

From: [REDACTED]
To: [REDACTED]
Subject: SEPA Response to Consultation Reference SEA01388/ER
Date: 31 August 2020 14:33:15
Attachments: [PCS171583Response.doc](#)

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.

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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/171583
SG ref: SEA01388/ER

If telephoning ask for:
Clare Pritchett

31 August 2020

Andy Brownrigg
Aberdeen City Council
Planning and Sustainable Development
Business Hub 4, Marischal College
Broad Street
Aberdeen
AB10 1AB

By email only to: [REDACTED]

Dear Sir/Madam

**Environmental Assessment [Scotland] Act 2005
Aberdeen City Local Development Plan 2022
Proposed Plan 2020
Strategic Environmental Assessment May 2020
Environmental Report**

Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Aberdeen City Local Development Plan 2020. This was received by SEPA via the Scottish Government SEA Gateway on 29 May 2020.

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 comments we have on the Aberdeen City Proposed Plan itself are provided separately.

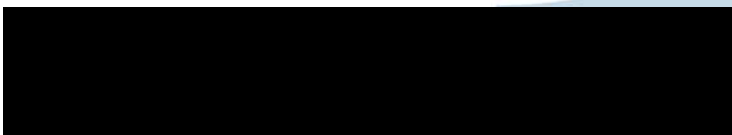
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Yours sincerely

Clare Pritchett

Ecopsy: [REDACTED]



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SEA01388/ER
Aberdeen City Local Development Plan 2020
SEPA's Comments on the Environmental Report (ER)

General comments

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We have provided a separate consultation response to the Aberdeen City Proposed Local Development Plan 2020 (our reference PCS170843) where we have commented in more detail on the proposed policies and Opportunity Sites.

Detailed comments

1. Relationship with other Plans, Policies and Strategies (PPS)

1.1 We consider all the PPS relevant to our interests as listed in Appendix 3 have been considered in the ER.

2. Baseline information

2.1 We previously welcomed the undertaking of the Strategic Flood Risk Assessment (SFRA) and reiterate we are generally satisfied that this has adequately informed the site assessment process and the mitigation measures put forward. However, we have provided detailed comments on specific site flood risk assessment in our Proposed Plan response and these should be taken forward to the Adopted Plan and the finalised ER.

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5. Mitigation Measures

5.1 We note and welcome that most of our previous comments regarding mitigation measures have been incorporated into the ER. We have highlighted above, and in our more detailed response to the Proposed Plan, some additional site specific mitigation measures we wish to see in the finalised ER and Plan.

6. Monitoring Framework

6.1 We have no further comment to make on the monitoring framework.

7. Next Steps

7.1 We have no further comments to make in this respect.

Appendix 1

OP56 – St. Fittick’s Park Energy Transition Zone 18.2ha (page 761)

(We did not consider this site as part of our consideration of the Main Issues Report)

We do not consider that the assessment fully assesses the potential impacts of the development of site OP56 as part of an ‘Energy Transition Park’ on the water environment and therefore it does not explain how potential adverse impacts could be addressed through mitigation.

The East Tullos Burn and associated wetlands runs through the centre of the proposed development site. This is not identified in the SEA. We consider that any development of this site would potentially have a direct impact on the water quality and the ecological status and therefore have significant adverse impacts on the water environment. This is not identified in the SEA. No site specific mitigation is currently proposed (beyond text in the site allocation) so we consider the potential impacts post mitigation would also be significantly adverse.

In relation to flood risk, the SEA states that it will be clearly identified which proposed sites flood and any parts of site at risk of flooding will be maintained as Green Space Network with watercourses maintained as naturalised channels with riparian buffer strips. As the East Tullos Burn runs through the site, at least part of the site is currently at risk (As the East Tullos Burn is a minor watercourse this is not modelled on the SEPA fluvial flood maps and a flood risk assessment is required to identify risk. The presence of localised areas of pluvial flood risk on the SEPA surface water flood maps, as is the case at this site, is often associated with fluvial flood risk from such minor watercourses.) This is not identified in the SEA and therefore no mitigation is proposed (A flood risk assessment is identified as required in the site allocation but until this is carried out it is not possible to assess whether the impacts would be anything other than adverse).

In relation to surface water drainage, we do not consider that any development and associated drainage would improve the current situation with the burn and associated wetlands. This is not identified in the SEA.

It is not clear why the Scottish Water Treatment Works are included within the site and there is no assessment of these and why they would form part of the ‘Energy Transition Zone’.

We advise that the Environmental Report be updated in line with the above comments.

APPENDIX 2
SEPA comments on the Flood Risk Section of the Opportunity Sites Assessments

Site	Site Name	SEPA Comments
OP3	Findlay Farm, Murcar	Flood Risk Section of assessment appears to be missing DIA required to address surface water flood risk. Flood Risk Assessment may be required. Silver Burn runs along part of the south-west boundary.
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OP22	Greenferns Landward	Flood Risk Assessment required. One watercourse flows through the site and one along the southern boundary. One watercourse flows through the site and one along the southern boundary. Flooding has been recorded on 2 occasions (22/10/2002 and between November 2007 and 2009) by ACC, due to the blockage of a culvert at Newhills Avenue.
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OP53	Tillyoch, Peterculter	Flood Risk Assessment may be required (if development proposed in SE of site adjacent to small watercourse)
OP112	West of Contlaw Road	Flood Risk Assessment may be required (Parts of site at risk of flooding)
OP56	St Fittick's Park	We do not consider that the assessment of this site in the SEA is satisfactory (see appendix 1)
OP61	Doonies	Flood Risk Assessment may be required following assessment of small watercourse close to north boundary (not included within SEPA Fluvial Flood Map).
OP65	Haudagain Triangle, Middlefield	Flood Risk Assessment required potential flood risk from small watercourse (not included within SEPA Fluvial Flood Map). We hold reports of flooding on 7.7.2015, adjacent to site. In the vicinity of Auchmill Road near junction with Manor Drive and Auchmill Road near Haudagain Roundabout. For information a FRA was provided for the adjacent Haudagain roundabout pre-planning enquiry.
OP116	Froghall Terrace	Mitigation measures required against possible groundwater flooding.

Appendix 3 SEPA comments on text on Water Abstraction

We have the following comments following liaison with SNH:

Page 46 of the SEA includes a comment that:

“Decisions regarding acceptable water abstraction levels from the River Dee are discussed and agreed between Scottish Environment Protection Agency (SEPA), Scottish Water and SNH. The Habitats Regulations Assessment also covers this issue.”

We recommend that you amend this to say:

“Decisions regarding acceptable water abstraction levels from the River Dee ~~are~~ **may be** discussed ~~and agreed~~ between Scottish Environment Protection Agency (SEPA), Scottish Water and SNH. The Habitats Regulations Assessment also ~~covers~~ **has a bearing** on this issue. **The licence for abstraction for the public water supply from the River Dee is held by Scottish Water, and SEPA is the principal regulator of that abstraction licence.**”

Although SNH has a role to play in terms of Habitats Regulations Appraisal for the River Dee Special Area of Conservation, the above change would more accurately reflect the roles of these various bodies.

Similarly, the SEA has over 200 entries saying:

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Scottish Water is responsible for providing the public drinking water supply through its water supply network. Whether a new development in Aberdeen City will require more water to be taken from the River Dee is a matter for Scottish Water in managing the water supply network.

We note that the Proposed Plan contains Policy R6 Low and Zero Carbon Buildings and Water Efficiency which requires all new developments to install water saving technologies.

From: [PI](#)
To: [Andrew Brownrigg](#)
Cc: [LDP](#)
Subject: FW: SEPA Response to Consultation Reference SEA01388/ER
Date: 01 September 2020 10:52:59
Attachments: [PCS171583Response.doc](#)

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

From: [REDACTED]
Sent: 31 August 2020 14:33
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[COVID-19]<<https://posting.cc/kDxFrXny>>

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Cc: [REDACTED]
Subject: FW: SEPA Response to Consultation Reference Proposed Plan
Date: 31 August 2020 15:14:07
Attachments: [PCS170843Response.doc](#)

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

From: [REDACTED]
Sent: 31 August 2020 15:08
To: pi@ aberdeencity.gov.uk; [REDACTED]
Subject: SEPA Response to Consultation Reference Proposed Plan

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Andy Brownrigg
Aberdeen City Council
Planning and Sustainable Development
Business Hub 4, Marischal College
Broad Street
Aberdeen
AB10 1AB

Our Ref: PCS/170843
Your Proposed Plan
Ref:

If telephoning ask for:
Clare Pritchett

By email only to: pi@aberdeencity.gov.uk

31 August 2020

Dear Mr Brownrigg

Proposed Aberdeen City Local Development Plan 2020

Thank you for your consultation email highlighting the publication of your Proposed Plan (hereinafter referred to as the Plan). We welcome the opportunity to comment on the Plan as part of the ongoing and productive liaison between us.

The attached Appendices provide our detailed advice on the Plan and other supporting documents.

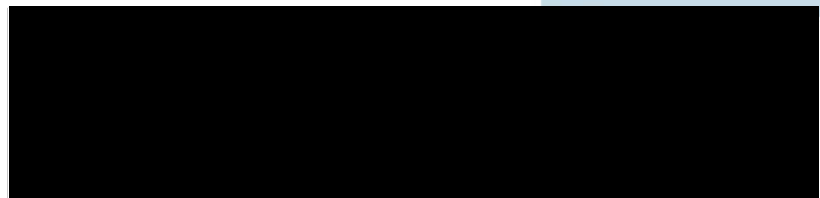
We support policies R6 Low and Zero Carbon Buildings, and Water Efficiency; R7 Renewable and Low Carbon Energy Developments and R8 Heat Networks with no proposed modifications.

We request rewording or additional wording to a number of Policies and Site Allocations as set out in the attached Appendix 1 (Policies & Supporting Text) and Appendix 2 (Opportunity Sites). We have indicated where we will **object** to the Policy or Site Allocation if these requests cannot be dealt with as minor modifications. In addition, we object to the allocation of opportunity site OP56 St Fitticks Park and consider that the assessment and proposed mitigation currently provided in the Environmental Report is incomplete.

Our comments on the Environmental Report have been provided separately via the Scottish Government SEA gateway.

Should you wish to discuss this letter please do not hesitate to contact me by email at [REDACTED]

Yours sincerely
Clare Pritchett



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APPENDIX 1:

SEPA RESPONSE TO ABERDEEN CITY PROPOSED LOCAL DEVELOPMENT PLAN 2020 POLICIES

Policy NE2 – Blue-Green Infrastructure

We suggest that this policy is re-worded as below.

Modification

The following additional text requires to be inserted into the policy itself (from the supporting text) to clarify and define the requirements.

Reason

The title of the Policy is 'Green & Blue Infrastructure' but the proposed policy wording does not reference blue infrastructure.

Green Space Network

Development proposals ~~will seek to~~ must demonstrate how they protect, support and enhance the Green Space Network (identified on the Proposals Map). Aberdeen's Green Space Network is a strategic city-wide network that connects natural green and blue spaces and habitats to each other and the communities around them. It is made up of multiple components of 'green infrastructure'. The city's 'blue features' are also included within this Network. This broadly encompasses the wildlife, biodiversity, ecosystem services & functions, access, recreation, landscape and townscape value of the Green Space Network. Development that does not achieve this will not be supported.

Policy NE3 – Our Natural Heritage

We suggest that this policy is re-worded as below.

Modification

There should be a presumption against development which would involve any draining or disturbing of peatland or carbon-rich soils. Where this resource is present, a soil or peat survey will be required to demonstrate that the highest quality of soil or deepest peat have been avoided. A soil or peat management plan will also be required to demonstrate that any unnecessary disturbance, degradation or erosion has been minimised, and includes proposed mitigation measures. Further information on how to undertake a peat survey can be found in the Scottish Government's Guidance on "Developments on Peatland: Peatland Survey (2017)"

Reason: To comply with Scottish Government Guidance and be transparent in terms of developer requirements where peat is likely to be present.

Carbon Rich Soils

Development should avoid areas of peatland and other carbon-rich soils. There will be a presumption against development which would involve ~~significant~~ any draining or disturbance of peatland or carbon-rich soils. Developments which may result in the disturbance of peatland and carbon-rich soils will require an assessment of the likely effects on CO2 emissions. A peat management plan may be required to assess and address potential impacts on peatlands or carbon-rich soils

POLICY NE4 – Our Water Environment

We **object** to this policy if our following rewording/additional text requests are not undertaken.

Modification & Reason

SEPA considers that the above modifications to proposed policy NE4 are required in order for the policy to comply with Scottish Planning Policy and the assessments and proposed mitigation set out in the Environmental Report.

Flood Risk & Management

Development will not be supported if:

1. It increases the current and/or future risk of flooding on site or elsewhere;
 - a. By reducing the ability of the functional flood plain to store and convey water; or
 - b. Through the discharge of additional surface water; or
 - c. By harming flood defences;
2. It would be at risk of flooding itself; or

3. Adequate provision is not made for ~~watercourses to be maintained as or restored to naturalised channels wherever possible with riparian buffer strips including for maintenance access and erosion prevention access to waterbodies for maintenance;~~ or

4. It would require the construction of new or strengthened flood defences ~~unless flood protection measures to an appropriate standard are a planned measure in a current flood risk management plan that would have a significantly damaging effect on the landscape character, built and historic environment, infrastructure and natural heritage interests within or adjacent to a waterbody.~~

The piecemeal reduction of functional floodplains will be avoided. Development on the functional floodplain will only be considered where its location is essential for operational reasons ~~and for water compatible uses.~~ Development must be designed and constructed to remain operational during floods and to ~~not impede water flow. Measures to protect against or manage flood risk will be required and any loss of flood storage capacity mitigated to achieve a neutral or better outcome.~~

Applicants will be required to provide a Flood Risk Assessment where a development ~~may is likely to result~~ in a material increase in the number of buildings ~~at risk of flooding, -or~~ area of land at risk of flooding, ~~if there is an increase in land use vulnerability compared to the existing land use~~ or where it has been indicated in the opportunity sites schedule that one will be prepared.

There is a presumption against excessive engineering and culverting of waterbodies. Natural treatments of floodplains and other water storage features will be preferred wherever possible. There will be a requirement to restore existing culverted or canalised water bodies to a naturalised state where this is possible ~~and supported by a flood risk assessment.~~ Where the Council agrees that culverts are unavoidable for technical reasons, they should be designed to maintain existing flow conditions and aquatic life. Any proposals for new culverts should have a ~~demonstrably~~ neutral impact on flood risk ~~as demonstrated in a flood risk assessment~~ and be linked to long term maintenance arrangements to ensure they are not the cause of flooding in the future.

POLICY NE4 – Our Water Environment

We **object** to this policy if our following rewording/additional text requests are not undertaken.

Modification & Reason

SEPA considers that the above modifications to proposed policy NE4 are required in order for the policy to comply with SEPA guidance.

Foul Drainage & Water Quality

Connection to the public sewer for foul drainage will be a prerequisite of all development where this is not already provided. Private wastewater treatment systems ~~within the settlement boundary in sewerred areas-~~ will not be permitted. ~~In areas not served by the public sewer, a private sewer treatment system for individual properties will be permitted provided that the developer demonstrates that there will be no adverse effects on the environment, amenity and public health.-~~

POLICY NE4 – Our Water Environment

We suggest that this policy is re-worded as below.

Modification & Reason

SEPA considers that the below modifications to proposed policy NE4 are required for clarification.

Surface Water Drainage

All new developments are required to incorporate SuDS to manage surface water, with the exception of single dwellings/extensions to residential properties or discharges to coastal waters. For change of use and/or redevelopment, opportunities should be sought to retrofit SuDS where appropriate.

SuDS components need to be selected based on specific site opportunities and constraints and provision should be addressed as part of a Drainage Impact Assessment (DIA) **which details how surface water quality and quantity will be managed**. DIAs will be required for new development proposals of 5 or more homes or 250 square metres non-residential floorspace. DIAs will also be required if the proposal falls within a sensitive area (identified in the TAN). ~~DIAs should detail how surface water will be managed.~~

Coastal Development

Development will not be supported in undeveloped coastal areas (shown on the Proposals Map). Exceptions to this general presumption will be considered where the proposal:

1. Is dependent on that coastal location given the purpose and operation of the development; and
2. There is no other suitable site, including brownfield land; and
3. It respects the character and value of the landscape, the natural and historic environment, and the recreational value of the surrounding area; or
4. There is an overriding environmental benefit from the proposal.

The exceptions listed above, where considered acceptable in principle, must also meet all of the following criteria:

1. The development must not be located in an area at risk of coastal erosion or flooding **(as demonstrated in a topographical survey showing that the development lies above the 200 year flood level plus additional allowances for climate change and freeboard)**;
- ~~2. A Topographical Survey (in agreement with SEPA) must accompany applications for development~~
3. Public access to and along the coast must be protected and promoted wherever possible; and
4. Where marine noise modelling is deemed necessary by the Council or key agencies, it must be demonstrated that adverse impacts on bottlenose dolphins, Atlantic salmon, and any other protected species will be avoided.

Surface Water Drainage paras 6.35 & 6.36

We suggest that this text is re-worded as below.

