From: Carolyn Deasley ████████████████████

Sent: 16 May 2018 16:41

To: █████████████████████████

Cc: Tom Walsh; Claire McArthur

Subject: Aberdeen City and Shire Strategic Development Plan 2 MIR consultation   - SNH response - 16 May 2018

Attachments: Aberdeen City and Shire Strategic Development Plan 2 MIR consultation   - SNH response - 16 May 2018 (A2568915).pdf

Dear SDP team

Please find appended SNH's response to the SDPA's MIR consultation.   Our response to the SEA Environmental Report is being sent separately via the SEA Gateway. Thank you for our recent helpful discussions and we look forward to continuing to work with you to progress the SDP. If you have any queries, please do get in touch.

Kind regards
Carolyn

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**Strategic Development Plan Review
Main Issues Report Consultation
12th March - 21st May 2018**

Contact Details:

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Please tick this box if you wish further correspondence to be directed to this address: YES

If you wish to be added to the SDPA distribution list to be kept informed of our progress in producing the next SDP, please tick this box and provide the email you wish to be added to our database (if different from above):

YES
Email : As above

Your Views

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

Main Issue / Question Number:

Q1 – Do you agree with the updated Vision, as set out in the Preferred Option?

We agree the Vision should be updated but in the following way:

We suggest that the 2nd and 3rd bullets are amended to : "<u>the region's unique natural environment as a key asset in underpinning its quality of life and place</u>."

Final sentence amend to "..and to lead the way towards development <u>which ensures sustainable use of natural resources and living within the area's environmental capacity,</u> dealing with climate change and creating a more inclusive society."

This is because the region's natural environment is a significant asset, and its contribution to achieving the vision through quality of life and place and therefore prosperity should be specifically recognised. The SDP's Vision should include safeguarding this asset and its sustainable use within the capacity of the environment. Please see our new [Corporate Plan](#) which focusses on 'Connecting People and Nature,' and sets out the contribution of the natural environment to prosperity and wellbeing

Q2 – Do you agree with the Preferred Option that the existing spatial strategy, in general terms, remains fit for purpose and should be carried forward?

We support the inclusion of a strategic walking and cycling network (para 3.10) in the SDP's Spatial Strategy, and the Proposal in Schedule 2 of the SDP to identify and develop green networks. We welcome the desire to progress this, and seek spatial identification and proposed implementation through this new Plan. We will be pleased to support you in this work - please see our comments under Q16.

Q3 – Do you agree with the Preferred Option that the new plan should protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development?

No comment

Q4 – Do you agree that the Preferred Option for the new plan should focus on the towns of Banff, Macduff, Fraserburgh and Peterhead for regeneration?

Regeneration of these towns should make the most of their coastal setting, and ensure safeguarding and enjoyment of this significant natural area. This coastline has a rich and internationally important natural heritage including geological SSSIs, seabird cliffs SSSI and SPA, including planned extensions to the Moray Firth Special Protection Area (SPA - consultation stage) http://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa_code=10490 and Ythan Estuary, Sands of Forvie and Meikle Loch (extension) SPA (consultation stage): http://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa_code=10479

A balanced approach is required which takes advantage of these assets but safeguards them from inappropriate development.

The Town Centre Toolkit and its themes of 'Attractive, Active, Accessible' link strongly to the design-led approach set out in SPP and NPF3. The Toolkit discusses how a town can embrace its waterfront.

The National Walking and Cycling Network (NWCN*) also shows the Aberdeenshire coastal route as a NWCN project/potential route but the Project Plan (Annex B) identifies the need to complete gaps in this route (e.g. the Macduff-Gardenstown area) to create a continuous coastal path. There is potential for these settlements to link with two of Scotland's Great Trails: the Moray Coast Trail and Formantine and Buchan Way. We would welcome the opportunity to discuss how these links can be made.

As coastal towns we also note the particular need for regeneration of these areas to be consistent with and help deliver some policies within the statutory National Marine Plan (NMP). Where there is a link to the marine area, the NMP contains policies relevant to the use, development, protection and enhancement of areas under the jurisdiction of terrestrial authorities.

We also lead on the Scottish Government's Green Infrastructure Strategic Intervention (GISI), part of the 2014–2020 ERDF programme. The GISI aims to improve Scotland's urban environment by increasing and enhancing greenspace in our towns and cities, especially close to areas of multiple deprivation. This will make these areas more attractive for people to live and work in, and therefore attract jobs, businesses and further investment. We would be pleased to discuss potential opportunities for these towns.

