

Post-adoption Statement for Aberdeen Local Development Plan 2017

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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Date

20 January 2017

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>

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1. Key Facts

Name of Responsible Authority	Aberdeen City Council
Title of the PPS	Aberdeen Local Development Plan 2017
What Prompted the PPS	Planning & etc. (Scotland) Act 2006
Subject	Land Use
Period Covered by the PPS	2017-2026
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	20January 2017
Contact Point	Donna Laing Planning and Sustainable Development Communities, Housing & Infrastructure Aberdeen City Council Business Hub 4, Ground Floor North Marischal College, Broad Street Aberdeen AB10 1AB 01224 523512

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 and the Scottish Ministers (Historic Scotland), now 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.

We consulted on the Interim Environmental Report and the Main Issues Report at the same time for a period of 10 weeks from 13 January 2014 to 24 March 2014. Similarly, we also consulted on the Environmental Report and the Proposed Local Development Plan for a period of 12 weeks from 20 March 2015 to 1 June 2015. Both the Interim Environmental Report and the Environmental Report were made available online, in local libraries, and at the Council's headquarters.

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"> 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. The necessity of addressing the relationship between construction and burning of biomass on the one hand and the release of particulate matter. 	Yes	<ul style="list-style-type: none"> 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. The Supplementary Guidance on Air Quality and Policy T3: Sustainable and Active Travel in the LDP seeks in part to address air quality issues in the City. 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.
Water	<ul style="list-style-type: none"> The importance of maintaining and improving water quality and water environment resulting from run off or the release of pollutants. The need to ensure that water abstraction does not have negative effects on water quality. The necessity of avoid development on land at risk from flooding and the need to adapt to future climate impacts. 	Yes	<ul style="list-style-type: none"> Policy NE6: Flooding, Drainage and Water Quality, Policy NE7: Coastal Planning; Supplementary Guidance on Flooding and Drainage, and Open Space have been designed with water quality in mind. In addition mitigation measures in the SEA will be taken into account when applications are considered. 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. The Plan avoided allocating development located on land at risk from 1 in 200 year flood events or greater.
Soil	<ul style="list-style-type: none"> The need to avoid contamination of land through development and support development that remediates existing contaminated land. The necessity of recycling waste and reducing the amount of waste that goes into the landfill. 	Yes	<ul style="list-style-type: none"> The Plan, through Policy R2: Degraded and Contaminated Land positively promotes the redevelopment of contaminated site subject to remediation. Additional facilities for recycling have been identified in the Plan through Policy R4: Sites for New Waste management Facilities and Opportunity Site 13, Opportunity Site 54 and Opportunity Site 107.

<p>Biodiversity Flora and Fauna</p>	<ul style="list-style-type: none"> • The necessity of reversing the decline in biodiversity as a result of land use, development and climate change. • The need to avoid development within the catchment of sensitive sites. 	<p>Yes</p>	<ul style="list-style-type: none"> • 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 NE8: Natural Heritage, • 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 NE1: Green Space Network, Policy NE3: Urban Green Space,
<p>Climatic Factors</p>	<ul style="list-style-type: none"> • The relationship between increased burning of fossil fuel and climate change • The necessity of minimising Aberdeen’s global footprint. • The link between our contributions to the changing climate and potential future unpredictable weather events, hotter summers and wetter winters. • This link between climate change and increased risk of flood events. • The necessity of protecting land and properties vulnerable to future flood risk through adaptation 	<p>Yes</p>	<ul style="list-style-type: none"> • The strategy has policies/supplementary 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 by Design, Policy T2: Managing the Transport Impact of Development, Policy T3: Sustainable and Active Travel, Policy NE5: Trees and Woodlands, Policy NE6: Flooding, Drainage and Water Quality, Policy R5: Energy from Waste, Policy R8: Renewable and Low Carbon Energy Developments • 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 R7: Low and Zero Carbon Buildings, and Water Efficiency and the Supplementary Guidance: Resources for New Developments. • The Plan does not permit allocating development on land at risk from 1 in 200 year flood events or greater.
<p>Cultural Heritage</p>	<ul style="list-style-type: none"> • The need to protect and, where appropriate, enhance or restore the historic environment • The necessity of improving the enjoyment and understanding of the historic environment • The need to recognise that future development could damage some historical features. 	<p>Yes</p>	<ul style="list-style-type: none"> • The Plan safeguards historic assets and incorporates guidance set out in the former Scottish Historic Environment Policy now Historic Environmental Scotland Policy Scottish Statement June 2016, identifying Conservation Areas and considering the effects of new development areas on the historic environment and its setting. • The plan supports the appropriate development or use of historical buildings. • Policy D4: Historic Environment and Policy D5: Our Granite Heritage, Policy D2: Landscape, Supplementary Guidance on Windows and Doors, Shopfronts and Signs and Stone Cleaning and Technical Advise Notes on Conservation Areas Character Appraisals, are some of the initiatives in the LDP

Landscape	<ul style="list-style-type: none"> • 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. 	Yes	<ul style="list-style-type: none"> • 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. • Policy NE2: Green belt and Policy D2: Landscape, Supplementary Guidance on Landscape seeks to protect Aberdeen's landscape.
Material Assets	<ul style="list-style-type: none"> • 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 • Linking development to existing infrastructure network does not only maximise resources but also addresses climate change problems • The link between recycling and use of material assets, • The potential for re-using recycled construction material 	Yes	<ul style="list-style-type: none"> • The plan identifies the required investment in material assets to support new development. • Policy I1: Infrastructure Delivery and Planning Obligations, , Supplementary Guidance: Planning Obligations, , Policy CF1: Existing Community Sites and Facilities and Policy CF2: New Community Facilities.
Population	<ul style="list-style-type: none"> • The need to support development that meets the needs of a future population, including jobs, homes and facilities. • The need to meet the needs of a increasing, ageing and diverse population in the City 	Yes	<ul style="list-style-type: none"> • 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. • Policy LR1: Land Release Policy, Policy LR2: Delivery of Mixed Use Communities, NC1: City Centre Development – Regional Centre, NC4: Sequential Approach and Impact, Policy B1: Business and Industrial Land, Policy B2: Specialist Employment Areas, Policy H1: Residential Area, Policy H2: Mixed Use Areas, Policy H4: Housing Mix, Policy H5: Affordable Housing, Policy H6: Gypsy and Traveller Caravan Sites, Policy H7: Gypsy and Traveller Requirements for New Residential Developments, Policy CF1: Existing Community Sites and Facilities and Policy CF2: New Community Facilities.
Human Health	<ul style="list-style-type: none"> • The link between urban green space and human well being • The link between sports and recreational facilities and active lifestyle of the population • The link between multiple deprivation and worsening human health • The link between, diabetes, high blood pressure, cardiovascular diseases and inactivity 	Yes	<ul style="list-style-type: none"> • 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 NE3: Urban Green Space. • The plan supports implementation of open space strategy and nature conservation strategy.

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 83 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 Topic	Findings from Environmental Report	Integrated into the Plan?	How integrated/Taken into Account or Reason for not being Taken into Account	When should mitigation be considered?
Air	<ul style="list-style-type: none"> • If the development of new homes causes more use of the motorcar, then congestion on the roads will be exacerbated and air quality standards will be compromised in some areas. Specifically within Air Quality Management Areas. • During the implementation phases of the LDP, housing construction is likely to have short-term negative impacts on air quality. • Cumulatively and individually developments are likely to have short term negative impacts on air quality from local dust nuisance given that PM10 measured in various parts of the city exceed 2010 Scottish annual mean objective. 	Yes	<ul style="list-style-type: none"> • Policy T2: Air Quality and supplementary guidance will be strictly applied. • All the allocations that have a negative affect on air quality will be required to comply with policy NE10 and supplementary guidance. • All of those sites that have been identified as having the most significant impact have been removed from the plan and are contained only as alternatives. • The LDP team will work with officers implementing local and regional strategies to encourage the integration of developments into the existing road network and to support the education strategy on modal shift. • Through the Air Quality Action Plan 2011 and the actions within the Local Transport Strategy. • Increased tree planting, street trees and wooded areas 	Through the development management process. When developing masterplans, local housing strategy, local transport strategy.

			will go some way to offset poor air quality. Policy NE5: Trees and Woodlands and the associated supplementary guidance presumes there will be no loss of, or damage to, trees and woodlands through development	
Water	<ul style="list-style-type: none"> • Development will have a negative impact on water quality and will increase water abstraction from the River Dee. Policies in the plan will protect water quality and the River Dee, but the plan is likely to have significant impacts on water. • Development in close proximity to the River Dee SAC is likely to have short term reversible negative impacts on water quality as a result of pollution. • Negative impacts on water quality where development is taking place in close proximity to water bodies. Especially during construction phases. • Within the assessments particular sites have been identified as having or being close to land at risk from flooding. • Impact on water quality if new development connects to water and waste water infrastructure that is at or near capacity. 	Yes	<ul style="list-style-type: none"> • Policy NE6 Flooding, Drainage and Water Quality and associated Supplementary Guidance on Flooding, Drainage and Water Quality and Supplementary Guidance on Natural Heritage will provide mitigation for the effects of development. All allocations that have been identified as having a significant impact on water quality will be required to comply with these policies. • All sites substantially at risk from flooding have been removed from the plan and are included only as alternatives. There are exceptions to this, but these are included on the basis that development on these areas does not take place on the land at risk from flooding. • Where the assessment has identified a significant flood risk these areas of sites have been identified as greenspace network. In addition the Natural Heritage Supplementary Guidance provides protection to all areas that have or are close to water courses. Also for sites with an identified flood risk this has been identified in Appendix 2 of the Local Development Plan. • Policy I1: Infrastructure Delivery and Planning Obligations details the infrastructure requirements for new developments, and where development cannot be accommodated in existing infrastructure there is a requirement to upgrade or provide new facilities. • In view of the potential significant negative impacts during implementation, EIA will be submitted before developments commence, and where appropriate, Habitats Regulation Assessment of sites that may impact on the River Dee SAC will be undertaken. • We will increase the resilience to future increases in precipitation flood risk and flooding by: avoiding development on areas at flood risk, use of SUDS, ensuring new infrastructure is not at risk of flooding and use of permeable surfaces. 	<p>Through the development management and EIA process.</p> <p>During the Habitats Regulation Assessment</p>