Modifications to & Reason

SEPA support the use of SUDS wherever possible as a means of **mitigating** surface water flooding, but not all flood risk can be managed through the use of SUDS. Changes to wording required to clarify that SUDS provide flood risk mitigation not management.

Our Water Environment

6.35 Sustainable Drainage Systems (SuDS) provide multiple benefits including **managing mitigating** flood risk, improving water quality and enhancing biodiversity. All new developments are required to make provision for SuDS and these should be designed in accordance with best-practice design guidance in the SuDS Manual (CIRIA C753), and the technical criterion set out in Sewers for Scotland v4.0 and its successors. In some circumstances, developments may also be required to adapt to flood risk by incorporating water resistant materials and forms of construction in line with the guidance set out in the Scottish Government's Online Planning Advice on Flood Risk.

6.36 The Council is developing strategic-level Regional SuDS ~~to provide which will incorporate~~ sustainable flood risk management at a strategic scale. There may be opportunities for developers to contribute to a Regional SuDS scheme to help address the impact of their development. Please see our Technical Advice Note (TAN) for more information.

POLICY WB2 Air Quality

Modification & Reason

We support the inclusion of Policy WB2 as it will help the Council to mitigate the impacts of future development on air quality, protecting human health and the environment. We suggest the following minor amendment to Section 5.8 as highlighted below:

As part of our statutory duties under the UK Environment Act 1995 the Council undertakes monitoring and assessment of seven key pollutants recognised to impact on health. Aberdeen currently exceeds the **EU and national annual mean objective for nitrogen dioxide and the annual mean national objectives for particulate matter**, resulting in three Air Quality Management Areas (AQMAs) being declared

POLICY B5 – Energy Transition Zones

Modification & Reason

Whilst we support the identification of 'Energy Transition Zones', we strongly suggest that an alternative location to OP56 for this welcome project is identified and we would be pleased to assist in the process of doing so. We support the proposed allocation of site OP62 Bay of Nigg (55ha) as an Energy Transition Zone which allocates land adjacent to the new harbour and existing rail line. We would welcome the consideration of existing brownfield sites, including site OP64 Former Ness Tip, and sites already allocated for business/industrial development as Energy Transition Zones.

Appendix 2 Opportunity Sites

Site OP56 St Fitticks Park Energy Transition Zone, Green Space Network

We **object** to this allocation.

(We did not consider this site as part of our consideration of the Main Issues Report)

Modification & Reason

Unfortunately we **object** to the inclusion of this site as a proposed opportunity site for development in the proposed plan and we do not consider that the assessment of this site in the SEA is satisfactory or the proposed mitigation sufficient.

We note that this proposed site covers the East Tullos Burn Project. This re-created a natural watercourse and wetlands with wildflowers and trees. It transformed the amenity of St Fittick's Park, which is now an area of quality greenspace enjoyed by the local community. The project tackled pollution, flooding and litter using natural solutions that have benefitted biodiversity and recreation. Access within and around the project area has been improved. The project involved considerable effort and significant public funding, and the local community helped inform the design and plant up the site. It has created an improved sense of place and is highly valued by people in Torry, a deprived part of Aberdeen.

The presence of the East Tullos Burn and associated wetlands and floodplain and requirement for buffer strips and the Scottish Water treatment works means that there is likely to be a very limited area of developable land at OP56 as currently shown.

We consider that it has not been demonstrated that there is sufficient land available for business/industrial development within OP56 which would not have significant adverse impacts on the East Tullos Burn and associated wetlands.

We do not consider that it has been demonstrated that the Scottish Water Treatment Works should form part of this proposed development site allocation.

We do not consider that it has been demonstrated that flood risk, water quality, recreational access and habitat connectivity (as set out in the site allocation) can be adequately addressed at the masterplanning stage for this site.

We suggest that if a site is to be allocated here then the relevant assessments are carried out first and the East Tullos Burn and wetlands and associated buffer strips and floodplain are excluded from the development site allocation. In addition to land required for recreational access and habitat connectivity.

We consider that the East Tullos Burn and associated open space including pedestrian access are essential blue/green infrastructure in accordance with proposed policy NE2 and we would strongly support the protection of this from allocation for development. We do not consider that a joint masterplan to be prepared by the developers once the site is allocated for development is the appropriate place to address these issues.

Aberdeen City Proposed Plan 2020 Opportunity Sites

See column headed 'SEPA comments' for requested modification and reason:

There are several sites where the information we hold suggests that, although part of the site is highly likely to be developable, there is a risk of flooding to part of the site and as such development may be constrained. Proposals for development would have to be accompanied by a satisfactory Flood Risk Assessment. The outcome of the FRA could reduce the area of the site that is developable, the capacity of the site or the appropriate design or layout for the site. Using mitigation measures to enable development in flood risk areas is only appropriate in exceptional circumstances or where flood defences exist (or are under construction) and meet the appropriate standard for development. For these sites, we would object to their inclusion in the Local Plan **unless** wording is included that highlights that flooding is a potential constraint and a FRA will be required. This ensures that developers are aware from the earliest stage of the possible implications and of the additional costs that will be incurred in bringing development forward for the site.

Site	Site Name	Site Size	Policy	Other Factors	SEPA Comments
Bridge of Don & Grandhome					
OP1	Murcar	27.8ha	Land Release Policy and Green Space Network	Strategic Reserve Employment Land for the period 2033-40. This site may be at risk of flooding. Flood Risk Assessment required to accompany development proposals.	
OP2	Cloverhill	24.8ha	Residential and Green Space Network	Opportunity for 550 homes on former employment land. Primary and secondary education and health capacity issues need to be addressed. Flood Risk Assessment required to accompany future development proposals.	
OP45	Berryhill	43.7ha	Business and Industry and Green Space Network	Development Framework approved in 2008 covers this site and land to the north. Land available for development of Use Class 4, 5 and 6. Flood Risk Assessment required to accompany future development proposals.	
OP3	Findlay Farm, Murcar	16.4ha	Business and Industrial Land	Opportunity to extend the Aberdeen Energy Park.	DIA required to address surface water flood risk. Object unless text added: Flood Risk Assessment may be required.
OP4	North Denmore	1.7ha	Residential	Residential opportunity for up to 30 houses on an unused Council owned site.	
OP5	Balgownie Centre, Bridge of Don	2.25ha	Residential	Former Aberdeen College building now cleared. Planning Brief available.	
OP6	WTR Site at Dubford	0.57ha	Residential and Green Space Network	Brownfield opportunity for residential development that should look to integrate with the neighbouring development at Dubford.	Object unless text added: Flood Risk Assessment may be required. (Topographic information may demonstrate the site is sufficiently elevated above the functional floodplain.)
OP7	Aberdeen College Gordon Centre	3.1ha	Mixed Use and Green Space Network	Location suitable for residential or mixed-use development. The woodland on site, particularly along the site's boundaries, should be retained.	DIA required to consider surface water management measures.
OP8	East Woodcroft North	2.2ha	Residential	Council owned site identified for 60 homes.	
OP9	Grandhome	323ha	Land Release Policy/Green Space Network	Privately owned site in single ownership identified for 7000 homes and 5 hectares of employment land (Class 4 uses). Town Centre identified for Phase 2 of this site. Developers will be required to provide a Flood Risk Assessment in support of any development proposals for	

				this site. Masterplan approved	
OP10	Dubford	4.2ha	Residential and Green Space Network	This is the undeveloped part of the 550 home Dubford development. Any proposal here must comply with the Dubford Development Framework. This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site.	
OP11	Balgownie Area 4	0.5ha	Residential	Opportunity for residential development of up to 15 houses.	Object unless text added: Flood Risk Assessment required.
OP12	Silverburn House	4.0ha	Residential	Opportunity for 100 homes on former employment land. Primary and secondary education and health capacity issues need to be addressed. Needs to link into OP2 and OP13 – the AECC site.	Object unless text added: Flood Risk Assessment required
OP13	AECC Bridge of Don	18.4ha	Mixed Use	Redevelopment opportunity for mixed use development. Masterplan approved. The site will be required to accommodate an expansion of the Park and Choose to 999 spaces and a household waste recycling centre to replace the facility at Scotstown Road. Any residential elements would need to address school capacity issues in the area. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. Development should respect the landscape setting and amenity of the course of the Royal Aberdeen Golf Club.	
OP75	Denmore Road	4.56ha	Commercial Centre	Opportunity for bulky goods retailing. Pitches lost should be replaced in Bridge of Don by new or upgraded pitches which are of comparable or greater benefit. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	Object unless text added: Flood Risk Assessment required (Glashie Burn runs through site)
Dyce Bucksburn & Woodside					
OP14	Former Cordyce School	7.9ha	Mixed Use and Green Space Network	Site suitable for a number of uses including housing, a garden centre and health and fitness village. Development should avoid harmful impacts on the community orchard. A Flood Risk Assessment is required.	
OP15	Former Carden School	0.37ha	Residential	Part of Dyce primary school deemed surplus to requirements.	
OP16	Davidsons Papermill, Mugiemoos Road, Bucksburn	29.5ha	Mixed Use	Former paper mill site and adjoining land. Development Framework and Phase 1 Masterplan approved. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	
OP17	Former Bucksburn Primary School	0.94ha	Residential	Former primary school suitable for residential, healthcare or other uses compatible with a residential area.	Object unless text added: Flood Risk Assessment required (to assess risk from Bucks Burn)
OP18	Cra bstone North and Walton Farm	20.0ha	Land Release Policy/Green Space Network	Opportunity for development of 1.5ha of employment and 18.5 hectares of Strategic Reserve employment land or a higher education and research institute in the 2033-40 period. Masterplan required. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	Masterplan required – add to masterplan list
OP19	Rowett North	63.9ha	Business Zone/Green Space Network/Airport Public Safety Zone	Site for The Event Complex Aberdeen and complimentary employment uses. Masterplan approved. Part of approved Newhills Development Framework? This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	
OP20	Cra bstone South	42.6ha	Land Release	Opportunity for 1000 homes. Part of approved Newhills Development Framework.	Object unless text added:

			Policy/Green Space Network		Flood Risk Assessment required.
OP21	Rowett South	106.85 ha	Land Release Policy/Green Space Network/Residential	Opportunity for 1940 homes of which 240 homes are phased in the period beyond 2032. Part of approved Newhills Development Framework. Town Centre identified for this site comprising of approx. 7,500 square metres total floorspace (4,000 square metres supermarket, 3,500 square metres other comparison and local shops and retail services.)	Object unless text added: Flood Risk Assessment may be required (for part of site not covered by planning consent)
OP22	Greenferns Landward	69.6ha	Land Release Policy	Opportunity for 1500 homes on Council owned land, of which 500 homes are phased for the period beyond 2032. Part of approved Newhills Development Framework. Burnbrae Moss District Wildlife Site lies adjacent to the southern boundary of this site.	Object unless text added: Flood Risk Assessment required
OP23	Dyce Drive	65ha	Business and Industrial Land /Green Space Network	This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site. The site lies within a pipeline notification zone.	
OP24	Central Park, Dyce	0.71ha	New Community Sites and Facilities	Site reserved for a new medical centre. Urban Green Space developed here should be replaced through the demolition of the existing medical centre north of Dyce shopping centre. Pedestrian access to the shopping centre car park should be provided.	
OP25	Woodside	19.1ha	Residential/Green Space Network/Green Belt	Site capable of accommodating up to 300 homes, including affordable housing as per Persley Den/Woodside Masterplan. Parts of the site may have a risk of flooding and development will have to be avoided in those areas. A Flood Risk Assessment will be required to support any development proposals for the site.	
OP86	Dyce Railway Station	1.1ha	Land for Transport	Opportunity Site for an expanded car park with associated SUDS and landscaping. Access to the Formartine Buchan Way should be retained and enhanced. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	
Kingswells & Greenferns					
OP26	Old Skene Road	1.2ha	Residential	Residential opportunity for 14 houses. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP27	Greenfern Infant School	0.91ha	Residential	Brownfield residential opportunity. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP28	Greenferns	13.6ha	Residential	This is an opportunity to provide 120 homes. Joint Development Framework with OP33 Greenferns approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals.	
OP29	Prime Four Business Park	50.0ha	Business Zone/Green Space Network	Opportunity for development of business land which will attract high quality businesses or be suitable for company headquarters. Masterplans and Development Framework prepared. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required (for any part of site not already covered by submitted FRA)
OP63	Prime 4	12.7ha	Business	Expansion to existing allocation. Masterplan approved. A	

	Business Park Phase 5 Extension		Zone	Traffic Impact Assessment will be required. The site lies within a pipeline notification zone. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP30	Kingsford	24.5ha	Green Belt	New stadium and training facilities. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP31	Maidencraig South East	29.8ha	Residential/ Green Space Network	Opportunity for development of 450 homes. Joint masterplan approved for this site and OP32 Maidencraig North East. This site may be at risk of flooding. Flood Risk Assessment required to accompany development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP32	Maidencraig North East	22.8ha	Residential/ Green Space Network	Opportunity for development of 300 homes. Joint masterplan approved for this site and OP31 Maidencraig South East. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP33	Greenferns	60.4ha	Land Release Policy/Green Space Network	Opportunity for development of 1350 homes and 10ha of employment land on a Council owned site. 400 of the homes are phased for the period beyond 2032. Joint Development Framework with OP28 Greenferns approved. This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site. Proposals for an extension to Enernec and a new NHS health centre will need to be accommodated on site.	
OP34	East Amhall	1.0ha	Land Release Policy	An opportunity for development of 1 hectares of employment land. A masterplan with Aberdeenshire Council involvement would be desirable given that the site borders the Local Authority boundaries. Site may be at risk of flooding. A Flood Risk Assessment will be required to accompany future development proposals. Site lies within a pipeline notification zone. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP11 1	Skene Road, Maidencraig	0.9ha	Residential and Green Space Network	Site capable of accommodating around 15 homes. A flood risk assessment will be required to accompany any future development proposals for this site. Development should seek to avoid any adverse impacts on the Den of Maidencraig Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Countesswells					
OP38	Countesswells	165.1ha	Land Release Policy/Green Space Network	An opportunity for development of 3000 homes and 10 hectares of employment land. Development Framework and Phase 1 Masterplan approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations	

				Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Deeside					
OP39	Braeside Infant School	1.04ha	Residential	Former school site with potential to be redeveloped for residential use in future. Development will have to respect residential amenity within and surrounding the area. The Council will seek the retention of the playpark in its current location to the south of site OP39. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP40	Cults Pumping Station	0.69ha	Urban Green Space	Brownfield residential opportunity. Development will have to respect green linkages to the west of the site and the retention of the allotments to the east of the site. Development should seek to avoid any adverse impacts on the Cults Den Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment required. (possible flooding from Cults Burn)
OP41	Friarsfield	5.6ha	Residential and Green Space Network	This is the undeveloped part of the 280 home Friarsfield development. Development Framework approved. This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP42	Hotel and Equestrian Centre at Hazlehead	9.2ha	Green Belt and Green Space Network	Planning permission granted for a hotel and equestrian centre. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP43	Milltimber Primary School	1.85ha	Residential	Milltimber Primary School is likely to become available in the future due to the development at Oldfold providing a new school. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP44	North Lasts Quarry	8.01ha	Green Belt	Ongoing mineral extraction. Planning Permission granted in February 2017 to continue hard rock extraction. The site lies within a pipeline consultation zone and all development should conform to the terms of Policy B6 – Pipelines, Major Hazards and Explosives Storage Sites. Site may be at risk of flooding. Flood Risk Assessment required to accompany any future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP47	Edgehill Road	4.4ha	Residential/ Green Space Network	Opportunity for development of 5 homes. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany	Flood Risk Assessment may be required

				development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP48	Oldfold	48.9ha	Land Release Policy	Opportunity for development of 550 homes and 5 hectares of employment land. Development Framework and Masterplan approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP49	Grove Nursery, Hazlehead	5.9ha	New Community Facilities	Following a Council resolution this site is identified for social enterprises specialising in nursery, horticulture and/or allotments and other associated uses. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Flood Risk Assessment may be required.
OP50	Skene Road, Hazlehead	49.7ha	Green Belt/ Green Space Network	Land reserved for a phased cemetery development. Site may be at risk of flooding. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Flood Risk Assessment may be required. Topographic information may demonstrate the site is sufficiently elevated above the functional floodplain.
OP51	Peterculter Burn	7.4ha	Residential and Green Space Network	Site capable of accommodating 19 homes, a hydro-electric scheme, fish pass, football pitch, changing facilities and car parking for Culter Youth Football Club and a new pathway opening up access to existing woodland. A Flood Risk Assessment demonstrating acceptable consequences will be required together with a masterplan giving details of access and setting out timescales for implementation of the different stages of the overall development. These matters will be reflected in any grant of planning permission. A planning brief will be required for OP51 setting out specific measures needed to avoid damage to, and enhance the Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Clarification required: planning brief & masterplan Object unless text added: Demonstration required that Culter Burn protected. Add to masterplan list
OP52	Malcolm Road Peterculter	1.5ha	Residential	Opportunity for 8 houses. Scots Pine trees on western boundary to be retained. Site (or part of) may be at risk of flooding. Flood Risk Assessment may be required in support of any development proposals for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	(SEPA would not request a flood risk assessment).
OP53	Tillyoch, Peterculter	15.25ha	Residential and Green Space Network	Housing opportunity for 250 houses. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required. Masterplan required.	Flood Risk Assessment may be required (if development proposed in SE of site adjacent to small watercourse) Masterplan required – add to masterplan list
OP54	Craigton,	2.45ha	Residential	Housing opportunity for 10 houses. Flood Risk	

