

Our ref: PCS/161571  
Your ref: Proposed SDP

If telephoning ask for:



17 December 2018

Aberdeen City & Shire  
Strategic Development Planning Authority  
Woodhill House  
Westburn Road  
Aberdeen  
AB15 5GB

By email only to: [team@aberdeencityandshire-sdpa.gov.uk](mailto:team@aberdeencityandshire-sdpa.gov.uk)

Dear Sir/Madam

## Proposed Strategic Development Plan (SDP) August 2018 Aberdeen City and Shire

Thank you for your consultation email which SEPA received on 4 October 2018.

At this point we have not filled in the consultation form as requested but have provided you with comments in our letter below which we hope you consider agreeable.

We believe that the two main areas which the SDP should look at closely are place making where blue green infrastructure is concerned and water supply within the City and Shire areas. The plan as it stands does not look into these two issues as proactively as it should.

We have therefore provided comments in that regard and our comments follow the structure of the SDP to allow for easy reference.

Further below in sections 7 and 8 we have also provided you with comments on the associated Strategic Flood Risk Assessment and Action Programme.

### 1. Vison

1.1 We consider the outlined vision to be satisfactory, however we ask that under bullet point 2, the phrase “*where appropriate*” should be removed. Enhancing the natural environment is crucial, not an optional extra if we want to maximise environmental, social and economic productivity. The text should therefore read:

*• the City Region’s unique built, historic and natural environment, which will be protected and enhanced as a key asset in underpinning a high quality of life and place.*



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1.2 In section 2.2 it is stated that the aims outlined to achieve the vision include promoting the need to use resources more efficiently and effectively and take on the challenges of climate change. We agree with this statement and it is the reason why the issues with the River Dee being a main source of water supply must be addressed. We are keen to work with you in regard to the issue of finding alternative solutions to water supply in the City and surrounding area to meet the needs and demands of the proposed development and service industries.

1.3 We ask that in addition to the above point (in 1.1), the second bullet point in section 2.2 should be corrected to read:

*promote the need to use resources more efficiently and effectively whilst protecting **and enhancing** our assets;*

1.4 We also ask that the second bullet point in section 2.3 should be corrected to read;

*protect and, ~~where appropriate~~, enhance our valued assets and resources, including biodiversity, the historic and natural environment and our cultural heritage;*

1.5 As well as the policy wording in section 2.3 being changed to read:

*In assessing proposals for development, we will balance the importance given to each Aim **and consider linkages** in coming to a decision, taking into account the Vision, Spatial Strategy, Objectives and Targets of this Plan.*

## **2. Our Spatial Strategy**

2.1 We agree generally with the spatial strategy. For example, in section 3.2, we agree that it is essential to identify areas where development will take place and we add that these should be areas which can also provide improvements and enhancements to the natural environment. Regeneration proposals should also be sought to minimise 'new' resource use.

2.2 Section 3.5 states that "*Local Development Plans will use the Spatial Strategy from this Plan to set policies and identify land for development. Planning applications will be assessed against the Spatial Strategy and the Local Development Plans to decide whether the location, nature and scale of development is in line with this Plan.*" It is not explained how this will be achieved, especially in regard to using the spatial strategy to determine planning applications as it appears the timelines for the production of these plans are different. It would be helpful if this is further explained.

2.3 We also suggest that the spatial strategy outlined within the key diagram – Figure 1, should show areas for potential environmental improvements and enhancements within the three strategic growth areas to ensure high quality natural environments. We are happy to provide you with information which highlights the Priority Rivers for restoration in the three growth areas in the near future and we would like to liaise with you regarding this.

2.4 In accordance with providing high quality natural environments within urban environments, we are particularly pleased to see in section 3.7 that "*Developers will also have to accept the need for contributions towards necessary infrastructure, services, and facilities, and should take account of this when negotiating the price paid for land.*" We would expect these contributions to include blue-green infrastructure as a primary infrastructure type.

