mentioned in the list of "issues to be addressed". | The suggestions put forward to include information on OP56 as a public park, the East Tullos Burn project, contaminated land and strong odours have been incorporated into the revised version of the Environmental Report. |
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| <p>The New Aberdeen Mosque and Community Centre Project</p> | <p>OP85 King Street/Beach Esplanade</p> | <p>Requests changes to the Strategic Environmental Assessment for OP85 and highlights that there are discrepancies between the SEA for this site in the extant Aberdeen Local Development Plan 2017 and the Proposed Plan 2020.</p> | <p>The Council agree that there are discrepancies between the Strategic Environmental Assessment that was carried out for OP85 King Street/Beach Esplanade in the extant Local Development Plan 2017 and the Proposed Local Development Plan. The Council have re-assessed OP85 in terms of its Strategic Environmental Assessment and are content that the content is correct. The SEA template has changed since 2017.</p> |
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| Scottish Environment Protection Agency                         | OP3, OP6, OP11, OP12, OP75, OP20, OP21, OP22, OP29, OP40, OP53, OP112, OP61, OP65, OP116, | Makes comments on OP sites listed in relation to 'Other Factors' section of Appendix 2 (shown in Proposed Local Development Plan and Environmental Report).  | For the Opportunity Sites listed it is agreed that greater emphasis should be given to the presence of woodland on site and possible mitigation. This information has been included in the revised version of the Environmental Report. |
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| Scottish Environment Protection Agency and Scottish Government | Supporting Comments   | <p>Satisfied that all relevant Plans, Policies and Strategies listed in Appendix 3 have been considered in the Environmental Report.</p> <p>Satisfied that the Strategic Flood Risk Assessment (SFRA) has adequately informed the site assessment process and the mitigation measures put forward. However, respondent provides detailed comments on specific site flood risk assessment in their Proposed Local Development Plan response and these should be taken forward into the Adopted Plan and the finalised Environmental Report.</p> <p>Welcomes additional environmental problems listed in Table 5.3. Respondent thanks the Council for providing them with up to date shape files in order for them to independently assess them.</p> | Welcomed and noted.   |
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| X3 Members of the Public | Anti-Social Behaviour                          | Further explanation required on how the Local Development Plan will safeguard mitigation action on anti-social behaviour. Queries whether the Strategic Environmental Assessment is required to assess anti-social behaviour issues that negatively affect physical or mental health of residents. | The Strategic Environmental Assessment is not required to assess or mitigate for anti-social behaviour. Such design issues are dealt with at the planning application/masterplanning stage where policies such as D1 – Quality Placemaking are applied to ensure that developments are safe and pleasant. |
| X2 Members of the Public | OP53, OP112, OP113, B0901, B0905, B0911, B0927 | Requests the SEA's for sites listed is reassessed particularly it's section on post mitigation. Respondent states that the Strategic Environmental Assessment is superficial and does not answer the criteria set.   | It is not clear what aspect of the Strategic Environmental Assessment's post mitigation is superficial. The Council are content that appropriate mitigation is discussed within the Strategic Environmental Assessment for sites OP53, OP112, OP113, B0901, B0905, B0911 and B0927.                       |



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| <p>OP56 St Fittick's Park and OP61 Doonies</p> | <p>Outlines how in their view the Environmental Report under-represents the importance of OP56 St Fittick's Park (in terms of its value to people, wildlife and flood management) and also under-represents the likelihood of adverse environmental effects, including post mitigation. The respondent observes that it would appear that the East Tullos Burn Project area has not been included in the Policy B5 and OP56 assessments. The respondent considers that all the benefits that the project has delivered (and the available North East Scotland Biological Records Centre records) have not been considered in the topics within the assessments. This is noting that the East Tullos Burn Project area takes up most of the undeveloped open space within OP56, which itself is a sizeable proportion of the Energy Transition Zone.</p> | <p>It is agreed that greater emphasis should be given to the presence of the East Tullos Burn and its associated environmental benefits within the Strategic Environmental Assessment for OP56 and Policy B5. This information has been included in the revised version of the Environmental Report.</p> |
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| <p>Water Abstraction</p> | <p>Requests that the text of page 46 'Note on the Assessment of Water' is amended to read, "<i>Decisions regarding acceptable water abstraction levels from the River Dee may be discussed between Scottish Environment Protection Agency (SEPA), Scottish Water and SNH. The Habitats Regulations Assessment also has a bearing on this issue. The licence for abstraction for the public water supply from the River Dee is held by Scottish Water, and SEPA is the principal regulator of that abstraction licence.</i>"</p> <p>Amend text of Environmental Report to read "<i>New development may increase the need for Scottish Water to abstract water from the River Dee for the public supply, with water abstraction licence requirements set by SEPA.</i>"</p> | <p>The word changes suggested for the section 'Note on the Assessment of Water', have also been made and incorporated into the revised version of the Environmental Report.</p> <p>The word changes suggested for other entries in the Environmental Report have also been made and incorporated into the revised version of the Environmental Report.</p> |
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| <p>OP56 St Fittick's Park and OP61 Doonies</p> | <p>Respondent highlights that the Energy Transition Zone (OP56 and OP61) has not been assessed in terms of its impact on the historic environment. The environmental assessment of the allocation of land in St Fittick's Park for the Energy Transition Zone does not consider the impact of the proposed land use on the Scheduled Monument St Fittick's Church (SM 10400). Given that the allocation for the Bay of Nigg OP62 - Harbour Expansion, Energy Transition Zone, Green Belt etc does assess the potential impact as having the "<i>potential to negatively impact on the scheduled monument of St. Fittick's Church</i>" respondent would have expected the assessment of OP56 to include an assessment of the same site with similar findings. Respondent therefore advises that the assessment be updated to cover this and put forward mitigation for identified effects..</p> | <p>It is agreed that the Strategic Environmental Assessment should be amended for OP56 and OP61 so that it fully assesses the Energy Transition Zone in terms of its impact on the historic environment. This information has been included in the revised version of the Environmental Report.</p> |
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|  | <p>As with OP56, the detailed assessment provided for OP61 Doonies (page 801) has not considered the potential impacts on the site and setting of the nationally important historic environment assets in its vicinity, in this case the Scheduled Monuments of Crab's Cairn (SM 4060), Tullos Cairn, cairn (SM 4055) and Baron's Cairn, cairn (SM 4126). In particular the Crab's Cairn Scheduled Monument lies directly adjacent to the north east corner of the allocation and may form part of a relict prehistoric landscape with the other monuments noted above. It is noted that the assessment for OP64 (Former Ness Tip - Solar Farm) that is being brought forward from the extant plan does offer an assessment on the scheduled cairns in its vicinity and that the potential for adverse effects prior to mitigation is predicted. On this it should be noted that the assessment scores this effect as positive after mitigation without offering explanation of what the positive effect is. The respondent would consider it more appropriate that if mitigation through siting and design served to lessen the impact on the setting of these sites it would be more accurate to consider the residual effect neutral rather than positive. In light of the above omissions regarding the assessment of the allocations relating to the Energy Transmission Zone we would advise that the environmental report be updated to ensure that the need for mitigation is recognised and that the delivery programme reflects this.</p> |  |
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| <p>OP46 Royal Devenick Park</p> | <p>Agrees with the Strategic Environmental Assessment that: <i>“Development will have a negative impact on the landscape setting of the area” for OP46 Royal Devenick Park.</i></p>                                       | <p>Agreement that OP46 will have a negative impact on the landscape setting of the area is noted.</p>  |
| <p>OP53 Tillyoch</p>            | <p>Advises mitigation which goes beyond that identified in the Environmental Report. Respondent advises excluding the woodland area and also providing information demonstrating how the woodland would be protected.</p> | <p>Issue 11 of the Schedule 4 document contains a detailed response regarding woodland within OP53 Tillyoch. The Strategic Environmental Assessment for OP53 discusses woodland and protected trees on site.</p> |

