Our ref: PCS/158489
Your ref:

Aberdeen City Council
Planning and Sustainable Development
Business Hub 4, Marischal College
Broad Street
Aberdeen
AB10 1AB

If telephoning ask for:
Clare Pritchett

28 May 2018

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

Dear Sir/Madam

Aberdeen Local Development Plan
Pre MIR Consultation

Thank you for consulting us in respect of the Aberdeen Local Development Plan - Pre MIR Consultation. We have considered the questionnaire provided and have the following comments.

1.   Opportunities

1.1   We consider that the beach, the rivers, blue/green infrastructure, the parks and open spaces are all opportunities within Aberdeen City to be enhanced and look forward to working with you on identifying opportunities.

1.2   We understand that there is on-going work on mapping areas of value, including habitats, and we support the sharing of this information and incorporation into the development plan.

1.3   We understand that there is on-going work into the provision, including adoption and maintenance, of sustainable urban drainage systems (SUDS) and we would welcome the opportunity to be involved in this.

1.4   We agree that Aberdeen City should move towards the sustainable use of all resources, including waste, and we would welcome the opportunity to work with you on more innovative uses of waste and also on renewable energy use.

2.   Constraints

2.1   We recognise that the provision of drinking water and waste water drainage are potential constraints to development and look forward to working with Scottish Water on their proposals.

Scottish
Living
Wage
Accreditation

UKAS
MANAGEMENT
SYSTEMS
001

Chairman
Bob Downes

Chief Executive
Terry A'Hearn

SEPA Aberdeen Office
Inverdee House, Baxter Street
Torry, Aberdeen AB11 9QA
tel 01224 266600 fax 01224 896657
www.sepa.org.uk • customer enquiries 03000 99 66 99

2.2   We recognise that areas at risk of flooding, including coastal areas, are constraints to development and look forward to working with you on identifying these areas.

3.   Data Sources & Environmental Baseline Information

3.1   SEPA holds significant amounts of environmental data which may be of interest to you in preparing the environmental baseline, identifying environmental problems, and summarising the likely changes to the environment. Many of these data are now readily available on SEPA's website. Additional local information may also be available from our Access to Information unit at our Corporate Office (Telephone 01786 457700 or email dataenquiries@sepa.org.uk). Other sources of data for issues that fall within SEPA's remit are referenced in our SEA topic guidance notes for air, soil, water, material assets and human health.

3.2   The attached information note provides:

- an overview of the issues that SEPA would want to be addressed within the Plan (section 1);
- sources of information and guidance we hold that should assist you in shaping the Main Issues Report and baseline information for the SEA (sections 2 – 6); and,
- advice on how proposed allocations are presented for consultation to enable us to provide the most timely and useful feedback (section 7).

3.3   We request that you also reassess and consult us on existing allocations without development consent you propose to retain in the updated plan, within the context of current information and policy, as advised in PAN 1/2010 and Scottish Government flood risk guidance (June 2015).

Should you wish to discuss this response, please do not hesitate to contact me on 01224 266609 or planningaberdeen@sepa.org.uk.

Yours sincerely

Clare Pritchett
Senior Planning Officer
Planning Service

Annex 1: SEPA Local Development Plan Information Note

1. SEPA development plan guidance
We have produced a series of topic based guidance documents to support the preparation of development plans. The guidance outlines the types of issues that we would expect to see covered in a plan. It covers five topic areas which are available through the following links:

- Flood risk;
- Sustainable resource use including zero waste, district heating and heat networks and renewable energy;
- Water environment;
- Soils; and,
- Air quality and co-location.

The topic guidance is supported by background papers that include useful contextual information including links to key documents and other sources of information for three of the topics.

Development plans have an important role in addressing climate change. Climate change is a cross cutting issue that affects all development plan policy areas. We have prepared a planning information note on how our guidance can help your development plan contribute to reducing greenhouse gas emissions and increase our resilience to climate change.

2. SEA Scoping
We have produced guidance in relation to the SEA topics of air, soil, water, material assets and human health. These guidance notes provide advice on:

- Identifying potential significant effects;
- Locating information sources for baseline and assessment purposes;
- Identifying other relevant plans, programmes and strategies;
- Establishing SEA objectives; and
- Developing mitigation and monitoring measures.

In addition an assessment proforma has been developed by the Consultation Authorities with input from a number of planning authorities. The assessment proforma provides a suggested checklist aimed at integrating DP and SEA site assessment processes and can be found on our website here. The proforma is a suggested checklist and is not intended to be used prescriptively.

