

[Redacted]

**From:** Tom Walsh  
**Sent:** 18 May 2018 17:11  
**To:** Claire McArthur  
**Subject:** FW: SEPA Response to Consultation Reference SEA/01239 ER  
**Attachments:** PCS158362Response.doc

**Categories:** Blue Category

FYI SEA response from SEPA

-----Original Message-----

**From:** planning.aberdeen@sepa.org.uk [mailto:planning.aberdeen@sepa.org.uk]  
**Sent:** 18 May 2018 17:07  
**To:** Tom Walsh [Redacted] sea.gateway@gov.scot; SEA\_Gateway@gov.scot  
**Subject:** SEPA Response to Consultation Reference SEA/01239 ER

Thank you for consulting SEPA on the above proposal. Please find our response attached.

Where applicable this email has been copied to the agent and/or applicant.

This is an auto-generated email sent on behalf of SEPA's Planning Service. Information on our planning service along with guidance for planning authorities, developers and any other interested party is available on our website at <http://www.sepa.org.uk/planning.aspx>.

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SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ.  
Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

Our ref: PCS/158362  
SG ref: SEA/01239 ER

If telephoning ask for:  
Judith Montford

18 May 2018

Tom Walsh  
Aberdeenshire Council



By email only to: [SEA\\_Gateway@gov.scot](mailto:SEA_Gateway@gov.scot)

Dear Tom Walsh

## **Aberdeen City and Aberdeenshire Strategic Development Plan Main Issues Report - Environmental Report**

Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Aberdeen City and Aberdeenshire Strategic Development Plan Main Issues Report (MIR). This was received by SEPA via the Scottish Government SEA Gateway on 04 April 2018.

We have used our scoping consultation response to consider the adequacy of the ER and this is used as the framework for detailed comments which can be found in Appendix 1. For convenience, these comments have been structured to reflect that of the ER. Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the Aberdeen City and Aberdeenshire Strategic Development Plan MIR itself will be provided separately.

As the Aberdeen City and Aberdeenshire Strategic Development Plan MIR is finalised, Aberdeenshire Council as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the [Scottish Government SEA Guidance](#). A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this environmental report consultation, please do not hesitate to contact me on 01224266604 or via our SEA Gateway at [sea.gateway@sepa.org.uk](mailto:sea.gateway@sepa.org.uk)

Yours sincerely

Judith Montford



Planning Service

Ecopy: [sea.gateway@hes.scot](mailto:sea.gateway@hes.scot); [sea\\_gateway@snh.gov.uk](mailto:sea_gateway@snh.gov.uk)

## **Appendix 1: Comments on the Environmental Report (ER)**

### **General comments**

We are pleased to note that a majority of the advice we provided in our scoping report have been incorporated into the Environmental Report (ER). Table 7.1 highlights the changes made based on our scoping comments. In instances where our advice was not adhered to, justifications have been given.

### **Detailed comments**

#### **1. Chapter 1 and 2 - Interim Environmental Report Non-Technical Summary and Outcomes from SDP1 and related PPS**

- 1.1 We find that a majority of the environmental problems that will arise due to the Strategic Development Plan (SDP) being taken forward within the City and Shire has been identified in the ER. We also agree with the mitigation measures identified to address the identified problems to enable the plan to be implemented.
- 1.2 We are pleased to note that pressure on potable water supplies within the City and Shire and pressure on the River Dee has been identified and the mitigation measures include the requirements for new developments to adopt water saving technologies to take the pressure off the River Dee. As stated in our response to the MIR we are happy to discuss this further.
- 1.3 Increased flood risk has also been identified as a problem and it is stated that as a mitigation measure, the plan will direct development away from land susceptible to flooding/flood risk.

#### **2. Chapter 3- The Main Report- Purpose of this Environmental Report and Key Facts**

- 2.1 We note the update made to the River Basin Management Plan for the Scotland river basin district: 2015-2027. Please update this accordingly in Appendix 7.3, Table 7.3, the section under - Water, Marine and Coastal column.
- 2.2 We are also pleased to note the inclusion of the following SEPA strategies - One Planet Prosperity –Our regulatory strategy and One Planet Prosperity – A Waste to Resources Framework in Table 3.6.

#### **3. Chapter 4 - Environmental problems**

- 3.1 We consider the role of the SDP in dealing with the issues/trends identified under biodiversity, flora, fauna, climatic factors, air quality, water, soil and material assets as in Table 4.1 generally adequate.
- 3.2 With regards to improving Air Quality (Table 4.1), the SDP should also promote active travel for example cycling within especially the city through the creation of pedestrian friendly roads/routes and access to bicycle schemes. As well, the SDP should promote the use of electric vehicles in the context of improving air quality. These opportunities should be sought.

3.3 With regards to 'Material Assets', the SDP can look into the innovative reuse of decommissioned waste (from energy infrastructure) that will be generated during the lifetime of the plan.

#### **4. Chapter 5 - Assessment of Vision/Objectives/Spatial Strategy/Preferred Options**

4.1 The assessments made of the impacts of the preferred and alternative options of the plan seem reasonable.

4.2 With regards Table 5.2 - Spatial strategy and Table 5.3 – Economic reform and Table 5.4 – Land allocations, under material assets, we consider that more resource will be used in the interim to deliver the SDP strategy; economic growth and development and hence there are likely to be some negative effects on the environment and not only positive. This should be acknowledged in the 'material assets' sections.

4.3 We understand (an updated) Strategic Flood Risk Assessment (SFRA) is yet to be produced and we consider this will give a more robust assessment of flood risk issues. We therefore ask that the assessment of flood risk (as in Table 5.5) is revisited and revised to reflect the accurate situation following robust strategic flood risk assessment of the City and Shire.

#### **5. Chapter 6 -Assessment Mitigation and Monitoring**

5.1 In Table 6.1 the proposed mitigation to reduce or offset any significant adverse effects of the plan on the environment seem reasonable. The table could include measurable targets to ensure the mitigation measures are deliverable.

5.2 As stated above, the implementation of the plan is likely have interim negative impacts where material assets is concerned and therefore this should be acknowledged in the 'material assets' section in Table 6.1. Similarly this should be reflected in table 7.2.