**Table 5.4: Modifications sought by Reporters' Report, September 2022**

| Policy / Site                                 | Modification   | Aberdeen City Council's assessment of impact on SEA   |
|---|--|---|
| Policy LR1: Land Release Policy               | Modify policy by adding and replacing text to Part A, and replacing text in Part B.  | Policy reassessed. No impact. Policy still ensures the release of land for development. See Appendix 9 of the Environmental Report.                                     |
| Policy LR2: Delivery of mixed use communities | Modify Table text  | Policy reassessed. No impact. Policy still ensures a mix of uses on sites. See Appendix 9 of the Environmental Report.  |
| Policy NE1: Greenbelt                         | Amend criteria c   | Policy reassessed. No additional impact. Policy still has a presumption to protect the greenbelt. See Appendix 9 of the Environmental Report.                           |
| Policy NE2: Green and Blue Infrastructure     | Under Urban Green Space subheading: amend first sentence of second paragraph; add text to first sentence of first paragraph; add text to first sentence of second paragraph. | Policy reassessed. No additional impact. Policy still has a presumption to protect, support and enhance urban green space. See Appendix 9 of the Environmental Report . |

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| Policy NE3: Our Natural Heritage  | Replace the first paragraph under Designated Sites and Protected Species subheading.<br>Substitute text  | Policy reassessed. No additional impact. Policy still has a presumption to protect designated sites and protected species. See Appendix 9 of the Environmental Report. |
| Policy NE4: Our Water Environment | Under Flood Risk and Management subheading:<br>add text to point 1;<br>replace text at point 3;<br>amend text in the second paragraph, first and second sentence;<br>replace text in the third paragraph;<br>amend text in the fourth paragraph, third, fourth and fifth sentence. | Policy reassessed. No additional impact. Policy still has a presumption to manage and reduce flood risk. See Appendix 9 of the Environmental Report.                   |
| Policy NE4: Our Water Environment | Under Foul Drainage and Water Quality subheading replace text and delete text.   | Policy reassessed. No additional impact. Policy still has a presumption to connect to public sewage. See Appendix 9 of the Environmental Report.                       |
| Policy NE4: Our Water Environment | Under Surface Water Drainage subheading insert and delete text   | Policy reassessed. No additional impact. Policy still has a presumption to incorporate SuDS. See Appendix 9 of the Environmental Report.                               |

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| Policy NE4: Our Water Environment | Under Coastal Developments subheading insert text   | Policy reassessed. No additional impact. Policy still has a presumption to safeguard the coast. See Appendix 9 of the Environmental Report.   |
| Policy NE5: Trees and Woodland    | Add text to second paragraph  | Policy reassessed. Biodiversity comment added. See Appendix 9 of the Environmental Report.  |
| Policy D6: Historic Environment   | Replace text  | Policy reassessed. No additional effect. The text outlines and supports the policy. See Appendix 9 of the Environmental Report.   |
| Policy R1: Minerals               | Add text to point 2<br>Add text to point 4  | Policy reassessed. No additional effect. Policy still notes mineral extraction proposals are acceptable in principle, subject to strict criteria regarding impacts on amenity and the environment. See Appendix 9 of the Environmental Report . |
| Policy R8: Heat Networks          | Add text under subheading low and zero carbon generating technologies<br>Add text to the third paragraph, first sentence under the heading Heat Networks. | Policy reassessed. No additional effect. Policy still encourages and supports the development of heat networks. See Appendix 9 of the Environmental Report .  |



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| Policy H8: Houses in Multiple Occupation                          | Delete last two paragraphs and insert a new paragraph              | Policy reassessed. No additional effect. Policy still provides guidance for HMOs and assessment of cumulative concentration. See Appendix 9 of the Environmental Report . |
| Policy CF1: Existing Community Sites and Facilities               | Add a bullet point<br>Add text to fourth paragraph, first sentence | Policy reassessed. No additional effect. Policy still supports existing community facilities. See Appendix 9 of the Environmental Report .                                |
| Policy VC3: Network of Centres                                    | Add text<br>Amend text   | Policy reassessed. No additional effect. Policy still supports the town centre first approach. See Appendix 9 of the Environmental Report .                               |
| Policy VC9: Out of Centre Proposals                               | Delete text<br>Amend text  | Policy reassessed. No additional effect. Policy still has a presumption against out of centre development. See Appendix 9 of the Environmental Report .                   |
| Policy I1: Infrastructure Delivery and Planning Obligations Table | Modify table text  | Table reassessed. No additional effect. The text notes the planning obligations required for development sites. See Appendix 9 of the Environmental Report .              |

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| Policy T3: Parking   | Add text under subheading Alternative Fuel Vehicle Infrastructure | Policy reassessed. No additional effect. Policy still supports provision of appropriate electric vehicle charging infrastructure. See Appendix 9 of the Environmental Report . |
| Page 10 and Preamble to Policy LR1: Land Release Policy                          | Modify text   | No additional effect. Correction of date. The additional text outlines and supports the policy.  |
| Preamble to Policy LR2: Delivery of mixed use communities                        | Insert text   | No additional effect. The additional text outlines and supports the policy.  |
| Preamble to Policy B5: Energy Transition Zones                                   | Amend text  | No additional effect. The text outlines and supports the policy  |
| Preamble to Policy NE4: Our Water Environment, subheading surface water drainage | Amend text  | No additional effect. The additional text outlines and supports the policy.  |

