

**POST-ADOPTION STATEMENT FOR THE
ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2017**

PART 1

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PART 2

A Post-adoption Statement is attached for the plan, programme or strategy (PPS) entitled:

**Aberdeenshire Local Development Plan 2017
and associated Supplementary Guidance**

The Responsible Authority is:

Aberdeenshire Council

PART 3

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Date	17 April 2017

INTRODUCTION

This document referred to here as the Post-Adoption SEA Statement has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

AVAILABILITY OF DOCUMENTS

Website

The full PPS as adopted, along with the Finalised Environmental Report and Post-Adoption SEA Statement are available on the Responsible Authority's website at:

<http://www.aberdeenshire.gov.uk/ldp>

Office Address

The Full PPS as adopted, along with the Environmental Report and Post-adoption SEA Statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at the principle office of the Responsible Authority.

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Monday to Friday (0900 to 1700)

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1 Key facts about the Local Development Plan

1.1 The key facts relating to the plan are set out in Table 1 below.

Table 1: Key facts relating to the local development plan

Name of Responsible Authority	Aberdeenshire Council
Title of PPS	Aberdeenshire Local Development Plan 2017
What prompted the PPS	Planning etc (Scotland) Act 2006
Subject	Land Use
Period covered by PPS	2017-2021
Frequency of updates	Every five years
Area covered by PPS	The whole of Aberdeenshire excluding the Cairngorms National Park
Purpose and/objectives of PPS	The purpose of the Local Development Plan is to provide a framework for Aberdeenshire Council's policies and proposals relating to the allocation, development and use of the land. It also sets out the context for sustainable development in relation to land covering in Aberdeenshire (excluding the Cairngorms National Park).
Date adopted	17 April 2017
Contact Point	Planning Policy, Planning and Building Standards, Infrastructure Service, Aberdeenshire Council, Woodhill House, Westburn Road, Aberdeen AB16 5GB 01224 665221

2 Strategic Environmental Assessment Process

2.1 The Aberdeenshire Local Development Plan 2017 (LDP) and associated supplementary guidance (SG) have been subject to strategic environmental assessment (SEA). This process allowed us to include the views of the Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH), Historic Environment Scotland (HES) (formerly Historic Scotland) and Scottish Ministers regarding the scope and level of detail that was appropriate for the environmental report its findings.

2.2 The environmental report was prepared in two stages. Firstly, an interim environmental report was produced to assess the impact of the main issues report (MIR). Following consultation on the MIR and interim environmental report, a proposed LDP and SG were prepared with an accompanying environmental report. The environmental report that supports the proposed LDP and SG has evolved from the interim environmental report. The environmental report has taken into account comments made during the consultation on the interim environmental report and the MIR. These comments influenced the development of the spatial strategy and policies contained in the proposed LDP.

- 2.3 We consulted on the interim environmental report and the MIR for a period of 13 weeks from 29 October 2013 to 1 February 2014. A MIR addendum was subsequently consulted on between 8 August and 19 September 2014 following publication of the revised Scottish Planning Policy in June 2014. Reasonable alternatives were considered and assessed in the Environmental Report as part of the development of the spatial strategy, policies and allocations. The SEA has led to the choice of preferred options for the LDP. We consulted on the environmental report and the proposed LDP for a period of 6 weeks from 28 March to 8 May 2015. The environmental report was further updated following conclusion of the proposed LDP examination to account for the Reporters recommendations.
- 2.4 Both the interim environmental report and environmental report were made available online, in local libraries, Area Offices, and at the Council's headquarters.
- 2.5 A separate SEA was undertaken for SG.8 The Aberdeenshire Forestry and Woodland Strategy 2017 as this was developed after the proposed LDP consultation.
- 2.6 The first step in preparing the environmental report was to collate the relevant baseline data relating to the current state of the environment and to identify what links exist between the LDP and SG and other relevant policies, plans, programmes and environmental objectives. We then assessed the effects of options of the strategy, policies and sites on the environment. The assessment took into account all the baseline information, any existing environmental problems and the effects that future developments are likely to have on all environmental topics considered. Where we identified significant negative impacts from any aspects of the LDP and SG, we devised mitigation measures to remove, reduce or compensate for the impacts on the environment. In almost all cases, that meant rejecting the policies, options or sites likely to have significant environmental effects. A monitoring plan forms part of the environmental report. It indicates the commitment of the Council to identify unforeseen adverse effects arising from the LDP and SG at an early stage and to undertake appropriate remedial actions. This has been integrated into plans for monitoring the LDP itself.

3 Effects of the Environmental Considerations on the LDP

- 3.1 Table 2 summarises how environmental considerations have been integrated into the LDP and its associated SG. This includes the measures that were taken to offset adverse effects or enhance positive effects, details of how the cumulative and other indirect effects of the plan have been considered and how these environmental protection objectives were taken into account in the LDP and SG.