2.5 In line with the point above, we ask that the following texts under the heading 'Strategic Growth Areas' be changed to read:

Section 3.10: *The Strategic Growth Areas will make housing, employment opportunities and services sustainable by ensuring that these uses are in close proximity to each other, **protecting and enhancing blue-green infrastructure** and connected by high quality active travel networks and public transport.*

Section 3.11: *It will therefore be important for Local Development Plans to explore opportunities to expand and connect strategic walking and cycle networks, building on current and planned networks where these are available. This should provide opportunities to improve the natural environment by linking habitats and open spaces through green infrastructure and networks **and should allow for community engagement throughout the design process.** Appropriate new planting will also play an important role. These networks should consider how best to link in with plans for a National Long Distance Cycling and Walking Network as they are developed in conjunction with the Regional and Local Transport Strategies.*

Section 3.12: *All four Strategic Growth Areas will focus on creating sustainable mixed communities with the services, facilities and infrastructure necessary for the 21<sup>st</sup> century. This will include new and improved infrastructure, such as:*

- *new or extended primary and secondary schools;*
- *multifunctional green networks and green spaces, **incorporating above ground surface water drainage features and** including areas for food growing;...*

2.8 In line with the point above, we ask that the following text under the heading 'City Centre Transformation Zone' be changed to read:

Section 3.18: *Aberdeen City Centre is an important asset for the City Region and must continue to be enhanced and promoted. We need to take determined action to create a City Centre to be proud of, and which reflects the global status and ambitions of the city and the wider region. The City Centre will be promoted through excellent public transport links **and an emphasis on active travel thereby** minimising the impact of traffic.*

2.6 On page 16 (under text heading - Strategic Growth Area: Aberdeen to Peterhead) Figure 3 shows a "green network opportunity" linking Ellon with Newburgh. While there is an active travel route shown running North from Ellon to Peterhead and then Fraserburgh there seems to be no indication that efforts will be made to "enhance" this route. We would have thought that there would be vacant land in the Peterhead/Fraserburgh area that could be linked up with the active travel route enhancing "sense of place", reflecting the intentions outlined in para 3.27 below. We imagine that the Authority will have Green Infrastructure (GI) datasets that they can run on GIS to investigate this.

2.7 In the text in sections 3.38 and 3.42, under 'Strategic Growth Area: Aberdeen to Laurencekirk' heading, we are pleased to see that a new settlement (*at Chapelton*) "*has the potential to set a new place making standard for future development*" in the area and also "*Opportunities for the provision and enhancement of active travel networks*" will be explored in the *Aberdeenshire Local Development Plan*". There are good opportunities here to have [Building with Nature](#) standards incorporated in future development. Local partnerships should be established with for example;

- SNH Outdoor fund for learning
- SNH Green Infrastructure Fund - capital works fund
- SNH GI Community Engagement Fund
- LIFE Nature and Biodiversity Funding
- Green Infrastructure intervention fund
- SNH Learning in Greenflag Grant Programme

- 2.8 To deliver blue green infrastructure in the area, the SDP should seek to gain the award itself for good policy making as well as promoting uptake of the award by developers as the award scheme is applicable to both policy and development. Criteria to be met to reflect good place-making principles should be nature, water and well-being. There is a detailed manual advising how the criteria are to be met on the [Building with Nature](#) website.
- 2.9 With regards to place making, we ask that producers of this plan refer to the policy 2 and 8 of the [Tay Strategic Development Plan 2016-2036](#) which incorporates/establishes in its policies good place making principles as a benchmark for developing the area.