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| Preamble to NE5:<br>Trees and<br>Woodlands  | Add text                                  | No additional effect. The additional text outlines and supports the policy. |
| Preamble to Policy<br>R1: Minerals  | Add text                                  | No additional effect. The text outlines and supports the policy             |
| Preamble to Policy<br>R8: Heat Networks   | Add text                                  | No additional effect. The text outlines and supports the policy             |
| Preamble to Policy<br>CF1: Existing<br>Community Sites and<br>Facilities                  | Add text                                  | No additional effect. The text outlines and supports the policy             |
| Preamble to Policy<br>I1: Infrastructure<br>Delivery and<br>Planning Obligations<br>Table | Insert text<br>Modify text<br>Insert text | No additional effect. The text outlines and supports the policy             |

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| Text after Policy H8: Houses in Multiple Occupation | Modify text   | No additional effect. The text outlines and supports the policy   |
| OP47: Edgehill                                      | Modify name   | No effect. See Appendix 7 of the Environmental Report .   |
| OP53: Tillyoch                                      | Delete site. Update references where required.  | Site previously assessed. Site is no longer an opportunity site and is classed as greenfield alternative. No additional effects. See Appendix 8 of the Environmental Report . |
| Site B0942 / Former OP114: Milltimber South         | Allocate site as mixed use with an indicative allocation of 60 dwellings and 1,225 square meters of ancillary retail / office space. Update Appendix 2 of the Plan. | Site previously assessed as a Bid at Main Issues Report Stage. Site reassessed. No additional effects. See Appendix 7 of the Environmental Report .                           |
| Appendix 1: Brownfield Sites                        | Modify text   | No additional effect. The additional text provides sites numbers and clarifying text.   |

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| Appendix 2:<br>Opportunity Sites -<br>OP8: East Woodcroft<br>North                | Add text    | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report.  |
| Appendix 2:<br>Opportunity Sites -<br>OP9: Grandhome                              | Add text    | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report.  |
| Appendix 2:<br>Opportunity Sites –<br>OP17: Former<br>Bucksburn Primary<br>School | Remove text | No additional effect. See Appendix 7 of the<br>Environmental Report.                            |
| Appendix 2:<br>Opportunity Sites –<br>OP14: Cordyce<br>School                     | Add text    | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report.  |
| Appendix 2:<br>Opportunity Sites –<br>OP17: Former<br>Bucksburn Primary<br>School | Add text    | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report . |

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| Appendix 2:<br>Opportunity Sites –<br>OP20: Craibstone<br>South    | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report . |
| Appendix 2:<br>Opportunity Sites -<br>OP21: Rowett South           | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report.  |
| Appendix 2:<br>Opportunity Sites –<br>OP22: Greenferns<br>Landward | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report . |
| Appendix 2:<br>Opportunity Sites –<br>OP28: Greenferns             | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report.  |
| Appendix 2:<br>Opportunity Sites –<br>OP33: Greenferns<br>Landward | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report.  |

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| Appendix 2:<br>Opportunity Sites –<br>OP31: Maidencraig<br>South East | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report . |
| Appendix 2:<br>Opportunity Sites –<br>OP32: Maidencraig<br>North East | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix .7 of the Environmental Report  |
| Appendix 2:<br>Opportunity Sites –<br>OP111: Skene Road               | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report . |
| Appendix 2:<br>Opportunity Sites -<br>OP52: Malcolm Road              | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report . |
| Appendix 2:<br>Opportunity Sites –<br>OP109: Woodend                  | Add text | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report . |

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| Appendix 2:<br>Opportunity Sites -<br>OP46: Royal<br>Devenick Park   | Add text relating to masterplan. | No additional effect. See Appendix 7 of the Environmental Report.   |
| Appendix 2:<br>Opportunity Sites -<br>OP46: Royal<br>Devenick Park   | Add text                         | Reassessed SEA. Biodiversity, Flora and Fauna comment added. See Appendix 7 of the Environmental Report . |
| Appendix 2:<br>Opportunity Sites –<br>OP59: Loirston   | Add text                         | No effect. Ecological survey noted in site SEA. See Appendix 7 of the Environmental Report .              |
| Appendix 2:<br>Opportunity Sites –<br>OP95: Station<br>Gateway City<br>Centre Masterplan<br>Intervention Area            | Add text                         | Site reassessed. Population comment added. See Appendix .7 of the Environmental Report                    |
| Appendix 2:<br>Opportunity Sites –<br>OP96: Castlegate<br>and Castlehill: City<br>Centre Masterplan<br>Intervention Area | Add text                         | Site reassessed. Population comment added. See Appendix 7 of the Environmental Report.                    |



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| Appendix 2:<br>Opportunity Sites –<br>OP82: Dunbar Halls<br>of Residence, Don<br>Street | Add text. | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report .           |
| Appendix 2:<br>Opportunity Sites –<br>OP99: Old Torry                                   | Add text  | No effect. Ecological survey noted in site SEA.<br>See Appendix 7 of the Environmental Report .           |
| Appendix 2:<br>Opportunity Sites –<br>OP106: Torry<br>Waterfront                        | Add text  | Site reassessed. Service infrastructure comment<br>added. See Appendix 7 of the Environmental<br>Report.  |
| Appendix 2:<br>Opportunity Sites –<br>OP56: St. Fitticks<br>Park                        | Add text  | Site reassessed. Service infrastructure comment<br>added. See Appendix 7 of the Environmental<br>Report . |