	Peterculter			Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP109	Woodend Peterculter	2ha	Residential	Opportunity for 19 houses. Drainage Impact Assessment required to consider protection of potential wet habitats/woodlands adjacent to the site and the potential requirement for a buffer to prevent any increase in drainage of wet habitats/woodlands. Ancient Woodland to the south of the site is to be protected. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP112	West of Contlaw Road	12.5ha	Residential	Opportunity for 10 houses. Arboricultural and ecological implications studies required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required (Part of site is at risk of flooding)
OP113	Culter House Road	2.4ha	Residential	Opportunity for 8 houses. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Loirston & Cove					
OP46	Royal Devenick Park	8.36ha	Residential	Housing opportunity for 150 houses. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP55	Blackhills Quarry, Cove	32.76ha	Green Belt	Planning permission granted in 2013 to continue hard rock extraction and processing.	
OP56	St Fittick's Park	18.2ha	Energy Transition Zone, Green Space Network	Energy Transition Zone. This site, along with OP61, will support renewable energy transition related industries in association with Aberdeen South Harbour. Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring 'roll on / roll off' level access to the South Harbour. Appropriate environmental assessments will be required, including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. A Flood Risk Assessment is also required. Other issues which need to be addressed include water quality, recreational access, habitat connectivity, compensatory planting and landscape buffering with residential areas. Joint Masterplan needed for OP56, OP61 and OP62.	Unfortunately we object to the inclusion of this site for development in the proposed plan and we do not consider that the assessment of this site in the SEA is satisfactory.
OP57	Craighill Primary School, Kincorth	0.86ha	Residential	Vacant Primary School. Forms part of the Strategic Infrastructure Plan Affordable Housing Programme. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP58	Stationfields, Cove	9.8ha	Residential and Green Space Network	Opportunity for 150 homes. Masterplan required.	Masterplan required – add to masterplan list
OP59	Loirston	119.2ha	Land Release	Opportunity for development of 1500 homes and 11 hectares of employment land. Potential to accommodate	Updated Development

			Policy/ Green Space Network	supermarket in a new district centre to meet convenience shopping deficiencies in south Aberdeen. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. Updated Development Framework to be approved. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Framework to be approved - Add to masterplan list
OP60	Charleston	20.5ha	Land Release Policy and Green Space Network	Opportunity for development of 20.5 hectares of employment land for the period 2033-40. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP61	Doonies	16.3ha	Energy Transition Zone, Green Space Network	Energy Transition Zone. This area along with OP56 will support renewable energy transition related industries in association with Aberdeen South Harbour. Appropriate environmental assessments will be required, including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. Other issues which need to be addressed include landscape impact of development, recreational access and habitat connectivity. Joint Masterplan needed for OP56, OP61 and OP62.	Object unless text added: Flood Risk Assessment may be required following assessment of small watercourse close to north boundary.
OP62	Bay of Nigg	55ha	Aberdeen Harbour, Energy Transition Zone, Green Belt and Green Space Network	Aberdeen Harbour expansion. Bay of Nigg Development Framework approved. Requires Flood Risk Assessment and full Transport Assessment. Appropriate environmental assessments will be required including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. Other issues to be addressed include re-instatement of the coastal path and recreational access. Joint Masterplan needed for OP56, OP61 and OP62.	We note that there are requirements in the existing planning permission for the new Aberdeen Harbour which will require to be incorporated into any masterplan including for areas of site restoration following completion of the harbor development.
OP64	Former Ness Tip	20.5ha	Green Belt and Green Space Network	Solar Farm. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 3	Former Torry Nursery School	0.53ha	Residential	Council owned site surplus to requirements. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 5	Kincorth Academy	3.94ha	Residential	Forms part of the Strategic Infrastructure Plan Affordable Housing Programme. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 7	East Tullos Gas Holder	3.12ha	Business and Industrial	Former gas holder site and Council owned recycling centre suitable for an energy from waste facility. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	
OP11 5	34-40 Abbotswell Road	1.03ha	Mixed Use	Suitable for residential use. A noise impact assessment will be required. A Habitats Regulations Appraisal is	

				required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
City Centre & Urban Areas					
OP35	Summerfield House, Eday Road	1.1ha	Residential	Brownfield residential opportunity. Drainage Impact Assessment required. School capacity issues would need to be addressed. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP36	Charlie House	1.5ha	Urban Green Space and Green Space Network	Site identified for children's respite centre and interactive garden area. A Flood Risk Assessment is required for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP37	Woodend Hospital	7.1ha	Existing Community Sites and Facilities and Green Space Network	Brownfield residential opportunity on part of the hospital site. Site includes listed buildings, trees and open space which require sensitive treatment. Flood Risk Assessment required. School capacity issues will need to be addressed. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required. Masterplan required	Add text: Masterplan required – already on list
OP65	Haudagain Triangle, Middlefield	4.0ha	Mixed use and Land for Transport	Vacant land made available as part of the Haudagain improvements. Site should accommodate a mix of residential, retail, commercial and community uses to support the regeneration of the area.	Object unless text added: Flood Risk Assessment required
OP66	Granitehill	4.8ha	Residential	Brownfield opportunity for up to 300 homes which should include a wide range of houses and flats. School capacity issues will need to be addressed. Masterplan required	Add text: Masterplan required – already on list. DIA required to consider any surface water issues.
OP68	1 Western Road	0.07ha	Residential	Capacity for approximately 22 residential units.	
OP69	152 Don Street, Old Aberdeen	0.63ha	Residential	Residential opportunity on brownfield site in Old Aberdeen Conservation Area. Drainage Impact Assessment required.	
OP70	Denburn Valley – City Centre Masterplan Intervention Area	6.5ha	Mixed Use, Urban Green Space, Green Space Network and City Centre Retail Core	New ground floor uses including use class 1 (Retail); use class 2 (Financial, Professional and other services), use class 3 (Food and Drink and use class 11 (Assembly and Leisure). New upper floor uses - use class 9 (houses) – suitable for apartments. Refurbishment of former Woolmanhill hospital buildings for Pavilion, class 7 (Hotels and Hostels) or use class 9 (Houses). Other remaining buildings suitable for use class 9 (Houses). A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. Refurbishment of Denburn Court. Upgrade and expansion of Union Terrace Gardens including outdoor amphitheatre, new soft landscaping and high level bridge access. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Masterplan/development framework required – add to list

OP72	Aberdon House	0.64ha	Residential	Cleared site which forms part of the Strategic Infrastructure Plan Affordable Housing Programme.	
OP73	Balgownie Machine Centre	0.2ha	Mixed Use	Land reserved partially for Berryden Road Improvements.	
OP74	Broadford Works, Maberley Street	3.6ha	Mixed Use	Consent granted for residential and other uses subject to legal agreement. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	No flood risk assessment required by SEPA. No development over culverts or culverting for land gain.
OP76	Former Raeden Centre	1.48ha	Residential and Green Space Network	The presence of mature trees means that only a small part of the previously developed area may be suitable for sensitive residential redevelopment. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP77	Cornhill Hospital	6.04ha	Existing Community Sites and Facilities	Former hospital site with substantial granite buildings in Rosemount Conservation Area. Redevelopment for mix of uses, residential, office/ business (Class 4), community uses. Development underway. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP78	Frederick Street	0.1ha	Mixed Use	Small brownfield opportunity.	
OP79	Crown House	0.04ha	Mixed Use	City centre location suitable for residential use. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP80	Mastrick Clinic	0.12ha	Neighbourhood Centre	Uses that would support the Mastrick neighbourhood centre. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP81	Queen's Square – City Centre Masterplan Intervention Area	5.4ha	Mixed Use	Refurbishment of the eastern annex of Marischal College for use class 4 (Offices) and class 11 (Assembly and Leisure). Refurbishment of Greyfriars John Knox Church – appropriate uses include use class 3 (Food and Drink); use class 4 (Business); use class 7 (Hotels and Hostels); use class 10 (Non-residential Institutions); use class 11 (Assembly and Leisure). New ground floor uses could include use class 1 (Retail); use class 2 (Financial, Professional and other services) and use class 3 (Food and Drink). New upper floor uses could include use class 9 (Houses) – suitable for apartments.	DIA required to address surface water issues.
OP82	Dunbar Halls of Residence, Don Street	1.64ha	Residential	Residential or student accommodation opportunity in Old Aberdeen Conservation Area.	
OP83	Urquhart Building, City Hospital	0.28ha	Existing Community Sites and Facilities	Residential opportunity would allow the re-use of this listed building.	
OP84	Resource Centre, City Hospital	0.16ha	Existing Community Sites and Facilities	Small scale retail, commercial or office use.	
OP85	King Street/ Beach Esplanade	2.0ha	New Community Facilities	Site is identified by Council resolution for a Mosque, community facilities and open space. Until proposals for these uses are progressed, or if a decision is made not	

				to pursue them, the existing open space use will be protected by Policy NE2 Green and Blue Infrastructure (Urban Green Space).	
OP87	Pittodrie Park	6.00ha	Residential	Proposed residential development. School capacity issues will need to be addressed.	
OP88	Shore Porters Warehouse	0.02ha	Mixed Use	Redundant warehouse. Residential will only be considered if suitable amenity can be demonstrated. Noise Impact Assessment required.	
OP89	Kaimhill Outdoor Centre	1.5ha	Residential and Green Space Network	Proposal for 35 houses. Play park area should be retained and compensatory recreational provision made in the local community. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP90	St Machar Primary School	1.01ha	Residential	Suitable for education use and/or affordable housing.	
OP91	Union Street West City Centre Masterplan Intervention Area	15.3ha	City Centre Retail Core, Mixed Use and West End Shops and Cafés	New Aberdeen City Rooms for ground floor cafe, multi-purpose foyer and gallery (use class 11) with offices (use class 4) above and rooftop restaurant (use class 3). Refurbishment of Golden Square. Refurbishment of Bon Accord Square. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	DIA required to address surface water issues.
OP92	St Peter's Nursery, Spital	0.09ha	Mixed Use	Sensitive residential redevelopment - within a Conservation Area. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP93	Former Summerhill Academy	3.3ha	Residential	Residential development. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP94	Tillydrone Primary School	2.11ha	Residential	Site of former Tillydrone Primary School. Site will be used for a new primary school.	
OP95	Station Gateway City Centre Masterplan Intervention Area	4.0ha	City Centre Retail Core, Mixed Use and Land for Transport	Expanded station concourse across two levels to include use class 1 (Retail) and 3 (Food and Drink). New station hotel above concourse. New Trinity Centre entrance and bridge links. Hotel/serviced apartments on Atholl House site - use class 7 (Hotels and Hostels). A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment required (to include issue of culverted Den Burn under site)
OP96	Castlegate and Castlehill City Centre Masterplan Intervention Area	2.6ha	City Centre Retail Core, Mixed Use and Residential	Refurbishment of properties on Castlegate and Justice Street. Appropriate ground floor uses include use class 1 (retail); Use class 3 (Food and Drink); and use class 11 (Assembly and Leisure). Appropriate upper floor uses include use class 4 (Offices), use class 7 (Hotels and Hostels) and use class 9 (residential). Refurbishment of Marischal and Virginia Court (use class 9) Houses; potential for use class 1 (Retail); use class 3 (Food and Drink) and use class 11 (Assembly and Leisure) at street level. New Residential development of approximately 46 apartments.	
OP97	Victoria Road Primary School	0.67ha	Mixed Use	Former Primary School. The site would be suited for sensitive redevelopment	

OP98	VSA Gallowgate	0.08ha	Mixed Use	Residential/Mixed use. Listed building.	
OP99	Old Torry	6.6ha	Mixed Use	Mixed use development. See also Old Torry Masterplan Study. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment.	Old Torry Masterplan Study – add to list
OP100	North Dee City Centre Masterplan Intervention Area	12.7ha	Business Zone, Mixed Use, Urban Green Space, Green Space Network and Land for Transport	New Urban Quarter with a high quality and imaginative approach to the public realm, creating permeable pedestrian linkages between the city centre and the River Dee. Masterplan required showing an appropriate mix of compatible new uses, including Class 1 (Retail), Class 2 (Financial, Professional and other services), Class 3 (Food and Drink), Class 4 (Business, including new office development and a Global Energy Hub if required), and Class 9 (Residential). Refurbishment of the listed smoke houses. Pedestrian bridge linking into OP106 Torry Waterfront. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required depending on location. Masterplan required – add to list
OP101	Woodside Congregational Church	0.07ha	Residential	Vacant church building.	
OP102	George Street / Crooked Lane	0.96ha	City Centre Retail Core	Opportunity for retail development, enhance George Street, link to John Lewis / extend Bon Accord Centre, address accessibility issues through the centre and address public realm issues. Some Listed Buildings. Existing traditional granite buildings on the St Andrew Street and George Street frontages, and upper floor residential uses, to be retained. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP106	Torry Waterfront City Centre Masterplan Intervention Area	5.0ha	Mixed Use, Urban Green Space and Green Space Network.	New residential development. New ground floor uses including use class 1 (Retail) and use class 3 (Food and Drink), Hotel Academy (use class 7). Pedestrian Bridge linking into OP100 North Dee. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required depending on location.
OP110	Heart of the City – City Centre Masterplan Intervention Area	5.4ha	City Centre Retail Core, Urban Green Space, Green Space Network, Existing Community Sites and Facilities and Mixed Use.	Refurbishment and remodelling of buildings on Union Street. Negligible increase in overall accommodation but increased utilisation of existing floor space. Appropriate uses for ground floors include use class 1 (Retail), use class 2 (Financial, Professional and other services), and use class 3 (Food and Drink). Appropriate uses for upper and lower floors include use class 4 (Business); use class 7 (Hotels and Hostels); use class 9 (Houses); use class 10 (Non-residential Institutions); use class 11 (Assembly and Leisure). Remodelling of the St Nicholas Centre. Negligible increase in retail floor space but potential for expansion of office accommodation. Refurbishment of Mither Kirk including use class 10 (Non-residential Institution) and use class 11 (Assembly and Leisure). Redevelopment of Aberdeen Indoor Market for appropriate uses such as use class 1 (Retail), use class	Flood Risk Assessment may be required (if residential proposed for Aberdeen Indoor Market)

				<p>3 (Food and Drink) and use class 11 (Assembly and Leisure), use class 6 (Houses) and use class 7 (Hotels and Hostels).</p> <p>A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.</p>	
OP116	Froghall Terrace	1.7ha	Mixed Use	Cleared depot. Suitable for residential accommodation.	<p>Mitigation measures required against possible groundwater flooding</p> <p>DIA required to address surface water management measures.</p>

Appendix 3 Masterplans and Development Frameworks

Masterplans

- Countesswells Development Framework and Phase 1 Masterplan
- Dubford Development Framework
- Former Davidson's Mill Development Framework and Masterplan
- Forresterhill Development Framework
- Friarsfield Development Framework
- Grandhome Development Framework
- Greenferns Development Framework and Masterplan
- Kingswells Development Framework and Phase 1 Masterplan (Prime 4)
- Kingswells Prime Four Business Park, Phases Two and Three
- Kingswells Prime 4 Business Park Phase 5 Extension (OP63)
- Loirston Development Framework
- Maidencraig Masterplan
- Newhills Development Framework (Craibstone)
- Oldfold Development Framework and Masterplan
- Persley Den/Woodside
- New AECC Site at Rowett North (OP19)
- Existing AECC Site at Bridge of Don (OP13)
- Berryhill Development Framework
- Cloverhill
- Old Torry Masterplan Study

New Masterplans and/or Development Frameworks for the following developments will be adopted as Aberdeen Planning Guidance.

- City Centre Masterplan and Delivery Programme Intervention Areas
- Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones at Bay of Nigg (OP56, OP61 and OP62)
- Woodend Hospital (OP37)
- Granitehill (OP66)
- North Dee City Centre Masterplan Intervention Area
- Stationfields, Cove?
- Tillyoch, Peterculter
- Peterculter Burn
- Murcar Aberdeen Energy Park (+ Findlay Farm)

From: [PI](#)
To: [LDP](#)
Cc: [Andrew Brownrigg](#)
Subject: FW: SEPA Response to Consultation Reference Proposed Plan
Date: 01 September 2020 10:48:32
Attachments: [PCS170843Response.doc](#)

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

From: [REDACTED]
Sent: 31 August 2020 15:08
To: PI <PI@aberdeencity.gov.uk>; [REDACTED]
Subject: SEPA Response to Consultation Reference Proposed Plan

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 [REDACTED]

The content of this email and any attachments may be confidential and are solely for the use of the intended recipient(s). If you have received this message by mistake, please contact the sender or email [REDACTED] as soon as possible then delete the email.

=====

The information contained in this email is confidential and is intended solely for the use of the named addressee. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to [REDACTED].