### 3. Our Communities

- 3.1 High quality green spaces and natural environments are assets to communities that benefit from them as they enhance health and well-being as well as provide social economic benefits. We ask that the following wording in red is included in the text of section 4.1:

*“If we are to achieve our overall Vision we must set the highest standards for placemaking, urban and rural design, promote a mix of land uses, use land more efficiently, and prioritise the re-use of previously developed land, **protecting and enhancing our natural environment for social, economic and environmental benefit**”.*

- 3.2 In terms of place making, with the targets identified to ensure sustainable communities, we ask that the following wording/bullet point be included to the text/bulleted points listed under ‘How to meet the targets’ on page 27:

***The natural environment will be considered a key context in developing “sense of place” delivering enhanced environmental, social and economic productivity.***

- 3.3 In terms of *Delivery of New Homes*, with the targets identified to ensure sustainable communities, we ask that the following wording/bullet point be included to the text/bulleted points listed under ‘How to meet the targets’ on page 31:

*Where necessary, Action Programmes, developer contributions and compulsory purchase powers should be used to focus attention on delivering new housing development and the associated necessary infrastructure. **This will include blue-green infrastructure.***

### 4. Our Resources

- 4.1 Following a review of section 6, we suggest that additional objectives are needed to capture the discussions in the subsequent paragraphs. These objectives should seek to promote a circular economy where waste generation is minimised and natural resources are protected and also ensure that developments protect and enhance existing water bodies. We ask that the following text in red be included in the list of objectives under the heading ‘Objective’:

**Objective**

• To make sure new development safeguards and, ~~where appropriate~~, enhances the City Region's historic, natural and cultural assets and is within the capacity of the environment.

• To be a City Region which:

- takes ownership of its natural environment and works sensitively to maximise environmental, social and economic benefits;
- ensures that development protects and also enhances the natural environment, including existing water bodies;
- takes the lead in reducing the amount of emissions and pollutants released into the environment;
- mitigates and adapts to the effects of climate change and changing weather patterns;
- limits the amount of non-renewable resources it uses; and,
- supports, protects and enhances our biodiversity

4.2 It is stated in section 6.4 that: “River Basin Management Planning at the catchment level should consider strategic options for improved surface water management that contributes to wildlife and ecology, while delivering opportunities to balance surface water flows and provide recharge for rivers and wetlands that may be under environmental pressure.” We do not agree that this should be promoted through the RBMP rather we consider this to be promoted through the Authorities Surface Water Management Plans and these plans should also ensure that, in addition to managing surface water flows and provide recharge for rivers and waterbodies, there should also be a strong focus to incorporate strong place-making.

4.3 Again, in light of the discussions above, we ask that the following wording in the text of section 6.5 be amended to read:

*Not all water bodies in the City Region currently meet **European Union Water Framework Directive standards relating to the physical structure, ecology and chemical and biological composition. The water environment includes all wetlands, rivers, lochs, transitional waters (estuaries), coastal waters and groundwater. The River Basin Management Plans promote improvements to water bodies not currently meeting the standards of the Directive, as well as to help maintain the quality of those that currently do. New development should not adversely impact on the quality of the water environment during either construction or operational phases. Development should be designed to avoid fragmentation of existing blue-green networks and further enhance these. This will require to be considered from land valuation onwards with developer contributions required to support this work.***

4.4 With regards to the point made in section 6.6, we are keen to work with you in regard to the issue of finding alternative solutions to providing a public water supply in the area to meet the needs of the proposed development. We are keen to look into alternatives and appropriate mitigation measures that will need to be undertaken. The situation regarding abstraction from the River Dee for public drinking water is that there will be no increase in the currently permitted abstraction limits of water from the River Dee. The River Dee lower water body (WBID: 23315) (at Mannofield) is assessed as at Moderate for modelled flows less than Q95, based on licensed volume, and discussions are on-going regarding a reduction in the volume licensed to be abstracted. This summer, in drought conditions,

Scottish Water proposed placing a pump at Invercarnie to maintain abstracted flows. This was within the licensed abstraction location so there was no need for a new authorisation.