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| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP26: Old Skene Road - amend text<br/> OP27: Greenferns Infant School- amend text<br/> OP29: Prime Four Business Park- amend text<br/> OP63: Prime Four Business Park Phase 5 Extension - amend text<br/> OP30: Kingsford - amend text<br/> OP31: Maidencraig South East - amend text<br/> OP32: Maidencraig North East - amend text<br/> OP34: East Arnhall – amend text<br/> OP111: Skene Road, Maidencraig – amend text<br/> OP38: Countesswells - amend text<br/> OP39: Braeside Infant School – amend text<br/> OP40: Cults Pumping Station – amend text<br/> OP41: Friasfield – amend text<br/> OP42: Hotel and Equestrian Centre – amend text<br/> OP43: Milltimber Primary School – amend text<br/> OP44: North Lasts Quarry – amend text<br/> OP47: Edgehill – amend text<br/> OP48: Oldfold – amend text<br/> OP49: Grove Nursery, Hazlehead – amend text<br/> OP50: Skene Road – amend text<br/> OP51: Peterculter Burn – amend text<br/> OP52: Malcolm Road – amend text<br/> OP54: Craigton, Peterculter – amend text<br/> OP109: Woodend, Peterculter – amend text<br/> OP112: West of Contlaw Road – amend text<br/> OP113: Culter House Road – amend text<br/> OP114: Milltimber South – insert text<br/> OP113: Culter House Road – amend text<br/> OP114: Milltimber South – insert text<br/> OP46: Royal Devenick Park – amend text</p> | <p>No additional effect. Habitats Regulations Appraisal notes sites where an HRA is required. See Appendix 7 of the Environmental Report.</p> |
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| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP56: St Fittick's Park – amend text<br/> OP57: Craighill Primary School, Kincorth – amend text<br/> OP59: Loirston – amend text<br/> OP60: Charleston – amend text<br/> OP61: Doonies – amend text<br/> OP62: Bay of Nigg – amend text<br/> OP64: Former Ness Tip – amend text<br/> OP103: Former Torry Nursery School – amend text<br/> OP105: Kincorth Academy – amend text<br/> OP115: 34-40 Abbotswell Road – amend text<br/> OP35: Summerfield House, Eday Road - – amend text<br/> OP36: Charlie House – amend text<br/> OP37: Woodend Hospital – amend text<br/> OP70: Denburn Valley City Centre Masterplan Intervention Area – amend text<br/> OP74: Broadford Works, Maberley Street – amend text<br/> OP76: Former Raeden Centre – amend text<br/> OP77: Cornhill Hospital – amend text<br/> OP79: Crown House – amend text<br/> OP80: Mastrick Clinic – amend text<br/> OP89: Kaimhill Outdoor Centre – amend text<br/> OP91: Union Street West City Centre Masterplan Intervention Area – amend text<br/> OP92: St Peter's Nursery, Spital – amend text<br/> OP95: Station Gateway City Centre Masterplan Intervention Area – amend text<br/> OP100: North Dee City Centre Masterplan Intervention Area – amend text</p> | <p>No additional effect. Habitats Regulations Appraisal notes sites where an HRA is required. See Appendix 7 of the Environmental Report .</p> |
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|  | OP102: George Street / Crooked Lane – amend text |  |
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| Appendix 2:<br>Opportunity Sites | OP106: Torry Waterfront City Centre Masterplan<br>Intervention Area – amend text<br>OP110: Heart of the City City Centre Masterplan<br>Intervention Area – amend text | No additional effect. Habitats Regulations<br>Appraisal notes sites where an HRA is required.<br>See Appendix 7 of the Environmental Report . |
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| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP1: Murcar - insert text<br/> OP45: Berryhill – insert text<br/> OP3: Findlay Farm – insert text<br/> OP6: WTR Site at Dubford – insert text<br/> OP8: East Woodcroft North – insert text<br/> OP9: Grandhome – insert text<br/> OP12: Silverburn House – insert text<br/> OP13: AECC Bridge of Don – insert text<br/> OP75: Denmore Road – insert text<br/> OP14: Former Cordyce School – insert text<br/> OP16: Davisdons Papermill – insert text<br/> OP17: Former Bucksburn Primary School – insert text<br/> OP18: Craibstone North and Walton Farm – insert text<br/> OP19: Rowett South – insert text<br/> OP20: Craibstone South – insert text<br/> OP21: Rowett South – insert text<br/> OP22: Greenferns Landward – insert text<br/> OP23: Dyce Drive – insert text<br/> OP24: Central Park, Dyce – insert text<br/> OP25: Woodside – insert text<br/> OP28: Greenferns – insert text<br/> OP29: Prime Four Business Park – insert text<br/> OP63: Prime Four Business Park Phase 5 extension – insert text<br/> OP30: Kingsford – insert text<br/> OP31: Maidencraig South East – insert text<br/> OP32: Maidencraig North East – insert text<br/> OP33: Greenferns – insert text</p> | <p>No additional effect. Habitats Regulations Appraisal notes sites where an ecological survey is required. See Appendix 7 of the Environmental Report .</p> |
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| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP34: Arnhall – insert text<br/> OP111: Skene Road – insert text<br/> OP38: Countesswells<br/> OP40: Cults Pumping Station – insert text<br/> OP41: Friarsfield – insert text<br/> OP42: Hotel and Equestrian Centre – insert text<br/> OP44: North Lasts Quarry – insert text<br/> OP47: Edgehill – insert text<br/> OP48: Oldfold – insert text<br/> OP49: Grove Nursery, Hazlehead – insert text<br/> OP50: Skene Road, Hazlehead – insert text<br/> OP51: Peterculter Burn – insert text<br/> OP52: Malcolm Road, Peterculter – insert text<br/> OP54: Craigton, Peterculter – insert text<br/> OP109: Woodend, Peterculter – insert text<br/> OP112: West of Contlaw Road – insert text<br/> OP113: Culter House Road – insert text<br/> OP114: Milltimber South – insert text<br/> OP55: Blackhills Quarry, Cove – insert text<br/> OP56: St Fittick’s Park – insert text<br/> OP58: Stationfields, Cove – insert text<br/> OP59: Loirston – insert text<br/> OP61: Doonies – insert text<br/> OP64: Former Ness Tip – insert text<br/> OP105: Kincorth Academy – insert text<br/> OP115: 34-40 Abbotswell Road – insert text<br/> OP35: Summerfield House, Eday Road<br/> OP36: Charlie House – insert text<br/> OP37: Woodend Hospital – insert text<br/> OP66: Granitehill – insert text<br/> OP69: 152 Don Street, Old Aberdeen – insert text<br/> OP72: Aberdon House – insert text<br/> OP73: Balgownie Machine Centre – insert text<br/> OP74: Broadford Works, Maberley Street 87 insert text</p> | <p>No additional effect. Habitats Regulations Appraisal notes sites where an ecological survey is required. See Appendix 7 of the Environmental Report .</p> |
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| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP76: Former Raeden Centre – insert text<br/> OP77: Cornhill Hospital – insert text<br/> OP78: Frederick Street – insert text<br/> OP82: Dunbar Halls of Residence, Don Street – insert text<br/> OP85: King Street / Beach Esplanade – insert text<br/> OP87: Pittodrie Park – insert text<br/> OP90: St Machar Primary School – insert text<br/> OP92: St Peter’s Nursery, Spital – insert text<br/> OP94: Tillydrone Primary School – insert text<br/> OP97: Victoria Road Primary School – insert text<br/> OP98: VSA Gallowgate – insert text<br/> OP99: Old Torry – insert text<br/> OP102: George Street / Crooked Lane – insert text</p> | <p>No additional effect. Habitats Regulations Appraisal notes sites where an ecological survey is required. See Appendix 7 of the Environmental Report .</p> |
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| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP3: Findlay Farm – insert text<br/> OP6: WTR Site at Dubford – insert text<br/> OP11: Balgownie Area 4 – insert text<br/> OP12: Silverburn House – insert text<br/> OP17: Former Bucksburn Primary School – insert text<br/> OP20: Craibstone South – insert text<br/> OP21: Rowett South – insert text<br/> OP22: Greenferns Landward – insert text<br/> OP29: Prime Four Business Park – insert text<br/> OP40: Cults Pumping Station – insert text<br/> OP65: Haudagain Triangle, Middlefield – insert text<br/> OP75: Denmore Road – insert text<br/> OP95: Station Gateway City Centre Masterplan Intervention Area – insert text</p> | <p>Site reassessed. Water updated. See Appendix 7 of the Environmental Report.</p>      |
| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP51: amend text</p>  | <p>Site reassessed. No additional effect. See Appendix of the Environmental Report.</p> |