			<ul style="list-style-type: none"> • A Habitats Regulation Assessment has been undertaken to ensure that the risk to the conservation status of the River Dee SAC has been minimised, and policies are included in the plan to ensure that development does not affect the River Dee's status. A Habitats Regulation Assessment will be required for developments in close proximity to the River Dee. • Increased green infrastructure, provision of natural flood plains, wetlands and trees will increase rainfall intervention and slow the rate of runoff. 	
Soil	<ul style="list-style-type: none"> • The implementation of the LDP is likely to have negative affects on soil through soil erosion, desegregation, compaction and contamination of greenfield sites. There would be positive impacts where development carries out remediation of contaminated land. • Short term impacts on soil quality during construction of development sites, specifically Greenfield developments. This will have long term irreversible impacts. • Brownfield development has the potential to have positive impacts on soil quality where there is the requirement for remediation of contaminated land. • Increase waste and landfill. • Development on land at risk from flooding or coastal erosion. 	Yes	<ul style="list-style-type: none"> • In order to reduce waste to landfill, Policy R5: Energy from Waste and Policy R6: Waste Management Requirements for New Development provides a spatial framework for new waste facilities such as: recycling, composting and thermal treatment. • Areas of land that are at risk from coastal erosion and flooding have not been included in the Plan for development and are only identified as alternatives, apart from the exceptions noted in the Water quality above. Policy NE7: Coastal Planning does not permit development in areas at risk from coastal erosion. • Policy NE5: Trees and Woodlands provides protection to native woodland to increase resilience to erosion and landslides. • Developments are encouraged to make use of construction waste to reduce landfill as per Policy R6: Waste Management Requirements for New Development. • In view of the potential significant negative impacts during implementation, EIA will be submitted before developments commence where appropriate. • Ensure that development undertakes remediation when required. Policy R2: Degraded and Contaminated Land will ensure that this is undertaken. • Increased housing density will decrease land take and thus decrease the amount of soil sealing. Policy H3: Density outlines the expected density. • Supplementary Guidance: Resources for New Developments has been produced to ensure recycling 	Through the development management and EIA process.

			and composting arrangements are available in new development to reduce landfill.	
Biodiversity Flora and Fauna	<ul style="list-style-type: none"> • Most of the developments may take place on greenfield sites. This will have long-term negative impacts on habitat loss (green space, open space, greenbelt and the countryside around the City), habitat fragmentation and vegetation removal. • In areas where there are designated sites there may be significant impacts on biodiversity, flora and fauna. • Within the River Dee SAC catchment there development has the potential to impact on biodiversity. • Development in close proximity to water bodies is likely to have long-term irreversible negative affects on biodiversity. • Developments in close proximity to natural heritage designations and trees and woodlands have the potential to cause long term negative affects on biodiversity as a result of the loss of habitats. • Policies included in the ALDP that have the potential to enhance natural heritage within new development areas through habitat creation. 	Yes	<ul style="list-style-type: none"> • Policies NE1: Green Space Network, NE2: Greenbelt, NE3: Urban Green Space, NE4: Open Space Provision in New Development, NE5: Trees and Woodland, NE6: Flooding, Drainage and Water Quality, NE7: Coastal Planning, NE8: Natural Heritage provide protection to biodiversity and developments that may have significant impacts on biodiversity are required to strictly comply with these policies. • Where policies that support development have a negative affect on biodiversity they will be overridden by the natural environment and open space policies. • Those proposals with significant impacts on biodiversity have been removed from the plan and are only alternatives. • Where the assessment has identified a natural heritage designation these areas of sites have been identified as greenspace network to provide protection. • In view of the potential significant impacts on biodiversity, developers will be required to undertake EIA prior to commencing some developments. EIA would address issues such as creation of wildlife corridors, habitat management and greenspace network. Where greenfield land is allocated, consideration will be given to improving housing densities. An “appropriate assessment” will be carried out where development projects are likely to cause a significant impact on the River Dee SAC and its qualifying species. Masterplans can also address this issue. • A Habitats Regulation Assessment has been undertaken to ensure that the risk to the conservation status of the River Dee SAC has been minimised, and policies are included in the plan to ensure that development does not affect the River Dee’s status. A Habitats Regulation Assessment will be required for developments in close proximity to the River Dee. • New development should compensate for any biodiversity loss and advocating high quality green 	Through the development management and EIA process. Masterplanning. Habitats Regulation Assessment

			<p>infrastructure within masterplanning and working with the grain of nature should also ensure that biodiversity is considered and incorporated in developments. (Policy NE3: Urban Green Space, NE4: Open Space Provision in New Development)</p> <ul style="list-style-type: none"> • Developments in close proximity to designated sites should have an appropriate buffer zone to ensure that they do not abut these important wildlife habitats. (Policy NE8: Natural Heritage and supplementary guidance on Natural Heritage). 	
Climatic Factors	<ul style="list-style-type: none"> • Increased carbon footprint as a result of an increase in the use of resources from future development. • New developments will have negative affects on the climate as they will increase the demand for energy and to travel. In particular increase in the use of the motor car. • New developments will be required to be more efficient than current buildings and there will be an increased requirement for renewable energy. • The scale of allocations means there is increase potential for decentralised energy and power, which would add to CO2 reductions. • New developments close to areas at risk from flooding will exacerbate impacts of climate change. Specific negative affects have been identified where sites have water bodies on or in close proximity to. • The delivery of local services facilities and a mix of housing and employment reduce the need to travel by car and have a positive affect on climate. • Protecting trees and woodlands through policy will prevent soil disturbance and reduce the likelihood of flooding. 	Yes	<ul style="list-style-type: none"> • Transport Policies T2: Managing the Transport Impact of Development, T3: Sustainable and Active Travel Supplementary Guidance: Transport and Accessibility and Policy D1: Quality Placemaking by Design promote development that reduces the need to travel. Also Policy LR2: Delivery of Mixed Use Communities seeks to deliver mixed use communities and reduce the need to travel. • Policy T2: Managing the Transport Impact of Development requires development to make provision for transport using the modal hierarchy with the motor car at the bottom. Further to this the policy and Supplementary Guidance on Transport Accessibility seek to make changes in how people choose to travel. • The plan supports the use of brownfield land for development as it is in a sustainable location. • All sites substantially at risk from flooding have been removed from the plan and are included only as alternatives. There are exceptions to this, but these are included on the basis that development on these areas does not take place on the land at risk from flooding. • Through the strategy the plan is aiming to make the most efficient use of infrastructure to reduce the need for additional facilities and associated emissions. • Policy R7: Low and Zero Carbon Buildings, and Water Efficiency and Supplementary Guidance: Resources for New Developments promotes energy efficiency in new developments and the use of passive measures to reduce energy requirements. 	When developing masterplans, local housing strategy.

			<ul style="list-style-type: none"> • Policy H3: Density promotes higher densities, reducing land take. • Policy NE5: Trees and Woodlands and Supplementary Guidance: Trees and Woodlands protects trees and promotes tree planting. • Policy R8 supports renewable developments in appropriate locations. • Policy R7: Low and Zero Carbon Buildings, and Water Efficiency requires micro generation. Through this policy and supplementary guidance the use of decentralised energy and heat is also promoted. • The LDP team will work to achieve developments that are more efficient and make use of renewable technologies. The LDP team will work with officers implementing local and regional strategies to encourage the integration of developments into the existing road network and to support the education strategy on modal shift. • Where the assessment has identified a significant flood risk these areas of sites have been identified as greenspace network. In addition Supplementary Guidance: Natural Heritage has been prepared to provide protection to all areas that have or are close to water courses. 	
Cultural Heritage	<ul style="list-style-type: none"> • Implementation of the LDP may have direct impacts on the historic environment including loss and or damage to historic buildings and remains, and affect the setting or the context. Features include: ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes, as well as marine heritage. Through the use of design policies and policies to enhance the historic environment there could be positive affects. • Significant amounts of Greenfield development around Aberdeen, especially in prominent areas will affect existing views and impact negatively on cultural heritage. 	Yes	<ul style="list-style-type: none"> • Policies D1: Quality Placemaking by Design, D3: Big Buildings, D4: Historic Environment, D5: Our Granite Heritage, and a number of associated Supplementary Guidance (Windows and Doors, Shops and Signs, Stonecleaning, The subdivision and redevelopment of residential curtilages, Big Buildings) providing more detailed policy advice will be applied strictly to ensure that development does not have a significant effect on cultural heritage. • Those sites that were expected to have the most significant impacts have not been included in the plan and are only identified as alternatives. • In view of the potential significant negative impacts during implementation, EIA will be submitted before development commences where appropriate. 	Through the development management and EIA process. Masterplanning.

	<ul style="list-style-type: none"> • Development within or close to Conservation areas and redevelopment of listed buildings may have long term negative impacts on cultural heritage. 		<ul style="list-style-type: none"> • Design policies to ensure that new developments enhance the historic environment. • Masterplanning to ensure that where there is a potential impact on the cultural heritage this is minimised and where possible enhanced. 	
Landscape	<ul style="list-style-type: none"> • Development of the scale proposed is likely to have significant impact on the setting of Aberdeen and some areas will be visually prominent. The removal of existing trees has the potential to impact significantly on the surrounding landscape. • Visually prominent areas of sites if not carefully designed may have significant negative impacts on the surrounding landscape. • Positive affects are likely through enhancement where the quality of the landscape and view are poor; where urban edges are hard and abrupt; or where the landscape is scrubby and visually exposed. 	Yes	<ul style="list-style-type: none"> • Policy D2: Landscape and Supplementary Guidance: Landscape will be applied strictly to ensure that development does not have a significant effect on landscape. • Those sites that were expected to have the most significant impacts have not been included in the plan and are only identified as alternatives. • Where the assessment has identified an area of a site which is more visually prominent on the landscape, these areas will need to be developed sensitively and in some cases greenspace network has been used to ensure development does not take place in these areas. • In view of the potential likely significant negative impacts arising from the implementation of the LDP EIA will be submitted before developments commence. Landscape and visual assessments can be required. 	Through the development management and EIA process. Landscape assessments and Masterplanning of sites.
Material Assets	<ul style="list-style-type: none"> • This option will provide large amounts of employment land to support expanding businesses and attract new businesses into Aberdeen. • This option will also provide a range of house types and sizes including affordable housing. There will be a wider range of housing and employment sites resulting from this option. • Enhancement and access to the environment. 	Yes	<ul style="list-style-type: none"> • Policies LR2: Delivery of Mixed Use Communities, H4: Housing Mix, H5: Affordable Housing, I1: Infrastructure Delivery and Planning Obligations have been included to ensure that the positive affect of development is enhanced. • Policies NE1: Greenspace Network, NE9: Access and Informal Recreation and NE4: Open Space Provision in New Developments will enhance access to and enjoyment of the environment. • In view of the potential significant positive impacts that developments have on material asset, collaboration will be made with stakeholder including landowners, developers, and housing associations to support the scheme. 	Through masterplanning of sites to incorporate assets in new developments. Provide support for sites that have the potential to create employment.
Population	<ul style="list-style-type: none"> • Development of the preferred option will support an increase in the population of Aberdeen and provide a range of house types 	Yes	<ul style="list-style-type: none"> • In view of the potential significant positive impacts that developments have on population, collaboration will be made with stakeholder including landowners, 	Use masterplanning of sites to achieve an appropriate mix of