SEPA registered office: [REDACTED]
Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.
[COVID-19]<<https://postimg.cc/kDxFrXny>>

Andy Brownrigg
Aberdeen City Council
Planning and Sustainable Development
Business Hub 4, Marischal College
Broad Street
Aberdeen
AB10 1AB

Our Ref: PCS/170843
Your Proposed Plan
Ref:

If telephoning ask for:
Clare Pritchett

By email only to: pi@aberdeencity.gov.uk

31 August 2020

Dear Mr Brownrigg

Proposed Aberdeen City Local Development Plan 2020

Thank you for your consultation email highlighting the publication of your Proposed Plan (hereinafter referred to as the Plan). We welcome the opportunity to comment on the Plan as part of the ongoing and productive liaison between us.

The attached Appendices provide our detailed advice on the Plan and other supporting documents.

We support policies R6 Low and Zero Carbon Buildings, and Water Efficiency; R7 Renewable and Low Carbon Energy Developments and R8 Heat Networks with no proposed modifications.

We request rewording or additional wording to a number of Policies and Site Allocations as set out in the attached Appendix 1 (Policies & Supporting Text) and Appendix 2 (Opportunity Sites). We have indicated where we will **object** to the Policy or Site Allocation if these requests cannot be dealt with as minor modifications. In addition, we object to the allocation of opportunity site OP56 St Fitticks Park and consider that the assessment and proposed mitigation currently provided in the Environmental Report is incomplete.

Our comments on the Environmental Report have been provided separately via the Scottish Government SEA gateway.

Should you wish to discuss this letter please do not hesitate to contact me by email at [REDACTED]

Yours sincerely
Clare Pritchett

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](#).

APPENDIX 1:

SEPA RESPONSE TO ABERDEEN CITY PROPOSED LOCAL DEVELOPMENT PLAN 2020 POLICIES

Policy NE2 – Blue-Green Infrastructure

We suggest that this policy is re-worded as below.

Modification

The following additional text requires to be inserted into the policy itself (from the supporting text) to clarify and define the requirements.

Reason

The title of the Policy is 'Green & Blue Infrastructure' but the proposed policy wording does not reference blue infrastructure.

Green Space Network

Development proposals ~~will seek to~~ must demonstrate how they protect, support and enhance the Green Space Network (identified on the Proposals Map). Aberdeen's Green Space Network is a strategic city-wide network that connects natural green and blue spaces and habitats to each other and the communities around them. It is made up of multiple components of 'green infrastructure'. The city's 'blue features' are also included within this Network. This broadly encompasses the wildlife, biodiversity, ecosystem services & functions, access, recreation, landscape and townscape value of the Green Space Network. Development that does not achieve this will not be supported.

Policy NE3 – Our Natural Heritage

We suggest that this policy is re-worded as below.

Modification

There should be a presumption against development which would involve any draining or disturbing of peatland or carbon-rich soils. Where this resource is present, a soil or peat survey will be required to demonstrate that the highest quality of soil or deepest peat have been avoided. A soil or peat management plan will also be required to demonstrate that any unnecessary disturbance, degradation or erosion has been minimised, and includes proposed mitigation measures. Further information on how to undertake a peat survey can be found in the Scottish Government's Guidance on "Developments on Peatland: Peatland Survey (2017)"

Reason: To comply with Scottish Government Guidance and be transparent in terms of developer requirements where peat is likely to be present.

Carbon Rich Soils

Development should avoid areas of peatland and other carbon-rich soils. There will be a presumption against development which would involve ~~significant~~ any draining or disturbance of peatland or carbon-rich soils. Developments which may result in the disturbance of peatland and carbon-rich soils will require an assessment of the likely effects on CO2 emissions. A peat management plan may be required to assess and address potential impacts on peatlands or carbon-rich soils

POLICY NE4 – Our Water Environment

We **object** to this policy if our following rewording/additional text requests are not undertaken.

Modification & Reason

SEPA considers that the above modifications to proposed policy NE4 are required in order for the policy to comply with Scottish Planning Policy and the assessments and proposed mitigation set out in the Environmental Report.

Flood Risk & Management

Development will not be supported if:

1. It increases the current and/or future risk of flooding on site or elsewhere;
 - a. By reducing the ability of the functional flood plain to store and convey water; or
 - b. Through the discharge of additional surface water; or
 - c. By harming flood defences;
2. It would be at risk of flooding itself; or

3. Adequate provision is not made for ~~watercourses to be maintained as or restored to naturalised channels wherever possible with riparian buffer strips including for maintenance access and erosion prevention access to waterbodies for maintenance;~~ or

4. It would require the construction of new or strengthened flood defences ~~unless flood protection measures to an appropriate standard are a planned measure in a current flood risk management plan that would have a significantly damaging effect on the landscape character, built and historic environment, infrastructure and natural heritage interests within or adjacent to a waterbody.~~

The piecemeal reduction of functional floodplains will be avoided. Development on the functional floodplain will only be considered where its location is essential for operational reasons ~~and for water compatible uses.~~ Development must be designed and constructed to remain operational during floods and to ~~not impede water flow.~~ ~~Measures to protect against or manage flood risk will be required and any loss of flood storage capacity mitigated to achieve a neutral or better outcome.~~

Applicants will be required to provide a Flood Risk Assessment where a development ~~may is likely to result~~ in a material increase in the number of buildings ~~at risk of flooding,~~ ~~or~~ area of land at risk of flooding, ~~if there is an increase in land use vulnerability compared to the existing land use~~ or where it has been indicated in the opportunity sites schedule that one will be prepared.

There is a presumption against excessive engineering and culverting of waterbodies. Natural treatments of floodplains and other water storage features will be preferred wherever possible. There will be a requirement to restore existing culverted or canalised water bodies to a naturalised state where this is possible ~~and supported by a flood risk assessment.~~ Where the Council agrees that culverts are unavoidable for technical reasons, they should be designed to maintain existing flow conditions and aquatic life. Any proposals for new culverts should have a ~~demonstrably~~ neutral impact on flood risk ~~as demonstrated in a flood risk assessment~~ and be linked to long term maintenance arrangements to ensure they are not the cause of flooding in the future.

POLICY NE4 – Our Water Environment

We **object** to this policy if our following rewording/additional text requests are not undertaken.

Modification & Reason

SEPA considers that the above modifications to proposed policy NE4 are required in order for the policy to comply with SEPA guidance.

Foul Drainage & Water Quality

Connection to the public sewer for foul drainage will be a prerequisite of all development where this is not already provided. Private wastewater treatment systems ~~within the settlement boundary in sewerred areas~~ will not be permitted. ~~In areas not served by the public sewer, a private sewer treatment system for individual properties will be permitted provided that the developer demonstrates that there will be no adverse effects on the environment, amenity and public health.~~

POLICY NE4 – Our Water Environment

We suggest that this policy is re-worded as below.

Modification & Reason

SEPA considers that the below modifications to proposed policy NE4 are required for clarification.

Surface Water Drainage

All new developments are required to incorporate SuDS to manage surface water, with the exception of single dwellings/extensions to residential properties or discharges to coastal waters. For change of use and/or redevelopment, opportunities should be sought to retrofit SuDS where appropriate.

SuDS components need to be selected based on specific site opportunities and constraints and provision should be addressed as part of a Drainage Impact Assessment (DIA) **which details how surface water quality and quantity will be managed**. DIAs will be required for new development proposals of 5 or more homes or 250 square metres non-residential floorspace. DIAs will also be required if the proposal falls within a sensitive area (identified in the TAN). ~~DIAs should detail how surface water will be managed.~~

Coastal Development

Development will not be supported in undeveloped coastal areas (shown on the Proposals Map). Exceptions to this general presumption will be considered where the proposal:

1. Is dependent on that coastal location given the purpose and operation of the development; and
2. There is no other suitable site, including brownfield land; and
3. It respects the character and value of the landscape, the natural and historic environment, and the recreational value of the surrounding area; or
4. There is an overriding environmental benefit from the proposal.

The exceptions listed above, where considered acceptable in principle, must also meet all of the following criteria:

1. The development must not be located in an area at risk of coastal erosion or flooding **(as demonstrated in a topographical survey showing that the development lies above the 200 year flood level plus additional allowances for climate change and freeboard)**;
- ~~2. A Topographical Survey (in agreement with SEPA) must accompany applications for development~~
3. Public access to and along the coast must be protected and promoted wherever possible; and
4. Where marine noise modelling is deemed necessary by the Council or key agencies, it must be demonstrated that adverse impacts on bottlenose dolphins, Atlantic salmon, and any other protected species will be avoided.

Surface Water Drainage paras 6.35 & 6.36

We suggest that this text is re-worded as below.

Modifications to & Reason

SEPA support the use of SUDS wherever possible as a means of **mitigating** surface water flooding, but not all flood risk can be managed through the use of SUDS. Changes to wording required to clarify that SUDS provide flood risk mitigation not management.

Our Water Environment

6.35 Sustainable Drainage Systems (SuDS) provide multiple benefits including **managing mitigating** flood risk, improving water quality and enhancing biodiversity. All new developments are required to make provision for SuDS and these should be designed in accordance with best-practice design guidance in the SuDS Manual (CIRIA C753), and the technical criterion set out in Sewers for Scotland v4.0 and its successors. In some circumstances, developments may also be required to adapt to flood risk by incorporating water resistant materials and forms of construction in line with the guidance set out in the Scottish Government's Online Planning Advice on Flood Risk.

6.36 The Council is developing strategic-level Regional SuDS ~~to provide which will incorporate~~ sustainable flood risk management at a strategic scale. There may be opportunities for developers to contribute to a Regional SuDS scheme to help address the impact of their development. Please see our Technical Advice Note (TAN) for more information.

POLICY WB2 Air Quality

Modification & Reason

We support the inclusion of Policy WB2 as it will help the Council to mitigate the impacts of future development on air quality, protecting human health and the environment. We suggest the following minor amendment to Section 5.8 as highlighted below:

As part of our statutory duties under the UK Environment Act 1995 the Council undertakes monitoring and assessment of seven key pollutants recognised to impact on health. Aberdeen currently exceeds the **EU and national annual mean objective for nitrogen dioxide and the annual mean national objectives for particulate matter**, resulting in three Air Quality Management Areas (AQMAs) being declared

POLICY B5 – Energy Transition Zones

Modification & Reason

Whilst we support the identification of 'Energy Transition Zones', we strongly suggest that an alternative location to OP56 for this welcome project is identified and we would be pleased to assist in the process of doing so. We support the proposed allocation of site OP62 Bay of Nigg (55ha) as an Energy Transition Zone which allocates land adjacent to the new harbour and existing rail line. We would welcome the consideration of existing brownfield sites, including site OP64 Former Ness Tip, and sites already allocated for business/industrial development as Energy Transition Zones.

Appendix 2 Opportunity Sites

Site OP56 St Fitticks Park Energy Transition Zone, Green Space Network

We **object** to this allocation.

(We did not consider this site as part of our consideration of the Main Issues Report)

Modification & Reason

Unfortunately we **object** to the inclusion of this site as a proposed opportunity site for development in the proposed plan and we do not consider that the assessment of this site in the SEA is satisfactory or the proposed mitigation sufficient.

We note that this proposed site covers the East Tullos Burn Project. This re-created a natural watercourse and wetlands with wildflowers and trees. It transformed the amenity of St Fittick's Park, which is now an area of quality greenspace enjoyed by the local community. The project tackled pollution, flooding and litter using natural solutions that have benefitted biodiversity and recreation. Access within and around the project area has been improved. The project involved considerable effort and significant public funding, and the local community helped inform the design and plant up the site. It has created an improved sense of place and is highly valued by people in Torry, a deprived part of Aberdeen.

The presence of the East Tullos Burn and associated wetlands and floodplain and requirement for buffer strips and the Scottish Water treatment works means that there is likely to be a very limited area of developable land at OP56 as currently shown.

We consider that it has not been demonstrated that there is sufficient land available for business/industrial development within OP56 which would not have significant adverse impacts on the East Tullos Burn and associated wetlands.

We do not consider that it has been demonstrated that the Scottish Water Treatment Works should form part of this proposed development site allocation.

We do not consider that it has been demonstrated that flood risk, water quality, recreational access and habitat connectivity (as set out in the site allocation) can be adequately addressed at the masterplanning stage for this site.

We suggest that if a site is to be allocated here then the relevant assessments are carried out first and the East Tullos Burn and wetlands and associated buffer strips and floodplain are excluded from the development site allocation. In addition to land required for recreational access and habitat connectivity.

We consider that the East Tullos Burn and associated open space including pedestrian access are essential blue/green infrastructure in accordance with proposed policy NE2 and we would strongly support the protection of this from allocation for development. We do not consider that a joint masterplan to be prepared by the developers once the site is allocated for development is the appropriate place to address these issues.

Aberdeen City Proposed Plan 2020 Opportunity Sites

See column headed 'SEPA comments' for requested modification and reason:

There are several sites where the information we hold suggests that, although part of the site is highly likely to be developable, there is a risk of flooding to part of the site and as such development may be constrained. Proposals for development would have to be accompanied by a satisfactory Flood Risk Assessment. The outcome of the FRA could reduce the area of the site that is developable, the capacity of the site or the appropriate design or layout for the site. Using mitigation measures to enable development in flood risk areas is only appropriate in exceptional circumstances or where flood defences exist (or are under construction) and meet the appropriate standard for development. For these sites, we would object to their inclusion in the Local Plan **unless** wording is included that highlights that flooding is a potential constraint and a FRA will be required. This ensures that developers are aware from the earliest stage of the possible implications and of the additional costs that will be incurred in bringing development forward for the site.

Site	Site Name	Site Size	Policy	Other Factors	SEPA Comments
Bridge of Don & Grandhome					
OP1	Murcar	27.8ha	Land Release Policy and Green Space Network	Strategic Reserve Employment Land for the period 2033-40. This site may be at risk of flooding. Flood Risk Assessment required to accompany development proposals.	
OP2	Cloverhill	24.8ha	Residential and Green Space Network	Opportunity for 550 homes on former employment land. Primary and secondary education and health capacity issues need to be addressed. Flood Risk Assessment required to accompany future development proposals.	
OP45	Berryhill	43.7ha	Business and Industry and Green Space Network	Development Framework approved in 2008 covers this site and land to the north. Land available for development of Use Class 4, 5 and 6. Flood Risk Assessment required to accompany future development proposals.	
OP3	Findlay Farm, Murcar	16.4ha	Business and Industrial Land	Opportunity to extend the Aberdeen Energy Park.	DIA required to address surface water flood risk. Object unless text added: Flood Risk Assessment may be required.
OP4	North Denmore	1.7ha	Residential	Residential opportunity for up to 30 houses on an unused Council owned site.	
OP5	Balgownie Centre, Bridge of Don	2.25ha	Residential	Former Aberdeen College building now cleared. Planning Brief available.	
OP6	WTR Site at Dubford	0.57ha	Residential and Green Space Network	Brownfield opportunity for residential development that should look to integrate with the neighbouring development at Dubford.	Object unless text added: Flood Risk Assessment may be required. (Topographic information may demonstrate the site is sufficiently elevated above the functional floodplain.)
OP7	Aberdeen College Gordon Centre	3.1ha	Mixed Use and Green Space Network	Location suitable for residential or mixed-use development. The woodland on site, particularly along the site's boundaries, should be retained.	DIA required to consider surface water management measures.
OP8	East Woodcroft North	2.2ha	Residential	Council owned site identified for 60 homes.	
OP9	Grandhome	323ha	Land Release Policy/Green Space Network	Privately owned site in single ownership identified for 7000 homes and 5 hectares of employment land (Class 4 uses). Town Centre identified for Phase 2 of this site. Developers will be required to provide a Flood Risk Assessment in support of any development proposals for	

				this site. Masterplan approved	
OP10	Dubford	4.2ha	Residential and Green Space Network	This is the undeveloped part of the 550 home Dubford development. Any proposal here must comply with the Dubford Development Framework. This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site.	
OP11	Balgownie Area 4	0.5ha	Residential	Opportunity for residential development of up to 15 houses.	Object unless text added: Flood Risk Assessment required.
OP12	Silverburn House	4.0ha	Residential	Opportunity for 100 homes on former employment land. Primary and secondary education and health capacity issues need to be addressed. Needs to link into OP2 and OP13 – the AECC site.	Object unless text added: Flood Risk Assessment required
OP13	AECC Bridge of Don	18.4ha	Mixed Use	Redevelopment opportunity for mixed use development. Masterplan approved. The site will be required to accommodate an expansion of the Park and Choose to 999 spaces and a household waste recycling centre to replace the facility at Scotstown Road. Any residential elements would need to address school capacity issues in the area. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. Development should respect the landscape setting and amenity of the course of the Royal Aberdeen Golf Club.	
OP75	Denmore Road	4.56ha	Commercial Centre	Opportunity for bulky goods retailing. Pitches lost should be replaced in Bridge of Don by new or upgraded pitches which are of comparable or greater benefit. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	Object unless text added: Flood Risk Assessment required (Glashie Burn runs through site)
Dyce Bucksburn & Woodside					
OP14	Former Cordyce School	7.9ha	Mixed Use and Green Space Network	Site suitable for a number of uses including housing, a garden centre and health and fitness village. Development should avoid harmful impacts on the community orchard. A Flood Risk Assessment is required.	
OP15	Former Carden School	0.37ha	Residential	Part of Dyce primary school deemed surplus to requirements.	
OP16	Davidsons Papermill, Mugiemoos Road, Bucksburn	29.5ha	Mixed Use	Former paper mill site and adjoining land. Development Framework and Phase 1 Masterplan approved. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	
OP17	Former Bucksburn Primary School	0.94ha	Residential	Former primary school suitable for residential, healthcare or other uses compatible with a residential area.	Object unless text added: Flood Risk Assessment required (to assess risk from Bucks Burn)
OP18	Cra bstone North and Walton Farm	20.0ha	Land Release Policy/Green Space Network	Opportunity for development of 1.5ha of employment and 18.5 hectares of Strategic Reserve employment land or a higher education and research institute in the 2033-40 period. Masterplan required. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	Masterplan required – add to masterplan list
OP19	Rowett North	63.9ha	Business Zone/Green Space Network/Airport Public Safety Zone	Site for The Event Complex Aberdeen and complimentary employment uses. Masterplan approved. Part of approved Newhills Development Framework? This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	
OP20	Cra bstone South	42.6ha	Land Release	Opportunity for 1000 homes. Part of approved Newhills Development Framework.	Object unless text added:

