

Response ID ANON-GAXH-VXNQ-N

Submitted to Aberdeen Local Development Plan - Proposed Plan 2020

Submitted on 2020-08-27 10:35:12

Important: Privacy Statement

1 Your Data

Please tick to confirm you have read the Privacy Statement:

Yes

Introduction

2 What is your name?

Name:

Andrew Stevenson

3 What is your email address?

Email:

[REDACTED]

4 What is your address?

Postal address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Telephone number::

[REDACTED]

5 If relevant, what is the name of your organisation?

Organisation :

Historic Environment Scotland

On behalf of (if relevant):

6 As is outlined in our Privacy Statement the Local Development Plan team will provide you with a respondent number. Would you like to receive your respondent number by email?

Yes

If you ticked yes, please confirm your email address below. If you ticked no, you will receive your respondent number by letter once the Local Development Plan team is back in the office. :

[REDACTED]

7 Which document are you commenting on?

Proposed Plan 2020, Environmental Report

Comment

8 Please name the site / policy / issues you wish to make comment on.

Comment relates to:

OP 56 and OP 61 - Energy Transition Zone

Please identify the paragraph you are making comment on:

9 What would you like to say?

Comment:

We welcome the engagement carried out throughout the preparation of this plan. In terms of the spatial content we note the inclusion at this stage of the Energy

Transition Zone so would wish to offer the following comments on these areas. As we note in part two of the response the impact of these proposals on the historic environment has not been assessed and we would therefore also point you to our further detailed comments on the environmental report.

Energy Transition Zone

The inclusion of this land zoned for the development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries is noted. We welcome that a Joint Masterplan for OP56, OP61 and OP62 is proposed for these sites and we would welcome the opportunity to engage with stakeholders in the preparation of this key document. Furthermore, we expect this masterplan to be informed and influenced by existing work that has been carried out in relation to mitigating impacts on the historic environment through documents such as the Detailed Mitigation and Compensation Plan for the Aberdeen Harbour Expansion Project.

As we note in our response to the Environmental Report accompanying the Proposed Plan the allocation of land for the Energy Transition Zone has not been assessed in terms of its potential impact on the historic environment. We offer further comment on this in our response to the ER. However, in looking forward to the proposed Joint Masterplan this should include an assessment of the potential direct (i.e. physical impacts from large-scale development and associated activities) and indirect (i.e. setting impacts) on scheduled monuments from OP56 and OP61. Those monuments requiring particular attention include St Fittick's Church, Aberdeen (SM 10400) and the three prehistoric burial cairns - Crab's Cairn, cairn (SM 4060), Tullos Cairn, cairn (SM 4055) and Baron's Cairn, cairn (SM 4126). The masterplan should ensure that any potential adverse impacts on these monuments are mitigated accordingly.

Although the landscape surrounding the monuments includes modern development, it is still possible to understand and appreciate the monuments and their setting. The assessment should therefore consider the likely impact on views both towards and from the monuments, and in the case of the prehistoric burial cairns, the views and relationship between them.

We would welcome any opportunity to enhance the surrounding landscape and have a positive impact on the setting of these monuments. We would be happy to discuss this further with you during the preparation of the masterplan.

Environmental Report

This response should be read together with our previous to the environmental report that accompanied the Main Issues Report. We welcome that the majority of comments have been acted upon and we particularly welcome the clear response to these presented in Appendices 1 and 2 of the environmental report.

Energy Transition Zone

The inclusion of this land zoned for the development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries is noted. In relation to these allocations we note that they have not been assessed in terms of their potential impact on the historic environment. We would therefore offer the following comments on OP56 and OP61.

OP56 St Fittick's Park (Energy Transition Zone)

The environmental assessment of the allocation of land in St Fittick's Park for the Energy Transition Zone does not consider the impact of the proposed land use on the scheduled monument St Fittick's Church (SM 10400). Given that the allocation for the Bay of Nigg OP62 - Harbour Expansion, Energy Transition Zone, Green Belt etc) does assess the potential impact as having the "potential to negatively impact on the scheduled monument of St. Fittick's Church" we would have expected the assessment of OP56 to include an assessment of the same site with similar findings. We would therefore advise that the assessment be updated to cover this and put forward mitigation for identified effects.

OP61 Doonies (Energy Transition Zone)

As with OP56, the detailed assessment provided for this site (page 801) has not considered the potential impacts on the site and setting of the nationally important historic environment assets in its vicinity, in this case the scheduled monuments of Crab's Cairn (SM 4060), Tullos Cairn, cairn (SM 4055) and Baron's Cairn, cairn (SM 4126). In particular the Crab's Cairn scheduled monument lies directly adjacent to the north east corner of the allocation and may form part of a relict prehistoric landscape with the other monuments noted above. It is noted that the assessment for OP64 (Former Ness Tip - Solar Farm) that is being brought forward from the existing plan does offer an assessment on the scheduled cairns in its vicinity and that the potential for adverse effects prior to mitigation is predicted. On this it should be noted that the assessment scores this effect as positive after mitigation without offering explanation of what the positive effect is. We would consider it more appropriate that if mitigation through siting and design served to lessen the impact on the setting of these sites it would be more accurate to consider the residual effect neutral rather than positive.

In light of the above omissions regarding the assessment of the allocations relating to the Energy Transmission Zone we would advise that the environmental report be updated to ensure that the need for mitigation is recognised and that the delivery programme reflects this. We note that a Joint Masterplan for the sites covered by the Energy Transition Zone (OP56 and OP61, as well as OP62) is to be produced and we would expect this masterplan to consider and assess in detail the potential direct (i.e. physical) impacts as well as potential indirect (i.e. setting) impacts on these monuments as a result of the proposals and to mitigate any identified impacts accordingly.

10 What changes would you like to see made?

Changes made:

Assessment within the Environmental Report for allocations associated with the Energy Transition Zones to be updated in relation to the historic environment. Mitigation for predicted effects should be also identified.

11 If you have any documents you would like to upload to support your response, please use the following function:

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