

Integrated Impact Assessment

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. The legislation considered within this assessment is:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Consumer Duty](#)
- Section 5 [Human Rights](#)
- Section 6 [Children and Young People’s Rights](#)
- Section 7 [Environmental impacts](#)

The term ‘policy’ is used throughout this document and applies to policies, proposals, strategies, provision, criteria, functions, practice, budget savings and activities that includes delivery of our services.

1. About the Policy

1.1 Title
Planning Permission in Principle Application 231371/PPP: Proposed business / industrial development (Class 4/5/6); road infrastructure; active travel connections; landscaping and environmental works including drainage and other infrastructure Land At Coast Road St Fittick's Park/ Gregness Headland/Doonies Farm Aberdeen (known as the Energy Transition Zone – ETZ)
1.2 What does this policy seek to achieve?
Seeks planning permission in principle for the development described above.
1.3 Is this a strategic programme/proposal/decision?
No - The strategic decision was taken at the time of adopting the Aberdeen Local Development Plan 2023, which allocates the land in question for the Energy Transition Zone. This was followed by the approval of a Masterplan for the ETZ area. An IIA was prepared for the ETZ Masterplan, which was approved by Full Council in January 2024.
1.4 Is this a new or existing policy?
No, approval of the application would create a new planning permission on the existing allocated sites -OP56 (St Fitticks Park) OP62 (Bay of Nigg) and OP61 (Doonies) and the associated Policy B5 (Energy Transition Zones) as identified on the ‘proposals map’ of the Aberdeen Local Development Plan (ALDP) 2023 and the adopted ETZ Masterplan.
1.5 Is this report going to a committee?
Yes
1.6 Committee name and date:
Planning Development Management Committee 7 November 2024
1.7 Report no and / or Budget proposal number and / or Business Case reference number:
Application Reference: 231371/PPP – CR&E/24/345.
1.8 Function and cluster:
City Regeneration and Environment – Strategic Place Planning

Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children’s rights and our socio-economic duty. This is our Public Sector Equality Duty (PSED). The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with [protected characteristics](#).

2.1 What impact could this policy have on any of the below groups?

Protected Characteristic	Negative			Neutral	Positive
	High	Medium	Low		
Age			X		
Disability			X		
Gender Reassignment				X	
Marriage and Civil Partnership				X	
Pregnancy and Maternity				X	
Race				X	
Religion or Belief				X	
Sex				X	
Sexual Orientation				X	

2.2 In what way will the policy impact people with these protected characteristics?

The planning application would grant permission for the principle of development on land which is allocated in the LDP. Open space, including recreational areas, woodland and play areas would be impacted by the development, particularly impacting young people and children and potentially those with disabilities. In accordance with the ETZ Masterplan, the planning application includes mitigation and enhancement measures

2.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

Scottish Index of Multiple Deprivation (SIMD) – see below

Scotland’s Census – see below

Adoption of the Aberdeen Local Development Plan 2023 by Council – Public Health Priorities for Scotland were considered in the LDP, with the LDP policies having been modified to bring health to the fore. The LDP supports the Local Outcome Improvement Plan 2016-2016 by creating a healthy environment and creating opportunities.

Health Impact Assessment as part of Environmental Impact Assessment for the planning application. This contains a community profile and health baseline and identifies loss of greenspace as the main outstanding issue and acknowledges that elsewhere in the EIA Report mitigations are proposed which would result in qualitative improvements to local open space and recreational facilities – as listed above.

SIMD data tells us that:

- residential areas to the east of St Fittick’s (Torry East data zone, southern section bounding St Fittick;

's Park) are amongst the most deprived 10% in Scotland overall and for employment, education and crime. Health, housing and income are the most deprived 20%.

- residential areas to the north east of St Fitticks (Torry East data zone, northern section bounding St Fitticks Park) are amongst the most deprived 20% overall, with crime in the most deprived 10%.

(It is noted that this pre-dates the RAAC issue which affects some housing in this zone).

Geographic access is higher than other indicators for both areas.

The whole of Torry, including Balnagask, scores in the most deprived 50%, with most areas in more deprived deciles.

Scotland's Census contains information on the basis of Electoral Ward (and other area location bases) including on health, disability, sexual orientation, demography, migration, ethnic groups, housing, religion.