Q5 – Do you agree that we should present an optimistic view of future economic growth in the new plan?

We suggest there should be a commitment to sustainable economic growth which is within the capacity of the environment to help ensure the natural environment can contribute to this aim.

Q6 – Do you agree with the Preferred Option that the new plan should delay releasing safeguarded employment land until after 2030 and look at improving existing employment areas for future use?

Yes, we agree with this approach and support the MIR's proposal to consider regeneration of existing areas. We advocate the natural environment's role in enhancing quality of place including current employment areas and therefore a more attractive place for business and industry to invest, work and live in. Green infrastructure can play a key role in delivering this.

Q7 – Do you agree with the Preferred Option that the new plan should take a stronger and more flexible approach to long-term tourist development?

We support tourism proposals which are developed sustainably, including infrastructure and visitor management. The natural environment is one of Scotland's greatest assets, making a major contribution to economic growth and quality of life. Our research report 'Valuing our Environment: The Economic Impact of Scotland's Natural Environment' calculated for the first time the significant economic impact of Scotland's natural environment as well as identifying wider benefits of the environment to businesses and the economy.

In the SDP area, the success of tourism also depends on the protection and enhancement of the significant environmental assets, such as the coastal and marine environment as we refer to under Q4. We suggest these messages are conveyed in the new SDP.

Q8 – Is there anything more the planning system should do to support sustainable economic growth?

Yes. Quality of environment and place as a cornerstone of quality of life is a key consideration in attracting investment in the SDP area. We refer to the strong place making principles and good design themes running through TAYplan (Policy 2) SESplan Proposed Plan and Clydeplan.

We seek a similar approach in the new SDP which encompasses the contribution of the natural heritage (including green infrastructure) to creating high quality, distinctive places. This includes enhancing the area's natural assets and landscape, climate resilience and adaptation and green infrastructure.

Q9 – Is there anything more that the planning system can do to help improve mobile data coverage and ultrafast broadband?

No comment

Q10 – Do you agree that the housing supply target should be based on a composite scenario rather than directly on any of the three scenarios identified in the Housing Need and Demand Assessment?

No comment

Q11 – Do you agree that we should assume continued funding for affordable housing at 2020/2021 levels from the Scottish Government for the whole of the next plan period?

No comment

Q12 – Do you agree that significant generosity should be included in the early years of the plan but, for the later periods, no generosity should be added? This would be subject to review in future plans.

No comment

Q13 – Do you agree that our Preferred Option should allow Local Development Plans to make some further housing allocations?

No comment

Q14 – Do you agree that any new greenfield allocations should preferably be under 100 houses in size?

Yes, we support the reduction of size of greenfield sites in principle because of their generally higher environmental impact. Extension to existing sites or settlements or green field alternatives will need to be evaluated on a site by site basis for their environmental impacts.

Q15 – Do you agree with the Preferred Option that the new plan should target generating 5 Gigawatt hours of renewable electricity and seek to diversify non-wind based generation by 2040, along with energy storage?

SPP sets out the policy for a spatial framework for strategic development planning authorities to identify capacity for onshore wind energy. We welcome the setting of a target, but do not have expertise to comment on whether the target is achievable.

We welcome the desire to diversify renewable energy generation as this meets the aims of the energy strategy to provide security of supply, and will spread the impact of generation across different habitats and landscapes.

We support the intention to look at opportunities for energy storage and encourage a focus on brownfield sites and locations with existing connections to the electricity network as this will reduce the effects of new infrastructure on our nature and landscapes. of new infrastructure.

Q16 – Do you agree that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions?

The strategic walking and cycling green network is a regionally significant active travel option and we recommend the SDP places greater emphasis on its delivery through LDPs as part of a strategic green network.

We support and welcome the recent work on active travel, including Nestrans Active Travel Action Plan and the local authorities' work on active travel. However, we agree with the MIR that "much more is needed across the area to make active travel a more attractive option" (para 9.11). The implementation of these active travel routes needs to be given greater emphasis in the new SDP, including their integration where appropriate into a strategic green network. Active travel is a key way of ensuring enjoyment of nature, recreation and walking and cycling can be combined.