	and sizes to meet everyone's needs. The plan is likely to have long term positive impacts on population.		developers, and housing associations to support the scheme. Also an appropriate mix of housing in line with the local housing strategy should be promoted. <ul style="list-style-type: none"> • Policy H4: Housing Mix requires a mix of housing types and sizes to be provided, which will meet the needs of future population. 	house types and tenures
Human Health	<ul style="list-style-type: none"> • Development which results in the loss of formal or informal recreation areas or paths may impact negatively on human health • Development may impact negatively on air quality, which may affect human health • New developments which conform to new building standards can enhance good health for occupiers. New homes are more generally energy efficient, incorporate good landscaping, and are located near the countryside or on greenfield land. They therefore provide the opportunity for people to have access to the open spaces and recreational facilities and to appreciate the natural environment. • If those with no access to housing gain access to housing, the strategy will engender long-term positive affects in bringing social justice and health if they are in safe environments. 	Yes	<ul style="list-style-type: none"> • Policy T4: Air Quality and Supplementary Guidance: Air Quality will be strictly applied. • All the allocations that have a negative affect on air quality will be required to comply with Policy T4: Air Quality and Supplementary Guidance: Air Quality • Policy NE3 Urban Greenspace provides protection to and enhancement of existing areas of greenspace in the City and will ensure that there is no negative impact on human health as a result of the plan. • In view of the potential significant positive impacts that developments have on population and human health collaboration will be made with stakeholder including landowners, developers, housing associations to ensure that developments are properly serviced. 	Encourage increased energy efficiency through policy. Encourage the use of combined heat and power plants through master planning. Make use of open space strategy in identifying the types of open space required.

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 2013

Comments from Key Agencies on Scoping Report, consultation May 2013			
Organisation	Section	Comment	Aberdeen City Council Response
Historic Scotland	Table 5.3 Environmental Problems Relevant to the Local Development Plan	<ul style="list-style-type: none"> Welcome comments made about opportunities for policy enhancement in relation to the historic environment. 	<ul style="list-style-type: none"> Noted. We have now revised and improved the policies that relate to the historic environment. See assessment of policies in Appendix 7.
	Table 6.1 Environmental Objectives and Questions	<ul style="list-style-type: none"> The inclusion of an appropriate objective for the historic environment is welcomed. The assessment questions allow the relative effects of these proposals to be identified. 	<ul style="list-style-type: none"> We have kept the relevant objectives and questions the same.
	Spatial Strategy: Aberdeen Harbour Expansion	<ul style="list-style-type: none"> While noting the negative effect on nearby scheduled monuments and listed buildings, it would be beneficial to point to the need to consider and mitigate this at next (lower) level. 	<ul style="list-style-type: none"> Where a site/proposal has a likely significant negative impact on a scheduled monument or listed building, we will require mitigation at a lower level.
	Spatial Strategy B0308 Prime Four North	<ul style="list-style-type: none"> The consumption dyke mentioned is a scheduled monument and category B listed structure. Consider that the potential negative effect would be significant and development of this site would be undesirable and not supported by Historic Scotland. 	<ul style="list-style-type: none"> Noted. This site has not been identified as an Opportunity Site in the Proposed Plan.
	Nigg Bay Solar Farm	<ul style="list-style-type: none"> There does not appear to be an assessment of this proposal. There are a number of scheduled monuments in the vicinity which need to be considered. 	<ul style="list-style-type: none"> This assessment was omitted from the Interim report in error. This site has now been assessed. See assessment of brownfield sites in Appendix 5.
	Mitigation	<ul style="list-style-type: none"> Welcome the approach of carrying out planning and SEA assessment at the same time. Consider that information already collected may be of benefit to include as mitigation which could inform developer requirements for sites with negative effects. 	<ul style="list-style-type: none"> Noted.
	Monitoring	<ul style="list-style-type: none"> In general, the approach to monitoring the effects of the plan is welcomed. The Buildings at Risk Register is no longer maintained by the Scottish Civic Trust, but by RCHAMS on behalf of Historic Scotland. 	<ul style="list-style-type: none"> We have amended the reference to Scottish Civic Trust to ARCHAMS.

Comments from Key Agencies on Scoping Report, consultation May 2013

Organisation	Section	Comment	Aberdeen City Council Response
Scottish Natural Heritage	General	<ul style="list-style-type: none"> Appreciate the way the assessment tables have been kept to manageable proportions. Some aspects of the MIR do not appear to have been included in the interim Environmental Report, e.g. the Nigg Solar Farm and proposed new policies. 	<ul style="list-style-type: none"> Noted. The approach of presenting assessment summaries is maintained. Assessment of Nigg Solar Farm has been omitted in error. This site has now been assessed. See assessment of brownfield sites in Appendix 5. The new policies had not yet been written and therefore their content could not be fully assessed. They have now been fully assessed for this report. See Appendix 7.
	Mitigation	<ul style="list-style-type: none"> Note that mitigation was only included for significant negative impacts. Recommend that mitigation be identified for other negative impacts. Would also encourage the SEA to seek positive environmental effects from the plan. In this regard, the SEA could make use of the Council's Greenspace Audit. 	<ul style="list-style-type: none"> Disagree with point on mitigation. SEA is only concerned with identifying, assessing and mitigating significant effects. Where other negative effects contribute cumulatively to a significant negative impact, this will be mitigated. However negative effects that are not deemed to be 'significant' do not require to be mitigated. The SEA will be used to help identify areas of positive impact and we will consider how the LDP enhance these. Some enhancement measures are shown in the assessment of policies and sites (Appendix 4-7).
	Table 5.1 Other Relevant Plans, Programmes and Strategies	<p>Suggest the following are added in the relevant categories:</p> <ul style="list-style-type: none"> Climate Change (Scotland) Act 2009 Scotland's Climate Change Adaptation Framework and Sector Plans. Countryside (Scotland) Act 1967 Land Reform (Scotland) Act) 2003 Scottish Biodiversity Strategy Wildlife and Natural Environment (Scotland) Act 2011 Protection of Badgers Act 1992 (as amended) Control of Woodland Removal Policy <ul style="list-style-type: none"> Page 30: as well as species protected under Schedules 1 (birds) and 5 (animals) of the Wildlife and Countryside Act 1981 as amended, mention should be made of species protected under schedule 8 (plants). Page 30: suggest other environmental protection objectives to include here are: avoid the introduction or spread of non-native invasive species and 	<ul style="list-style-type: none"> We have made all of these suggested additions to the relevant section.

Comments from Key Agencies on Scoping Report, consultation May 2013

Organisation	Section	Comment	Aberdeen City Council Response
		ensure terrestrial and marine planning are integrated.	
	Table 5.2 Potential Environmental Changes without the LDP	<ul style="list-style-type: none"> Recommend that consideration is given to water quantity (i.e. degree of abstraction to meet need) as well as water quality. 	<ul style="list-style-type: none"> We have updated the relevant table to include reference to water quantity.
	Table 5.3. Environmental Problems Relevant to the LDP	<ul style="list-style-type: none"> Biodiversity: text under 'implications for the LDP' should read: "the LDP should protect biodiversity through minimising the impact on designated sites (including LNCS), protected species, BAP species, and habitats, green spaces and networks". Soil: note that there is no mention of prime quality land or carbon-rich soils. Clarify if these are not significant factors for Aberdeen City. Water: amplify the point on abstraction to include the potential adverse impacts on the River Dee SAC qualifying interests. Landscape: a further implication for the LDP should be that the LDP should safeguard landscape character. 	<ul style="list-style-type: none"> We have made all of these suggestion amendments to the relevant table. Policy NE8 Natural Heritage has now been updated to protect peat land and carbon-rich soils from development.
	Table 6.2 Effect of Plan and Mitigation Measures	<ul style="list-style-type: none"> Biodiversity: appropriate assessment is not mitigation for the plan itself. Mitigation would be an inclusion of a relevant statement in the plan. The mitigation measure for water abstraction should be amended to state that new developments should install water-saving technology to minimise abstraction rates. Bat surveys should only be carried out where there is a sufficient likelihood that bats will be present in accordance with SG. Plan impact of the harbour – there is also the potential for it to have an adverse impact on extent, quality and use of green space in the vicinity. Another plan impact should be the impact of development on habitats and species of biodiversity value. Soil: make reference to the proposed addition of protection for peat soils. Consider a new policy for soil protection in general. Water: amend to read that water abstraction levels from the Dee need to be agreed between Scottish Water and SEPA (not SNH) Landscape: ensuring good siting, design and layout is another important mitigation measure to consider. This ties in with the proposal for Design Statements. The EIA should consider appropriate landscape mitigation for the 	<ul style="list-style-type: none"> All suggested changes to relevant table made.