The electoral ward of Ferryhill/Torry includes the application site, with some key points below:

In this ward more than one third of people follow a religion with more than a quarter being Christian. More than 1 in 10 people were born in the EU, with over half of those being born in Poland.

In terms of age, there are more people in their 20s, 30s and 40s than in other age ranges. The proportion of children (0-15 years) is approximately one in ten.

80% of people described their health as very good or good, with 5% bad or very bad. Poor health was in the older age groups predominantly.

In terms of car ownership 4,602 out of 11,170 households reported having no car or van.

Two hundred and thirty three (233no.)_representations have been received (221 of these are objections). A small number of those representations have made reference to a particular characteristic (age and disability) and the impact that this proposal may have on them and/or more broadly the impact on health and wellbeing.

What consultation and engagement has been undertaken with officers and partner organisations?

ACC Officers and partner organisations with the following areas of responsibility have been consulted:

- Torry Community Council
- Environment Policy
- Archaeology
- Transportation
- Planning
- Legal
- City Growth
- Flooding
- Environmental services
- Waste strategy
- Roads
- Environmental health
- Developer obligations
- SEPA
- NatureScot
- Health and Safety Executive
- Historic Environment Scotland
- Network Rail
- Scottish Forestry
- Port of Aberdeen
- Sportscotland
- Scottish Water
- North East Scotland Biological Records Centre
- Police Scotland
- Scottish Government
- RSPB

What consultation and engagement has been undertaken with people who may be impacted by this policy?

Neighbour notification took place and the application was advertised in the local press. Following receipt of further information on 16th July 2024, neighbours were re-notified, re-consultation took place and the application was re-advertised. Representations have been made by a total of 233 people. This includes 221 letters of objection and twelve (12no.) letters of support.

A Pre-Determination Hearing on the planning application was held with Members of the Planning Development Management Committee (PDMC) on 29th August 2024. A number of members of public from the local community, as well as the applicant and their agents made verbal representations. The minutes of that meeting are available here: <https://committees.aberdeencity.gov.uk/ieListDocuments.aspx?CId=348&MId=9460&Ver=4> Since the PDH, further information and clarifications have been sought from the applicant to address matters raised at the PDH.

Pre-application consultation was undertaken by the applicant in August 2023. Two public events were held and consultation materials was published online. The events were advertised in the press, with notices sent to Torry and Kincorth/Nigg/Cove Community Councils. A local flyer-drop advertising the event to c. 9,000 residential addresses within communities of Torry, Balnagask and Cove.

Circulation of a consultation event flyer via email to all attendees of previous ETZ Consultation Events that have provided contact details and wish to be kept informed about further consultations.

Circulation of a consultation event flyer to local community media and groups and organisations with capacity to circulate: SHMU/Torry Vision, Old Torry Community Centre, Altens Community Centre, Balnagask Community Centre, Tullos Management Committee, Torry Community Group, King’s Community Church, Tullos Community Garden, Old Torry Heritage Group, Torry Library, Cove Library, Greyhope Bay, Cultivate Aberdeen, Torry People’s Assembly, St Fittick’s Church, Jesus House, Sacred Heart Roman Catholic Church, Friends of St Fittick’s, Big Noise Torry, GREC, Balnagask Golf Club, Deeside Family Resource Centre.

A newspaper notice advertising the consultation arrangements and events was published at least 7 days before the events took place in accordance with Regulations.

As mentioned above, Two hundred and twenty one (221no.) number of objections have been received; some of which have made reference to a particular characteristic and the impact that this development may have on them or more broadly the impact on health and wellbeing.

2.4 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Mitigations and compensation are proposed in the form of:

1. Improvements to existing green and brownfield open spaces within Torry / Balnagask with final locations and design subject to community consultation;
2. St Fittick’s Church interpretation and repair works;
3. Path network enhancements within St Fittick’s Park inside and outside the site;
4. Improving water quality and habitat in and around East Tullos Burn;
5. Improving the path network and access to Tullos Wood, including legible entrance(s);
6. Enhancing play and recreational equipment and areas;
7. Enhancing habitats with pollinator planning and management for biodiversity in St Fittick’s Park;
8. Replacement sports pitch at Tullos School playing fields and enhancing recreational and leisure provision to complement existing Multi Use Games Areas (MUGA), subject to consultation with community;
9. Enhancement to coastal path connections leading northwards to Torry Battery and south via Gregness;
10. Enhancement / extension to the existing skate park;
11. Provision of ‘pump’ track;
12. Compensatory tree planting on and off-site.