Table 2: Environmental Considerations & the environmental report

SEA Topic	Environmental Considerations	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Air	The need to address the link between traffic congestion and air pollution with a focus on having a consideration of the Air Quality Management Plan.	Yes	<p>The SDP sets the requirements for housing and economic growth. The strategy is to create sustainable communities that reduce the need to travel and minimise the impact on air quality. This has been carried forward in the aims of the LDP.</p> <p>The allocations proposed in the LDP seek to avoid worsening traffic issues in the larger settlements of Aberdeenshire.</p>

SEA Topic	Environmental Considerations	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Water	<p>The importance of maintaining and improving water quality and water environment resulting from run off or the release of pollutants.</p> <p>The importance of protecting species from disturbance and human use in areas of high sensitivity (River Dee and Ythan Estuary Natura sites).</p> <p>The need to ensure that water abstraction does not have negative effects on water quality.</p> <p>The necessity of avoid development on land at risk from flooding and the need to adapt to future climate impacts.</p>	Yes	<p>The LDP aims to protect and improve assets and resources and promote sustainable mixed communities, which are implemented through policies on developing on special rural areas, layout, siting and design, developer contributions, natural heritage and landscape, and protected resources; and relevant SG. The Aberdeenshire Parks and Open Spaces Strategy has been designed with water quality in mind. In addition, mitigation measures in the SEA will be taken into account when applications are considered.</p> <p>In addition to the above policies, allocations are not proposed immediately adjacent to the most environmentally sensitive areas.</p> <p>The capacity of the River Dee was considered in the SDP allocations. Thus the Dee can accommodate additional abstraction whilst avoiding negative impact on water quality.</p> <p>The LDP avoided allocating development located on land at risk from 1 in 200 year flood events or greater. There are exceptions to this, but these are included on the basis that development on these areas does not take place on the land at risk from flooding.</p> <p>Where the assessment has identified a significant flood risk these areas have been identified as open space.</p>

SEA Topic	Environmental Considerations	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Soil	<p>The need to avoid contamination of land through development and support development that remediates existing contaminated land.</p> <p>The need to avoid the loss of soil from climate change and erosion, including prime agricultural land.</p>	Yes	<p>The LDP positively promotes the redevelopment of contaminated sites subject to remediation.</p> <p>The LDP, through land use allocations and policies on flooding and erosion, and the protection of prime agricultural land seek to avoid development on the most sensitive locations, and ensure that SuDS are delivered in new development.</p>
Biodiversity	<p>The necessity of reversing the decline in biodiversity as a result of land use, development and climate change.</p> <p>The need to avoid development within the catchment of sites.</p>		<p>Generally, options in the Spatial Strategy and sites that are likely to have significant effects on designated sites have been rejected. Those options and sites that are within close proximity of sensitive sites are to be subject to additional assessments such as Habitats Regulations Assessment and Environmental Impact Assessment.</p> <p>The LDP protects existing areas of green space in settlements to support biodiversity. Our natural heritage policy seeks improvements in biodiversity. In addition, the Aberdeenshire Parks and Open Spaces Strategy has been designed with natural heritage in mind.</p>

SEA Topic	Environmental Considerations	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Climatic factors	<p>The relationship between increased burning of fossil fuel and climate change.</p> <p>The necessity of minimising Aberdeenshire's global footprint.</p> <p>The link between our contributions to the changing climate and potential future unpredictable weather events, hotter summers and wetter winters.</p> <p>This link between climate change and increased risk of flood events.</p> <p>The necessity of protecting land and properties vulnerable to future flood risk through adaptation</p>	Yes	<p>The LDP also sets requirements for low and zero carbon generating technologies to be included in all new development to reduce the predicted carbon emissions.</p> <p>The LDP avoided allocating development located on land at risk from 1 in 200 year flood events or greater. There are exceptions to this, but these are included on the basis that development on these areas does not take place on the land at risk from flooding (i.e. these areas are used as public open space).</p>
Human health	<p>The link between urban green space and human wellbeing.</p> <p>The link between sports and recreational facilities and active lifestyle of the population.</p> <p>The link between multiple deprivation and worsening human health.</p> <p>The link between, diabetes, high blood pressure, cardiovascular diseases and inactivity.</p>	Yes	<p>The LDP does not permit allocating development on sites where there would be a loss of urban open space or sports pitches unless improvements to existing facilities or new facilities are provided. Additionally, most of these sites are protected in the LDP.</p> <p>The LDP allocates a greater proportion of housing and employment land in the Regeneration Priority Areas than would normally be expected to help support regeneration.</p> <p>The LDP supports implementation of the parks and open space strategy, and sets out the requirement of public open space provision in new development.</p>