4.5 We ask that, with this in mind, the wording in section 6.6 be amended to read;

*“During and beyond the period of this Plan, the effects of climate change and increasing water demand from development may affect the river. Both Councils will need to work together to reduce impacts on the River Dee. Appropriate mitigation and adaptation measures ~~may~~ will have to be taken, and this could include measures to reduce the amount of water that Scottish Water is licensed to take from the River Dee to deal with this matter.”*

4.6 In light of previous points made above, we ask that the following wording in the text of section 6.8 be changed to:

*Quality blue-green infrastructure is critical to the delivery of resilient sustainable development. Biodiversity, wildlife habitats and landscape can be vulnerable to the effects of new development. Land should be valued taking account of the requirement to protect and enhance these assets. These interests will require to be considered from the visioning stage in determining the location and design of new development. We need to make sure there are no possible effects from proposed development on internationally, nationally or locally designated areas. Biodiversity and the natural environment also underpin much of the City Region’s rural economy, as well as the quality of life of its communities.*

4.7 We are generally happy with the points made in this section under sustainable development and climate change.

4.8 In section 6.14 we note the commitment to focus “on a fabric first approach and energy-efficiency measures to reduce the demand for energy and improve water efficiency, will be an early step towards achieving carbon-neutral development in the near future.” We consider this a more sustainable approach and ask that opportunities for development to be self-sufficient in regard to energy efficiency as well as the use of energy as a by-product (example energy from waste) by developments be pushed for to reduce the need to create energy for these development as stated in sections 6.18. Proposals whereby energy will be sought from e.g. non-waste bio sources should be discouraged.

4.9 We have been working closely with The Scottish Land Commission to bring thousands of acres of derelict and vacant land back into productive use as referenced [here](#). This section should refer to this commitment in prioritising the use of brownfield over greenfield sites for development. We suggest this wording (which should also be reiterated in section 5 - *Our Economy*) be included in this sector:

*We will work with the Vacant and Derelict Land Commission and relevant stakeholders to put land back into reuse, boosting local economic, social and environmental productivity.*

4.10 In terms of the targets identified to ensure sustainable development, we ask that the following wording in red be included to the text/bullet points on page 42:

#### **Targets**

- To make sure that development safeguards and, where appropriate, enhances, the City Region’s historic environment, and that development will not lead to its loss or damage.

- To ensure development supports protection and improvement of the physical structure, ecology, chemistry and biology of the water environment in support of the Water Framework Directives
- ~~To avoid having to increase the amount of water Scottish Water are licensed to take from the River Dee, as a result of the new developments proposed in the Plan.~~
- To identify ways that Scottish Water can meet the water supply demands of development whilst reducing the demands on the River Dee
- For all new developments to be designed to minimise resource demand and incorporate water and energy efficiency measures.
- To reduce waste going to landfill and support the provision of waste treatment facilities and the recycling of waste.

4.11 In order to meet these targets we suggest the wording below instead of “Both Councils will take part in the River Basin Management Planning process, particularly as it relates to new development.”

*“We will work closely with relevant stakeholders to ensure protection and improvement of the water environment is embedded as a key principle of “place-making” in the area”*

## 5. Our Connections

- 5.1 With regard to transport, we support the need for sustainable “place-making” options for connectivity and we ask that the following wording in red be included in the text of section 7.4:

*Walking and cycling are the most environmentally friendly forms of transport and should be encouraged as a way to achieve important health, social and environmental benefits. Active travel routes will be designed taking account of local objectives relating to blue-green infrastructure to ensure these benefits are maximised. The Plan will help ensure sustainable land use patterns to reduce the need to travel and promote improved connections between both local and strategic active travel networks and public transport.*

- 5.2 With regard to digital infrastructure, it will be useful to include in section 7.8 that to maximise the usefulness of works associated with providing linear infrastructure, opportunities will be sought to make room for digital infrastructure at the same time.