With mitigations in place, what is the new overall rating of the negative impact(s)?

High	
Medium	
Low	

3: Socio-Economic Impacts

Aberdeen City Council has a duty to reduce the inequalities of outcome that can arise from socio-economic disadvantage. This section is used to consider what impact the policy may have on people experiencing socio-economic disadvantage – and how any inequalities of outcome arising from the policy can be reduced.

Use this guide to understand more on socio-economic inequalities: [The Fairer Scotland Duty: Guidance for Public Bodies \(www.gov.scot\)](http://www.gov.scot)

3.1 What impact could this policy have on people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
Low income – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.	X		
Low/ no wealth – those who have no savings for unexpected spend or provision for the future.	X		
Material deprivation – those who cannot afford or access goods or services that are considered essential or desirable for a decent quality of life, such as food, clothing, heating, transport, internet, cultural, recreational and social activities.	X		
Area deprivation – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.	X		
Socio-economic background – social class, parents’ education, employment, income.		x	

3.2 In what way will the policy impact people experiencing socio-economic disadvantage?

Loss of areas of existing greenspace and recreational facilities close to residential areas disproportionately affects people without cars, bicycles or other forms of transport as they are less able to travel to other parks and recreational facilities, lacking the means to access facilities and spaces further from home due to the costs associated with travelling away. Lack of warm and waterproof clothing makes longer trips to alternative greenspaces by active travel less desirable, especially in inclement weather. High crime levels may add to a perceived threat of insecurity especially during hours of darkness, the park would potentially be more enclosed by development and tree planting. Enhancement of other green spaces in the area by way of improved sports equipment, accessibility and environmental enhancements are however considered to be able to appropriately offset such impacts.

The wider ETZ project includes a skills campus providing leading edge education and training infrastructure that can support and enhance the local skills base. It will facilitate for education and skills development are energy transition technologies and industries, with potentially a positive impact on people experiencing socio-economic disadvantage.

3.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

Data as detailed above.

What consultation and engagement has been undertaken with officers and partner organisations?

Consultation as detailed above.

What consultation and engagement has been undertaken with people who may be impacted by this policy?

Consultations as detailed above.

3.4 What mitigations can be put in place?

What can be done to reduce any negative impacts of this policy (if applicable)?	
Mitigations and compensation are proposed in the form of:	
<ol style="list-style-type: none"> 1. Improvements to existing green and brownfield open spaces within Torry / Balnagask with final locations and design subject to community consultation; 2. St Fittick's Church interpretation and repair works; 3. Path network enhancements within St Fittick's Park inside and outside the site; 4. Improving water quality and habitat in and around East Tullos Burn; 5. Improving the path network and access to Tullos Wood, including legible entrance(s); 6. Enhancing play and recreational equipment and areas; 7. Enhancing habitats with pollinator planning and management for biodiversity in St Fittick's Park; 8. Replacement sports pitch at Tullos School playing fields and enhancing recreational and leisure provision to complement existing Multi Use Games Areas (MUGA), subject to consultation with community; 9. Enhancement to coastal path connections leading northwards to Torry Battery and south via Gregness; 10. Enhancement / extension to the existing skate park; 11. Provision of 'pump' track;. 12. Compensatory tree planting on and off-site. 	
Consideration of safety and security will be included in the assessment of detailed proposals for development on the sites at a later stage, including externally lighting.	
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains
	Yes – negative impact reduced
	Yes - negative impact removed
	X

4: Consumer Impacts

The Consumer Scotland Act 2020 places a Consumer Duty on the public sector to put consumer interests at the heart of strategic decision-making, emphasising the need for accessible and affordable public services, especially during times of financial pressure. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

This section of the IIA is used to consider the impact of the policy on consumers of any services that the policy is intended to change.