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| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP47: Edgehill – insert text<br/> OP49: Grove Nursery, Hazlehead – insert text<br/> OP50: Skene Road, Hazlehead – insert text<br/> OP61: Doonies – insert text<br/> OP100: North Dee City Centre Masterplan<br/> Intervention Area – insert text<br/> OP106: Torry Waterfront City Centre Masterplan<br/> Intervention Area – insert text<br/> OP110: Heart of the City – City Centre Masterplan<br/> Intervention Area – insert text<br/> OP112: West of Contlaw Road – insert text</p> | <p>Site reassessed for possible flood risk assessment. No additional effect. See Appendix 7 of the Environmental Report.</p> |
| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>OP3: Findlay Farm – insert text<br/> OP7: Aberdeen College Gordon Centre – insert text<br/> OP66: Granitehill – insert text<br/> OP81: Queen’s Square City Centre Masterplan<br/> Intervention Area – insert text<br/> OP91: Union Street West City Centre Masterplan<br/> Intervention Area – insert text<br/> OP116: Froghall Terrace – insert text</p>  | <p>Site reassessed for drainage impact assessment. No additional effect See Appendix 7 of the Environmental Report.</p>      |
| <p>Appendix 2:<br/>Opportunity Sites</p> | <p>Replace text</p>   | <p>No additional effect. Updating reference to Europa site(s). See Appendix 7 of the Environmental Report.</p>               |

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| Appendix 3:<br>Masterplans and<br>Development<br>Frameworks | Add text   | No additional effect |
| Appendix 4:<br>Aberdeen Planning<br>Policy                  | Add text   | No additional effect |
| Glossary  | Amend text | No additional effect |

**5.5 Analysis of Scottish Minister's Direction Letter, 10 May 2023.**

| Reference                        | Modification  | Aberdeen City Council's assessment of impact on SEA |
|----------------------------------|---|---|
| Contents page 1                  | Remove "Aberdeen City and Shire Strategic Development Plan" and renumber as required.   | No additional effect.                               |
| Page 6 paragraph 1.1.2           | Remove ", from The Planning (Scotland) Act 2019 through the National Planning Framework, Scottish Planning Policy, down to Local Development Plans and Aberdeen Planning Guidance."   | No additional effect.                               |
| Page 13 List under paragraph 1.4 | Add "National Planning Framework 4"<br>Remove "Scottish Planning Policy" Remove "Aberdeen City and Shire Strategic Development Plan"  | No additional effect.                               |
| Page 15 paragraph 2.2            | Remove "The National Planning Framework (NPF3) is currently under review and its replacement will set out Scotland's vision for the future as well as introducing national policies on various topics. The current"                   | No additional effect.                               |
| Page 15 paragraph 2.3            | Remove "Planning authorities must take NPF3 into account when preparing local development plans and it is a material consideration in determining planning applications. This will remain the position until it is replaced by NPF4." | No additional effect.                               |

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| Pages 15 and 16        | Remove paragraphs 2.4, 2.5 and 2.6  | No additional effect. |
| Page 16 paragraph 2.8  | Add "Given the timing of this plan, a pragmatic approach has been taken to changes in the planning system. National Planning Framework 4 was adopted following the examination and subsequent modification of this plan, and as a result some terminology referred to here may vary from the new policy framework. References to the Scottish Planning Policy in the Proposed Plan have been removed to minimise confusion. References to the Strategic Development Plan have been minimised but retained where necessary to explain the source of data and requirements, but it should be noted that this plan, together with NPF4 now forms the basis of the statutory development plan." | No additional effect. |
| Page 16 paragraph 2.11 | Remove "and the Strategic Development Plan"   | No additional effect. |
| Page 17 paragraph 3.1  | Remove "the wider strategic aims of the Strategic Development Plan and"   | No additional effect. |
| Page 17 paragraph 3.4  | Remove paragraph 3.4 and table 2 (and related footnotes) and replace with: From February 2023, the National Planning Framework forms part of the statutory development plan. It sets out a 10 year Minimum All-Tenure Housing Land  | No additional effect. |

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|                          | <p>Requirement of 7,000 units at Annex E. This plan was prepared on the basis of the Strategic Development Plan that was part of the statutory development plan at that time, which set out a Housing Land Requirement of 21,450 for 2016 to 2032. Proposals are already progressing or are in the pipeline for much of the land that will accommodate these requirements.</p> <p>Most of this requirement will be met through established sites identified through this local development plan with a focus on sites that are deliverable within the timeframe to 2032. There will also be a continued emphasis on meeting the needs of the whole community including through the provision of affordable housing.</p> <p>Monitoring and review of the contribution of the land supply to delivering affordable housing will be important in this respect.</p> |                       |
| Page 18<br>Paragraph 3.5 | Remove: "in Table 2"  | No additional effect. |
| Page 18<br>paragraph 3.5 | At title of Table 3 remove "Housing and"<br>In table 3, remove the part/columns relating to Housing Allowances  | No additional effect. |
| Page 18<br>Paragraph 3.6 | Add text to the start of paragraph 3.6<br>"This LDP was prepared on the basis that"   | No additional effect. |
| Page 18<br>paragraph 3.6 | Second sentence, after "allocation for", remove "housing and"   | No additional effect. |