Comments from Key Agencies on Scoping Report, consultation May 2013

Organisation	Section	Comment	Aberdeen City Council Response
		harbour.	
	Table 6.3 Monitoring of Plan	<ul style="list-style-type: none"> The monitoring plan could be refined to give more specific and quantifiable information. Monitoring measures should be more clearly related to the plan impacts. Biodiversity: how many applications require Species Protection Plans or licensing tests. Also monitoring the effect of the plan on statutory designated sites could be included by reference to SNH Site Condition Monitoring and Sitecheck data. For habitat fragmentation, monitor the number of applications which include land in the GSN and which would result in habitat loss. Water: volume of water abstracted from the Dee in comparison to the consented CAR limit Landscape: development approved that is incompatible with present landscape character Population and Material Assets: add number/length of new and connecting paths created. 	<ul style="list-style-type: none"> Mitigation and monitoring should be clearly linked. We only need to monitor those indicators which relate to significant effects. Some of the suggested indicators are not monitored at present and there is limited capacity to do so at present. Monitoring plan has been updated to include those indicators which are relevant and data is available.
	Appendix 1: Links to other PPS and Environmental Protection Objectives	<ul style="list-style-type: none"> The same PPS should be added in as noted in comments on Table 5.1. The 'implication' of the Habitats Directive should include protection of internationally designated nature conservation sites and European Protected Species. 	<ul style="list-style-type: none"> Table updated to reflect additions to relevant PPS.
	Appendix 2: Baseline Data, Trends and Targets	<ul style="list-style-type: none"> Biodiversity: part of the baseline for SSSI and SAC can be the condition of qualifying features as found on SNH website. NESBReC, the NBN Gateway and Native Woodland Survey of Scotland are also useful sources of baseline data. Human Health: length of core paths and cycle routes could be added as baseline data 	<ul style="list-style-type: none"> We have updated Baseline appendix to include condition of qualifying features of SSSIs and River Dee SAC. We do not monitor the length or core paths or cycle routes so it has not been included this time. We will look into monitoring this in future.
	Appendix 3 Map Based Information	<ul style="list-style-type: none"> A map of the Green Space Network could be added. More detailed soil maps can be downloaded from the Soil Scotland website. 	<ul style="list-style-type: none"> GSN map added and Soil Scotland maps added. See Appendix 3.
	Appendix 4 Assessment of Greenfield Options <ul style="list-style-type: none"> Generic Greenfield Assessment 	<ul style="list-style-type: none"> Mitigation does not mention that all developments should enhance biodiversity as in Policy NE8 Mitigation does not include provision of means by which public transport and active travel can be utilised. Mitigation does not include scope for a new policy on soil – see DEFRA 	<ul style="list-style-type: none"> The Mitigation section has been updated to include these suggestions, with the exception of soil. Protection for peatland and carbon-rich soils has been made through policy NE8. We consider that a dedicated policy on general soils would not be

Comments from Key Agencies on Scoping Report, consultation May 2013

Organisation	Section	Comment	Aberdeen City Council Response
		<p>guidance for example.</p> <ul style="list-style-type: none"> Amend text to refer to SEPA rather than SNH with regards to water abstraction from the Dee. 	<p>appropriate for the LDP.</p> <ul style="list-style-type: none"> Reference to SNH has been amended to SEPA in relation to water abstraction from the River Dee.
	<ul style="list-style-type: none"> New Greenfield Bids 2013 	<ul style="list-style-type: none"> Include mitigation for single minus negative effects as well as double minus. Assume mitigation in the table will be carried into developer contribution and LDP text. B0904/B0905 Woodend: no justification or mitigation set out for the loss of ancient woodland. Minimum mitigation would require compensatory planting and prior species survey and protection plan. B0913: see above B0914 Mid Anguston: mitigation required for significant intrusion into the landscape. 051 Nigg Solar Farm: no assessment of this proposal. B0946 Contlaw Road: presence of ancient woodland not mentioned in the SEA assessment – should be under 'biodiversity'. B0947 Huxterstone: This non-preferred site is not assessed. 	<ul style="list-style-type: none"> Disagree with mitigating all negative effects. SEA is only concerned with identifying, assessing and mitigating significant effects. However, where other negative effects contribute cumulatively to a significant negative impact, this will be mitigated. Suggested mitigation for loss of ancient woodland has been included for B0904/B09005/B0913. Significant intrusion into the landscape has not been identified as an environmental effect for B0914 Mid Anguston. Nigg Solar Farm was omitted in error and has now been assessed in this report. B0947 Huxterstone was assessed under a different site code. This has now been amended to read B0947.
	<p>Appendix 6 Assessment of Main Issues</p> <ul style="list-style-type: none"> Seeming omissions 	<ul style="list-style-type: none"> Proposed new policy zoning for the beach and leisure has not been assessed. All potential new policies in the Monitoring Statement should have been assessed as part of the MIR. Assume potential new SG will be individually screened for SEA Proposals included in Section 5 (transport and education) have not been assessed. AECC site at Bridge of Don could be assessed as part of brownfield preferred options. Nigg Solar Farm is not assessed. Facility at Tullos Hill landfill site (generate renewable energy) will also need to be assessed if it is included as an allocation. 	<ul style="list-style-type: none"> New policy on 'Beach and Leisure' had not yet been written at the time of the Interim ER. It has now been fully assessed. See assessment of policies in Appendix 7. Proposed SG will be presented to committee in January 2015 and this report will be updated accordingly. The proposal for the new academy is on the existing OP80 site (Calder Park). This has been given a new assessment for a new school. See assessment of greenfield sites in Appendix 4. The Proposed Gypsy and Traveller site at Howes Road has also been fully assessed. Nigg Solar Farm assessment was omitted in error and has now been fully assessed. See assessment of brownfield sites in Appendix 5. There are no proposals for a renewable energy proposal at Tullos Hill – this may be the same as Nigg

Comments from Key Agencies on Scoping Report, consultation May 2013

Organisation	Section	Comment	Aberdeen City Council Response
	Other comments	<ul style="list-style-type: none"> Main Issue 6 (Retail Outwith the City Centre) – current approach would seem to be negative for biodiversity rather than neutral. Main Issue 7 (Harbour Expansion) – impacts on recreation should be addressed in the mitigation column. The EIA should address access and recreation. In general the LDP should identify requirements for project-level EIA. 	<p>Solar Farm.</p> <ul style="list-style-type: none"> Score changed to negative for biodiversity for current approach to retail outwith the City Centre. Mitigation included that EIA for the new harbour should address access and recreation. In general the LDP does identify requirements for project-level EIA where appropriate.
SEPA	Appendix 7 Cumulative Assessment	<ul style="list-style-type: none"> Report identified a significant long-term implications for soil city-wide. Would be helpful to discuss mitigation here, e.g. a new soil policy. Water-saving technologies may not be enough to compensate for the volume of water needed to support the allocations – highlight the importance of water monitoring. Redouble efforts to secure biodiversity enhancements in new development through the incorporation of green infrastructure and applying standards on green space. 	<ul style="list-style-type: none"> Protection for peatland and carbon-rich soils has been made through policy NE8. A dedicated policy on general soils would not be desirable for the LDP.
SEPA	General	<ul style="list-style-type: none"> In general, satisfied that a detailed environmental assessment of the MIR has been carried out and it is clear how this has informed the MIR. 	<ul style="list-style-type: none"> Noted.
SEPA	Description of PPS Content of LDP MIR	<ul style="list-style-type: none"> The thirteen Main Issues preferred options and alternative options are clearly set out and assessed and welcome this approach We note that the Vision is carried forward from the SDP which has already been subject to SEA. We accept that all the policies and allocations in the Proposed Plan will be assessed in the finalised Environmental Report. 	<ul style="list-style-type: none"> Noted. All of the policies and allocations have been assessed in this report.
SEPA	Plan, Programme or Strategy Context	<ul style="list-style-type: none"> The PPS listed (page 27) provide a good background for the plan-making process. Certain legislation will require to be updated, and new flood maps have now been produced. Pleased to note that a Strategic Flood Risk Assessment has been produced. 	<ul style="list-style-type: none"> List of relevant PPS has been checked and updated with latest legislation.

Comments from Key Agencies on Scoping Report, consultation May 2013

Organisation	Section	Comment	Aberdeen City Council Response
	Environmental Problems	<ul style="list-style-type: none"> • There are a number of emerging issues it may be appropriate to consider: • Climate change: increasing rainfall levels are having an impact on contaminated surface water run-off. This is particularly relevant for the River Dee Catchment (page 39). • Soils (page 55): all development has the potential to impact on carbon rich soils including peat. We consider that a measurement of sustainable management is the amount of peat generated by a proposed development and the percentage that is identified as 'waste'. • Connection to the public sewer system is an environmental problem due to capacity issues in certain treatment plants and the network. There may also be environmental problems associated with proposals for private foul drainage treatment systems, particularly relevant for the River Dee Catchment (page 39). • Water environment: there is also a potential impact on private water supplies which are groundwater abstractions. • Biodiversity, we consider Invasive Non Native Species, especially waterborne ones, as an environmental problem. 	<ul style="list-style-type: none"> • The Environmental Problems table has been updated to include the suggested issues, with the exception of soil. • Policy NE8 Natural Heritage now includes protection for peatland and carbon rich soils.
	Assessment	<ul style="list-style-type: none"> • Sufficient information and justification is provided in the Interim ER to understand how conclusions were drawn. • There is a change in circumstances for some of the sites and text should be added to the Proposed Plan 2015, for example highlighting the need for flood risk assessments for certain sites. We therefore request that the Finalised Environmental Report includes this and all other updated baseline information in the site assessments (gives list of sites which require FRA). • Recommend a table detailing all site allocations in the Proposed Plan, when they were assessed (e.g. a previous ER, 2013 Interim ER, 2015 Finalised ER) and if assessed in a previous ER that there are no changes in circumstances following your own, ours and other consultees considerations of the MIR site allocations. • The scale of water efficiency technologies envisaged may not be able to compensate for the volume and quality of water resources needed to support the allocations. Water abstraction, especially from the River Dee is already an existing issue and even with water saving technologies any new development will exacerbate this. • We are able to accept the principle of development on flood risk grounds for all the proposed sites and sites to be carried forward. Therefore no mitigation requires to be identified in this regard. • The protection of the marine environment is not identified in the assessment 	<ul style="list-style-type: none"> • We have included a column to the site assessments (Appendix 4-6) showing when each site was originally/last assessed and any changes in circumstances since then. • Acceptable levels of water abstraction are agreed between SEPA and Scottish Water. • Note that flooding is not a significant issue for any of the proposed sites or those to be carried forward.