SEA Topic	Environmental Considerations	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Population	<p>The need to support development that meets the needs of a future population, including jobs, homes and facilities.</p> <p>The need to meet the needs of a increasing, ageing and diverse population in Aberdeenshire.</p>	Yes	<p>The LDP makes significant housing and employment allocations to support the population. It makes clear how and when these will be delivered to ensure a five year effective supply of housing land and supply of employment land at all times.</p> <p>The settlement statements highlight what settlement infrastructure is likely to be required some allocations, including the provision for gypsy/ traveller sites, affordable housing and open space.</p> <p>Policy on layout, siting and design requires for balanced mix of house and other building types, and land uses.</p>
Cultural heritage	<p>The need to protect and, where appropriate, enhance or restore the historic environment, especially those on the Buildings at Risk Register.</p> <p>The necessity of improving the enjoyment and understanding of the historic environment.</p> <p>The need to recognise that future development could damage some historical features.</p>	Yes	<p>The LDP safeguards historic assets and incorporates guidance set out in Scottish Historic Environmental Policy, identifying Conservation Areas and Designed Landscapes, and considering the effects of new development areas on the historic environment and its setting.</p> <p>The LDP supports the appropriate development or use of historical buildings.</p> <p>Policies on layout, siting and design, enabling development, landscape, and protecting, improving and conserving the historic environment are some of the initiatives in the LDP.</p>

SEA Topic	Environmental Considerations	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Landscape	<p>Recognising the link between increased development and negative changes to the landscape features, their context, patterns of past use, and how they are valued and enjoyed by many people.</p>	Yes	<p>The LDP aims to facilitate positive change whilst maintaining and enhancing the distinctive character of Aberdeenshire's landscape. In particular proposals have been avoided in prominent sites that will have a detrimental impact on the landscape or require strategic landscaping.</p> <p>SG on Aberdeenshire Special Landscape Areas seeks to protect Aberdeenshire's most locally valued landscapes.</p>
Material assets	<p>The need to protect and enhance existing material assets and to be aware that development will put pressure on existing infrastructure but also create opportunities for acquisition of assets.</p> <p>Linking development to existing infrastructure network does not only maximise resources but also addresses climate change problems.</p> <p>The link between recycling and use of material assets.</p> <p>The potential for re-using recycled construction material.</p>	Yes	<p>The LDP identifies the required investment in material assets to support new development.</p> <p>Further support is provided in policy and associated supplementary guidance on developer contributions, and policy on layout, siting and design (resource efficiency).</p>

4. Effects of the Environmental Report on the LDP

- 4.1 The LDP sets the strategy for future development in Aberdeenshire and sets the policy framework to determine the suitability of proposals. A significant part of the strategy is the identification of specific sites for housing, employment, commercial centres, community uses and transport proposals. To allow for full consideration of the environmental impact of the LDP, assessments of all of the 400+ alternative housing and employment sites (bid sites) and all other proposals were undertaken. The environmental assessment has shown that the preferred sites are unlikely to have significant and/or cumulative effects on the environment. Where some strategic options have been assessed to show likely significant effects on the environment, they were rejected or fully mitigated.
- 4.2 Table 3 summarises how the environmental report has been taken into account within the LDP (including its associated supplementary guidance) in accordance with Section 18 (3) (a-b) of the Environmental Assessment (Scotland) Act 2005. This table describes how the environmental report has been taken into account in the adopted LDP and what specific changes were made particularly where significant negative and cumulative effects were identified. In this case the significant negative effects were as a result of land use allocations. None of the aims and policies of the LDP and SG raised any significant negative effects. The table highlights when the mitigation is to be considered if there is the need for a more detailed assessment at a later stage in the planning process.

Table 3: Environmental report

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Air	Positive effects can be enhanced by facilitating the development of the park and ride facility in Portlethen and community facilities in Stonehaven to increase the use of public transport, and reduce car dependency, CO ₂ levels, air pollution and nuisance in the Strategic Growth Area.	Yes	The LDP makes the most efficient use of infrastructure to reduce the need for additional facilities and associated emissions, which focuses development in the strategic growth areas, and where there is a need. Policy on layout, siting and design seeks to deliver mixed use communities and reduce the need to travel.	Through the Development management and EIA process. When preparing masterplans, local housing strategy, local transport strategy.