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| <p>Page 18<br/>paragraph 3.7</p>  | <p>Remove “The Strategic Development Plan 2020 states that” Capitalise the following sentence. Remove “endorses that approach and” Remove “in line with SDP targets”</p>   | <p>No additional effect.</p> |
| <p>Page 18<br/>paragraph 3.8</p>  | <p>Remove “This Local Development Plan needs to show how we will meet the 5,107 housing allowance which the Strategic Development Plans sets for Aberdeen for the period to 2032. The Strategic Plan states that” Capitalise the following sentence. Remove “new allowance includes” and replace with “sites include”</p>                    | <p>No additional effect.</p> |
| <p>Page 19<br/>paragraph 3.9</p>  | <p>Remove “That leaves a potential shortfall in the new housing land allowance of some 1568 units. However Scottish Planning Policy places the focus on the maintenance of a five year land supply drawing from all sources.”</p> <p>Remove “enable the future maintenance of the 5 year effective supply”. Replace with “come forward.”</p> | <p>No additional effect.</p> |
| <p>Page 20<br/>paragraph 3.11</p> | <p>Remove “(used as the basis for calculating the Strategic Development Plan allocations)”</p>   | <p>No additional effect.</p> |

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| <p>Page 20<br/>subheading after<br/>paragraph<br/>3.12</p> | <p>Remove “Period 2 Allowances 2033 -35 and Period 3 Allowances 2036-40 Replace with “Sites beyond 2033”</p>  | <p>No additional effect.</p> |
| <p>Page 20<br/>paragraph 3.13</p>                          | <p>Remove “These sites can be set against the new Period 2 Allowances for 2033-35. We do not propose to identify any further sites to meet the allowances for Periods 2 and 3. Neither Scottish Planning Policy or the Strategic Development Plan requires this Plan to do so.”</p>   | <p>No additional effect.</p> |
| <p>Page 21<br/>paragraph 3.14</p>                          | <p>Remove whole paragraph: “The Strategic Development Plan 2020 asks Local Development Plans to make sure there is at least 60 hectares of marketable land available to businesses at all times in a range of places within Aberdeen City. In addition, at least 20 hectares of the marketable employment land in the Strategic Growth Areas should be of a standard which will attract high quality businesses or be suitable for company headquarters.”</p> | <p>No additional effect.</p> |
| <p>Page 21<br/>Paragraph 3.17</p>                          | <p>After Part A – Existing Housing Allocations and Housing remove “Allowances” and replace with “sites” After Housing and employment development on existing allocated sites and housing remove “allowance”</p>   | <p>No additional effect.</p> |



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| <p>Page 22 PolicyLR1</p>      | <p>Remove “The council will work with developers, service providers and otherpartners to maintain the 5 year supply of effective housing land at all times, along with the supply of employment land.”</p> <p>Replace with “The council will work with developers, service providers and other partners to maintain a sufficient pipeline of deliverable housing land along with the supply of employment land.”</p>                   | <p>No additional effect.</p> |
| <p>Page 22 paragraph 3.18</p> | <p>Remove “Policy LR1 at Part A supports the maintenance of a 5 yeareffective supply of housing land at alltimes (in the relevant 10 year period to 2032). This is to providea supply of land sufficient to meet the housing land requirement as established in the strategic plan. It is recognised abovethat there is a shortfall in terms of those sites specifically identified to meet the strategic allowance. Consequently”</p> | <p>No additional effect.</p> |
| <p>Page 22 paragraph 3.19</p> | <p>Remove “This will result in the replacement of the strategic development plan context with that to be established through the new National Planning Framework.” and “This is particularly important in the circumstances where the extent of newallowance sites identified through this local development planfalls short of that envisaged by thecurrent</p>   | <p>No additional effect.</p> |

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|                           | strategic plan.  |                       |
| Page 23<br>paragraph 3.23 | Remove “and meet the requirements of the Strategic Development Plan.”  | No additional effect. |
| Page 36                   | Under “Delivering Sustainable Communities” remove “and how we will meet the objectives and targets of the Strategic Development Plan.”   | No additional effect. |
| Page 36<br>paragraph 5.1  | Remove “National Planning Framework3, Scottish Planning Policy and the Aberdeen City and Aberdeenshire Strategic Development Plan all highlight the relationship between wellplanned places, a healthy lifestyle, wellbeing and social inclusion.” | No additional effect. |
| Page 41<br>paragraph 6.4  | Remove “The Strategic Development Plan sets objectives for the region ensuring that...”<br>Replace “new” with “New”<br>Add “should ensure that it” between “development” and “safeguards”  | No additional effect. |

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| Page 42<br>paragraph 6.6  | Remove “Scottish Planning Policy states that”. Capitalise the following sentence.<br><br>Remove “In line with the Strategic Development Plan,”. Capitalise the following sentence. | No additional effect. |
| Page 42<br>paragraph 6.7  | Remove “In line with the Scottish Planning Policy,”. Capitalise the following sentence.  | No additional effect. |
| Page 42<br>paragraph 6.8  | Remove “In line with the Scottish Planning Policy”. Capitalise the following sentence.   | No additional effect. |
| Page 43<br>paragraph 6.12 | Remove “Scottish Planning Policy states that”. Capitalise the following sentence.  | No additional effect. |
| Page 47 bullet 2          | Remove “Scottish Planning Policy and”  | No additional effect. |
| Page 48<br>paragraph 6.32 | Remove “as set out in Scottish Planning Policy”  | No additional effect. |
| Page 53<br>paragraph 7.1. | Replace “NPF3” with “NPF4”, remove “Scottish Planning Policy”  | No additional effect. |
| Page 60<br>paragraph 7.15 | Remove “Scottish Planning Policy and”<br>Amend “NPF3” to “NPF4”  | No additional effect. |
| Page 66<br>paragraph 8.5  | Remove “Scottish planning Policy requires” Insert “are required to” after “Planning authorities”   | No additional effect. |

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| Page 68<br>paragraph 8.12 | Replace “Scottish Planning Policy” with “National planning policy”  | No additional effect. |
| Page 69<br>paragraph 8.13 | Remove “The Strategic Development Plan has identified”. Capitalise the following sentence.<br>Remove “The Strategic Development Plan notes that”  | No additional effect. |
| Page 71<br>paragraph 8.17 | Remove “Scottish Planning Policy and National Planning Framework 3” Replace with “National planning policies”   | No additional effect. |
| Page 76<br>paragraph 9.8  | Remove “Scottish Planning Policy states that where a demand is identified through Housing Need and Demand Assessment (HNDA), policies should be put in place to mitigate for this change through the provision of suitable housing.” Replace with “National planning policies support proposals for new homes which address identified gaps in provision, which could include homes for older people, including supported accommodation, care homes and sheltered housing.” | No additional effect. |
| Page 77<br>paragraph 9.13 | Remove “and take into consideration the Strategic Development Plan affordable housing targets, the provisions of Scottish Planning Policy and Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits; which sets a benchmark of 25% provision for new developments.”   | No additional effect. |

