Responses from Statutory Consultees.

1. SEPA – From Covering letter “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.”

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. A s 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.

1. Response from Nature Scot

Policy B5 and OP56 In our view the Environmental Report under-represents the importance of OP56 St Fittick’s Park (in terms its value to people, wildlife and flood management) and also under-represents the likelihood of adverse environmental effects, including post mitigation. It would appear that the East Tullos Burn Project area has not been included in the Policy B5 and OP56 assessments at all. Therefore all the benefits that the project has delivered (and the available North East Scotland Biological Records Centre records) have not been considered in the topics within the assessments. This is noting that the East Tullos Burn Project area takes up most of the undeveloped open space within OP56, which itself is a sizeable proportion of the Energy Transition Zone. In our consultation response on the Proposed Plan, we have included representations on Policy B5 Energy Transition Zones and the related OP56 St Fittick’s Park, and these representations can inform the post adoption statement or any revision to the Environmental Report.

1. Response from Scottish Forestry

OP56 – St. Fittick’s Park - The SEA has not recognised that this site has been planted as a woodland with the assistance of grant aid from Scottish Forestry or even that this is a woodland site. SF requests that the SEA is amended to state that the area is classed as woodland and that any development proposal will therefore be subject to assessment under the COWRP and any loss of woodland will require appropriate compensatory planting that delivers greater woodland related public benefits than those lost to development, as mitigation

1. Response from Historic Environment Scotland

Energy Transition Zone The inclusion of this land zoned for the development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries is noted. We welcome that a Joint Masterplan for OP56, OP61 and OP62 is proposed for these sites and we would welcome the opportunity to engage with stakeholders in the preparation of this key document. Furthermore, we expect this masterplan to be informed and influenced by existing work that has been carried out in relation to mitigating impacts on the historic environment through documents such as the Detailed Mitigation and Compensation Plan for the Aberdeen Harbour Expansion Project. As we note in our response to the Environmental Report accompanying the Proposed Plan the allocation of land for the Energy Transition Zone has not been assessed in terms of its potential impact on the historic environment. We offer further comment on this in our response to the ER. However, in looking forward to the proposed Joint Masterplan this should include an assessment of the potential direct (i.e. physical impacts from large-scale development and associated activities) and indirect (i.e. setting impacts) on scheduled monuments from OP56 and OP61. Those monuments requiring particular attention include St Fittick's Church, Aberdeen (SM 10400) and the three prehistoric burial cairns - Crab's Cairn, cairn (SM 4060), Tullos Cairn, cairn (SM 4055) and Baron's Cairn, cairn (SM4126). The masterplan should ensure that any potential adverse impacts on these monuments are mitigated accordingly. Although the landscape surrounding the monuments includes modern development, it is still possible to understand and appreciate the monuments and their setting. The assessment should therefore consider the likely impact on views both towards and from the monuments, and in the case of the prehistoric burial cairns, the views and relationship between them. We would welcome any opportunity to enhance the surrounding landscape and have a positive impact on the setting of these monuments. We would be happy to discuss this further with you during the preparation of the masterplan. Environmental Report This response should be read together with our previous to the environmental report that accompanied the Main Issues Report. We welcome that the majority of comments have been acted upon and we particularly welcome the clear response to these presented in Appendices 1 and 2 of the environmental report.

Energy Transition Zone The inclusion of this land zoned for the development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries is noted. In relation to these allocations we note that they have not been assessed in terms of their potential impact on the historic environment. We would therefore offer the following comments on OP56 and OP61. OP56 St Fittick’s Park (Energy Transition Zone) The environmental assessment of the allocation of land in St Fittick’s Park for the Energy Transition Zone does not consider the impact of the proposed land use on the scheduled monument St Fittick’s Church (SM 10400). Given that the allocation for the Bay of Nigg OP62 - Harbour Expansion, Energy Transition Zone,Green Belt etc) does assess the potential impact as having the “potential to negatively impact on the scheduled monument of St. Fittick's Church” we would have expected the assessment of OP56 to include an assessment of the same site with similar findings. We would therefore advise that the assessment be updated to cover this and put forward mitigation for identified effects. OP61 Doonies (Energy Transition Zone) As with OP56, the detailed assessment provided for this site (page 801) has not considered the potential impacts on the site and setting of the nationally important historic environment assets in its vicinity, in this case the scheduled monuments of Crab’s Cairn (SM 4060), Tullos Cairn, cairn (SM 4055) and Baron's Cairn, cairn (SM 4126). In particular the Crab’s Cairn scheduled monument lies directly adjacent to the north east corner of the allocation and may form part of a relict prehistoric landscape with the other monuments noted above. It is noted that the assessment for OP64 (Former Ness Tip - Solar Farm) that is being brought forward from the existing plan does offer an assessment on the scheduled cairns in its vicinity and that the potential for adverse effects prior to mitigation is predicted. On this it should be noted that the assessment scores this effect as positive after mitigation without offering explanation of what the positive effect is. We would consider it more appropriate that if mitigation through siting and design served to lessen the impact on the setting of these sites it would be more accurate to consider the residual effect neutral rather than positive. In light of the above omissions regarding the assessment of the allocations relating to the Energy Transmission Zone we would advise that the environmental report be updated to ensure that the need for mitigation is recognised and that the delivery programme reflects this. We note that a Joint Masterplan for the sites covered by the Energy Transition Zone (OP56 and OP61, as well as OP62) is to be produced and we would expect this masterplan to consider and assess in detail the potential direct (i.e. physical) impacts as well as potential indirect (i.e. setting) impacts on these monuments as a result of the proposals and to mitigate any identified impacts accordingly.