Comments from Key Agencies on Scoping Report, consultation May 2013

Organisation	Section	Comment	Aberdeen City Council Response
		<p>apart from the Aberdeen Harbour extension proposal.</p>	
	Mitigation	<ul style="list-style-type: none"> • Welcome the overall approach to mitigation. • Pleased to note that an EIA will be required for Nigg Bay with specific mitigation measures. • Do not consider that SUDS can provide solutions to flood risk issues on sites. Flood Risk Assessment can identify the issues and appropriate mitigation measures. • We support that any areas identified as being at risk of flooding should be designated as Green Space Network. • We fully support the introduction of a new policy on construction waste. At present we would seek to assess proposals for construction waste management on a development site through the requirement to submit a Construction Environmental Management Plan • No mitigation is identified for damage to soil quality, structure and morphology. Mitigation in the form of a policy or supplementary guidance on development on peatlands may be appropriate. • Mitigation indicates that the Council will liaise with SEPA where there is potential for pollution of the water environment and policies and supplementary guidance on buffer strips will be applied. This may not be sufficient mitigation to prevent pollution and that further supplementary guidance may be required on Construction Environment Management Plans. • Amend reference to SNH to read SEPA in relation to abstraction issues related to the River Dee. All new development will require disposal of foul drainage and that mitigation measures, identified in conjunction with Scottish Water, may be required to address on-going capacity issues. 	<ul style="list-style-type: none"> • For sites where flooding is an issue, (based on advice from SEPA given in response to the Main Issues Report), FRA is shown as a mitigation measure, with the appropriate lower-level mitigation specified. • Policy NE8 includes reference to a requirement for Construction Environmental Management Plans. • Peatland and carbon-rich soils are protected through policy NE8. • The reference to SNH has been amended to SEPA in relation to abstraction issues.
	Monitoring	<ul style="list-style-type: none"> • Content with monitoring proposals. • It may be more appropriate to monitor impacts of a policy on water usage on the River Dee (page 55) through Scottish Water's abstraction figures and SEPA's monitoring results rather than the Dee Catchment Management Plan. 	<ul style="list-style-type: none"> • Noted. • We have updated the Monitoring Plan to include this new source of information.
Scottish Water	Table 5.1. Other relevant Plans, Programmes and Strategies	<ul style="list-style-type: none"> • Scottish Water's Strategic Asset Capacity Development Plan. This document is published annually so it may be more advisable to state this rather than providing a specific year. • Amend references to SNH to read SEPA in relation to regulating the abstraction levels from the River Dee. 	<ul style="list-style-type: none"> • This document has been included in the list of relevant PPS. • Reference to SNH has been amended to SEPA in relation to abstraction level from River Dee.

Table 5.2: Analysis of Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015

Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015			
Organisation	Section	Comment	Aberdeen City Council Response
Scottish Natural Heritage	Table Assessment of Environmental Effects, page 5	<ul style="list-style-type: none"> The sentence which reads, “The overall effects of the plan on water are negative, because all new development requires more water to be taken from the River Dee...” The implication of this is that the issue needs to be addressed as part of the Habitats Regulations Appraisal (HRA) of the LDP in respect of the River Dee Special Area of Conservation (SAC). It would be helpful to include a reference here to the HRA appraisal, and possibly also to the relevant section of the City & Shire SDP (page 31). 	<ul style="list-style-type: none"> Reference has been made to the Habitats Regulation Appraisal and to page 31 of the Aberdeen City and Aberdeenshire Strategic Development Plan . See Table: Assessment of Environmental Effects.
	Table 7.a Significant Effects of the Plan and Mitigation Measures, Biodiversity	<ul style="list-style-type: none"> Under “mitigation/enhancement measures”, reference should also be made to the Supplementary Guidance on the Natural Environment regarding invasive non-native species (INNS) as a means to mitigate the potential spread of INNS that may otherwise be caused by development, to the detriment of protected areas, protected species, general biodiversity and people. 	<ul style="list-style-type: none"> Reference has been made to the relevant Supplementary Guidance. See Table 7a: Significant Effects of the Plan and Mitigation.
	Table 7.a Significant Effects of the Plan and Mitigation Measures, Water	<ul style="list-style-type: none"> Regarding the sentence “All new development will increase the need to abstract water from the River Dee...” As above, the implication of this is that the issue needs to be addressed as part of the Habitats Regulations Appraisal (HRA) of the LDP in respect of the River Dee (SAC). It would be helpful to include a reference here to the HRA appraisal, and possibly also to the relevant section of the City & Shire SDP (page 31). 	<ul style="list-style-type: none"> Reference has been made to the Habitats Regulation Appraisal and to page 31 of Aberdeen City and Aberdeenshire Strategic Development Plan . See Table 7a: Significant Effects of the Plan and Mitigation Measures.
	Table 7.a Significant Effects of the Plan and Mitigation Measures, Water	<ul style="list-style-type: none"> Regarding the sentence “Acceptable rates of water abstraction from the Dee are agreed between SEPA and Scottish Water.”, with regard to water abstraction affecting the River Dee SAC, we recommend that consideration is given to including Scottish Water (as well as SEPA) as one of the parties responsible for mitigation. This is because they are responsible for water abstraction and so could be expected to monitor compliance with the relevant water abstraction license(s) for the SAC. 	<ul style="list-style-type: none"> Scottish Water have been added to the list of parties involved. See Table 7a: Significant Effects of the Plan and Mitigation Measures.
		<ul style="list-style-type: none"> Mitigation - In relation to the proposed mitigation, it would be appropriate to add the requirement for HRA (and likely EIA) for master-planning and through the DM and Planning Agreements processes as part of mitigation to avoid adverse effects on the integrity of the River Dee SAC. 	<ul style="list-style-type: none"> Text has been added regarding this matter. See Table 7a: Significant Effects of the Plan and Mitigation Measures.
		<ul style="list-style-type: none"> Notwithstanding the above, the Council will need to be able to confirm, based on up-to-date (and predicted for the levels of proposed development) water abstraction levels information (sourced from Scottish Water) and compliance 	<ul style="list-style-type: none"> Aberdeen City Council met with and wrote to Scottish Water asking if they could address concerns over the amount of proposed development in both Aberdeen

Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015

Organisation	Section	Comment	Aberdeen City Council Response
		<p>with licensed abstraction (sourced from SEPA) that any proposed changes in abstraction that would arise from the proposed development allocations is still as described at the time the SDP was drawn up and remains achievable without having an adverse effect on the integrity of the SAC.</p>	<p>City and Aberdeenshire and the possible impact this may have on licenced water abstraction levels from the River Dee. Scottish Water confirmed in writing that taking into consideration all proposed developments in the two LDP's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. SHN confirmed by email that they are satisfied with this approach and that the LDP will not adversely affect the integrity of the sites listed in this assessment.</p>
	<p>Table 7.a, significant effects of plan and mitigation measures; Soil, Ground contamination</p>	<ul style="list-style-type: none"> With regard to "Mitigation/Enhancement measures" we find the second bullet point confusing, as we would consider that development on a landfill site is likely to be a planning (and potentially EIA) matter. Clarification of what is meant by this second bullet point would therefore be useful. 	<ul style="list-style-type: none"> The second point relates to the digging out of the contaminated site, this would be subject to strict guidelines with are not within planning legislation. Text has been amended to be clearer. The potential requirement for an EIA has been noted. See Table 7a: Significant Effects of the Plan and Mitigation Measures
		<ul style="list-style-type: none"> We note the proposed mitigation (via the Plan policy) in relation to "Peat Soils", but advise that it does not appear to follow Scottish Planning Policy concerning development on carbon rich soils, peat and peatland habitats. SPP paragraph 205 does not prohibit development on peat and carbon rich soils, but refers to assessment and minimisation of carbon dioxide release. Further consideration will be required to align the SEA (and LDP policy) with SPP, and then what that would mean for the SEA 	<ul style="list-style-type: none"> During examination of the Proposed Plan the Reports Unit outlined proposed modifications to Policy NE8. These were accepted at modification stage and additional text was added to Policy NE8. Policy NE8 was reassessed. See Appendix 7.
	<p>Table 8a: Monitoring Plan, Biodiversity, Impact on water quality of the River Dee and on its qualifying features</p>	<ul style="list-style-type: none"> With respect to "When should remedial action be taken", we recommend adding a measure that remedial action will also be required should the level of water abstraction come close to or exceed the licensed abstraction volume. This is so that future development can be appropriately managed to avoid an adverse effect on the integrity of the River Dee Special Area of Conservation (SAC). 	<ul style="list-style-type: none"> Aberdeen City Council received an email from SNH on 27 July 2015 confirming they were satisfied the Proposed Sites in both the Aberdeen Local Development Plan and Aberdeenshire Local Development Plan remains acceptable. Should this change acceptable rates of water abstraction should be agreed between Scottish Water and SEPA.
		<ul style="list-style-type: none"> With respect to "who is responsible for undertaking monitoring?" we recommend that consideration is given to including Scottish Water (as well as SEPA) as one of the parties responsible for monitoring. This is because they are responsible for water abstraction and so could be expected to monitor compliance with the relevant water abstraction license(s) for the SAC. 	<ul style="list-style-type: none"> Text has been added regarding this matter. See Table 8a: Monitoring Plan

Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015

Organisation	Section	Comment	Aberdeen City Council Response
		<ul style="list-style-type: none"> With respect to “where will information be obtained from?”, We recommend adding water abstraction data from Scottish Water and SEPA’s monitoring results to the list of information sources. 	<ul style="list-style-type: none"> Text has been added regarding this matter. See Table 8a: Monitoring Plan
		<ul style="list-style-type: none"> With respect to “when should remedial action be considered?”, we recommend adding a measure that remedial action will also be required should the level of water abstraction come close to or exceed the licensed abstraction volume. This is so that future development can be appropriately managed to avoid an adverse effect on the integrity of the River Dee Special Area of Conservation (SAC). This is because too much abstraction could negatively affect water quality (as well as quantity) within the SAC, which would affect the qualifying interests of the SAC. [On a minor point, the correct terminology for the interests of Natura sites are “qualifying interests” (not qualifying features). 	<ul style="list-style-type: none"> Text has been added regarding this matter. See Table 8a: Monitoring Plan
	Appendix 4, 4b, OP 52 Malcolm Road, Peterculter and OP 109 Woodend, Peterculter	<ul style="list-style-type: none"> The SEA states that “the majority of the site is designated as SNH Ancient Woodland, although it has been felled this designation remains valid”. We do not believe this to be the case - we understand that approximately 80% of the site remains as woodland as at May 2015. The mitigation/enhancement identified is to apply LDP policies on protection of trees and woodland. As around 80% of the site is woodland, if the policies on protection of trees and woodland are applied, we suggest that most of this site is unsuitable for development. The SEA divides OP109 into two sites and for one, identifying that the majority of the site is covered by the “ancient woodland designation”. It identifies the need for mitigation as per policy NE8 but should also refer to policy NE5, trees and woodland. If the policies on protection of trees and woodland are applied, we suggest that most of this part of the site is unsuitable for development. 	<ul style="list-style-type: none"> The Malcolm Road site is designated Ancient Woodland. The site was chosen as a preferred option during a Council meeting on 12 November 2013 in regard to the local development plan main issues report. The primary reason being it provided further housing opportunities and would help support the local primary school. Site OP109 was inserted into the local development plan at a Council meeting of 28 October 2015. The primary reason being the site will promote and protect local facilities. Both sites were subject to examination. The Reporter Report removed the area of woodland from both sites, thereby reduced the size of both sites. The modifications were acceptable. Both OP52 and OP109 have been reassessed and mitigated. See Appendix 4b.
	Appendix 4, 4b, OP 62 Aberdeen Harbour expansion Nigg Bay	<ul style="list-style-type: none"> Under biodiversity, consideration of the potential impacts on Atlantic salmon and fresh water pearl mussel needs to be added (as interests of the River Dee SAC), as well as impacts on grey seals of the Isle of May SAC and 	<ul style="list-style-type: none"> Consider Atlantic salmon, fresh water pearl mussel, grey seals of the Isle of May SAC and Berwickshire and North Northumberland Coast SAC, and harbour

Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015

Organisation	Section	Comment	Aberdeen City Council Response
		<p>Berwickshire and North Northumberland Coast SAC, and harbour seals (a protected species). As mitigation, impacts on these interests should be considered in the HRA and EIA for the proposed development when it comes forward. (We understand that the Harbour Authority are aware of the connectivity to the SACs and so should be taking them into account when considering options for the harbour expansion. The HRA for the harbour expansion should therefore ensure that development avoids an adverse effect on the integrity of the Natura sites, and avoids an adverse effect on the population of harbour seals.)</p>	<p>seals. Site OP62 has been reassessed and mitigated. See Appendix 4b.</p>
<p>Scottish Environment Protection Agency</p>	<p>Policies, opportunity sites and supplementary guidance.</p>	<ul style="list-style-type: none"> We consider that the policies, opportunity sites and supplementary guidance are clearly assessed and we welcome this approach. 	<ul style="list-style-type: none"> Noted and welcomed
	<p>PPS and background data of Section 5</p>	<ul style="list-style-type: none"> We consider that the PPS and baseline data listed in Section 5 provide a good background for the plan-making process. We are pleased to note that although the ER only addresses those aspects of the plan which are considered to have significant negative effects on the environment, the issues of construction impacts and impacts on carbon rich soils including peat have been addressed. 	<ul style="list-style-type: none"> Noted and welcomed
	<p>Scope and level of the assessment and the assessment framework</p>	<ul style="list-style-type: none"> We consider that the scope and level of the assessment and the assessment framework provided in the Environmental Report allows us to understand how the conclusions were drawn. We welcome the inclusion of a column detailing site history for all site allocations in the Proposed Plan. 	<ul style="list-style-type: none"> Noted and welcomed
	<p>OP1, OP31 and OP80</p>	<ul style="list-style-type: none"> We have requested text is added highlighting the need for flood risk assessments for certain sites where this is not currently identified (OP1, OP31 and OP80). We therefore request that the Finalised Environmental Report includes this in the site assessments. We consider that we are able to accept the principle of development on flood risk grounds for all the Opportunity Sites. 	<ul style="list-style-type: none"> The amendments to the plan suggested by SEPA to mitigate the flood risk have been accepted and the plan will include these. No significant changes will result from this modification. Sites OP1, OP31 and OP80 have been reassessed and mitigated. There are no significant impacts. See Appendix 4b and 5b
	<p>Table 7a</p>	<ul style="list-style-type: none"> We welcome how you have outlined the identified mitigation and now this will be achieved in Table 7a (page 42) including who is responsible for undertaking mitigation. 	<ul style="list-style-type: none"> Noted and welcomed
	<p>Table 7a</p>	<ul style="list-style-type: none"> We note that under 'Impacts on Watercourses and Waterbodies', reference to watercourses could be removed and the mitigation/ enhancement measures should not just refer to impacts on watercourses but on waterbodies which 	<ul style="list-style-type: none"> Text modified to reflect waterbodies.

Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015

Organisation	Section	Comment	Aberdeen City Council Response
		<p>include wetlands and groundwater dependent terrestrial ecosystem.</p> <ul style="list-style-type: none"> We have suggested additional wording in Policy NE6 and NE8 and Supplementary Guidance – Natural Heritage, if incorporated, this should be referenced here. 	<ul style="list-style-type: none"> Policy NE6 and NE8 were subject to examination and the Reporters outlined modifications to the text of each policy. Both policies were reassessed and mitigated. There were no significant impacts due to the modified text.
	Table 7a	<ul style="list-style-type: none"> The mitigation/enhancement measures under Water – Pollution of Watercourses should reference Pollution of Waterbodies and could also include Policy NE8 and the requirement for a Construction Environmental Management Plan. 	<ul style="list-style-type: none"> Text modified. See Table 7a.
	Table 7a	<ul style="list-style-type: none"> We are content with the monitoring proposals as set out the Monitoring Plan. 	<ul style="list-style-type: none"> Noted and welcome
	Table 7a	<ul style="list-style-type: none"> We welcome that our previous comments on the environmental report accompanying the Main Issues Report have been acted upon and this response should be read in conjunction with our comments issued to that consultation. The updated environmental report clearly sets out the approach to the assessment and the detailed site assessments provided are particularly welcome. We also welcome the efforts that have been made in making the environmental report as understandable as possible. The language utilised helps in explaining the likely environmental effects of the plan and should benefit all readers. 	<ul style="list-style-type: none"> Noted and welcome
Historic Scotland	General comment	<ul style="list-style-type: none"> We welcome that our previous comments on the environmental report accompanying the Main Issues Report have been acted upon and this response should be read in conjunction with our comments issued to that consultation. The updated environmental report clearly sets out the approach to the assessment and the detailed site assessments provided are particularly welcome. We also welcome the efforts that have been made in making the environmental report as understandable as possible. The language utilised helps in explaining the likely environmental effects of the plan and should benefit all readers. 	<ul style="list-style-type: none"> Noted and welcome
	Appendix 7	<ul style="list-style-type: none"> We welcome the assessment for both the Historic Environment Policy and Our Granite Heritage Policy. As you will be aware, we have offered representations on these policies which aim to further clarify the wording but we are content that their context provides for a significantly positive effect on the historic 	<ul style="list-style-type: none"> Noted and welcome. Policy D5: Our Granite Heritage was subject to examination. The text has been modified and the policy subject to reassessment. No significant impacts have resulted. See Appendix 7.

Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015

Organisation	Section	Comment	Aberdeen City Council Response
		environment.	
	General Site Comment	<ul style="list-style-type: none"> As a general comment on the assessment, while noting that mitigation is required for those effects that are considered to be significant it is beneficial for those sites that have predicted negative effects (significant or otherwise) to offer mitigation. This is particularly beneficial where there is uncertainty regarding the likely effects, notably where a site is scored +/- . Forward thinking mitigation in this regard can help influence the plan and focus proposals to the positive side for the historic environment. 	<ul style="list-style-type: none"> +/- does not indicate there is uncertainty; it indicates there are both positive and negative impacts.
	<ul style="list-style-type: none"> Appendix 4, 4b, OP63 Prime 4 Business Park Phase 5 Extension 	<ul style="list-style-type: none"> We welcome the assessment of the potential effects on the Category C listed Quaker Burial Ground and the subsequent mitigation suggested. However, potential negative effects on the setting of the scheduled consumption dyke should also have been noted here. 	<ul style="list-style-type: none"> The amendments suggested have been accepted. The site has been reassessed and mitigated. No significant changes will result from this modification. See Appendix 4b.
	<ul style="list-style-type: none"> Appendix 4, 4b, OP62 Nigg Bay 	<ul style="list-style-type: none"> This proposed land use has the potential to have significant effects on the historic environment through the effect on the setting of the scheduled monument St Fitticks Church, the listed Girdleness Lighthouse as well as the potential for archaeological remains within the bay area. 	<ul style="list-style-type: none"> The amendments suggested have been accepted. The site has been reassessed and mitigated. . No further significant changes will result from this modification. See Appendix 4b.
	<ul style="list-style-type: none"> Appendix 5, 5b, OP64 Former Ness Tip 	<ul style="list-style-type: none"> There are a number of scheduled cairns in proximity to the development area. The proposal has the potential to impact on the setting of these sites. This should have been recorded in the assessment with mitigation options put forward. 	<ul style="list-style-type: none"> The amendments suggested have been accepted. The site has been reassessed and mitigated. No further significant changes will result from this modification. See Appendix 5b.
	<ul style="list-style-type: none"> Appendix 5, 5b, OP102 George St/Crooked Lane 	<ul style="list-style-type: none"> We are concerned with the reference within this assessment that “redevelopment is likely to result in the loss of a single Category C Listed Building”. We would therefore recommend that the starting point for delivering this site should consider the retention of the building. 	<ul style="list-style-type: none"> Policy D4 and D5 both require the retention and appropriate reuse of buildings. Further to this modifications and demolition of listed buildings would have to satisfy criteria within SHEP (as of 01 June 2016 - Historic Environment Scotland Policy Statement 2016). . The policies have a positive impact on the historic environment. The site has been reassessed and mitigated. No further significant changes will result from this modification. See Appendix 5b.
	<ul style="list-style-type: none"> Table 8a: Monitoring 	<ul style="list-style-type: none"> You may wish to consider monitoring sites where negative or uncertain impacts on designations and their settings are predicted. It is also unclear why Scottish Civic Trust have been named as being partly responsible for monitoring the plan. 	<ul style="list-style-type: none"> The reference to the Scottish Civic Trust recognises the Trusts objective number 5: its Awards and Commendations Scheme by which recognition is given to those who have contributed to the amenity of the

Comments from Key Agencies and Public on Environmental Report, consultation from 20 March – 1 June 2015

Organisation	Section	Comment	Aberdeen City Council Response
			<p>city by means of... restoration and preservation of old buildings. The scheme is monitored by ACC to establish of any recent developments in the city have been awarded. The reference will be made clearer within Table 8a.</p>
<p>The New Aberdeen Mosque and Community Centre Project</p>	<ul style="list-style-type: none"> Appendix 6 	<ul style="list-style-type: none"> Detailed comments submitted regarding the SEA of site OP85: King Street/Beach Esplanade making counterarguments to the negative SEA scorings on Air, Water, Soil and Climate, Biodiversity. 	<ul style="list-style-type: none"> The principle of development and the significant impact of development is assessed by the SEA. Many of the comments submitted relate to design details; the SEA does not assess this level of detail. The proposal will have a negative impact on air during the construction period through dust, due to vehicular access moving to and from the site, and post construction from people visiting the site. Water will be negatively impacted by the need to abstract water during the construction and servicing of the new development, and the potential to release water borne pollutants into the water course. Soil will be sealed and compacted due to the development, and substances may be released during construction and climatic factors will include increased energy consumption. There may be a negative impact on biodiversity due to the loss of open space. Cultural heritage relates to the promotion protection and, where appropriate, enhancement the historic environment. There is no impact. Material Assets and Population is positive and will remain so. Impact on human health will be both positive and negative due to the causes stated in the SEA. No changes.