3. SEPA Policies and Planning Guidance
SEPA policy and guidance documents provide useful background information that can assist with the production of topic papers and the Main Issues Report. They provide further information as to our priorities and position with regards key environmental issues. Useful links are provided below.

SEPA Corporate Plan   SEPA Corporate Plan 2012-2017
SEPA Policies e.g. Groundwater Policy Policies	Scottish Environment Protection Agency (SEPA)
SEPA Planning Guidance   www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes

3.1 Strategic Flood Risk Assessment (SFRA) Guidance
SEPA has produced a specific guidance document with regards SFRA and is available from the link below. This technical guidance has been produced by us to ensure planning authorities to make use of Strategic Flood Risk Assessment (SFRA) as a practical tool to help deliver real change in managing flood risk early on in the development plan process and feed into the SEA

findings.
http://www.sepa.org.uk/media/143351/lups-gu23-strategic-flood-risk-assessment-sepa-technical-guidance-to-support-development-planning.pdf
SFRA is designed for the purposes of informing the development planning process, primarily, to avoid increasing overall flood risk by avoiding areas of flood hazard. It constitutes a strategic overview of flood risk to the development plan area and should involve the collection, analysis and presentation of all existing available and readily derivable information on flood risk from all sources. It should be used to apply the risk based approach to the identification of land for development and for the development of policies for flood risk management, including surface water management. Planning authorities should prepare SFRA in consultation with us and other stakeholders with an aim to achieving co-ownership of the assessment.

3.2 Land Use Vulnerability Guidance

This guidance provides a framework to assist the assessment of the vulnerability of different types of land use to the impact of flooding and may therefore be useful during the risk assessment of potential site allocations. The guidance was developed through our Flood Risk and Land Use Planning Working Group which includes representatives from the Built Environment and Environment Divisions of the Scottish Government and the Heads of Planning Scotland. A link to the document on our website is provided below.
http://www.sepa.org.uk/media/143416/land-use-vulnerability-guidance.pdf

4. SEPA data for the Aberdeenshire area

We can provide the following information which is bespoke to your plan area. A brief description of each data source and how it can be used in the development plan process is provided.

4.1 Water environment / River Basin Planning data

We endeavour to provide Authorities with the most up to date information available in respect of the water environment in their area.

Mapped data supporting the River Basin Planning process is available and provides details of the overall classification of Scotland's water bodies, the pressures affecting them and the causes of these pressures. Data shown is the best currently available. This information will require to be considered in preparing development plan policies and considering site allocations. The data will aid Authorities in discharging their duties to "protect" and "improve" the water environment under 2(1) & 2(2) of the Water Environment and Water Services (Scotland) Act 2003. The data can also be useful as baseline information and in identifying existing environmental problems relating to the water environment to inform the SEA process. . Updated data sets are currently being verified and will be released, together with a new suite of agreed improvement measures in support of the finalised 2nd River Basin Plans (by Dec 2015)".

4.2 Data available for use on your GIS system

The following SEPA layers are all derived from the Ordnance Survey Panorama 1:50k dataset:
- Loch water bodies
- Transitional water bodies
- Coastal water bodies
- Groundwater bodies

The Panorama dataset is available free of charge from Ordnance Survey under Open Data terms and conditions. Contact should be made with your authority's One Scotland Mapping Agreement (OSMA) representative to obtain these terms and conditions (they are generally in the GIS team but may be planning or roads transport). If you wish to request the above layers please submit your request to dataenquiries@sepa.org.uk

- River water bodies

If you would like the river water body information to put on your own internal GIS systems to map with other constraints and information a licence is required for the CEH DRN. The reason for this is that the data is derived from the CEH 1:50k digital river network (DRN) and we cannot supply them to any third party unless you also have a relevant licence.

Your Environmental Health colleagues may already have a licence to use these maps. If your authority already holds a licence for the CEH DRN and wish to request the river water bodies GIS layer you can send a scanned version of your licence along with your request to dataenquries@sepa.org.uk .

If your organisation does not have a licence and one needs to be bought from CEH contact should be made with CEH via spatialdata@ceh.ac.uk (contact at CEH is Oliver Robertson, 01491 692342). Once you have obtained a licence please mail your data request and scanned copy of the licence to dataenquries@sepa.org.uk

The licence fees varying dependent on the geographical extent of data required. Some local authorities have already bought a licence while others are waiting to see if the issue can be resolved nationally. It has been raised with the Scottish Government, but no solution has been reached so far.