## 6. Glossary

- 6.1 As a minor point, we ask that in the glossary, the reference to water bodies throughout SDP should be replaced with water environment and a definition of water environment included in the glossary as:

**Water environment** - all wetlands, rivers, lochs, transitional waters (estuaries), coastal waters and groundwater.

## 7. Strategic Flood Risk Assessment (SFRA)

- 7.1 Although this Strategic Flood Risk Assessment (SFRA) for Aberdeen City and Shire has been carried out to support the Strategic Development Plan (SDP) for the City Region, we note that individual SFRA's are proposed by both Aberdeen City Council, and

Aberdeenshire Council to accompany their Main Issues Reports, and we look forward to providing more detailed comments on these in due course.

- 7.2 The SDP identifies flooding as an issue and there is an action to address this under 'How to Meet the Targets' section of Chapter 6. It appears that flood risk has not specifically been addressed as a target, so it may be beneficial to amend this section of the SDP so that there is consistency between the targets and the actions. However, we are supportive of the actions of the plan and the SFRA to promote flood avoidance and not allocate sites for development which are at risk of flooding. The plan has identified the risk relative to the type of development proposed, and we highlight that our [SEPA Land Use Vulnerability](#) guidance can offer additional advice, and help inform appropriate development.
- 7.3 With regards to section 7 of the SFRA, we highlight that updated climate change projections (UKCP18) have very recently been published (December 2018). The UKCP18 sea level rise projections are higher than UKCP09 for similar emissions scenarios. Therefore we highlight to Aberdeen City Council and Aberdeenshire Council in their roles as Flood Risk Management Authorities that the previous projections have been superseded and they may require this, or other SFRAs, to be updated.
- 7.4 We have noted a few errors with the flood history in Appendix 3 and have listed these below for information:
- Page 24 Aberdeen City, Storm Frank was in December 2015, although there was another significant flood event in early January 2016 which impacted the River Don.
  - Page 25 Portsoy, There was also an event in June 2017 which caused flooding to properties.
  - Page 28 Ellon, We understood that the recent significant flooding in Ellon occurred in January 2016.

## 8. The Action Programme

The Action Programme focus should include a commitment to ensure place making principles are embedded in developments in the area to enhance and protect the natural environment. We therefore ask that the following (in red) is included;

*The Action Programme focuses on:*

- *Actions to deliver cross-boundary infrastructure and infrastructure of regional importance;*
- *Actions to help deliver national developments; and,*
- *Actions that require the input and coordination of more than one Council to deliver*
- *Actions to ensure place making principles are embedded in developments in the area to enhance and protect the natural environment.*

### **Action 9 and 26 state that;**

#### *Action 9*

*“Opportunities will be explored where these projects / strategies could enhance the connectivity of existing and new development to green networks, blue green corridors and existing active travel infrastructure. The Aberdeenshire and Aberdeen City Local Development Plans will have a role to play in identifying opportunities at a settlement level. SDP images show indicative locations only”.*

#### *Action 26*

*“The SDPA will work with Aberdeen City Council, Aberdeenshire Council and Nestrans explore opportunities to develop improved cross boundary active travel connections and green networks (and synergies of the two). Connections and networks may be achieved through the use of River*



*Corridors, existing or future green networks (greenbelt) and existing or planned development within the limitation of the development plan. Where possible improved connections should seek to enhance existing green networks. SDP images show indicative locations only.”*

We are aware of good practice undertaken by Glasgow and Clyde Valley Green Network Trust, which should be referred to. [Opportunities mapping](#) was undertaken for the Glasgow and Clyde Valley SDP by overlying datasets relating to habitat, access, open space and development to identify hot spots for the delivery of green networks, Spatial strategies for several of the resulting Green Network Strategic Development Areas thereby identified were prepared outlining opportunities and action plans , these can be viewed [here](#). The approach is now also being applied at the Local Plan level, the resulting reports being used to inform Main Issues Reports. GCVGNP have also undertaken a detailed review of Scottish policies on GI and worked up examples of exemplar coverage - reflecting water management, access, open space, habitat enhancement and importantly STEWARDSHIP. Please see page 59 [here](#) .