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Water	<p>Some development will have a negative impact on water quality, resulting in some water bodies failing to meet or retain their good ecological status due to diffuse or point source pollution or pressure on sewage works, and/or inappropriate SuDS.</p> <p>Some development will be susceptible to surface water runoff, which will have to be appropriately addressed through a Drainage Impact Assessment.</p> <p>Impact on water quality if new development connects to water and waste water infrastructure that is at or near capacity.</p>	Yes	<p>Policies R1 Special rural areas, P1 Layout siting and design, E1 Natural heritage and PR1 Protecting importance resources will provide mitigation for the effects of development. All allocations that have been identified as having a significant impact on water quality will be required to comply with these policies, including the needs for a drainage impact assessment, buffer strip and/or flood risk assessment.</p> <p>Policy RD1 Providing suitable services details the infrastructure requirements for new developments and where development cannot be accommodated in existing infrastructure there is a requirement to upgrade or provide new facilities.</p> <p>In addition to the above policies, allocations are not proposed immediately adjacent to the most environmentally sensitive areas.</p> <p>In view of the potential significant negative impacts during implementation, EIA will be submitted before developments commence, and where appropriate, Habitats Regulation Assessment of sites that may impact on Natura sites, including the River Dee SAC and Ythan Estuary SAC, will be undertaken.</p> <p>A Habitats Regulation Assessment has been undertaken to ensure that the risk to the conservation status of the River Dee and Ythan Estury SAC have been minimised, and policies are included in the plan to ensure that development does not affect their status. A Habitats Regulation Assessment will be required for developments in close proximity to Natura sites.</p> <p>We will increase the resilience to future increases in</p>	<p>Through the Development management and EIA process.</p> <p>When preparing masterplans.</p> <p>During the Habitats Regulation Assessment.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Soil	Some development will result in the loss of prime agricultural land, but this is in exceptional circumstances on sites allocated by the LDP. The result of development maximise the social benefits development on these would give to the community.	No	Generally areas of land on prime agricultural land have generally not been included in the LDP for development. However, there are a handful of exceptions where the economic and social benefit would outweigh the loss of prime agricultural land. Furthermore, in these areas, the loss to prime agricultural land would only be a minimum given its abundance.	Through the development management and EIA process.
Biodiversity	The LDP protects biodiversity by minimising adverse impacts from development on designated sites, protected species and the wider biodiversity, requiring enhancement of biodiversity and creation of greenspace for wildlife.	Yes	Policy E1 Natural heritage sets out measures intended to protect biodiversity and minimise any adverse impact as a result of development. Greater emphasis has been given to identifying, protecting and enhancing green networks through Policy RD2. Water efficiency and the incorporation of water saving technologies has been promoted for all new development through Policy C1.	Through the development management and EIA process.

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Climatic factors	<p>Effects on climatic factors in rural settlements can be reduced where land for a new primary school is reserved (e.g. Cornhill, Banff).</p> <p>Positive effects can be enhanced by facilitating large scale and/or mixed use developments which can minimise car dependency and reduce CO₂ levels, air pollution and nuisance.</p> <p>Maximise resource efficiency and energy use in new buildings through good layout, siting and design in accordance with policy. Facilitate the creation of combined heat and power plants or other renewables in new developments at the masterplanning stage.</p> <p>Mitigate potential flood risk through drainage impact assessments or flood risk assessments and the provision of appropriate buffer strips adjacent to water bodies.</p> <p>Mitigate against unsustainable settlement patterns through open space and links (paths) to the facilities in the settlement to maximise integration.</p>	Yes	<p>The LDP makes the most efficient use of infrastructure to reduce the need for additional facilities and associated emissions, which focuses development where there is a need. However, in liaison with the Education Service, new development in rural locations have been supported where school closures are proposed and preferred new sites have been identified.</p> <p>All sites substantially at risk from flooding have been removed from the plan and are included only as alternatives or as open space within an allocation.</p> <p>Where the assessment has identified a significant flood risk these areas have been identified as open space. In addition the LDP requires buffer strips adjacent to all water bodies. Also for sites with an identified flood risk, each Settlement Statement highlights whether a flood risk assessment may or will be required.</p>	<p>Through the Development management and review of the LDP process.</p> <p>When developing Masterplans.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Human health	<p>The loss of open space for other community uses (e.g. a health centre in Banchory) should be compensated elsewhere through new development.</p> <p>Supporting the provision of employment land and new housing in a regeneration priority area has the potential to have positive impacts on human health.</p>	Yes	<p>Existing areas of public open space are protected under policies PR1 Protecting importance resources and P2 Open space and access in new development, with this policy also referring to the creation of new areas of open space as part of a development proposal.</p> <p>The LDP also supports opportunities for new business and employment proposals.</p>	Through the development management process.
Population	<p>The LDP makes housing land allocations taking population change, house type, tenure, specific needs and affordable housing into consideration.</p> <p>An increasing population and a growing elderly population places great and wide ranging demands on housing.</p>	Yes	<p>Policies on housing are intended to meet the housing needs of the area. A generous supply of housing is maintained in both market areas.</p>	Through the development management process.
Cultural heritage	<p>Potential for development to impact on listed buildings, archaeological sites and battlefields, historic gardens and designed landscape.</p> <p>Vulnerability of historic and cultural heritage assets to insensitive developments.</p> <p>Potential loss of heritage resources of regional and national significance.</p> <p>High number of buildings on at risk</p>	Yes	<p>The LDP contains policies to protect and enhance the historical environment. It manages the conflict between modern requirements and historic buildings. A robust process of design encourages good design quality.</p>	Through the development management process.