Use this guide to understand more on the consumer duty: [How to meet the consumer duty: guidance for public authorities](#)

4.1 What impact could this policy have on any of the below consumer groups?

	Negative	Neutral	Positive
Individuals			X
Small businesses			X

4.2 In what way will the policy impact people in these consumer groups?

There is a clear and deliverable commitment to deliver both on-site and off-site mitigation, working with local community and key stakeholders on detailed proposals. The wider ETZ project includes a skills campus providing leading edge education and training infrastructure that can support and enhance the local skills base. It will facilitate education and skills development in relation to energy transition technologies and industries. This proposals identify the potential of the ETZ to increase economic activity in the area and wider city and region. These include increasing local economic activity, employment and productivity for the long term benefit of the area, with potential wider socio-economic benefits that can contribute to health and wellbeing outcomes over time.

These are set out in more detail in the Statement of Community Benefit, including Jobs & Skills Plan which is included within the application.

4.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

N/A

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

5: Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of 'Articles'. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](#).

5.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 2: Right to life		X	
Article 4: Prohibition of slavery and forced labour		X	
Article 5: Right to liberty and security		X	
Article 6: Right to a fair trial		X	
Article 7: No punishment without law		X	
Article 8: Right to respect for private and family life, home and correspondence		X	
Article 9: Freedom of thought, belief and religion		X	
Article 10: Freedom of expression		X	
Article 11: Freedom of assembly and association		X	
Article 12: Right to marry and start a family		X	
Article 14: Protection from discrimination in respect of these rights and freedoms		X	
Article 1 of Protocol 1: Right to peaceful enjoyment of your property		X	
Article 2 of Protocol 1: Right to education		X	
Article 3 of Protocol 1: Right to participate in free elections		X	

5.2 In what way will the policy impact Human Rights?

Neutral

5.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?	
N/A	
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains
	Yes – negative impact reduced
	Yes - negative impact removed

6: Children and Young People’s Rights Impacts

The United Nations Convention has 54 articles that cover all aspects of a child’s life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.

Children’s rights apply to every child/young person under the age of 18 and to adults still eligible to receive a “children’s service” (e.g. care leavers aged 18 – 26 years old).

There are 4 articles known as the “General Principles”. They help to interpret the other articles. They are:

1. Non-discrimination (Article 2)
2. Best interest of the child (Article 3)
3. Right to life survival and development (Article 6)
4. Right to be heard (Article 12)

For ease, the articles have been grouped in three categories to support assessments against the Convention, those most directly related to the **PROVISION** of services, those most directly related to the **PROTECTION** of children and young people, and those to encourage their active **PARTICIPATION in decision making**. You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

6.1 What impact could this policy have on the rights of Children and Young People?

	Negative	Neutral	Positive
PROVISION			
Article 2: non-discrimination		X	
Article 3: best interests of the child provision and protection		X	
Article 5: parental guidance and a child's evolving capacities		X	
Article 16: right to privacy		X	
Article 17: access to information from the media		X	
Article 18: parental responsibilities and state assistance		X	
Article 22: refugee children		X	
Article 23: children with a disability	X		
Article 24: health and health services		X	
Article 26: social security		X	
Article 27: adequate standard of living		X	
Article 28: right to education		X	
Article 29: goals of education		X	
Article 30: children from minority or indigenous groups		X	
Article 31: leisure, play and culture	X		
Article 39: recovery from trauma and reintegration		X	
Article 40: juvenile justice		X	
PROTECTION			
Article 6: life, survival and development		X	
Article 7: birth registration, name, nationality, care		X	
Article 8: protection and preservation of identity		X	
Article 9: Separation from parents		X	
Article 10: family reunification protection		X	
Article 11: abduction and non-return of children		X	
Article 15: freedom of association		X	

Article 19: protection from violence, abuse and neglect		X	
Article 20: children unable to live with their family		X	
Article 21: adoption		X	
Article 25: review of treatment in care		X	
Article 33: drug abuse		X	
Article 34: sexual exploitation		X	
Article 35: abduction, sale and trafficking		X	
Article 36: other forms of exploitation		X	
Article 37: inhumane treatment and detention		X	
Article 38: war and armed conflicts		X	
Article 32: child labour		X	
PARTICIPATION			
Article 12: respect for the views of the child		X	
Article 13: freedom of expression		X	
Article 14: freedom of thought, belief and religion		X	
Article 42: knowledge of rights		X	

6.2 In what way will the policy impact the rights of Children and Young People?

Loss of greenspace, play and recreation areas, especially in an area of socio-economic disadvantage where families are less able to travel frequently away from home due to lack of transport and associated costs. The development proposal could adversely affect the right of Children and Young People to relax, play and take part in a range of activities which could also have an impact on their health and wellbeing.