			Policy/Green Space Network		Flood Risk Assessment required.
OP21	Rowett South	106.85 ha	Land Release Policy/Green Space Network/Residential	Opportunity for 1940 homes of which 240 homes are phased in the period beyond 2032. Part of approved Newhills Development Framework. Town Centre identified for this site comprising of approx. 7,500 square metres total floorspace (4,000 square metres supermarket, 3,500 square metres other comparison and local shops and retail services.)	Object unless text added: Flood Risk Assessment may be required (for part of site not covered by planning consent)
OP22	Greenferns Landward	69.6ha	Land Release Policy	Opportunity for 1500 homes on Council owned land, of which 500 homes are phased for the period beyond 2032. Part of approved Newhills Development Framework. Burnbrae Moss District Wildlife Site lies adjacent to the southern boundary of this site.	Object unless text added: Flood Risk Assessment required
OP23	Dyce Drive	65ha	Business and Industrial Land /Green Space Network	This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site. The site lies within a pipeline notification zone.	
OP24	Central Park, Dyce	0.71ha	New Community Sites and Facilities	Site reserved for a new medical centre. Urban Green Space developed here should be replaced through the demolition of the existing medical centre north of Dyce shopping centre. Pedestrian access to the shopping centre car park should be provided.	
OP25	Woodside	19.1ha	Residential/Green Space Network/Green Belt	Site capable of accommodating up to 300 homes, including affordable housing as per Persley Den/Woodside Masterplan. Parts of the site may have a risk of flooding and development will have to be avoided in those areas. A Flood Risk Assessment will be required to support any development proposals for the site.	
OP86	Dyce Railway Station	1.1ha	Land for Transport	Opportunity Site for an expanded car park with associated SUDS and landscaping. Access to the Formartine Buchan Way should be retained and enhanced. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	
Kingswells & Greenferns					
OP26	Old Skene Road	1.2ha	Residential	Residential opportunity for 14 houses. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP27	Greenfern Infant School	0.91ha	Residential	Brownfield residential opportunity. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP28	Greenferns	13.6ha	Residential	This is an opportunity to provide 120 homes. Joint Development Framework with OP33 Greenferns approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals.	
OP29	Prime Four Business Park	50.0ha	Business Zone/Green Space Network	Opportunity for development of business land which will attract high quality businesses or be suitable for company headquarters. Masterplans and Development Framework prepared. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required (for any part of site not already covered by submitted FRA)
OP63	Prime 4	12.7ha	Business	Expansion to existing allocation. Masterplan approved. A	

	Business Park Phase 5 Extension		Zone	Traffic Impact Assessment will be required. The site lies within a pipeline notification zone. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP30	Kingsford	24.5ha	Green Belt	New stadium and training facilities. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP31	Maidencraig South East	29.8ha	Residential/ Green Space Network	Opportunity for development of 450 homes. Joint masterplan approved for this site and OP32 Maidencraig North East. This site may be at risk of flooding. Flood Risk Assessment required to accompany development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP32	Maidencraig North East	22.8ha	Residential/ Green Space Network	Opportunity for development of 300 homes. Joint masterplan approved for this site and OP31 Maidencraig South East. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP33	Greenferns	60.4ha	Land Release Policy/Green Space Network	Opportunity for development of 1350 homes and 10ha of employment land on a Council owned site. 400 of the homes are phased for the period beyond 2032. Joint Development Framework with OP28 Greenferns approved. This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site. Proposals for an extension to Enernec and a new NHS health centre will need to be accommodated on site.	
OP34	East Amhall	1.0ha	Land Release Policy	An opportunity for development of 1 hectares of employment land. A masterplan with Aberdeenshire Council involvement would be desirable given that the site borders the Local Authority boundaries. Site may be at risk of flooding. A Flood Risk Assessment will be required to accompany future development proposals. Site lies within a pipeline notification zone. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP11 1	Skene Road, Maidencraig	0.9ha	Residential and Green Space Network	Site capable of accommodating around 15 homes. A flood risk assessment will be required to accompany any future development proposals for this site. Development should seek to avoid any adverse impacts on the Den of Maidencraig Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Countesswells					
OP38	Countesswells	165.1ha	Land Release Policy/Green Space Network	An opportunity for development of 3000 homes and 10 hectares of employment land. Development Framework and Phase 1 Masterplan approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations	

				Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Deeside					
OP39	Braeside Infant School	1.04ha	Residential	Former school site with potential to be redeveloped for residential use in future. Development will have to respect residential amenity within and surrounding the area. The Council will seek the retention of the playpark in its current location to the south of site OP39. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP40	Cults Pumping Station	0.69ha	Urban Green Space	Brownfield residential opportunity. Development will have to respect green linkages to the west of the site and the retention of the allotments to the east of the site. Development should seek to avoid any adverse impacts on the Cults Den Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment required. (possible flooding from Cults Burn)
OP41	Friarsfield	5.6ha	Residential and Green Space Network	This is the undeveloped part of the 280 home Friarsfield development. Development Framework approved. This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP42	Hotel and Equestrian Centre at Hazlehead	9.2ha	Green Belt and Green Space Network	Planning permission granted for a hotel and equestrian centre. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP43	Milltimber Primary School	1.85ha	Residential	Milltimber Primary School is likely to become available in the future due to the development at Oldfold providing a new school. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP44	North Lasts Quarry	8.01ha	Green Belt	Ongoing mineral extraction. Planning Permission granted in February 2017 to continue hard rock extraction. The site lies within a pipeline consultation zone and all development should conform to the terms of Policy B6 – Pipelines, Major Hazards and Explosives Storage Sites. Site may be at risk of flooding. Flood Risk Assessment required to accompany any future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP47	Edgehill Road	4.4ha	Residential/ Green Space Network	Opportunity for development of 5 homes. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany	Flood Risk Assessment may be required

				development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP48	Oldfold	48.9ha	Land Release Policy	Opportunity for development of 550 homes and 5 hectares of employment land. Development Framework and Masterplan approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP49	Grove Nursery, Hazlehead	5.9ha	New Community Facilities	Following a Council resolution this site is identified for social enterprises specialising in nursery, horticulture and/or allotments and other associated uses. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Flood Risk Assessment may be required.
OP50	Skene Road, Hazlehead	49.7ha	Green Belt/ Green Space Network	Land reserved for a phased cemetery development. Site may be at risk of flooding. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Flood Risk Assessment may be required. Topographic information may demonstrate the site is sufficiently elevated above the functional floodplain.
OP51	Peterculter Burn	7.4ha	Residential and Green Space Network	Site capable of accommodating 19 homes, a hydro-electric scheme, fish pass, football pitch, changing facilities and car parking for Culter Youth Football Club and a new pathway opening up access to existing woodland. A Flood Risk Assessment demonstrating acceptable consequences will be required together with a masterplan giving details of access and setting out timescales for implementation of the different stages of the overall development. These matters will be reflected in any grant of planning permission. A planning brief will be required for OP51 setting out specific measures needed to avoid damage to, and enhance the Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Clarification required: planning brief & masterplan Object unless text added: Demonstration required that Culter Burn protected. Add to masterplan list
OP52	Malcolm Road Peterculter	1.5ha	Residential	Opportunity for 8 houses. Scots Pine trees on western boundary to be retained. Site (or part of) may be at risk of flooding. Flood Risk Assessment may be required in support of any development proposals for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	(SEPA would not request a flood risk assessment).
OP53	Tillyoch, Peterculter	15.25ha	Residential and Green Space Network	Housing opportunity for 250 houses. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required. Masterplan required.	Flood Risk Assessment may be required (if development proposed in SE of site adjacent to small watercourse) Masterplan required – add to masterplan list
OP54	Craigton,	2.45ha	Residential	Housing opportunity for 10 houses. Flood Risk	

	Peterculter			Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP109	Woodend Peterculter	2ha	Residential	Opportunity for 19 houses. Drainage Impact Assessment required to consider protection of potential wet habitats/woodlands adjacent to the site and the potential requirement for a buffer to prevent any increase in drainage of wet habitats/woodlands. Ancient Woodland to the south of the site is to be protected. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP112	West of Contlaw Road	12.5ha	Residential	Opportunity for 10 houses. Arboricultural and ecological implications studies required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required (Part of site is at risk of flooding)
OP113	Culter House Road	2.4ha	Residential	Opportunity for 8 houses. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Loirston & Cove					
OP46	Royal Devenick Park	8.36ha	Residential	Housing opportunity for 150 houses. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP55	Blackhills Quarry, Cove	32.76ha	Green Belt	Planning permission granted in 2013 to continue hard rock extraction and processing.	
OP56	St Fittick's Park	18.2ha	Energy Transition Zone, Green Space Network	Energy Transition Zone. This site, along with OP61, will support renewable energy transition related industries in association with Aberdeen South Harbour. Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring 'roll on / roll off' level access to the South Harbour. Appropriate environmental assessments will be required, including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. A Flood Risk Assessment is also required. Other issues which need to be addressed include water quality, recreational access, habitat connectivity, compensatory planting and landscape buffering with residential areas. Joint Masterplan needed for OP56, OP61 and OP62.	Unfortunately we object to the inclusion of this site for development in the proposed plan and we do not consider that the assessment of this site in the SEA is satisfactory.
OP57	Craighill Primary School, Kincorth	0.86ha	Residential	Vacant Primary School. Forms part of the Strategic Infrastructure Plan Affordable Housing Programme. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP58	Stationfields, Cove	9.8ha	Residential and Green Space Network	Opportunity for 150 homes. Masterplan required.	Masterplan required – add to masterplan list
OP59	Loirston	119.2ha	Land Release	Opportunity for development of 1500 homes and 11 hectares of employment land. Potential to accommodate	Updated Development

			Policy/ Green Space Network	supermarket in a new district centre to meet convenience shopping deficiencies in south Aberdeen. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. Updated Development Framework to be approved. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Framework to be approved - Add to masterplan list
OP60	Charleston	20.5ha	Land Release Policy and Green Space Network	Opportunity for development of 20.5 hectares of employment land for the period 2033-40. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP61	Doonies	16.3ha	Energy Transition Zone, Green Space Network	Energy Transition Zone. This area along with OP56 will support renewable energy transition related industries in association with Aberdeen South Harbour. Appropriate environmental assessments will be required, including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. Other issues which need to be addressed include landscape impact of development, recreational access and habitat connectivity. Joint Masterplan needed for OP56, OP61 and OP62.	Object unless text added: Flood Risk Assessment may be required following assessment of small watercourse close to north boundary.
OP62	Bay of Nigg	55ha	Aberdeen Harbour, Energy Transition Zone, Green Belt and Green Space Network	Aberdeen Harbour expansion. Bay of Nigg Development Framework approved. Requires Flood Risk Assessment and full Transport Assessment. Appropriate environmental assessments will be required including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. Other issues to be addressed include re-instatement of the coastal path and recreational access. Joint Masterplan needed for OP56, OP61 and OP62.	We note that there are requirements in the existing planning permission for the new Aberdeen Harbour which will require to be incorporated into any masterplan including for areas of site restoration following completion of the harbor development.
OP64	Former Ness Tip	20.5ha	Green Belt and Green Space Network	Solar Farm. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 3	Former Torry Nursery School	0.53ha	Residential	Council owned site surplus to requirements. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 5	Kincorth Academy	3.94ha	Residential	Forms part of the Strategic Infrastructure Plan Affordable Housing Programme. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 7	East Tullos Gas Holder	3.12ha	Business and Industrial	Former gas holder site and Council owned recycling centre suitable for an energy from waste facility. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	
OP11 5	34-40 Abbotswell Road	1.03ha	Mixed Use	Suitable for residential use. A noise impact assessment will be required. A Habitats Regulations Appraisal is	

				required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
City Centre & Urban Areas					
OP35	Summerfield House, Eday Road	1.1ha	Residential	Brownfield residential opportunity. Drainage Impact Assessment required. School capacity issues would need to be addressed. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP36	Charlie House	1.5ha	Urban Green Space and Green Space Network	Site identified for children's respite centre and interactive garden area. A Flood Risk Assessment is required for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP37	Woodend Hospital	7.1ha	Existing Community Sites and Facilities and Green Space Network	Brownfield residential opportunity on part of the hospital site. Site includes listed buildings, trees and open space which require sensitive treatment. Flood Risk Assessment required. School capacity issues will need to be addressed. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required. Masterplan required	Add text: Masterplan required – already on list
OP65	Haudagain Triangle, Middlefield	4.0ha	Mixed use and Land for Transport	Vacant land made available as part of the Haudagain improvements. Site should accommodate a mix of residential, retail, commercial and community uses to support the regeneration of the area.	Object unless text added: Flood Risk Assessment required
OP66	Granitehill	4.8ha	Residential	Brownfield opportunity for up to 300 homes which should include a wide range of houses and flats. School capacity issues will need to be addressed. Masterplan required	Add text: Masterplan required – already on list. DIA required to consider any surface water issues.
OP68	1 Western Road	0.07ha	Residential	Capacity for approximately 22 residential units.	
OP69	152 Don Street, Old Aberdeen	0.63ha	Residential	Residential opportunity on brownfield site in Old Aberdeen Conservation Area. Drainage Impact Assessment required.	
OP70	Denburn Valley – City Centre Masterplan Intervention Area	6.5ha	Mixed Use, Urban Green Space, Green Space Network and City Centre Retail Core	New ground floor uses including use class 1 (Retail); use class 2 (Financial, Professional and other services), use class 3 (Food and Drink and use class 11 (Assembly and Leisure). New upper floor uses - use class 9 (houses) – suitable for apartments. Refurbishment of former Woolmanhill hospital buildings for Pavilion, class 7 (Hotels and Hostels) or use class 9 (Houses). Other remaining buildings suitable for use class 9 (Houses). A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. Refurbishment of Denburn Court. Upgrade and expansion of Union Terrace Gardens including outdoor amphitheatre, new soft landscaping and high level bridge access. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Masterplan/development framework required – add to list