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Landscape	<p>Maximise the integration of new development where it is out-of-scale of the existing settlement through open space (e.g. strategic landscaping and paths).</p>	<p>Yes</p>	<p>Policy E1 Landscape and its associated supplementary guidance will be applied strictly to ensure that development does not have a significant effect on the landscape.</p> <p>Policy P2 Open space and access in new development requires new development to integrate with its surroundings through public open space and pathways.</p> <p>Those sites that were expected to have the most significant impacts have not been included in the plan and are only identified as alternatives.</p> <p>Where the assessment has identified an area of a site which is more visually prominent on the landscape, these areas will need to be developed sensitively and will require strategic landscaping, as identified in the Settlement Statements. In some cases the undeveloped coastal zone has been used to ensure development does not take place in these areas.</p> <p>In view of the potential likely significant negative impacts arising from the implementation of the LDP EIA will be submitted before developments commence. Landscape strategies can be required.</p>	<p>Through the development management and EIA process.</p> <p>Landscape strategies and masterplanning of sites.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Material Asset	<p>Lack of adequate infrastructure to accommodate the scale of housing proposed and potential for new development to demand mineral resources and different types of infrastructure (e.g. water transport, social, energy).</p> <p>The need to increase reuse and recycling of resources.</p> <p>The need to prioritise development on vacant brown field sites.</p> <p>Lack of planned green networks within and connecting settlements.</p>	Yes	<p>The LDP contained a variety of policies that are designed to have a positive impact on development and mitigate any adverse effects.</p> <p>Further opportunities for brownfield redevelopment will continue to be identified, which will provide opportunities to remediate contaminated land.</p> <p>Green networks have been identified within settlements, although generally this is associated with open space. Better integration of the green network may be required in the future.</p>	<p>Through the development management process.</p> <p>Masterplanning.</p>

5. Taking Consultation Opinions into Account

- 5.1 As required by Section 18 (3) (c) and (d) of the Environmental Assessment (Scotland) Act 2005, the opinion expressed during the consultation were given due consideration. Tables 4 and 5 summarise how opinions expressed during the consultation of the Interim environmental report, which was published alongside the Main Issue Report in 2013, and environmental report, which was published alongside the Proposed LDP in 2015, and how they have been taken into account.

Analysis of comments on the environmental report

Table 4: Analysis of Comments from Consultation Authorities on the Scoping Report (proposed LDP, 2015)

Consultation Authority	Issue	Concern / Comments	Action proposed
Historic Scotland	General Comments	The environmental report provides a clear and comprehensive assessment of the significant environmental effects of the Main Issues Report on the historic environment and we are content with the level of information provided.	Noted.
Historic Scotland	Relationship with other PPS & Environmental Objectives (p.31 and 35)	Pleased to see that previous Historic Scotland comments regarding avoidance of adverse impacts from development on statutory and non-statutory protected sites for cultural heritage have been applied here.	Noted.
Historic Scotland	Assessment, Mitigation and Monitoring – Table 5.1	It is noted that a significant negative score is predicted for cultural heritage SEA objective, however, despite this high score, cultural heritage topic is not mentioned in Table 5.2: Mitigation Measures. It is recommended that this omission is rectified and all proposed mitigation measures are covered in this section.	Revised in line with comments – see Table 5.2.
Historic Scotland	Assessment, Mitigation and Monitoring – Table 5.3	Cultural heritage topic is mentioned twice in the left hand column and it is not clear with which version or aim of the plan it is meant to correspond. Make clear what features the Council consider the ‘most valued’.	Mitigation table is reformatted to avoid the repeats - see Table 5.2
Historic Scotland	Assessment, Mitigation and	Cultural heritage topic is not mentioned in table despite negative assessment of some alternative site allocations.	Added in Table 5.2 and Table 5.3.