6.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Replacement sports pitch and play equipment are included as mitigations, as well as extension to skate park and pump track subject to community consultation. Improvements to the quality of greenspace remaining in the park will result in a positive outcome for Children and Young People.

If mitigations are in place, does this remove or reduce the negative impact?

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

X

7: Environmental Impacts

Aberdeen City Council has a duty to meet its legal environmental responsibilities by working towards Net Zero emissions, adapting to climate change, and acting in a way it considers most sustainable. We must also fulfil the [biodiversity duty](#) and [sustainable procurement duty](#).

This section in the Integrated Impact Assessment demonstrates that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

Use this guide to understand more on the legal climate change duty: [Climate change - gov.scot \(www.gov.scot\)](#) and find out more about how Aberdeen is adapting to Climate Change: [Aberdeen Adapts | Aberdeen City Council](#)

7.1 What is the impact of this policy on any of the below climate, environmental and waste considerations?

	Negative	Neutral	Positive
Council or City-wide carbon emissions			X
Active and sustainable travel			X
Facilities for local living		X	
Resilience and adaptability to flooding and weather events		X	
Biodiversity improvement and wildlife/habitat connectivity			X
Water consumption and drainage	X		
Pollution (air, water, noise, light and land contamination)		X	
Impact on resource use and waste		X	
Sustainable procurement of goods and services		X	

7.2 In what way will the policy impact the environment?

The development will impact upon the existing course and setting of the East Tullos Burn watercourse, and will result in the formation of commercial development on areas that are currently semi natural grassland.

7.3 What considerations have been made in reaching the above assessment?

What internal or external data has been considered? What does this data tell us?

The application proposed has been assessed through the Environmental Impact Assessment process which is described in the EIA Report that accompanies the application. This covers: need for the project, description of proposal, alternatives considered, summary of environmental commitments and environmental assessment with the following:

- Biodiversity, ecology and nature conservation and Biodiversity Protection and Enhancement Plan
- Landscape Framework, Landscape and Visual Impact Assessment
- Tree Survey
- Population and Health Report
- Cultural Heritage Report
- Air Quality, Climate Change and Noise & Vibration
- Site investigations
- Flood Risk Assessment
- Drainage Assessment

What consultation and engagement has been undertaken with local groups, partner organisations, experts etc? Where required, identify any other environmental assessments that have been completed.

Consultation as outlined above for the planning application

7.4 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?	
<p>Range of mitigation measures as noted above.</p> <p>At detailed application stage a range of assessment will be required as part of further applications for Matters Specified in Conditions. These include detailed biodiversity plan, tree survey and tree planting to provide an overall increase in tree cover, landscape planting, air quality and noise assessments with any recommendations implemented, detailed flood risk and drainage assessment and measures recommended.</p>	
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains
	Yes – negative impact reduced
	Yes - negative impact removed
	X

8: Sign Off

Any further positive or negative impacts on individuals or groups that have been considered?	
No	
Does the policy relate to the Council's Equality Outcomes? If yes, how:	
Yes EO1 (as a service provider) The planning application and associated EIA Report have been prepared and consulted upon in an open, fair and inclusive manner adhering to the statutory requirements of the Planning (Scotland) Act 2006 and Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 which support the objectives of Aberdeen City Council' Equality Outcomes. The consultation process included a range of means of reaching people for them to obtain information about the application - these are detailed above.	No Unsure
Overall summary of changes made to the policy as a result of impact assessment.	
A range of mitigation measures are included in the application and further assessments will be required to be submitted as part of further detailed applications. The mitigation measures will be the subject of community consultation and further applications will be the subject of consultation with organisations and local community.	
Outline how the impact of policy will be monitored.	
The development proposal will be subject to further detailed applications based on a range of conditions that require further details to be submitted. These will be subject of planning applications as part of the statutory planning process.	
If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.	
N/A	

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Date	30 October 2024
Chief Officer	David Dunne
Date	30 October 2024