**Action 64 states: -**

*The Water Framework Directive target for all rivers to achieve 'good' quality status by 2027 is supported by the SDP. Local Development Plan site allocations should identify buffers to river margins and planning proposals should include surface water management. This may include a requirement for Environmental Management Plans, especially on larger sites near sensitive waterbodies. The next Local Development Plans are anticipated to come into effect by 2022 at which stage the Platinum Sustainability Standard for all new development should be the minimum standard. Abstraction of drinking water from rivers is monitored by Scottish Water, under licence from SEPA who control and manage all licences for abstractions. The SDPA will work with Scottish Water and SEPA to consider potential longer-term constraints and future development options to inform the next review of the SDP.*

We would like to see in this Action 64, the reference to the buffer strips and surface water management linked to proposals on blue-green infrastructure and “creation of place”.

**Action 67 states: -**

*The SDPA will facilitate joint working between the two Councils to better inform flood protection projects. Local Development Plans will consider the SDP SFRA and the North East Local Plan District Local Flood Risk Management Plan. Local Development Plans will undertake their own SFRA during the Main Issues Report and Preferred Site Assessment process. Consideration must be given to Potentially Vulnerable Areas, SEPA Flooding Maps and the River Basin Management Plans when considering Local Development Plan allocations and during the development management process. Joint working between the SDPA and the two Council Flood Risk Management and Local Development Plan Policy Teams will continue. Consideration is to be given for the scope for managed realignment of parts of the coast to allow naturally for future sea level rising processes.*

This action should recognise the benefits of surface water management planning dovetailing with blue-green infrastructure provision, prioritising management and treatment of surface waters above ground and reducing sewer flooding.

**Action 68 states:-**

*The SDPA will monitor progress in the delivery of the Energy from Waste facility in Aberdeen City, and respond positively to other proposals that will support the prospects of the circular economy either through Local Development Plan allocations or development management decisions. Both Councils should consider the need for time extensions for operational landfill sites in order to maintain landfill capacity available for necessary disposals, reflecting changing regulatory*

*requirements at the time and the effects of proposals on nearby communities. All partners should take account of construction and demolition waste along with domestic and industrial waste generated throughout the life of the development in terms of the need and design of waste management proposals. Partners should work together (wherever possible) to put in place appropriate residual waste management solutions.*

This action programme should also include opportunities to create decommissioning centres that will manage offshore and onshore energy facilities that will be at their life end.

**Action 69 states:-**

*All partners have obligations under the Water Framework Directives and Birds and Habitats Directives. Key national agencies have responsibilities for monitoring to meet these Directives. The SDPA will work with key partners to gain a better understanding of the likely medium to long-term effects of climate change on the River Dee and any adaptation measures that may be needed in order to meet Directive obligations. The Local Development Plans will promote water saving technologies to be employed in new developments (aiming towards Platinum Standard) and develop contingencies as and when required. This work should build on current partnership working that has established current availability to meet water quality and availability, along with Agencies responsible for monitoring EU environmental objectives to identify potential initiatives / infrastructure in support of long-term development needs. This work will inform the next Strategic Development Plan. The SDPA will work with partners on the licensing of water abstraction from the River Dee so that the interests of this Special Area of Conservation are fully considered.*

We are happy with this Action Programme and, in addition to promoting water saving technologies to be employed in new developments, we are also keen to work with you in regard to the issue of finding alternative solutions to water supply in the area to meet the needs of the proposed development.

If you have any queries relating to this letter, please contact me by telephone on 01224 266604 or e-mail at [planning.aberdeen@sepa.org.uk](mailto:planning.aberdeen@sepa.org.uk)

Yours sincerely

  
Senior Planning Officer  
Planning Service

*Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).*

Our ref: PCS/161598  
SG ref: SEA01239/ER

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17 December 2018

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

Dear ██████████

## Aberdeen City and Aberdeenshire Strategic Development Plan 2020 - 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 2020. This was received by SEPA via the Scottish Government SEA Gateway on 04 October 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 2020 itself will be provided separately.