OP72	Aberdon House	0.64ha	Residential	Cleared site which forms part of the Strategic Infrastructure Plan Affordable Housing Programme.	
OP73	Balgownie Machine Centre	0.2ha	Mixed Use	Land reserved partially for Berryden Road Improvements.	
OP74	Broadford Works, Maberley Street	3.6ha	Mixed Use	Consent granted for residential and other uses subject to legal agreement. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	No flood risk assessment required by SEPA. No development over culverts or culverting for land gain.
OP76	Former Raeden Centre	1.48ha	Residential and Green Space Network	The presence of mature trees means that only a small part of the previously developed area may be suitable for sensitive residential redevelopment. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP77	Cornhill Hospital	6.04ha	Existing Community Sites and Facilities	Former hospital site with substantial granite buildings in Rosemount Conservation Area. Redevelopment for mix of uses, residential, office/ business (Class 4), community uses. Development underway. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP78	Frederick Street	0.1ha	Mixed Use	Small brownfield opportunity.	
OP79	Crown House	0.04ha	Mixed Use	City centre location suitable for residential use. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP80	Mastrick Clinic	0.12ha	Neighbourhood Centre	Uses that would support the Mastrick neighbourhood centre. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP81	Queen's Square – City Centre Masterplan Intervention Area	5.4ha	Mixed Use	Refurbishment of the eastern annex of Marischal College for use class 4 (Offices) and class 11 (Assembly and Leisure). Refurbishment of Greyfriars John Knox Church – appropriate uses include use class 3 (Food and Drink); use class 4 (Business); use class 7 (Hotels and Hostels); use class 10 (Non-residential Institutions); use class 11 (Assembly and Leisure). New ground floor uses could include use class 1 (Retail); use class 2 (Financial, Professional and other services) and use class 3 (Food and Drink). New upper floor uses could include use class 9 (Houses) – suitable for apartments.	DIA required to address surface water issues.
OP82	Dunbar Halls of Residence, Don Street	1.64ha	Residential	Residential or student accommodation opportunity in Old Aberdeen Conservation Area.	
OP83	Urquhart Building, City Hospital	0.28ha	Existing Community Sites and Facilities	Residential opportunity would allow the re-use of this listed building.	
OP84	Resource Centre, City Hospital	0.16ha	Existing Community Sites and Facilities	Small scale retail, commercial or office use.	
OP85	King Street/ Beach Esplanade	2.0ha	New Community Facilities	Site is identified by Council resolution for a Mosque, community facilities and open space. Until proposals for these uses are progressed, or if a decision is made not	

				to pursue them, the existing open space use will be protected by Policy NE2 Green and Blue Infrastructure (Urban Green Space).	
OP87	Pittodrie Park	6.00ha	Residential	Proposed residential development. School capacity issues will need to be addressed.	
OP88	Shore Porters Warehouse	0.02ha	Mixed Use	Redundant warehouse. Residential will only be considered if suitable amenity can be demonstrated. Noise Impact Assessment required.	
OP89	Kaimhill Outdoor Centre	1.5ha	Residential and Green Space Network	Proposal for 35 houses. Play park area should be retained and compensatory recreational provision made in the local community. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP90	St Machar Primary School	1.01ha	Residential	Suitable for education use and/or affordable housing.	
OP91	Union Street West City Centre Masterplan Intervention Area	15.3ha	City Centre Retail Core, Mixed Use and West End Shops and Cafés	New Aberdeen City Rooms for ground floor cafe, multi-purpose foyer and gallery (use class 11) with offices (use class 4) above and rooftop restaurant (use class 3). Refurbishment of Golden Square. Refurbishment of Bon Accord Square. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	DIA required to address surface water issues.
OP92	St Peter's Nursery, Spital	0.09ha	Mixed Use	Sensitive residential redevelopment - within a Conservation Area. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP93	Former Summerhill Academy	3.3ha	Residential	Residential development. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP94	Tillydrone Primary School	2.11ha	Residential	Site of former Tillydrone Primary School. Site will be used for a new primary school.	
OP95	Station Gateway City Centre Masterplan Intervention Area	4.0ha	City Centre Retail Core, Mixed Use and Land for Transport	Expanded station concourse across two levels to include use class 1 (Retail) and 3 (Food and Drink). New station hotel above concourse. New Trinity Centre entrance and bridge links. Hotel/serviced apartments on Atholl House site - use class 7 (Hotels and Hostels). A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment required (to include issue of culverted Den Burn under site)
OP96	Castlegate and Castlehill City Centre Masterplan Intervention Area	2.6ha	City Centre Retail Core, Mixed Use and Residential	Refurbishment of properties on Castlegate and Justice Street. Appropriate ground floor uses include use class 1 (retail); Use class 3 (Food and Drink); and use class 11 (Assembly and Leisure). Appropriate upper floor uses include use class 4 (Offices), use class 7 (Hotels and Hostels) and use class 9 (residential). Refurbishment of Marischal and Virginia Court (use class 9) Houses; potential for use class 1 (Retail); use class 3 (Food and Drink) and use class 11 (Assembly and Leisure) at street level. New Residential development of approximately 46 apartments.	
OP97	Victoria Road Primary School	0.67ha	Mixed Use	Former Primary School. The site would be suited for sensitive redevelopment	

OP98	VSA Gallowgate	0.08ha	Mixed Use	Residential/Mixed use. Listed building.	
OP99	Old Torry	6.6ha	Mixed Use	Mixed use development. See also Old Torry Masterplan Study. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment.	Old Torry Masterplan Study – add to list
OP100	North Dee City Centre Masterplan Intervention Area	12.7ha	Business Zone, Mixed Use, Urban Green Space, Green Space Network and Land for Transport	New Urban Quarter with a high quality and imaginative approach to the public realm, creating permeable pedestrian linkages between the city centre and the River Dee. Masterplan required showing an appropriate mix of compatible new uses, including Class 1 (Retail), Class 2 (Financial, Professional and other services), Class 3 (Food and Drink), Class 4 (Business, including new office development and a Global Energy Hub if required), and Class 9 (Residential). Refurbishment of the listed smoke houses. Pedestrian bridge linking into OP106 Torry Waterfront. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required depending on location. Masterplan required – add to list
OP101	Woodside Congregational Church	0.07ha	Residential	Vacant church building.	
OP102	George Street / Crooked Lane	0.96ha	City Centre Retail Core	Opportunity for retail development, enhance George Street, link to John Lewis / extend Bon Accord Centre, address accessibility issues through the centre and address public realm issues. Some Listed Buildings. Existing traditional granite buildings on the St Andrew Street and George Street frontages, and upper floor residential uses, to be retained. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP106	Torry Waterfront City Centre Masterplan Intervention Area	5.0ha	Mixed Use, Urban Green Space and Green Space Network.	New residential development. New ground floor uses including use class 1 (Retail) and use class 3 (Food and Drink), Hotel Academy (use class 7). Pedestrian Bridge linking into OP100 North Dee. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required depending on location.
OP110	Heart of the City – City Centre Masterplan Intervention Area	5.4ha	City Centre Retail Core, Urban Green Space, Green Space Network, Existing Community Sites and Facilities and Mixed Use.	Refurbishment and remodelling of buildings on Union Street. Negligible increase in overall accommodation but increased utilisation of existing floor space. Appropriate uses for ground floors include use class 1 (Retail), use class 2 (Financial, Professional and other services), and use class 3 (Food and Drink). Appropriate uses for upper and lower floors include use class 4 (Business); use class 7 (Hotels and Hostels); use class 9 (Houses); use class 10 (Non-residential Institutions); use class 11 (Assembly and Leisure). Remodelling of the St Nicholas Centre. Negligible increase in retail floor space but potential for expansion of office accommodation. Refurbishment of Mither Kirk including use class 10 (Non-residential Institution) and use class 11 (Assembly and Leisure). Redevelopment of Aberdeen Indoor Market for appropriate uses such as use class 1 (Retail), use class	Flood Risk Assessment may be required (if residential proposed for Aberdeen Indoor Market)

				<p>3 (Food and Drink) and use class 11 (Assembly and Leisure), use class 6 (Houses) and use class 7 (Hotels and Hostels).</p> <p>A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.</p>	
OP116	Froghall Terrace	1.7ha	Mixed Use	Cleared depot. Suitable for residential accommodation.	<p>Mitigation measures required against possible groundwater flooding</p> <p>DIA required to address surface water management measures.</p>

Appendix 3 Masterplans and Development Frameworks

Masterplans

- Countesswells Development Framework and Phase 1 Masterplan
- Dubford Development Framework
- Former Davidson's Mill Development Framework and Masterplan
- Forresterhill Development Framework
- Friarsfield Development Framework
- Grandhome Development Framework
- Greenferns Development Framework and Masterplan
- Kingswells Development Framework and Phase 1 Masterplan (Prime 4)
- Kingswells Prime Four Business Park, Phases Two and Three
- Kingswells Prime 4 Business Park Phase 5 Extension (OP63)
- Loirston Development Framework
- Maidencraig Masterplan
- Newhills Development Framework (Craibstone)
- Oldfold Development Framework and Masterplan
- Persley Den/Woodside
- New AECC Site at Rowett North (OP19)
- Existing AECC Site at Bridge of Don (OP13)
- Berryhill Development Framework
- Cloverhill
- Old Torry Masterplan Study

New Masterplans and/or Development Frameworks for the following developments will be adopted as Aberdeen Planning Guidance.

- City Centre Masterplan and Delivery Programme Intervention Areas
- Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones at Bay of Nigg (OP56, OP61 and OP62)
- Woodend Hospital (OP37)
- Granitehill (OP66)
- North Dee City Centre Masterplan Intervention Area
- Stationfields, Cove?
- Tillyoch, Peterculter
- Peterculter Burn
- Murcar Aberdeen Energy Park (+ Findlay Farm)

From: [PI](#)
To: [LDP](#)
Cc: [Andrew Brownrigg](#)
Subject: FW: SEPA Response to Consultation Reference Proposed Plan
Date: 01 September 2020 10:49:00
Attachments: [PCS170843Response.doc](#)

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

From: [REDACTED]
Sent: 31 August 2020 15:08
To: PI <PI@ aberdeencity.gov.uk>; [REDACTED]
Subject: SEPA Response to Consultation Reference Proposed Plan

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 [REDACTED]

The content of this email and any attachments may be confidential and are solely for the use of the intended recipient(s). If you have received this message by mistake, please contact the sender or email [REDACTED] as soon as possible then delete the email.

=====

The information contained in this email is confidential and is intended solely for the use of the named addressee. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to [REDACTED].

SEPA registered office: [REDACTED]
Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.
[COVID-19]<<https://postimg.cc/kDxFrXny>>

Andy Brownrigg
Aberdeen City Council
Planning and Sustainable Development
Business Hub 4, Marischal College
Broad Street
Aberdeen
AB10 1AB

Our Ref: PCS/170843
Your Proposed Plan
Ref:

If telephoning ask for:
Clare Pritchett

By email only to: pi@aberdeencity.gov.uk

31 August 2020

Dear Mr Brownrigg

Proposed Aberdeen City Local Development Plan 2020

Thank you for your consultation email highlighting the publication of your Proposed Plan (hereinafter referred to as the Plan). We welcome the opportunity to comment on the Plan as part of the ongoing and productive liaison between us.

The attached Appendices provide our detailed advice on the Plan and other supporting documents.

We support policies R6 Low and Zero Carbon Buildings, and Water Efficiency; R7 Renewable and Low Carbon Energy Developments and R8 Heat Networks with no proposed modifications.

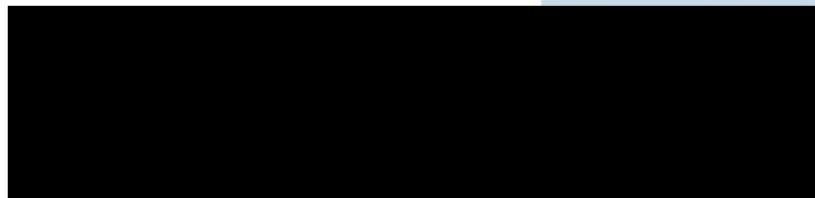
We request rewording or additional wording to a number of Policies and Site Allocations as set out in the attached Appendix 1 (Policies & Supporting Text) and Appendix 2 (Opportunity Sites). We have indicated where we will **object** to the Policy or Site Allocation if these requests cannot be dealt with as minor modifications. In addition, we object to the allocation of opportunity site OP56 St Fitticks Park and consider that the assessment and proposed mitigation currently provided in the Environmental Report is incomplete.

Our comments on the Environmental Report have been provided separately via the Scottish Government SEA gateway.

Should you wish to discuss this letter please do not hesitate to contact me by email at [REDACTED].

Yours sincerely
Clare Pritchett

[REDACTED]



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](#).

APPENDIX 1:

SEPA RESPONSE TO ABERDEEN CITY PROPOSED LOCAL DEVELOPMENT PLAN 2020 POLICIES

Policy NE2 – Blue-Green Infrastructure

We suggest that this policy is re-worded as below.

Modification

The following additional text requires to be inserted into the policy itself (from the supporting text) to clarify and define the requirements.

Reason

The title of the Policy is 'Green & Blue Infrastructure' but the proposed policy wording does not reference blue infrastructure.

Green Space Network

Development proposals ~~will seek to~~ must demonstrate how they protect, support and enhance the Green Space Network (identified on the Proposals Map). Aberdeen's Green Space Network is a strategic city-wide network that connects natural green and blue spaces and habitats to each other and the communities around them. It is made up of multiple components of 'green infrastructure'. The city's 'blue features' are also included within this Network. This broadly encompasses the wildlife, biodiversity, ecosystem services & functions, access, recreation, landscape and townscape value of the Green Space Network. Development that does not achieve this will not be supported.

Policy NE3 – Our Natural Heritage

We suggest that this policy is re-worded as below.

Modification

There should be a presumption against development which would involve any draining or disturbing of peatland or carbon-rich soils. Where this resource is present, a soil or peat survey will be required to demonstrate that the highest quality of soil or deepest peat have been avoided. A soil or peat management plan will also be required to demonstrate that any unnecessary disturbance, degradation or erosion has been minimised, and includes proposed mitigation measures. Further information on how to undertake a peat survey can be found in the Scottish Government's Guidance on "Developments on Peatland: Peatland Survey (2017)"

Reason: To comply with Scottish Government Guidance and be transparent in terms of developer requirements where peat is likely to be present.

Carbon Rich Soils

Development should avoid areas of peatland and other carbon-rich soils. There will be a presumption against development which would involve ~~significant~~ any draining or disturbance of peatland or carbon-rich soils. Developments which may result in the disturbance of peatland and carbon-rich soils will require an assessment of the likely effects on CO2 emissions. A peat management plan may be required to assess and address potential impacts on peatlands or carbon-rich soils

POLICY NE4 – Our Water Environment

We **object** to this policy if our following rewording/additional text requests are not undertaken.

Modification & Reason

SEPA considers that the above modifications to proposed policy NE4 are required in order for the policy to comply with Scottish Planning Policy and the assessments and proposed mitigation set out in the Environmental Report.

Flood Risk & Management

Development will not be supported if:

1. It increases the current and/or future risk of flooding on site or elsewhere;
 - a. By reducing the ability of the functional flood plain to store and convey water; or
 - b. Through the discharge of additional surface water; or
 - c. By harming flood defences;
2. It would be at risk of flooding itself; or

3. Adequate provision is not made for ~~watercourses to be maintained as or restored to naturalised channels wherever possible with riparian buffer strips including for maintenance access and erosion prevention access to waterbodies for maintenance;~~ or

4. It would require the construction of new or strengthened flood defences ~~unless flood protection measures to an appropriate standard are a planned measure in a current flood risk management plan that would have a significantly damaging effect on the landscape character, built and historic environment, infrastructure and natural heritage interests within or adjacent to a waterbody.~~

The piecemeal reduction of functional floodplains will be avoided. Development on the functional floodplain will only be considered where its location is essential for operational reasons ~~and for water compatible uses.~~ Development must be designed and constructed to remain operational during floods and to ~~not impede water flow. Measures to protect against or manage flood risk will be required and any loss of flood storage capacity mitigated to achieve a neutral or better outcome.~~

Applicants will be required to provide a Flood Risk Assessment where a development ~~may is likely to result~~ in a material increase in the number of buildings ~~at risk of flooding, -or~~ area of land at risk of flooding, ~~if there is an increase in land use vulnerability compared to the existing land use~~ or where it has been indicated in the opportunity sites schedule that one will be prepared.

There is a presumption against excessive engineering and culverting of waterbodies. Natural treatments of floodplains and other water storage features will be preferred wherever possible. There will be a requirement to restore existing culverted or canalised water bodies to a naturalised state where this is possible ~~and supported by a flood risk assessment.~~ Where the Council agrees that culverts are unavoidable for technical reasons, they should be designed to maintain existing flow conditions and aquatic life. Any proposals for new culverts should have a ~~demonstrably~~ neutral impact on flood risk ~~as demonstrated in a flood risk assessment~~ and be linked to long term maintenance arrangements to ensure they are not the cause of flooding in the future.

POLICY NE4 – Our Water Environment

We **object** to this policy if our following rewording/additional text requests are not undertaken.

Modification & Reason

SEPA considers that the above modifications to proposed policy NE4 are required in order for the policy to comply with SEPA guidance.

Foul Drainage & Water Quality

Connection to the public sewer for foul drainage will be a prerequisite of all development where this is not already provided. Private wastewater treatment systems ~~within the settlement boundary in sewerred areas-~~ will not be permitted. ~~In areas not served by the public sewer, a private sewer treatment system for individual properties will be permitted provided that the developer demonstrates that there will be no adverse effects on the environment, amenity and public health.-~~

POLICY NE4 – Our Water Environment

We suggest that this policy is re-worded as below.

Modification & Reason

SEPA considers that the below modifications to proposed policy NE4 are required for clarification.

Surface Water Drainage

All new developments are required to incorporate SuDS to manage surface water, with the exception of single dwellings/extensions to residential properties or discharges to coastal waters. For change of use and/or redevelopment, opportunities should be sought to retrofit SuDS where appropriate.

SuDS components need to be selected based on specific site opportunities and constraints and provision should be addressed as part of a Drainage Impact Assessment (DIA) **which details how surface water quality and quantity will be managed**. DIAs will be required for new development proposals of 5 or more homes or 250 square metres non-residential floorspace. DIAs will also be required if the proposal falls within a sensitive area (identified in the TAN). ~~DIAs should detail how surface water will be managed.~~

Coastal Development

Development will not be supported in undeveloped coastal areas (shown on the Proposals Map). Exceptions to this general presumption will be considered where the proposal:

1. Is dependent on that coastal location given the purpose and operation of the development; and
2. There is no other suitable site, including brownfield land; and
3. It respects the character and value of the landscape, the natural and historic environment, and the recreational value of the surrounding area; or
4. There is an overriding environmental benefit from the proposal.