Table 5.3: Modifications sought by Reporters' Report, September 2016

Policy / Site	Modification	Aberdeen City Council's assessment of impact on SEA
LR2: Delivery of mixed use communities	<ul style="list-style-type: none"> Modification to table text, add paragraph and update text within policy LR2 	<ul style="list-style-type: none"> Policy reassess .No impact to the SEA due to modification Policy still ensures that large new greenfield housing release includes a mix of housing and employment. See Appendix 7.
Policy R2: Degraded and Contaminated Land	<ul style="list-style-type: none"> Add sentence to end of policy 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still requires that all degraded (including visually) or contaminated land is restored, reclaimed or remediated to a level suitable for its proposed use. See Appendix 7.
Policy D3: Big Buildings	<ul style="list-style-type: none"> Add sentence to policy 	<ul style="list-style-type: none"> Policy and supplementary guidance reassessed. No additional effect. Policy still requires that big buildings must be a high quality design which complements or improves the existing site context. See Appendix 7 and Appendix 8.
Policy D4: Historic Environment	<ul style="list-style-type: none"> Add sentence to policy, remove fourth paragraph and add text 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still protects, conserves and enhances the historic environment; ensuring new development respects the character, appearance and setting of the historic environment. See Appendix 7.
Policy D5: Our Granite Heritage	<ul style="list-style-type: none"> Reword third paragraph 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still seeks the retention and appropriate re-use, conversion and adaptation of all granite features, structures and buildings. See Appendix 7.
Policy NC1: City Centre Development – Regional Centre	<ul style="list-style-type: none"> Add text to paragraph one and paragraph two. 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still encourages all major footfall-generating uses to locate in the City Centre, according to the sequential approach. See Appendix 7.
Policy NC2: City Centre Retail Core and Union Street	<ul style="list-style-type: none"> Reword criterion e 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still encourages all major retail developments to locate in the City Centre. See Appendix 7.
Policy NC3: West End shops and cafes	<ul style="list-style-type: none"> Reword criterion 4 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still protects the shops and cafes in the West End from change of use. See Appendix 7.
Policy NC4: Sequential Approach and Impact	<ul style="list-style-type: none"> Add text to paragraph one, paragraph three, four, five and eleven. Reword paragraph seven, and move paragraph eight. 	<ul style="list-style-type: none"> Policy and supplementary guidance reassessed. No additional effect. Policy still encourages significant footfall generating development to be located within a designated centre. See Appendix 7 and Appendix 8.
Policy NC5: Out of Centre Proposals	<ul style="list-style-type: none"> Add text to paragraph one. 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still outlines out of centre proposals will only be permitted under certain circumstances. See Appendix 7.
Policy NC6: Town, District, Neighbourhood and Commercial Centres	<ul style="list-style-type: none"> Modify criterion 6 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still protects against change of use from retail to another use. See Appendix 7.

Policy / Site	Modification	Aberdeen City Council's assessment of impact on SEA
Policy I1: Infrastructure Delivery and Planning Obligations	<ul style="list-style-type: none"> Add text to paragraph three 	<ul style="list-style-type: none"> Policy and supplementary guidance reassessed. No additional impact. Policy still provides guidance on developer contributions and infrastructure requirements according to masterplan zones. It provides a clear and concise guide to the contributions that each developer will be expected to pay to support new development. See Appendix 7.
Policy T5: Noise	<ul style="list-style-type: none"> Replace one word 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still aims to prevent conflict between noise generating developments, and noise sensitive uses. Protects Candidate Noise Management Areas and Candidate Quiet Areas from development that would lead to a deterioration of noise conditions. See Appendix 7.
Policy B2: Specialist Employment Areas	<ul style="list-style-type: none"> Add text 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still safeguards Class 4 Use within this zoning. See Appendix 7.
Policy B4: Aberdeen Airport	<ul style="list-style-type: none"> Modify text 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still protects the operational efficiency and safety of Aberdeen Airport and Perwinnes Radar, and ensures there is no conflict between the airport and other uses, in terms of safety, noise or amenity. See Appendix 7.
Policy B5: Aberdeen Harbour	<ul style="list-style-type: none"> Modify paragraph two. 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still aims to control development in the vicinity of the harbour, in order to protect the safety and efficiency of harbour operations. On land zoned for the harbour, there is a presumption in favour of harbour-related uses. See Appendix 7.
Policy NE3: Urban Green Space	<ul style="list-style-type: none"> Add text to criterion seven 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still protects parks, open space and recreational and sporting facilities. See Appendix 7.
Policy NE5: Trees and Woodlands	<ul style="list-style-type: none"> Add text to paragraph three, and a sentence to paragraph five 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still protects areas of trees and woodland from loss or damage through new development, and encourages tree planting in new development. See Appendix 7.
Policy NE8: Natural Heritage	<ul style="list-style-type: none"> Add text to second paragraph of Designated Sites, and modify third paragraph. Modify second paragraph of Protected Species Modify second paragraph of Carbon-rich Soils Add text to item 3 	<ul style="list-style-type: none"> Policy reassessed. No additional impact. Policy still protects designated sites and outlines how they will be considered in the planning process. See Appendix 7. Policy reassessed. No additional impact. Policy still protects protected species and outlines how they will be considered in the planning process. See Appendix 7. Policy reassessed. No additional impact. Policy still protects carbon rich soils and outlines how they will be considered in the planning process. See Appendix 7. Policy reassessed. No additional impact. Policy still protects designated natural heritage sites, protected species and carbon rich soils, and considers how these will be considered through the planning process. See

Policy / Site	Modification	Aberdeen City Council's assessment of impact on SEA
		Appendix 7.
Policy NE6: Flooding, Drainage and Water Quality	<ul style="list-style-type: none"> Add text to second paragraph 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still restricts development in areas at risk of flooding and protects the capacity of the floodplain. See Appendix 7.
Policy NE7: Coastal Planning	<ul style="list-style-type: none"> Modify text in point four of the second paragraph 	<ul style="list-style-type: none"> Policy reassessed. No additional effect. Policy still safeguards the undeveloped coast and protected species from inappropriate development. See Appendix 7.
Policy R7: Low and Zero Carbon Buildings, and Water Efficiency	<ul style="list-style-type: none"> Modify paragraph one 	<ul style="list-style-type: none"> Policy and supplementary guidance reassessed. No additional effect. Policy still aims to reduce the impact of new development on the environment through the use of LZCGT. See Appendix 7.
OP3: Findlay Farm, Murcar	<ul style="list-style-type: none"> Change zoning from Specialist Employment to Business and Industry 	<ul style="list-style-type: none"> Site reassessed. No impact to SEA. See Appendix 4b.
OP7: Aberdeen College Gordon Centre	<ul style="list-style-type: none"> Extend site to the west to include remainder of North East Scotland College landholding, Update Appendix 2 of the Plan. 	<ul style="list-style-type: none"> The brownfield site was assessed after the proposed plan consultation. No additional effect. See Appendix 5b.
OP14: Bankhead Academy	<ul style="list-style-type: none"> Remove Bankhead School Lodge from the zoning. Update Appendix 2 of the Plan. 	<ul style="list-style-type: none"> Site reassessed. No additional effect. See Appendix b.
OP33: Greenferns	<ul style="list-style-type: none"> Remove green space network designation from land within and along the southern boundary 	<ul style="list-style-type: none"> Site reassessed. Biodiversity impact is already significant. Removal of Green Space Network designation will not lessen this impact. See Appendix 4b.
OP111: Skene Road	<ul style="list-style-type: none"> Allocate 0.9 ha site for 15 homes. Update Appendix 2 of the Plan. 	<ul style="list-style-type: none"> Site previously assessed as a Bid at Main Issues Report Stage. Site reassessed. No additional effects. See Appendix 4b.
OP52: Malcolm Road	<ul style="list-style-type: none"> Reduce from 71 homes to 8 homes, and redraw boundary. Update references where required. 	<ul style="list-style-type: none"> Site previously assessed at Main Issues Report Stage. Site boundary and number of proposed houses has been reduced. Site reassessed. Impact on biodiversity is less than previous proposal. See Appendix 4b.
OP108: Mid Anguston	<ul style="list-style-type: none"> Delete site. Update references where required. 	<ul style="list-style-type: none"> Site previously assessed at Main Issues Report stage. Site is no longer an opportunity site and is classed as greenfield alternative. No additional effects. See Appendix 4c.
OP109: Woodend Peterculter	<ul style="list-style-type: none"> Redraw boundary to exclude ancient woodland to the south of the site. Update references where required. 	<ul style="list-style-type: none"> Site reassessed. Impact on biodiversity is less than previous proposal. See Appendix 4b.
OP112: West of Contlaw Road	<ul style="list-style-type: none"> Allocate site for 10 homes. Update references where required. 	<ul style="list-style-type: none"> Site previously assessed at Main Issues Report stage. Site reassessed. Mitigation measures included. See Appendix 4b.