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| Page 101<br>paragraph 12.1 | Remove “The Strategic Development Plan requires a ready supply of employment to be maintained in the city. Therefore to”<br>Start the following sentence with “To” | No additional effect. |
| Page 108                   | Under “Ecosystems Services” Remove “As defined in Scottish Planning Policy,”   | No additional effect. |
| Page 109                   | Remove “Effective Land Supply Sites which have no constraints and are available for development.”  | No additional effect. |
| Page 112                   | Under Strategic Development Plan Remove “to be replaced by Regional Spatial Strategies.” And replace with “and no longer part of the statutory development plan.”  | No additional effect. |
| Page 115                   | Remove “Consequently they are not counted as part of the strategic allowance as set out in Chapter 3 of the plan. Nevertheless” Capitalise the next sentence       | No additional effect. |

## **6. Reasons for Adopting the Local Development Plan**

The consideration of alternatives undertaken during the SEA and the preparation of the Local Development Plan Main Issues Report and the consultation on these documents had a significant influence on the content of the Local Development Plan. The process strengthened and clarified policy aims and objectives and ensured an appropriate social, economic and environmental balance was struck. Consistent with Section 18(3)(e), this LDP is adopted in the light of other reasonable alternatives discussed in the Environmental Report on the basis of the following reasons:

- The preferred options are more consistent with other relevant plans, policies and environmental protective objectives at international, national, regional and local levels than their alternatives..
- Less likely to have long-term irreversible significant effects on the environment
- Where there are negative effects, the Council is more likely to minimise the negative impacts of the preferred options than for the alternative options.
- The assessment indicates that the preferred sites are more likely to have long-term positive effects than the alternative sites.
- The preferred options have more in-built protective policies than their alternatives.
- The alternative strategies and policies are less likely to be amenable to consultation outcome than the preferred options.
- The preferred options are more environmentally, socially and economically feasible to implement than the alternative options; they promote sustainable development.

## **7. Monitoring Measures**

Aberdeen City Council is required under to Section 18(3)(f) of the Environmental Assessment (Scotland) Act 2005 to monitor the significant environmental effects when the plan is implemented. This monitoring will include 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. An annual monitoring report will be prepared to constantly monitor the significant effects. The framework for monitoring the significant effects of the implementation of the plan is shown in the Table 7.1 below. The monitoring data will be incorporated into the ALDP.

- The strategy will be monitored on an ongoing basis and reviewed yearly where lessons will be learned for the next review.
- When planning new projects that will be required to implement the Plan, further assessments will be conducted to establish any potential and unexpected environmental effects.

- As a requirement of the LDP, officers and teams listed in the monitoring table will monitor and review process and make changes where necessary, particularly where unforeseen issues may arise. It will be part of the LDP's delivery programme in general.

**Table 7.1: Monitoring Plan**

| <b>Effects</b> | <b>What sort of information is required? (Indicators)</b>                               | <b>Where will information be obtained from?</b>                  | <b>Are there gaps in the existing information and how can it be resolved?</b> | <b>When should the remedial action be considered?</b>  | <b>Who is responsible for undertaking the monitoring?</b>  | <b>How should the results be presented?</b> | <b>What remedial actions could be taken?</b>  |
|----------------|---|--|---|--|--|---|---|
| Biodiversity   | Impact on the qualifying features of the River Dee SAC, and impact on its water quality | Dee Catchment Management Plan; Scotland's Environment statistics | None  | Remedial action should be considered if water quality deteriorates or there is a decrease in water resource. | Aberdeen City Council Environment Policy Team, NatureScot, SEPA, Dee Catchment Partnership, North East Scotland Biodiversity Partnership | Annually                                    | A review of land allocations through the Local Development Plan Process<br><br>Review of Aberdeen Planning Guidance on Natural Heritage should a quicker response be required |

| <b>Effects</b> | <b>What sort of information is required? (Indicators)</b>   | <b>Where will information be obtained from?</b>   | <b>Are there gaps in the existing information and how can it be resolved?</b> | <b>When should the remedial action be considered?</b>   | <b>Who is responsible for undertaking the monitoring?</b>  | <b>How should the results be presented?</b>                        | <b>What remedial actions could be taken?</b>                              |
|----------------|---|---|---|---|--|--|---|
|                | Rate and scale of habitat fragmentation   | Open Space Strategy and Greenspace Network reviews<br><br>Number of applications approved which include GSN                     |   | When Local Nature Conservation Strategy and/or consultee advice indicates a negative impact on habitats and species as a result of development pressure | Aberdeen City Council Environment Team, NatureScot, SEPA, Dee Catchment Partnership, North East Scotland Biodiversity        | Open Space Strategy Annual Monitoring                              | Review of Aberdeen Planning Guidance on open space and greenspace network |
|                | Number and land area of sites designated for conservation purposes<br><br>Number of biodiversity action plan species and habitats | Local Nature Conservation Strategy<br><br>North East Scotland Biodiversity Action Plan<br><br>Scotland's Environment Statistics |   | When Local Nature Conservation Strategy and/or consultee advice indicates a negative impact on habitats and species as a result of development pressure | Aberdeen City Council Environment Policy Team, NatureScot, SEPA, Dee Catchment Partnership, North East Scotland Biodiversity | Annually   | Review of Aberdeen Planning Guidance on Natural Heritage                  |
| Air            | Nitrogen dioxide emissions<br><br>Air quality (PM <sub>10</sub> )   | Aberdeen City Council Local Air Quality Management: Progress Reports  |   | When new Air Quality Management Areas are declared.<br><br>Planning Applications<br><br>Review of Aberdeen Planning Guidance on Air Quality             | Environmental Health   | As part of the Air Quality Action Plan or as and when is necessary | Review Aberdeen Planning Guidance on Air Quality                          |



| Effects          | What sort of information is required? (Indicators)                              | Where will information be obtained from?   | Are there gaps in the existing information and how can it be resolved?    | When should the remedial action be considered?   | Who is responsible for undertaking the monitoring?      | How should the results be presented?      | What remedial actions could be taken?   |
|------------------|---|--|---|--|---|---|---|
| Climatic factors | Increase in resource use from new development, carbon footprint                 | Monitoring of new development emissions, Building Standards Sustainability labels                              | Currently limited information on the overall global footprint of Aberdeen | When planning applications are being approved contrary to policies.  | LDP Team, Building Standards and Development Management | Annually                                  | Review of Aberdeen Planning Guidance if developments are not achieving desired outcomes                                   |
|                  | Increase in car use and energy consumption in new developments                  | Local Transport Strategy<br><br>Monitoring of modal shift in transport modes                                   |   | When transport monitoring shows increases in congestion and a modal shift is not occurring, i.e. use of the car is increasing.                                       | LDP Team and Transportation                             | Annual monitoring report                  |   |
|                  | Area at risk from flooding and new developments at risk from flooding           | Flood Risk Management Plans  | This is currently in preparation and is not available.                    | If the areas at risk from flooding change there is a need to review the spatial strategy   | Aberdeen City, Council, SEPA                            | In a finalised Flood Risk Management Plan | Review allocations and flooding policies and the need for flood defences through the review of the Local Development Plan |
| Soil             | Contaminated land<br><br>Meeting landfill allowance targets<br><br>Soil erosion | Contaminated Land Strategy<br><br>Aberdeen City Council Waste Strategy<br><br>Flood monitoring data from SEPA. |   | If the number of contaminated sites/land increases<br><br>If the level of biodegradable municipal waste sent to landfill increases<br><br>When flood events increase | Contaminated Land Unit, SEPA                            | As and when                               | Prepare or revise Aberdeen Planning Guidance.   |