Consultation Authority	Issue	Concern / Comments	Action proposed
	Monitoring – Table 5.4		
Historic Scotland	Assessment, Mitigation and Monitoring – Table 5.7	Analysis of comments from Consultation Authorities on the Scoping Report – Historic Scotland found this table particularly helpful in demonstrating how the comments that were expressed at scoping stage have been taken into account.	Noted.
Historic Scotland	Appendix 1.1 Main Issues Assessment	<p>We are largely content with the assessment of implications that each main issue could have on the historic environment.</p> <p>Main Issue 3 – Supporting Town Centres – both preferred and alternative options were given a neutral score for cultural heritage. The preferred policy aims to contribute to the vibrancy of town centres by requiring office developments to locate in town centres unless it can be demonstrated that there are no town centre sites available. This in turn could lead to re-use of existing derelict buildings and have a positive impact on empty listed buildings/ buildings within conservation areas being brought back into use. Therefore we would have expected a positive score.</p>	<p>Revised in line with comment.</p> <p>See Appendix 1.1.</p>
Historic Scotland	Alternative options for settlements	<p>We note that the generic assessment scores for cultural heritage within all 6 areas of Aberdeenshire are significant negative (--). These results are not consistent with the assessment of individual sites within the 6 areas, where the highest score attained is a single negative (-). We would recommend that the disparity between the generic and individual scores is clarified.</p> <p>It would be helpful to clarify if the potential negative impacts on setting of heritage assets have been taken into consideration during the assessment process and contributed to these scores.</p> <p>We also note that in-depth planner's overview of site allocations has correctly identified potential impacts on cultural heritage features but these are not pulled through into Appendix 1 – see site specific detail and actions proposed below.</p>	Alternative options for settlements have been reassessed accordingly. See Appendices 1.4b, 1.5b, 1.6b and 1.7b

Consultation Authority	Issue	Concern / Comments	Action proposed
Historic Scotland	Appendix 1.4b Alternative option for settlements in Formartine 2013	Fm077c and a – the sites are located in proximity to scheduled monuments SM 3277 Hare Cairn, cairn 600m W of Keir and SM 3275 The Temple Stones, stone circle NE of Potterton House. Views from and towards both scheduled monument will be important elements of both settings therefore we would have expected a negative score.	Revised in line with comment. See Appendix 1.4b.
Historic Scotland	Appendix 1.5b Alternative option for settlements in Garioch 2013	<p>GA059, Inverurie – the site contains a scheduled monument: Bruce’s Camp, hillfort (AM 12523). The allocation could potentially impact directly on the monument and impact on its setting, therefore we would have expected a significant negative score here.</p> <p>Ga055 – this site is located in proximity to an A-listed Bourtie House (HB No. 2819). Although located within mature woodland, a gap in trees to the SW may provide views towards the proposed development. The proximity and scale of the allocation has the potential to impact on the building’s setting therefore we would have expected a negative score here.</p> <p>Ga054 and Ga050 – both sites are located in proximity to SM 12334 Berryhill. The landscape and topography suggests that the monument is also a visible feature in the landscape. Both allocations have the potential to impact on the monument’s setting therefore we would have expected a negative score here.</p>	Revised in line with comments. See Appendix 1.5b.
Historic Scotland	Appendix 1.6b Alternative options for settlements in Kincardine and Mearns 2013	<p>KM036 – site is adjacent to a scheduled monument SM5936 Marykirk, old parish church and burial ground. Limited screening (environmental/ seasonal factors) between scheduled monument and allocation. Further to this, the allocation would spread development to south and west of existing settlement, effectively surrounding the monument. Therefore, we would have expected a negative score here.</p> <p>KM087 – site contains SM 4596 Findlayston, cairn, enclosure and field systems 500m ENE. Due to large size of allocation, it is unclear at present what impacts (direct/ indirect) there will be potentially be on the scheduled monument. For this</p>	Revised in line with comments. See Appendix 1.6b.

Consultation Authority	Issue	Concern / Comments	Action proposed
		reason, Historic Scotland would have expected a negative score recorded.	
Historic Scotland	Appendix 1.7b Alternative option for settlements in Marr 2013	Ma019 and Ma050 – sites are located within Alford Inventory battlefield and in close proximity to Auld Kirk, ring cairn (SM6). Large allocation extends into the battlefield boundary, as well as having potential impact on the setting of the monument, therefore we would have expected a significant negative score here.	Revised in line with comments. See Appendix 1.7b.
Historic Scotland	Appendix 6 Designated Sites	It would be useful if the quality and scale of the maps were increased as these changes would make them easier to read.	New maps added.
Scottish Natural Heritage	General Comments	Overall, this is a most comprehensive Interim SEA Report. We did however find Table 5.3 and 5.4 difficult to follow, and so it would be helpful if these were clarified at the Updated ER Stage.	Comment noted.
Scottish Natural Heritage	Non Technical Summary – Table 1.2 Mitigation Measures	It would be helpful if the entries for soil (and cultural heritage) included reference to relevant protective policies in the plan, as well as reference to the development management stage, as has been done for all the other SEA issues.	New protective policies added.
Scottish Natural Heritage	Plan, Programme or Strategy Context	Table 4.1 – Consider PPS relating to access under Human Health, e.g. Land Reform (Scotland) Act 2003 and the Scottish Outdoor Access Code. Para 4.1.3 – Another bullet point suggested – <ul style="list-style-type: none"> • Ensure avoidance of spread of invasive non-native species Para 4.4 – This refers to Appendices 7.2, 7.2.5 and 7.2.5 which do not appear to be included in this environmental report.	Amended in line with comments – see Table 4.1 and Paragraphs 4.1.3 and 4.4.
Scottish Natural Heritage	Assessment, mitigation and monitoring – Table 5.2 Mitigation Measures - Water	It is unclear why Main Issue 12 Land Supply and Distribution is not included here (e.g. in terms of water supply and wastewater treatment). Following this Main Issue 1 Climate Change could also be added here, since under this is proposed to be policy with regard to water efficiency.	Added to Table 5.2.
Scottish Natural Heritage	Assessment, mitigation and monitoring – Table	Table is not clear. SEA topics are repeated in the left hand column and it is not clear how the rows relate to aspects of the vision and aims. The aims of the plan are not set out in this table. In addition, as regards mitigation we are not certain	Table reformatted.