The exceptions listed above, where considered acceptable in principle, must also meet all of the following criteria:

1. The development must not be located in an area at risk of coastal erosion or flooding **(as demonstrated in a topographical survey showing that the development lies above the 200 year flood level plus additional allowances for climate change and freeboard)**;
- ~~2. A Topographical Survey (in agreement with SEPA) must accompany applications for development~~
3. Public access to and along the coast must be protected and promoted wherever possible; and
4. Where marine noise modelling is deemed necessary by the Council or key agencies, it must be demonstrated that adverse impacts on bottlenose dolphins, Atlantic salmon, and any other protected species will be avoided.

Surface Water Drainage paras 6.35 & 6.36

We suggest that this text is re-worded as below.

Modifications to & Reason

SEPA support the use of SUDS wherever possible as a means of **mitigating** surface water flooding, but not all flood risk can be managed through the use of SUDS. Changes to wording required to clarify that SUDS provide flood risk mitigation not management.

Our Water Environment

6.35 Sustainable Drainage Systems (SuDS) provide multiple benefits including **managing mitigating** flood risk, improving water quality and enhancing biodiversity. All new developments are required to make provision for SuDS and these should be designed in accordance with best-practice design guidance in the SuDS Manual (CIRIA C753), and the technical criterion set out in Sewers for Scotland v4.0 and its successors. In some circumstances, developments may also be required to adapt to flood risk by incorporating water resistant materials and forms of construction in line with the guidance set out in the Scottish Government's Online Planning Advice on Flood Risk.

6.36 The Council is developing strategic-level Regional SuDS ~~to provide which will incorporate~~ sustainable flood risk management at a strategic scale. There may be opportunities for developers to contribute to a Regional SuDS scheme to help address the impact of their development. Please see our Technical Advice Note (TAN) for more information.

POLICY WB2 Air Quality

Modification & Reason

We support the inclusion of Policy WB2 as it will help the Council to mitigate the impacts of future development on air quality, protecting human health and the environment. We suggest the following minor amendment to Section 5.8 as highlighted below:

As part of our statutory duties under the UK Environment Act 1995 the Council undertakes monitoring and assessment of seven key pollutants recognised to impact on health. Aberdeen currently exceeds the **EU and national annual mean objective for nitrogen dioxide and the annual mean national objectives for particulate matter**, resulting in three Air Quality Management Areas (AQMAs) being declared

POLICY B5 – Energy Transition Zones

Modification & Reason

Whilst we support the identification of 'Energy Transition Zones', we strongly suggest that an alternative location to OP56 for this welcome project is identified and we would be pleased to assist in the process of doing so. We support the proposed allocation of site OP62 Bay of Nigg (55ha) as an Energy Transition Zone which allocates land adjacent to the new harbour and existing rail line. We would welcome the consideration of existing brownfield sites, including site OP64 Former Ness Tip, and sites already allocated for business/industrial development as Energy Transition Zones.

Appendix 2 Opportunity Sites

Site OP56 St Fitticks Park Energy Transition Zone, Green Space Network

We **object** to this allocation.

(We did not consider this site as part of our consideration of the Main Issues Report)

Modification & Reason

Unfortunately we **object** to the inclusion of this site as a proposed opportunity site for development in the proposed plan and we do not consider that the assessment of this site in the SEA is satisfactory or the proposed mitigation sufficient.

We note that this proposed site covers the East Tullos Burn Project. This re-created a natural watercourse and wetlands with wildflowers and trees. It transformed the amenity of St Fittick's Park, which is now an area of quality greenspace enjoyed by the local community. The project tackled pollution, flooding and litter using natural solutions that have benefitted biodiversity and recreation. Access within and around the project area has been improved. The project involved considerable effort and significant public funding, and the local community helped inform the design and plant up the site. It has created an improved sense of place and is highly valued by people in Torry, a deprived part of Aberdeen.

The presence of the East Tullos Burn and associated wetlands and floodplain and requirement for buffer strips and the Scottish Water treatment works means that there is likely to be a very limited area of developable land at OP56 as currently shown.

We consider that it has not been demonstrated that there is sufficient land available for business/industrial development within OP56 which would not have significant adverse impacts on the East Tullos Burn and associated wetlands.

We do not consider that it has been demonstrated that the Scottish Water Treatment Works should form part of this proposed development site allocation.

We do not consider that it has been demonstrated that flood risk, water quality, recreational access and habitat connectivity (as set out in the site allocation) can be adequately addressed at the masterplanning stage for this site.

We suggest that if a site is to be allocated here then the relevant assessments are carried out first and the East Tullos Burn and wetlands and associated buffer strips and floodplain are excluded from the development site allocation. In addition to land required for recreational access and habitat connectivity.

We consider that the East Tullos Burn and associated open space including pedestrian access are essential blue/green infrastructure in accordance with proposed policy NE2 and we would strongly support the protection of this from allocation for development. We do not consider that a joint masterplan to be prepared by the developers once the site is allocated for development is the appropriate place to address these issues.

Aberdeen City Proposed Plan 2020 Opportunity Sites

See column headed 'SEPA comments' for requested modification and reason:

There are several sites where the information we hold suggests that, although part of the site is highly likely to be developable, there is a risk of flooding to part of the site and as such development may be constrained. Proposals for development would have to be accompanied by a satisfactory Flood Risk Assessment. The outcome of the FRA could reduce the area of the site that is developable, the capacity of the site or the appropriate design or layout for the site. Using mitigation measures to enable development in flood risk areas is only appropriate in exceptional circumstances or where flood defences exist (or are under construction) and meet the appropriate standard for development. For these sites, we would object to their inclusion in the Local Plan **unless** wording is included that highlights that flooding is a potential constraint and a FRA will be required. This ensures that developers are aware from the earliest stage of the possible implications and of the additional costs that will be incurred in bringing development forward for the site.

Site	Site Name	Site Size	Policy	Other Factors	SEPA Comments
Bridge of Don & Grandhome					
OP1	Murcar	27.8ha	Land Release Policy and Green Space Network	Strategic Reserve Employment Land for the period 2033-40. This site may be at risk of flooding. Flood Risk Assessment required to accompany development proposals.	
OP2	Cloverhill	24.8ha	Residential and Green Space Network	Opportunity for 550 homes on former employment land. Primary and secondary education and health capacity issues need to be addressed. Flood Risk Assessment required to accompany future development proposals.	
OP45	Berryhill	43.7ha	Business and Industry and Green Space Network	Development Framework approved in 2008 covers this site and land to the north. Land available for development of Use Class 4, 5 and 6. Flood Risk Assessment required to accompany future development proposals.	
OP3	Findlay Farm, Murcar	16.4ha	Business and Industrial Land	Opportunity to extend the Aberdeen Energy Park.	DIA required to address surface water flood risk. Object unless text added: Flood Risk Assessment may be required.
OP4	North Denmore	1.7ha	Residential	Residential opportunity for up to 30 houses on an unused Council owned site.	
OP5	Balgownie Centre, Bridge of Don	2.25ha	Residential	Former Aberdeen College building now cleared. Planning Brief available.	
OP6	WTR Site at Dubford	0.57ha	Residential and Green Space Network	Brownfield opportunity for residential development that should look to integrate with the neighbouring development at Dubford.	Object unless text added: Flood Risk Assessment may be required. (Topographic information may demonstrate the site is sufficiently elevated above the functional floodplain.)
OP7	Aberdeen College Gordon Centre	3.1ha	Mixed Use and Green Space Network	Location suitable for residential or mixed-use development. The woodland on site, particularly along the site's boundaries, should be retained.	DIA required to consider surface water management measures.
OP8	East Woodcroft North	2.2ha	Residential	Council owned site identified for 60 homes.	
OP9	Grandhome	323ha	Land Release Policy/Green Space Network	Privately owned site in single ownership identified for 7000 homes and 5 hectares of employment land (Class 4 uses). Town Centre identified for Phase 2 of this site. Developers will be required to provide a Flood Risk Assessment in support of any development proposals for	

				this site. Masterplan approved	
OP10	Dubford	4.2ha	Residential and Green Space Network	This is the undeveloped part of the 550 home Dubford development. Any proposal here must comply with the Dubford Development Framework. This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site.	
OP11	Balgownie Area 4	0.5ha	Residential	Opportunity for residential development of up to 15 houses.	Object unless text added: Flood Risk Assessment required.
OP12	Silverburn House	4.0ha	Residential	Opportunity for 100 homes on former employment land. Primary and secondary education and health capacity issues need to be addressed. Needs to link into OP2 and OP13 – the AECC site.	Object unless text added: Flood Risk Assessment required
OP13	AECC Bridge of Don	18.4ha	Mixed Use	Redevelopment opportunity for mixed use development. Masterplan approved. The site will be required to accommodate an expansion of the Park and Choose to 999 spaces and a household waste recycling centre to replace the facility at Scotstown Road. Any residential elements would need to address school capacity issues in the area. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. Development should respect the landscape setting and amenity of the course of the Royal Aberdeen Golf Club.	
OP75	Denmore Road	4.56ha	Commercial Centre	Opportunity for bulky goods retailing. Pitches lost should be replaced in Bridge of Don by new or upgraded pitches which are of comparable or greater benefit. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	Object unless text added: Flood Risk Assessment required (Glashie Burn runs through site)
Dyce Bucksburn & Woodside					
OP14	Former Cordyce School	7.9ha	Mixed Use and Green Space Network	Site suitable for a number of uses including housing, a garden centre and health and fitness village. Development should avoid harmful impacts on the community orchard. A Flood Risk Assessment is required.	
OP15	Former Carden School	0.37ha	Residential	Part of Dyce primary school deemed surplus to requirements.	
OP16	Davidsons Papermill, Mugiemoos Road, Bucksburn	29.5ha	Mixed Use	Former paper mill site and adjoining land. Development Framework and Phase 1 Masterplan approved. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	
OP17	Former Bucksburn Primary School	0.94ha	Residential	Former primary school suitable for residential, healthcare or other uses compatible with a residential area.	Object unless text added: Flood Risk Assessment required (to assess risk from Bucks Burn)
OP18	Cra bstone North and Walton Farm	20.0ha	Land Release Policy/Green Space Network	Opportunity for development of 1.5ha of employment and 18.5 hectares of Strategic Reserve employment land or a higher education and research institute in the 2033-40 period. Masterplan required. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	Masterplan required – add to masterplan list
OP19	Rowett North	63.9ha	Business Zone/Green Space Network/Airport Public Safety Zone	Site for The Event Complex Aberdeen and complimentary employment uses. Masterplan approved. Part of approved Newhills Development Framework? This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site.	
OP20	Cra bstone South	42.6ha	Land Release	Opportunity for 1000 homes. Part of approved Newhills Development Framework.	Object unless text added:

			Policy/Green Space Network		Flood Risk Assessment required.
OP21	Rowett South	106.85 ha	Land Release Policy/Green Space Network/Residential	Opportunity for 1940 homes of which 240 homes are phased in the period beyond 2032. Part of approved Newhills Development Framework. Town Centre identified for this site comprising of approx. 7,500 square metres total floorspace (4,000 square metres supermarket, 3,500 square metres other comparison and local shops and retail services.)	Object unless text added: Flood Risk Assessment may be required (for part of site not covered by planning consent)
OP22	Greenferns Landward	69.6ha	Land Release Policy	Opportunity for 1500 homes on Council owned land, of which 500 homes are phased for the period beyond 2032. Part of approved Newhills Development Framework. Burnbrae Moss District Wildlife Site lies adjacent to the southern boundary of this site.	Object unless text added: Flood Risk Assessment required
OP23	Dyce Drive	65ha	Business and Industrial Land /Green Space Network	This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site. The site lies within a pipeline notification zone.	
OP24	Central Park, Dyce	0.71ha	New Community Sites and Facilities	Site reserved for a new medical centre. Urban Green Space developed here should be replaced through the demolition of the existing medical centre north of Dyce shopping centre. Pedestrian access to the shopping centre car park should be provided.	
OP25	Woodside	19.1ha	Residential/Green Space Network/Green Belt	Site capable of accommodating up to 300 homes, including affordable housing as per Persley Den/Woodside Masterplan. Parts of the site may have a risk of flooding and development will have to be avoided in those areas. A Flood Risk Assessment will be required to support any development proposals for the site.	
OP86	Dyce Railway Station	1.1ha	Land for Transport	Opportunity Site for an expanded car park with associated SUDS and landscaping. Access to the Formartine Buchan Way should be retained and enhanced. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	
Kingswells & Greenferns					
OP26	Old Skene Road	1.2ha	Residential	Residential opportunity for 14 houses. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP27	Greenfern Infant School	0.91ha	Residential	Brownfield residential opportunity. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP28	Greenferns	13.6ha	Residential	This is an opportunity to provide 120 homes. Joint Development Framework with OP33 Greenferns approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals.	
OP29	Prime Four Business Park	50.0ha	Business Zone/Green Space Network	Opportunity for development of business land which will attract high quality businesses or be suitable for company headquarters. Masterplans and Development Framework prepared. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required (for any part of site not already covered by submitted FRA)
OP63	Prime 4	12.7ha	Business	Expansion to existing allocation. Masterplan approved. A	

	Business Park Phase 5 Extension		Zone	Traffic Impact Assessment will be required. The site lies within a pipeline notification zone. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP30	Kingsford	24.5ha	Green Belt	New stadium and training facilities. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP31	Maidencraig South East	29.8ha	Residential/ Green Space Network	Opportunity for development of 450 homes. Joint masterplan approved for this site and OP32 Maidencraig North East. This site may be at risk of flooding. Flood Risk Assessment required to accompany development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP32	Maidencraig North East	22.8ha	Residential/ Green Space Network	Opportunity for development of 300 homes. Joint masterplan approved for this site and OP31 Maidencraig South East. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP33	Greenferns	60.4ha	Land Release Policy/Green Space Network	Opportunity for development of 1350 homes and 10ha of employment land on a Council owned site. 400 of the homes are phased for the period beyond 2032. Joint Development Framework with OP28 Greenferns approved. This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site. Proposals for an extension to Enernec and a new NHS health centre will need to be accommodated on site.	
OP34	East Amhall	1.0ha	Land Release Policy	An opportunity for development of 1 hectares of employment land. A masterplan with Aberdeenshire Council involvement would be desirable given that the site borders the Local Authority boundaries. Site may be at risk of flooding. A Flood Risk Assessment will be required to accompany future development proposals. Site lies within a pipeline notification zone. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP11 1	Skene Road, Maidencraig	0.9ha	Residential and Green Space Network	Site capable of accommodating around 15 homes. A flood risk assessment will be required to accompany any future development proposals for this site. Development should seek to avoid any adverse impacts on the Den of Maidencraig Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Countesswells					
OP38	Countesswells	165.1ha	Land Release Policy/Green Space Network	An opportunity for development of 3000 homes and 10 hectares of employment land. Development Framework and Phase 1 Masterplan approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations	

				Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Deeside					
OP39	Braeside Infant School	1.04ha	Residential	Former school site with potential to be redeveloped for residential use in future. Development will have to respect residential amenity within and surrounding the area. The Council will seek the retention of the playpark in its current location to the south of site OP39. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP40	Cults Pumping Station	0.69ha	Urban Green Space	Brownfield residential opportunity. Development will have to respect green linkages to the west of the site and the retention of the allotments to the east of the site. Development should seek to avoid any adverse impacts on the Cults Den Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment required. (possible flooding from Cults Burn)
OP41	Friarsfield	5.6ha	Residential and Green Space Network	This is the undeveloped part of the 280 home Friarsfield development. Development Framework approved. This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP42	Hotel and Equestrian Centre at Hazlehead	9.2ha	Green Belt and Green Space Network	Planning permission granted for a hotel and equestrian centre. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP43	Milltimber Primary School	1.85ha	Residential	Milltimber Primary School is likely to become available in the future due to the development at Oldfold providing a new school. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP44	North Lasts Quarry	8.01ha	Green Belt	Ongoing mineral extraction. Planning Permission granted in February 2017 to continue hard rock extraction. The site lies within a pipeline consultation zone and all development should conform to the terms of Policy B6 – Pipelines, Major Hazards and Explosives Storage Sites. Site may be at risk of flooding. Flood Risk Assessment required to accompany any future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP47	Edgehill Road	4.4ha	Residential/ Green Space Network	Opportunity for development of 5 homes. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany	Flood Risk Assessment may be required

				development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP48	Oldfold	48.9ha	Land Release Policy	Opportunity for development of 550 homes and 5 hectares of employment land. Development Framework and Masterplan approved. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP49	Grove Nursery, Hazlehead	5.9ha	New Community Facilities	Following a Council resolution this site is identified for social enterprises specialising in nursery, horticulture and/or allotments and other associated uses. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Flood Risk Assessment may be required.
OP50	Skene Road, Hazlehead	49.7ha	Green Belt/ Green Space Network	Land reserved for a phased cemetery development. Site may be at risk of flooding. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Flood Risk Assessment may be required. Topographic information may demonstrate the site is sufficiently elevated above the functional floodplain.
OP51	Peterculter Burn	7.4ha	Residential and Green Space Network	Site capable of accommodating 19 homes, a hydro-electric scheme, fish pass, football pitch, changing facilities and car parking for Culter Youth Football Club and a new pathway opening up access to existing woodland. A Flood Risk Assessment demonstrating acceptable consequences will be required together with a masterplan giving details of access and setting out timescales for implementation of the different stages of the overall development. These matters will be reflected in any grant of planning permission. A planning brief will be required for OP51 setting out specific measures needed to avoid damage to, and enhance the Local Nature Conservation Site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Clarification required: planning brief & masterplan Object unless text added: Demonstration required that Culter Burn protected. Add to masterplan list
OP52	Malcolm Road Peterculter	1.5ha	Residential	Opportunity for 8 houses. Scots Pine trees on western boundary to be retained. Site (or part of) may be at risk of flooding. Flood Risk Assessment may be required in support of any development proposals for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	(SEPA would not request a flood risk assessment).
OP53	Tillyoch, Peterculter	15.25ha	Residential and Green Space Network	Housing opportunity for 250 houses. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required. Masterplan required.	Flood Risk Assessment may be required (if development proposed in SE of site adjacent to small watercourse) Masterplan required – add to masterplan list
OP54	Craigton,	2.45ha	Residential	Housing opportunity for 10 houses. Flood Risk	