| <b>Effects</b> | <b>What sort of information is required? (Indicators)</b>  | <b>Where will information be obtained from?</b>   | <b>Are there gaps in the existing information and how can it be resolved?</b> | <b>When should the remedial action be considered?</b>   | <b>Who is responsible for undertaking the monitoring?</b> | <b>How should the results be presented?</b>    | <b>What remedial actions could be taken?</b>   |
|----------------|--|---|---|---|---|--|--|
| Water          | <p>Impact on water quality of River Dee SAC</p> <p>Impact of development on Flooding</p> <p>Impact of development on water pollution</p> <p>Physical impact of development on water bodies and the coast</p> <p>Impact of policy on water usage on the River Dee</p> | <p>Dee catchment management plan</p> <p>SEPA flood monitoring and local authority flood monitoring data</p> <p>SNH on the impact on the qualifying interests of the River Dee SAC</p> <p>Scottish Water abstraction figures and SEPA's monitoring results</p> |   | <p>When data from SEPA and SNH indicate potential pollution in the Dee</p> <p>When data indicates that there has been an increase in flood incidents action should be taken</p> | SEPA, NatureScot and Aberdeen City Council                | As and when flood risk and pollution increases | <p>Review the action programme of the local development plan</p> <p>Review Aberdeen Planning Guidance on flooding and drainage</p> |
| Landscape      | <p>Impact of development on visually prominent areas</p> <p>Development adversely affecting the landscape and townscape setting</p>  | <p>Landscape appraisal</p> <p>Public complaints</p>   |   | <p>When landscape appraisal indicates a negative impact on landscape and townscape setting</p> <p>When there is a large amount of opposition to development</p>                 | Development Management and developers                     | Annually                                       | Review land allocations and/or prepare Aberdeen Planning Guidance  |

| <b>Effects</b> | <b>What sort of information is required? (Indicators)</b> | <b>Where will information be obtained from?</b>  | <b>Are there gaps in the existing information and how can it be resolved?</b>  | <b>When should the remedial action be considered?</b>   | <b>Who is responsible for undertaking the monitoring?</b> | <b>How should the results be presented?</b> | <b>What remedial actions could be taken?</b>  |
|----------------|---|--|--|---|---|---|---|
|                | Loss of trees and landscape features                      | Information will be gained through the consultation responses to planning applications by the Council's Environment Policy Team. | There is not currently any statistical data collected. This would not necessarily provide a good picture as replacement planting schemes will often be agreed. | If there is difficulty in implementing the policy to protect trees and landscape features then a review should be undertaken. | LDP Team and Environment Policy Team                      | Local Development Plan Monitoring Statement | Review policy position or provide further advice or training for case officers and elected members. |
| Population     | Increase in the range of house types and tenures          | Housing land audit   |  | When the plan is reviewed   | LDP Team  | Annually                                    | Review policies and allocations in ALDP, Supplementary Guidance and Aberdeen Planning Guidance      |
|                | Increase in the number of care homes built                | Monitoring of planning applications  |  | When the plan is reviewed   | LDP Team  | Annually                                    | Review policies and allocations in ALDP   |

| <b>Effects</b>    | <b>What sort of information is required? (Indicators)</b>            | <b>Where will information be obtained from?</b>                | <b>Are there gaps in the existing information and how can it be resolved?</b> | <b>When should the remedial action be considered?</b>  | <b>Who is responsible for undertaking the monitoring?</b>     | <b>How should the results be presented?</b> | <b>What remedial actions could be taken?</b>                           |
|-------------------|--|--|---|--|---|---|--|
| Cultural Heritage | Impact on archaeological remains on greenfield sites                 | Archaeology – number of excavations and remains found on sites |   | When there is an increase in archaeological remains being discovered   | Scottish Civic Trust and LDP Team, Archaeology and developers | Annually                                    | Review/ prepare Aberdeen Planning Guidance and revise land allocations |
|                   | Reduced numbers of historic buildings registered as 'at risk'        | Scottish Civic Trust Buildings at risk register for Scotland   |   | When the number of buildings on the 'at risk' register remains static or increases                             |   |   |  |
|                   | The impact of development on listed buildings and conservation areas |  |   |  |   |   |  |
| Material Assets   | School capacities  | School Roll Forecasts  |   | Remedial action will have to be taken through the application process to take account of changes               | Education, Development Management                             | Annually in School Roll Forecasts           | Changes made to the requirements for infrastructure                    |
|                   | Quantity and quality of open space                                   | Open Space Audit annual monitoring                             |   | Remedial action should be taken where there is a significant loss of open space as a result of new development | Environment Policy Team                                       | Annually in Open Space Audit Monitoring     | Review Aberdeen Planning Guidance on open space                        |

## **8. Conclusion**

It is our view that this SEA has had a positive effect on the development of the LDP. The SEA process has identified some possible negative effects on the environment - effects that were not anticipated at the start of the planning process. The process has, therefore, enabled mitigation measures, addressing identified significant negative environmental effects, to be incorporated into the Plan. With mitigation measures and ongoing monitoring of the significant effects of the Local Development Plan, it is considered that the options, policies, supplementary guidance, planning guidance and allocations in the Local Development Plan are the most suitable ones to allow for sustainable economic growth in Aberdeen in line with the requirements of the national policy. Through these mitigation measures significant negative impacts will be prevented, reduced or compensated for whilst implementing the strategy. Overall the environmental assessment has helped to guide our preference for developing options and alternatives, and it has helped us to reword the Local Development Plan and clarify the main policy issues. The Local Development Plan will need to take account of these mitigations measures during the implementation of the Plan. We believe the SEA process has been of significant help in developing a balanced Local Development Plan. This, in turn, will ensure that future development will support economic growth, protect and enhance the environment, even within extreme scenario of climate change, and make improvements to the social wellbeing of the residents of Aberdeen.