Consultation Authority	Issue	Concern / Comments	Action proposed
	5.3 Proposed mitigation measures for vision and aims of the plan	about the planning application stage/Development Management being the basis for mitigation, rather than other elements of the plan, e.g. general protective policies or site assessment criteria.	
Scottish Natural Heritage	Assessment, mitigation and monitoring – Table 5.4 Mitigation/enhancement for development in the six areas of Aberdeenshire	Table is not clear. Some entries relate to specific allocations, but most appear general in nature. For those appearing to relate to a specific allocation, e.g. loss of open space for a health centre in Banchory, is mitigation to be included as a developer requirement or a development factor in the plan? Again reference here to mitigation being based on planning applications and development management is unclear in comparison say to reference to specific allocation requirements or general protective policies in the plan.	Table reformatted and clarified Table 5.2 and Table 5.3.
Scottish Natural Heritage	Assessment, mitigation and monitoring – Table 5.5 Monitoring	<ol style="list-style-type: none"> 1) Water – We recommend water quantity as well as quality should be monitored, especially for the River Dee. This would be based on compliance with abstraction licences consented by SEPA. 2) Soil – Development on carbon-rich soils could additionally be monitored, based on map data provided by JHI. 3) Biodiversity – We suggest ‘protected habitats’ is broadened in scope to include important non-designated habitats such as Annex 1 habitats, ancient, long established and semi natural woodland, and BAP priority habitats. 4) Climatic factors – It would be useful if efforts to encourage modal shift could be monitored, e.g. vehicle count and cycle counts 	Amended in line with comments – see Table 5.5.
Scottish Natural Heritage	Appendix 1.1 Main Issues Assessment	<p>Main Issue 1 Climate Change – We note that Alternative 2 has more positive overall scoring than the preferred option, especially for Air, presumably because of bringing sustainable transport into the proposed policy. Please see our response to the Main Issues Report, where while warmly welcoming proposed policy and supplementary guidance, we do prefer alternative 2. The SEA would seem to support this.</p> <p>Main Issue 5 Wind Energy – Preferred option (wind energy spatial framework) –</p>	Amended in line with comments – see Appendix 1.1.

Consultation Authority	Issue	Concern / Comments	Action proposed
		we wonder about the negative score for Landscape, given the role of the landscape capacity study within the framework. Text here states that the policy/issue seeks to minimise effects of wind energy development on landscape. Also we wonder about the neutral/negative score for Soil, given that protection of carbon-rich soils is one of the spatial layers included in the framework.	
Scottish Natural Heritage	Appendix 1.2b Alternative Options for Settlements of Banff and Buchan	Aberchirder BaB015 – this is scored as neutral for soil, climate and biodiversity, but being located on peat we would have anticipated a negative assessment of these issues.	Updated in line with comments received – see Appendix 1.2b.
Scottish Natural Heritage	Appendix 1.5b Alternative Options for Settlements in Garioch	Inverurie Ga060 – this is assessed as neutral in all regards but the rationale for this is unclear given that this would extend the boundary of existing sites H1, E1 and SR1.	Updated in line with comments received – see Appendix 1.5b.
Scottish Natural Heritage	Appendix 1.6b Alternative Options for Settlements in Kincardine and Mearns	<p>Drumoak Km034 – this is assessed as neutral for biodiversity but the MIR notes possible impact on River Dee SAC, since this site is adjacent to the designated area.</p> <p>Kirkton of Durris Km057 – it is stated here that this site has planning consent, and so it is assessed as neutral in all regards. However the MIR states that the western expansion area would need planning permission and so assessment of potential expansion area in the LDP would be anticipated in this SEA.</p> <p>Stonehaven Km022 – this is assessed as neutral for biodiversity but from a desk assessment, some ancient woodland (long established, of plantation origin) appears to be present within the site.</p> <p>Woodland of Durris KM030 – this is assessed as neutral for both biodiversity and landscape, but the MIR states that development of the site is likely to have an adverse landscape impact and result in loss of habitat and woodland (site</p>	Updated in line with all comments received – see Appendix 1.6b.