	Peterculter			Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP109	Woodend Peterculter	2ha	Residential	Opportunity for 19 houses. Drainage Impact Assessment required to consider protection of potential wet habitats/woodlands adjacent to the site and the potential requirement for a buffer to prevent any increase in drainage of wet habitats/woodlands. Ancient Woodland to the south of the site is to be protected. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP112	West of Contlaw Road	12.5ha	Residential	Opportunity for 10 houses. Arboricultural and ecological implications studies required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required (Part of site is at risk of flooding)
OP113	Culter House Road	2.4ha	Residential	Opportunity for 8 houses. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
Loirston & Cove					
OP46	Royal Devenick Park	8.36ha	Residential	Housing opportunity for 150 houses. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP55	Blackhills Quarry, Cove	32.76ha	Green Belt	Planning permission granted in 2013 to continue hard rock extraction and processing.	
OP56	St Fittick's Park	18.2ha	Energy Transition Zone, Green Space Network	Energy Transition Zone. This site, along with OP61, will support renewable energy transition related industries in association with Aberdeen South Harbour. Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring 'roll on / roll off' level access to the South Harbour. Appropriate environmental assessments will be required, including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. A Flood Risk Assessment is also required. Other issues which need to be addressed include water quality, recreational access, habitat connectivity, compensatory planting and landscape buffering with residential areas. Joint Masterplan needed for OP56, OP61 and OP62.	Unfortunately we object to the inclusion of this site for development in the proposed plan and we do not consider that the assessment of this site in the SEA is satisfactory.
OP57	Craighill Primary School, Kincorth	0.86ha	Residential	Vacant Primary School. Forms part of the Strategic Infrastructure Plan Affordable Housing Programme. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP58	Stationfields, Cove	9.8ha	Residential and Green Space Network	Opportunity for 150 homes. Masterplan required.	Masterplan required – add to masterplan list
OP59	Loirston	119.2ha	Land Release	Opportunity for development of 1500 homes and 11 hectares of employment land. Potential to accommodate	Updated Development

			Policy/ Green Space Network	supermarket in a new district centre to meet convenience shopping deficiencies in south Aberdeen. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. Updated Development Framework to be approved. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Framework to be approved - Add to masterplan list
OP60	Charleston	20.5ha	Land Release Policy and Green Space Network	Opportunity for development of 20.5 hectares of employment land for the period 2033-40. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP61	Doonies	16.3ha	Energy Transition Zone, Green Space Network	Energy Transition Zone. This area along with OP56 will support renewable energy transition related industries in association with Aberdeen South Harbour. Appropriate environmental assessments will be required, including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. Other issues which need to be addressed include landscape impact of development, recreational access and habitat connectivity. Joint Masterplan needed for OP56, OP61 and OP62.	Object unless text added: Flood Risk Assessment may be required following assessment of small watercourse close to north boundary.
OP62	Bay of Nigg	55ha	Aberdeen Harbour, Energy Transition Zone, Green Belt and Green Space Network	Aberdeen Harbour expansion. Bay of Nigg Development Framework approved. Requires Flood Risk Assessment and full Transport Assessment. Appropriate environmental assessments will be required including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. Other issues to be addressed include re-instatement of the coastal path and recreational access. Joint Masterplan needed for OP56, OP61 and OP62.	We note that there are requirements in the existing planning permission for the new Aberdeen Harbour which will require to be incorporated into any masterplan including for areas of site restoration following completion of the harbor development.
OP64	Former Ness Tip	20.5ha	Green Belt and Green Space Network	Solar Farm. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 3	Former Torry Nursery School	0.53ha	Residential	Council owned site surplus to requirements. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 5	Kincorth Academy	3.94ha	Residential	Forms part of the Strategic Infrastructure Plan Affordable Housing Programme. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP10 7	East Tullos Gas Holder	3.12ha	Business and Industrial	Former gas holder site and Council owned recycling centre suitable for an energy from waste facility. Drainage Impact Assessment accompanying development proposals should address any surface water flooding issues.	
OP11 5	34-40 Abbotswell Road	1.03ha	Mixed Use	Suitable for residential use. A noise impact assessment will be required. A Habitats Regulations Appraisal is	

				required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
City Centre & Urban Areas					
OP35	Summerfield House, Eday Road	1.1ha	Residential	Brownfield residential opportunity. Drainage Impact Assessment required. School capacity issues would need to be addressed. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP36	Charlie House	1.5ha	Urban Green Space and Green Space Network	Site identified for children's respite centre and interactive garden area. A Flood Risk Assessment is required for this site. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP37	Woodend Hospital	7.1ha	Existing Community Sites and Facilities and Green Space Network	Brownfield residential opportunity on part of the hospital site. Site includes listed buildings, trees and open space which require sensitive treatment. Flood Risk Assessment required. School capacity issues will need to be addressed. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required. Masterplan required	Add text: Masterplan required – already on list
OP65	Haudagain Triangle, Middlefield	4.0ha	Mixed use and Land for Transport	Vacant land made available as part of the Haudagain improvements. Site should accommodate a mix of residential, retail, commercial and community uses to support the regeneration of the area.	Object unless text added: Flood Risk Assessment required
OP66	Granitehill	4.8ha	Residential	Brownfield opportunity for up to 300 homes which should include a wide range of houses and flats. School capacity issues will need to be addressed. Masterplan required	Add text: Masterplan required – already on list. DIA required to consider any surface water issues.
OP68	1 Western Road	0.07ha	Residential	Capacity for approximately 22 residential units.	
OP69	152 Don Street, Old Aberdeen	0.63ha	Residential	Residential opportunity on brownfield site in Old Aberdeen Conservation Area. Drainage Impact Assessment required.	
OP70	Denburn Valley – City Centre Masterplan Intervention Area	6.5ha	Mixed Use, Urban Green Space, Green Space Network and City Centre Retail Core	New ground floor uses including use class 1 (Retail); use class 2 (Financial, Professional and other services), use class 3 (Food and Drink and use class 11 (Assembly and Leisure). New upper floor uses - use class 9 (houses) – suitable for apartments. Refurbishment of former Woolmanhill hospital buildings for Pavilion, class 7 (Hotels and Hostels) or use class 9 (Houses). Other remaining buildings suitable for use class 9 (Houses). A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. Refurbishment of Denburn Court. Upgrade and expansion of Union Terrace Gardens including outdoor amphitheatre, new soft landscaping and high level bridge access. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Masterplan/development framework required – add to list

OP72	Aberdon House	0.64ha	Residential	Cleared site which forms part of the Strategic Infrastructure Plan Affordable Housing Programme.	
OP73	Balgownie Machine Centre	0.2ha	Mixed Use	Land reserved partially for Berryden Road Improvements.	
OP74	Broadford Works, Maberley Street	3.6ha	Mixed Use	Consent granted for residential and other uses subject to legal agreement. Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	No flood risk assessment required by SEPA. No development over culverts or culverting for land gain.
OP76	Former Raeden Centre	1.48ha	Residential and Green Space Network	The presence of mature trees means that only a small part of the previously developed area may be suitable for sensitive residential redevelopment. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP77	Cornhill Hospital	6.04ha	Existing Community Sites and Facilities	Former hospital site with substantial granite buildings in Rosemount Conservation Area. Redevelopment for mix of uses, residential, office/ business (Class 4), community uses. Development underway. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP78	Frederick Street	0.1ha	Mixed Use	Small brownfield opportunity.	
OP79	Crown House	0.04ha	Mixed Use	City centre location suitable for residential use. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP80	Mastrick Clinic	0.12ha	Neighbourhood Centre	Uses that would support the Mastrick neighbourhood centre. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP81	Queen's Square – City Centre Masterplan Intervention Area	5.4ha	Mixed Use	Refurbishment of the eastern annex of Marischal College for use class 4 (Offices) and class 11 (Assembly and Leisure). Refurbishment of Greyfriars John Knox Church – appropriate uses include use class 3 (Food and Drink); use class 4 (Business); use class 7 (Hotels and Hostels); use class 10 (Non-residential Institutions); use class 11 (Assembly and Leisure). New ground floor uses could include use class 1 (Retail); use class 2 (Financial, Professional and other services) and use class 3 (Food and Drink). New upper floor uses could include use class 9 (Houses) – suitable for apartments.	DIA required to address surface water issues.
OP82	Dunbar Halls of Residence, Don Street	1.64ha	Residential	Residential or student accommodation opportunity in Old Aberdeen Conservation Area.	
OP83	Urquhart Building, City Hospital	0.28ha	Existing Community Sites and Facilities	Residential opportunity would allow the re-use of this listed building.	
OP84	Resource Centre, City Hospital	0.16ha	Existing Community Sites and Facilities	Small scale retail, commercial or office use.	
OP85	King Street/ Beach Esplanade	2.0ha	New Community Facilities	Site is identified by Council resolution for a Mosque, community facilities and open space. Until proposals for these uses are progressed, or if a decision is made not	

				to pursue them, the existing open space use will be protected by Policy NE2 Green and Blue Infrastructure (Urban Green Space).	
OP87	Pittodrie Park	6.00ha	Residential	Proposed residential development. School capacity issues will need to be addressed.	
OP88	Shore Porters Warehouse	0.02ha	Mixed Use	Redundant warehouse. Residential will only be considered if suitable amenity can be demonstrated. Noise Impact Assessment required.	
OP89	Kaimhill Outdoor Centre	1.5ha	Residential and Green Space Network	Proposal for 35 houses. Play park area should be retained and compensatory recreational provision made in the local community. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP90	St Machar Primary School	1.01ha	Residential	Suitable for education use and/or affordable housing.	
OP91	Union Street West City Centre Masterplan Intervention Area	15.3ha	City Centre Retail Core, Mixed Use and West End Shops and Cafés	New Aberdeen City Rooms for ground floor cafe, multi-purpose foyer and gallery (use class 11) with offices (use class 4) above and rooftop restaurant (use class 3). Refurbishment of Golden Square. Refurbishment of Bon Accord Square. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	DIA required to address surface water issues.
OP92	St Peter's Nursery, Spital	0.09ha	Mixed Use	Sensitive residential redevelopment - within a Conservation Area. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP93	Former Summerhill Academy	3.3ha	Residential	Residential development. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP94	Tillydrone Primary School	2.11ha	Residential	Site of former Tillydrone Primary School. Site will be used for a new primary school.	
OP95	Station Gateway City Centre Masterplan Intervention Area	4.0ha	City Centre Retail Core, Mixed Use and Land for Transport	Expanded station concourse across two levels to include use class 1 (Retail) and 3 (Food and Drink). New station hotel above concourse. New Trinity Centre entrance and bridge links. Hotel/serviced apartments on Atholl House site - use class 7 (Hotels and Hostels). A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment required (to include issue of culverted Den Burn under site)
OP96	Castlegate and Castlehill City Centre Masterplan Intervention Area	2.6ha	City Centre Retail Core, Mixed Use and Residential	Refurbishment of properties on Castlegate and Justice Street. Appropriate ground floor uses include use class 1 (retail); Use class 3 (Food and Drink); and use class 11 (Assembly and Leisure). Appropriate upper floor uses include use class 4 (Offices), use class 7 (Hotels and Hostels) and use class 9 (residential). Refurbishment of Marischal and Virginia Court (use class 9) Houses; potential for use class 1 (Retail); use class 3 (Food and Drink) and use class 11 (Assembly and Leisure) at street level. New Residential development of approximately 46 apartments.	
OP97	Victoria Road Primary School	0.67ha	Mixed Use	Former Primary School. The site would be suited for sensitive redevelopment	

OP98	VSA Gallowgate	0.08ha	Mixed Use	Residential/Mixed use. Listed building.	
OP99	Old Torry	6.6ha	Mixed Use	Mixed use development. See also Old Torry Masterplan Study. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment.	Old Torry Masterplan Study – add to list
OP100	North Dee City Centre Masterplan Intervention Area	12.7ha	Business Zone, Mixed Use, Urban Green Space, Green Space Network and Land for Transport	New Urban Quarter with a high quality and imaginative approach to the public realm, creating permeable pedestrian linkages between the city centre and the River Dee. Masterplan required showing an appropriate mix of compatible new uses, including Class 1 (Retail), Class 2 (Financial, Professional and other services), Class 3 (Food and Drink), Class 4 (Business, including new office development and a Global Energy Hub if required), and Class 9 (Residential). Refurbishment of the listed smoke houses. Pedestrian bridge linking into OP106 Torry Waterfront. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required depending on location. Masterplan required – add to list
OP101	Woodside Congregational Church	0.07ha	Residential	Vacant church building.	
OP102	George Street / Crooked Lane	0.96ha	City Centre Retail Core	Opportunity for retail development, enhance George Street, link to John Lewis / extend Bon Accord Centre, address accessibility issues through the centre and address public realm issues. Some Listed Buildings. Existing traditional granite buildings on the St Andrew Street and George Street frontages, and upper floor residential uses, to be retained. This site may be at risk of flooding. A Flood Risk Assessment will be required in order to assess its suitability for redevelopment. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	
OP106	Torry Waterfront City Centre Masterplan Intervention Area	5.0ha	Mixed Use, Urban Green Space and Green Space Network.	New residential development. New ground floor uses including use class 1 (Retail) and use class 3 (Food and Drink), Hotel Academy (use class 7). Pedestrian Bridge linking into OP100 North Dee. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.	Object unless text added: Flood Risk Assessment may be required depending on location.
OP110	Heart of the City – City Centre Masterplan Intervention Area	5.4ha	City Centre Retail Core, Urban Green Space, Green Space Network, Existing Community Sites and Facilities and Mixed Use.	Refurbishment and remodelling of buildings on Union Street. Negligible increase in overall accommodation but increased utilisation of existing floor space. Appropriate uses for ground floors include use class 1 (Retail), use class 2 (Financial, Professional and other services), and use class 3 (Food and Drink). Appropriate uses for upper and lower floors include use class 4 (Business); use class 7 (Hotels and Hostels); use class 9 (Houses); use class 10 (Non-residential Institutions); use class 11 (Assembly and Leisure). Remodelling of the St Nicholas Centre. Negligible increase in retail floor space but potential for expansion of office accommodation. Refurbishment of Mither Kirk including use class 10 (Non-residential Institution) and use class 11 (Assembly and Leisure). Redevelopment of Aberdeen Indoor Market for appropriate uses such as use class 1 (Retail), use class	Flood Risk Assessment may be required (if residential proposed for Aberdeen Indoor Market)

				<p>3 (Food and Drink) and use class 11 (Assembly and Leisure), use class 6 (Houses) and use class 7 (Hotels and Hostels).</p> <p>A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required.</p>	
OP116	Froghall Terrace	1.7ha	Mixed Use	Cleared depot. Suitable for residential accommodation.	<p>Mitigation measures required against possible groundwater flooding</p> <p>DIA required to address surface water management measures.</p>

Appendix 3 Masterplans and Development Frameworks

Masterplans

- Countesswells Development Framework and Phase 1 Masterplan
- Dubford Development Framework
- Former Davidson's Mill Development Framework and Masterplan
- Forresterhill Development Framework
- Friarsfield Development Framework
- Grandhome Development Framework
- Greenferns Development Framework and Masterplan
- Kingswells Development Framework and Phase 1 Masterplan (Prime 4)
- Kingswells Prime Four Business Park, Phases Two and Three
- Kingswells Prime 4 Business Park Phase 5 Extension (OP63)
- Loirston Development Framework
- Maidencraig Masterplan
- Newhills Development Framework (Craibstone)
- Oldfold Development Framework and Masterplan
- Persley Den/Woodside
- New AECC Site at Rowett North (OP19)
- Existing AECC Site at Bridge of Don (OP13)
- Berryhill Development Framework
- Cloverhill
- Old Torry Masterplan Study

New Masterplans and/or Development Frameworks for the following developments will be adopted as Aberdeen Planning Guidance.

- City Centre Masterplan and Delivery Programme Intervention Areas
- Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones at Bay of Nigg (OP56, OP61 and OP62)
- Woodend Hospital (OP37)
- Granitehill (OP66)
- North Dee City Centre Masterplan Intervention Area
- Stationfields, Cove?
- Tillyoch, Peterculter
- Peterculter Burn
- Murcar Aberdeen Energy Park (+ Findlay Farm)