Policy / Site	Modification	Aberdeen City Council's assessment of impact on SEA
OP113: Culter House Road	<ul style="list-style-type: none"> Allocate 2.4 ha site for 8 homes. Update references where required. 	<ul style="list-style-type: none"> Site previously assessed as a bid during the Main Issues Report stage. Site reassessed. Mitigation measures included. See Appendix 4b.
OP114: Milltimber South	<ul style="list-style-type: none"> Allocate 11.5 ha site for 60 homes and 1,225 square metres of retail/office space. Update references where required. 	<ul style="list-style-type: none"> Site previously assessed as a bid during the Main Issues Report stage. Site reassessed. Mitigation measures included. See Appendix 4b.
OP115: 34-40 Abbotswell Road	<ul style="list-style-type: none"> Allocate 1.05 ha site for residential use. Update references where required. 	<ul style="list-style-type: none"> Site previously assessed as a bid during the Main Issues Report stage. Site reassessed. Mitigation measures included. See Appendix 5b.
OP66: Manor Walk, Middlefield	<ul style="list-style-type: none"> Remove caravan park from site OP66. 	<ul style="list-style-type: none"> Site rolled over from 2012 ALDP. Previously assessed for Proposed Plan 2010. Site reassessed. Removal of caravan park from site will have no impact on the assessment. See Appendix 4b.
OP116: Froghall Terrace	<ul style="list-style-type: none"> Allocate 1.7 ha site for residential. Update references where required. 	<ul style="list-style-type: none"> Site assessed as brownfield general during the Main Issues Report Stage. Site reassessed as an opportunity site. See Appendix 5b.
Cairnfield Place	<ul style="list-style-type: none"> Remove green space network designation from area. 	<ul style="list-style-type: none"> Area assessed as greenfield general during Main Issues Report. This has not changed due to green space network removal.
Heathvale	<ul style="list-style-type: none"> Remove greenbelt zoning. 	<ul style="list-style-type: none"> Area assessed as greenfield general during Main Issues Report. This has not change due to greenbelt zoning. Site zone as greenspace network and urban greenspace.
City Centre Development	<ul style="list-style-type: none"> Insert paragraph 	<ul style="list-style-type: none"> No additional effect. The text added to the preamble before Policy NC4 relates to Torry and Rosemount town centres and future strategies. Any guidance produced for the Town Centres will be subject to a separate SEA process.
Design Policy preamble	<ul style="list-style-type: none"> Add reference to Technical Advice Notes 	<ul style="list-style-type: none"> No additional effect. The text outlines where further information can be found. The Technical Advice Notes will be subject to a separate SEA process.
Six Qualities of Successful Placemaking	<ul style="list-style-type: none"> Add text to resource efficient section 	<ul style="list-style-type: none"> No additional effect. The added text supports the existing statement.
Text after Policy T1	<ul style="list-style-type: none"> Modify text 	<ul style="list-style-type: none"> No additional effect. The text outlines the current position of the Aberdeen City and Shire Strategic Development Plan's Strategic Transport Fund.
Green Space Network preamble	<ul style="list-style-type: none"> Insert paragraph Add text third sentence of paragraph 3.96 	<ul style="list-style-type: none"> No additional effect. The paragraph notes the possibility of temporary greening. No impact. The text outlines further benefits to the Green Space Network.
Open Space Provision in New Development preamble	<ul style="list-style-type: none"> Insert text 	<ul style="list-style-type: none"> No additional effect. Added a use to the list of examples.

Policy / Site	Modification	Aberdeen City Council's assessment of impact on SEA
Natural Heritage preamble	<ul style="list-style-type: none"> • Add text 	<ul style="list-style-type: none"> • No additional effect.
Coastal Planning preamble	<ul style="list-style-type: none"> • Modify text 	<ul style="list-style-type: none"> • No additional effect. Updates text on current status of The National Marine Plan and where it applies.
Low and Zero Carbon Buildings, and Water Efficiency preamble	<ul style="list-style-type: none"> • Modify text 	<ul style="list-style-type: none"> • No additional effect. Update to preamble reflects the position of SSP14 and the update to the Sullivan Report.
Appendix 2: Opportunity Sites	<ul style="list-style-type: none"> • OP13: AECC Bridge of Don – add text • OP59: Loirston – update appendix • OP102: George Street – add sentence • OP65: Haudagain Triangle – modify reference • OP1: Murcar – add text • OP31: Maidencraig South East – add text • OP80: Bon Accord – add text • OP75: Denmore Road – add text • OP86: Dyce Railway Station – add text • OP32: Maidencraig North East – add text • OP107: East Tullos Gas Holder – add text • OP110: Wellington Circle – add text • OP35: Granitehill – add text • OP9: Grandhome – delete text • OP63: Prime Four Business Park Extension – add text 	<ul style="list-style-type: none"> • Site reassessed. No additional effect. See Appendix 5b. • Site reassessed. Material assets comment added. See Appendix 4b. • Site reassessed. No additional effect. See Appendix 5b. • Site reassessed. No additional effect. See Appendix 5b. • Site reassessed as per table 3c above. • Site reassessed as per table 3c above. • Site reassessed as per table 3c above. • Site reassessed. Climatic Factors added. See Appendix 4b. • Site reassessed. Climatic factor mitigation added. See Appendix 6. • Site reassessed. Climatic Factors updated. See Appendix 4b. • Site reassessed. Climatic Factors updated. See Appendix 6. • Site reassessed. Climatic Factors updated. See Appendix 5b. • Site reassessed. Climatic Factors added. See Appendix 5b. • Site reassessed. No additional effect. See Appendix 4b. • Site reassessed as per table 3c above

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 Proposed 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. For example, they are consistent with the Scottish Planning Policy and Aberdeen City and Aberdeenshire Strategic Development Plan.
- 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 action programme in general.

Table 7.1: Monitoring Plan

Effects	What sort of information is required? (Indicators)	Where will information be obtained from?	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?
Biodiversity	Impact on water quality of the River Dee and impact on its qualifying interests.	Dee Catchment Management Plan; Scotland's Environment statistics	Remedial action should be considered if water quality deteriorates or there is a decrease in water resource.	ACC Environmental Policy, SNH, SEPA, Dee Catchment Partnership, North East Scotland Biodiversity Partnership	Annually	Review of land allocations through the Local Development Plan Process. Review of content of Supplementary Guidance on Natural Heritage should a quicker response be required.
	Water abstraction	Scottish Water and SEPA	When the level of water abstracted is close to or exceeds the licensed abstraction volume.	Scottish Water and SEPA		
	Rate and scale of habitat fragmentation	Open Space Strategy and Greenspace Network reviews; number of applications approved which include GSN	When Local Nature Conservation Strategy and/or consultee advice indicates a development will have a negative impact on habitats and species.	ACC Environmental Policy, SNH, SEPA, Dee Catchment Partnership, North East Scotland Biodiversity Partnership	Open Space Strategy Annual Monitoring	Review of supplementary guidance on Open Space and Greenspace network; working with applicants to improve development proposals.
Air	Number and land area of sites designated for nature conservation purposes	Local Nature Conservation Strategy; North East Scotland Biodiversity Action Plan; Scotland's Environment statistics	When Local Nature Conservation Strategy and/or consultee advice indicates a development will have a negative impact on designated sites, habitats and species.	ACC Environmental Policy, SNH, SEPA, Dee Catchment Partnership, North East Scotland Biodiversity Partnership	Annually	Review of Supplementary Guidance on Natural Heritage
	Nitrogen dioxide emissions Air quality (PM ₁₀)	Aberdeen City Council Local Air Quality Management: Progress Reports	When new Air Quality Management Areas are declared. Planning Applications Review of supplementary guidance on Air Quality	Environmental Health	As part of the Air Quality Action Plan or as and when is necessary	Review Supplementary Guidance on Air Quality

Effects	What sort of information is required? (Indicators)	Where will information be obtained from?	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	When planning applications are being approved contrary to Policies.	LDP Team , Building Standards and Development Management,	Annually	Review of supplementary guidance if developments are not achieving desired outcomes
	Increase in car use and energy consumption in new developments	Local Transport Strategy 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	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 Meeting landfill allowance targets Soil erosion	Contaminated land strategy Aberdeen City Council Waste Strategy Flood monitoring data from SEPA.	If the number of contaminated sites/land increases If the level of biodegradable municipal waste sent to landfill increases When flood events increase	Contaminated Land Unit, SEPA	As and when	Prepare or revise supplementary guidance.
Water	Impact on water quality of River Dee SAC Impact of development on Flooding Impact of development on water pollution Physical impact of development on water bodies and the coast Impact of policy on water usage on the River Dee	Dee catchment management plan SEPA flood monitoring and local authority flood monitoring data SNH on the impact on the qualifying interests of the River Dee SAC Scottish Water abstraction figures and SEPA's monitoring results	When data from SEPA and SNH indicate potential pollution in the Dee When data indicates that there has been an increase in flood incidents action should be taken	SEPA, SNH and Aberdeen City Council	As and when flood risk and pollution increases	Review the action programme of the local development plan Review supplementary guidance on flooding and drainage

Effects	What sort of information is required? (Indicators)	Where will information be obtained from?	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?
Landscape	Impact of development on visually prominent areas Development adversely affecting the landscape and townscape setting.	Landscape appraisal Public complaints	When landscape appraisal indicates a negative impact on landscape and townscape setting When there is a large amount of opposition to development	Development Management and developers	Annually	Review land allocations and/or prepare supplementary guidance
	Loss of trees and landscape features	Information will be gained through the consultation responses to planning applications by the Council's Environment Team.	If there is difficulty in implementing the policy to protect trees and landscape features then a review should be undertaken.	LDP Team and Environment 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 LDP and supplementary 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 LDP
Cultural Heritage	Impact on Archaeological remains on Greenfield sites Reduced numbers of historic buildings registered as 'at risk' The impact of development on listed buildings and conservation areas	Archaeology – number of excavations and remains found on sites RCHAMS Buildings at risk register for Scotland Monitor policy usage when determining applications Monitoring sites where negative or uncertain impacts on designations and their settings are predicted.	When there is an increase in Archaeological remains being discovered When the number of buildings on the 'at risk' register remains static or increases When appraisal indicates a negative impact on designations and setting	MDC team, Historic Environment Scotland Consultation, LDP Team, Archaeology and developers, LDP assessing Scottish Civic Trust Awards and Commendations	As and when applications and masterplans are submitted	Review of prepare supplementary guidance and revise land allocations
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 Team	Annually in Open Space Audit Monitoring	Review the Supplementary Guidance on open space

Effects	What sort of information is required? (Indicators)	Where will information be obtained from?	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?
Human Health	<p>Reduced access to open spaces</p> <p>Number of people suffering from air borne diseases as a result of NO2 and PM10, e.g. asthma.</p>	<p>Open space strategy</p> <p>NHS Grampian</p>	<p>When there is a substantial increase or high incidence of people suffering from air borne diseases.</p> <p>If open space audit indicates negative impacts on access to open space</p>	LDP Team, NHS	Annually	<p>Review land allocations and supplementary guidance on greenspace networks and open space.</p> <p>For air quality actions as per effects on Air</p>

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 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 Strategic Development Plan and 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.