As the Aberdeen City and Aberdeenshire Strategic Development Plan 2020 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

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

### **General comments**

We consider the Environmental Report to be satisfactory and we have provided you with detailed comments below.

### **Detailed comments**

#### **1. Chapter 1 Proposed Plan Environmental Report Non-Technical Summary**

- 1.1 We agree with the assessment made on the effect the proposed plan will have on water. This as stated in the plan will be negative *“as a result of the volume of housing and employment land”* the SDP authority wishes to take place. Also there will be other demands on water such as from tourism which has not been acknowledged. It is further stated that *the “Proposed Plan promotes water efficiency for new developments and as such more sustainable use of the water abstracted”*. It is important for the proposed plan to seek robust strategic solutions to first of all, providing water from alternative sources to meet the needs of developments, services and infrastructure within the City and areas beyond and managing the water supply. Identifying and then managing alternative sources of water to meet the needs of the proposed development and services within the plan area should be included as a mitigation measure.
- 1.2 The majority of the proposed mitigation measures as outlined in Table 1.2 are satisfactory. We ask that in regard to the development of district heating systems (‘climatic factors’), this should also not have an effect/impact on land and soil and natural habitat.
- 1.3 Under material assets the plan should actively promote opportunities to reuse end of life facilities to promote the circular economy concept. This should also be reflected in table 4.1.

#### **2. Chapter 2, Outcomes from SDP1 and related PPS**

- 2.1 As a Post Adoption Statement mitigation measure under ‘climatic factors’ it is stated that; *“The spatial strategy identifies the need for investment in new waste management infrastructure in close proximity to new and existing facilities and requires waste to be managed in line with the waste hierarchy and promotes the move towards energy from waste facilities.”*
- 2.2 In line with the Zero Waste Plan and the waste hierarchy, in the first instance actions should be taken to prevent, reuse or recycle waste. For residual waste and non- recyclable wastes energy from waste facilities should be appropriately located and the energy from waste should be used in the form of electricity and heat where possible. This should also be reflected in table 4.1.

#### **3. Chapter 3 The Proposed Plan - Purpose of this Environmental Report and key Facts**

- 3.1 We note that the changes we suggested have been made and where this is a future action, this has been highlighted in Table 7.1 b.

#### **4. Chapter 4 Environmental problems**

- 4.1 In regard to Air Quality a possible role of the SDP can be to push for the use of carbon friendly vehicles (both for public and private transport means) and active travel which also means providing the platform such as soft engineering for it.
- 4.2 In regard to Material Assets (see also our comments in section 1.2 above) a possible role of the SDP can be to be innovative and push for the active reuse of material assets and ensure end of life infrastructure.

#### **5. Chapter 5 Assessment of Our Vision and Our Spatial Strategy**

- 5.1 The assessments made of the impact of the plan on the environment seem reasonable.
- 5.2 As in table 5.1 – Assessment of our Vision-Water, we support the overarching vision which is to *“To protect and enhance the quality of the water environment which includes surface, marine and groundwater resources”*. We ask that ensuring water security/quantity is included in this vision.
- 5.3 With regards to the comments justifying the score given under water as in Table 5.2 – Assessment of our spatial strategy-Water and Table 5.4 – Assessment of Land Allocation (due to a further increase of 3000 new homes) – Water, the proposed plan will have a negative impact on water (as stated in section Chapter 1) therefore this should be acknowledged in this section. Irrespective of the collaborative work being carried out by key agencies to solve the issues, there will need to be more robust measures put in place such as finding alternative water supply sources. This proposed measure (water supply alternative) should be reflected in Table 5.6.
- 5.4 We support the fact that the two LDP's in the area will be used to deliver some of the proposed mitigation measures.

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

- 6.1 Table 6.1 could include measurable targets to ensure the outlined measures are deliverable. Again as a mitigation measure, the discussions above on water supply should be included.