We therefore seek the identification of a strategic green network in SDP2 with a clear rationale and action/investment plan as part of the SDP. We welcome discussions to date to progress this and will be pleased to continue to support and facilitate this. We recommend the Plan provides for:

- Spatial representation of strategic routes (including cross boundary links) and policy protection
- A commitment for LDPs to spatially identify green networks at an O.S. based local settlement scale, including their functions as active walking and cycling routes, enhancement of existing routes, identification of gaps in the active travel network and implementation of new links
- Some clear principles are established that will enable LDPs to achieve a consistent approach to green networks across the SDP area

- LDPs include green infrastructure as eligible developer contributions. TAYplan's Policy 8 on Green Networks and SESplan provide examples as to how this is being delivered through other SDPs. In terms of delivery, eligible developer contributions should include active travel (off road walking and cycling provision) and green infrastructure as is the case with other SDPs.

Additional comments from SNH

The contribution of the natural environment: We seek greater emphasis on the quality of the natural environment in the new SDP, including:
- Its safeguarding and enhancement so it can contribute to making better places for people
- The need for development to be within the capacity of the environment, and working with nature to deliver solutions.
- Recognition and spatial representation of its key strategic natural resources.

We recommend that the following natural resources are spatially mapped in the SDP with supporting policy protection:
- International and national designated sites are shown on a map that forms part of the approved plan, or are included in policy/text for protection.
- Policies provide appropriate levels of protection for protected species
- Areas of carbon rich soil are spatially represented in the plan and there are clear policies or statements to protect carbon rich soil.

Habitats Regulations Appraisal (HRA): We encourage the timely commencement of the HRA to ensure there are no adverse effects on the integrity of any European site.

River Dee SAC: Development and abstraction of water from the River Dee should be planned to ensure that waterbodies on the main stem of the river are restored to 'good' status for water flows. We note that the waterbodies from Banchory to Aberdeen are currently in 'moderate' condition but are projected to be 'good' by 2027. We would welcome further discussion with the SDPA, LDPs, Scottish Water and SEPA to identify how best the SDP can effectively contribute to the delivery of 'good' status water flow, and better understand the effects of climate change effects on the Dee as referred to in the approved SDP (pg. 31), including a commitment to water efficiency in all new development.

Climate change: We encourage the SDP to lead by example on climate change issues and adopt best practice in relation to the mitigation of and adaptation to potential impacts of climate change, including sea level rise and the measures that may be required to adapt to such changes.

The National Coastal Change Assessment (NCCA) informs policy makers of past and anticipated future coastal change and promotes greater appreciation of the 'assets' which are vulnerable and resilient to coastal erosion. Please see http://www.dynamiccoast.com/about_project.html and individual coastal cell reports: http://www.dynamiccoast.com/files/reports/NCCA%20-%20Cell%202%20-%20Fife%20Ness%20to%20Cairnbulg%20Point.pdf As a partner in the NCCA research project we will be pleased to facilitate a cross boundary discussion with Aberdeen and neighbouring authorities on its implications for the SDP's coastal zone.

We refer to the Government's Climate Change Plan: The Third Report on Proposals and policies 2018-2032 (Feb 2018) and reference to the planning system, (pgs. 33-35) supporting the need for low carbon lifestyles, placemaking, energy efficiency in buildings, sustainable forms of travel and active lifestyles. We welcome discussion between stakeholders so the SDP can set the best framework for adaptation and mitigation. Adaptation Scotland's Climate Ready Places may be a useful way of communicating this

issue to the wider audience. Scotland's Climate Ready Cities provides Scottish showcase examples at COP23 Annual United Nations Climate Change Conference.

Planning across the land-sea interface: We encourage the SDP (and LDPs) to take a broader approach to the integration of marine and terrestrial planning systems. Many decisions about the land affect the marine area and its use, just as many decisions about the sea affect people, businesses and the environment on land.

The National Marine Plan was adopted by Scottish Ministers in 2015 and includes many policies relevant to terrestrial planners and decision-makers. In due course it is also expected that a regional tier of statutory marine plans will come forward, which will allow more detailed integration; however, it is not known when regional marine plans will come forward for marine areas adjacent to Aberdeen City & Shire.

In the interim the East Grampian Coastal Partnership (EGCP) aims to progress work to support an integrated approach to coastal management. It would be helpful to discuss with EGCP (and Marine Scotland) how the key development planning considerations can be integrated following the 'Marine Planning on the East Grampian coast' workshop in March 2017 (http://www.egcp.org.uk/publications.html) and the preparation for regional marine planning.

Issues on which the SDP may be able to facilitate an integrated approach to planning across the land-sea areas may include:

- Identifying developed and unspoiled areas of the coastline for the SDP area.
- Encouraging a shoreline management plan
- Access to and along the coast, and potential improvement of land-based facilities for marine and coastal recreation and tourism
- Land-based grid infrastructure for electricity generated offshore
- Shore-side facilities for marine industries