- Groundwater Vulnerability Maps

The groundwater classification maps have recently been updated. British Geological Survey are in the process of making the new maps available externally on a new server, it is expected that this work will be completed imminently

4.3 Waste Infrastructure Mapping
Our Waste Sites and Capacity Tool provides an interactive waste mapping tool that allows users to view existing landfill and waste management facilities within Scotland. This tool allows users to search for waste facilities using various criteria including local authority and/or waste facility type and can be accessed here:
http://www.sepa.org.uk/data-visualisation/waste-sites-and-capacity-tool/

This mapping tool is based on SEPA's Waste Sites and Capacity annual reports and Landfill Sites and Capacity reports which list the licensed/permitted waste management facilities in Scotland. The annual reports (i.e. spreadsheets) are published on our website here:
http://www.sepa.org.uk/environment/waste/waste-data/waste-data-reporting/waste-site-information/waste-sites-and-capacity-excel/

This interactive map shows existing waste management facilities in Scotland, and can be used to inform the development plan preparation. Use this tool to show the location of each waste facility in the area regulated by us and review information about the site. To obtain this information:

1. Open the interactive mapping tool using the website above.
2. Click the 'All Waste Sites Map'.
3. Click the relevant waste facility or all waste facilities from the upper left hand box.
4. Click on the relevant Local Authority from the lower left hand box.
5. Each facility will display as a coloured symbol. Zoom to the appropriate location.
6. Click the select button (white mouse icon) then click and hold to highlight all waste management facilities in the area. A table will appear below the interactive map showing various attributes for each waste management facility including: site details, operator, capacity, inputs/outputs and permit /license details.
7. Right click on the map and chose 'Export Visualization Image' to save a PDF of the relevant waste facilities and background mapping.
8. This process can be repeated by clicking on the 'Landfill Map' to review all licensed landfill

sites.

9. Alternatively, additional waste and capacity information for each site can also be obtained from the annual report spreadsheets discussed above.

This data can be used to ensure that waste management facilities in your area are protected from inappropriate neighbouring developments through the development plan process, by identifying the waste management sites in the proposed plan, and supporting their continued waste management use by incorporating appropriate policy wording within the development plan. In addition the identification of sites in the plan could also highlight opportunities, for example, for appropriate co-location of surplus heat users or processing industries which could utilise separated recyclates etc.

These data can also be used to identify baseline information and existing environmental problems with regard to the waste element of the material assets topic for use in the SEA.

5. Other data, advice and guidance
The table below summarises information available to download from our website which may be useful in defining the baseline environmental information and identifying existing environmental problems for the SEA.
In addition external sources of baseline information for SEA can be found in:

- Scottish Government SEA pages with links to relevant detailed guidance documents: http://www.scotland.gov.uk/Topics/Environment/environmental-assessment/sea
- **Scotland's Environment Web** which aims to provide in once place information on the state of Scotland's environment: www.environment.scotland.gov.uk/
- **Scotland's Soils website** which has key facts regarding soils functions and pressures and interactive maps and datasets which can be downloaded: http://www.soils-scotland.gov.uk/

State of the Environment Reports – For Air, Water, Soil and Scotland http://www.environment.scotland.gov.uk/get-informed/state-of-the-environment-summary/what-is-the-state-of-the-environment-report/
Climate Change Information http://www.sepa.org.uk/environment/climate-change/
River level data http://www.sepa.org.uk/environment/water/water-levels
Flood information http://www.sepa.org.uk/environment/water/flooding/
Catchment Management Plans – e.g. such as the Spey Catchment Plan
Waste Strategy/waste data reports – e.g. Waste Data Digests providing information about waste arisings http://www.sepa.org.uk/environment/waste/waste-data/
Scottish Pollutant Release Inventory (SPRI) – is a database of pollutant releases to air, water and land from SEPA regulated industrial sites http://www.sepa.org.uk/environment/environmental-data/spri/
Scottish Air Quality Database (SAQD) http://www.scottishairquality.co.uk/data/
Air Pollution Information System Air Pollution Information System	APIS

6. Potentially Vulnerable Area Information
Based on the National Flood Risk Assessment, we have identified Potentially Vulnerable Areas (PVAs) where the potential impact is sufficient to justify further assessment and appraisal of flood risk management actions. This required the setting of a threshold above which the total impact of

floods in a given area is considered nationally significant due to the presence of, for example, strategic transport infrastructure or community infrastructure such as a hospital. These PVAs are based on catchments and are available to view from the link at the bottom of this section.

It is important to note, not all properties within a PVA are at risk of flooding and conversely not all properties outwith a PVA are free of flood risk. Detailed measures to address flood risk within these catchments will come forward through the Flood Risk Management Plans due out in 2015.

http://www.sepa.org.uk/environment/water/flooding/flood-risk-management/national-flood-risk-assessment/

The Flood Map is the main source of SEPA information and your authority has a copy of planning subfolder which contains the relevant layers and should be utilised to ensure that strategic development areas and allocations avoid areas at risk of all sources of flooding.

http://www.sepa.org.uk/environment/water/flooding/flood-maps/

7. Information requirements for screening potential sites

In order that we can provide you with comprehensive, accurate comments throughout the development plan process regarding potential sites we need you to provide us with the following information for all proposed allocations. It is important that this includes sites that have previously been allocated for development in the adopted plan, to enable their continued effectiveness to be reassessed (for example, in light of new information relating to flood risk).

1) GIS shape files – this will allow us to review each site against the environmental information we hold for the area to identify any potential constraints. As a minimum the shape files must show the boundary of each site and include the site reference as an attribute.

2) Site details – the following information should be provided for each site. For ease, we have attached a basic excel spreadsheet to this letter with the necessary headers pre-populated. You are welcome to use the provided spreadsheet or supply the information in your own format (preferably excel file). Your GIS colleagues may be able to extract some of this data from the information tables associated with the GIS shapefiles.

- Site Reference
- Previous Reference (including, where applicable, for allocations in existing LDPs)
- Settlement
- Site Name
- Easting
- Northing
- Proposed land use
- Preferred site or not
- Planning permission status
- Undeveloped or previously developed

In order that we can upload the information into our Interactive GIS in house please can you complete and return to planning.aberdeen@sepa.org.uk the Local Authority data form attached to this letter in Annex 2.

Given the complexity of the task that we undertake to assess the sites with internal consultees we ask for a consultation period of 6 weeks and that the sites have been pre-screened with only viable sites being submitted for consultation where possible.

Due to past experience we recommend that a table is kept within your authority of all the reference numbers/ names used for each site from the outset of the process. The provision of this information to us at the later stages of the DP process makes matching up previous comments a lot more straightforward.

Annex 2: Local Authority Data Form

In order to upload the Local Development Plan site shapefiles onto our GIS system we require the following detailed dataset information for all proposed site allocations (including any sites allocated for development in the adopted plan). Please fill in the tables provided below.

Please note that our system will only allow us to have a single legend for development plan sites. If you have separate layers for each land use (e.g. residential, mixed use and economic etc.), you will need to amalgamate the dataset prior to sending it into us.

1) Meta Data Details

Dataset	e.g. XX Council Local Development Plan Sites
Abstract	Insert brief description of dataset e.g. preferred and non-preferred sites for the X LDP e.g. site allocations for the X LDP
Location	SEPA GIS to complete this section
Availability	Internal uses only. Request for the data should be directed to <insert Council>
Attributes	
Filename	SEPA GIS to complete this section
Coverage	Insert Council Area
Data Supplier	Insert Council name
Digitised By	Insert Council name
Source	e.g. XX Council Local Development Plan
Source Scale	e.g. 1.1250
Source Date	e.g. December 2012
Dataset Status	Is this a finalised dataset or are updates on-going?
Update Frequency	If you intend to update the dataset, what is the frequency? (e.g. annually, infrequently, never etc.).
Spatial Reference	e.g. British National Grid
Creation Details	e.g. Data captured by X Council.
Internal SEPA Contact	SEPA to complete - insert name of main planning service contact

2) Attribute Details

Please complete this table with the attribute headings contained in the attributes table accompanying the dataset. As a minimum we required a site reference, name and proposed landuse. To allow us to check these details an extracted copy of the attribute table should also be sent into us.

Attribute	Description

* Please insert additional rows if required.
* Completed examples of this table are provided on the next page.

Attribute Details - Example 1

Attribute	Alternative Title	Description
Area (hectares)		Area of the site in hectares.
Policy type		Type of land use proposed for the site.
Site Number		Reference number for planning site.
Site		Name of site.

Attributes Details - Example 2

Attribute	Alternative Title	Description
Trans		Transparency of fill in layer file
Site_ref		Site reference as shown within the Aberdeenshire Local Development Plan at xxxx stage
District		District where the allocation is located.
Settlement		Settlement where the allocation is located
Cfs_Ref		Reference used from the Call for Sites in [date]
Site_Type		Proposed Use of the Site
Devt_plan		Name of Development Plan site
Id		Unique ID

3) Information Package
When complete please forward the following information to planning.aberdeen@sepa.org.uk:
- Completed form detailing metadata and attributes details
- A copy of the attributes table attached to the shapefiles for us to check
- The shapefiles