Consultation Authority	Issue	Concern / Comments	Action proposed
		<p>includes long established woodland of plantation origin and is in proximity to River Dee SAC). Therefore negative assessments would have been expected here for biodiversity and landscape.</p> <p>Woodland of Durris Km030 – similarly while this is assessed as neutral here for biodiversity, the MIR notes potential loss of woodland and biodiversity, so a negative assessment would also have been expected here.</p> <p>Invercrynock, Netherley Km050 – this site is assessed as neutral for biodiversity but is adjacent to the River Dee SAC (Crynock Burn).</p> <p>Peterculter West Km100 – this site is assessed as neutral for both biodiversity and landscape but the MIR states that the site is sensitive due to existing trees on site, with development likely to lead to loss of trees, and that as a prominent site is would be visually dominant. Therefore negative assessments would have expected here for biodiversity and landscape.</p> <p>Waterside Farm, Banchory Devenick Km044 – this site is assessed as neutral for both biodiversity and landscape, but the MIR states that the site could significantly impact on the (adjacent) River Dee SAC, would adversely affect biodiversity and is likely to have a significant adverse landscape impact. Therefore negative/significant negative assessments would have been expected here for biodiversity and landscape.</p>	
Scottish Natural Heritage	Appendix 1.7b Alternative Options for Settlements in Marr	<p>Banchory Ma017 – this appears to be missing from the SEA – in terms of biodiversity the MIR notes immediate proximity to River Dee SAC and that the site contains a significant area of mature trees, both with biodiversity value upon which development could have a negative impact.</p> <p>Finzean Ma044 – the assessment for biodiversity is neutral but the commentary (reflecting the MIR) notes negative effect in view of being in immediate proximity</p>	Updated in line with comments received – see Appendix 1.7b.

Consultation Authority	Issue	Concern / Comments	Action proposed
		<p>to River Dee SAC.</p> <p>Torphins Ma005 and Ma056 – the assessment for biodiversity is neutral for these sites but they are in immediate proximity to River Dee SAC and the MIR notes the scale of developments could impact upon the designation. Therefore the negative assessment would have been anticipated.</p> <p>Torphins Ma039 – this appears to be missing from the SEA – re biodiversity it is adjacent to River Dee SAC to the south.</p>	
Scottish Natural Heritage	Appendix 1.8 Cumulative Effects	<p>Landscape, Human Health, Population and Material Assets appear to be missing as SEA Criteria.</p> <p>Water – we note the statement within the assessment as a result of a +/- score that although the MIR promotes water efficient technologies, the scale of water efficiency technologies envisaged may not be able to support the allocations. This makes monitoring of this issue of water demand (see Table 5.5 above) all the more important.</p>	<p>Amended in line with comment.</p> <p>Noted.</p>
Scottish Natural Heritage	Appendix 2 Other Relevant Plans and Environmental Protection Objectives	<p>Under International-Nature Conservation the Ramsar Convention should be added, for the protection of wetland birds (this is included in Table 4.1 earlier.</p> <p>Amend the European Biodiversity Framework to 'EU Biodiversity Strategy to 2020.</p> <p>Under National Nature Conservation and Biodiversity should be added –</p> <ul style="list-style-type: none"> • Wildlife and Natural Environment (Scotland) (Act) 2011 (e.g. in tackling invasive non-native species) • Protection of Badgers Act 1992 as amended • 2020 Challenge for Scotland's Biodiversity (2013) (which along with the 2004 document comprises the Scottish Biodiversity Strategy) <p>(These are included in Table 4.1 earlier)</p>	Updated in line with all comments received – see Appendix 2.

Consultation Authority	Issue	Concern / Comments	Action proposed
		<p>Under National-Health could be added the Land Reform (Scotland) Act 2003 in regard to access rights.</p> <p>Under Local-Access, Open Space and Landscape the entry for Aberdeenshire Landscape Character Assessment could be split into entries for the South and Central Aberdeenshire LCA (1998) and Banff and Buchan LCA (1997).</p>	
Scottish Natural Heritage	Appendix 3 Baseline Information	<p>Re Appendix 3.4 Soil the entry for Geodiversity is blank. As a minimum GCR sites can be noted here (54 sites in Aberdeenshire – see details in SiteLink).</p> <p>Further baseline data as regards soils (including carbon-rich soils) may be available on the new ‘Scotland’s Soils’ website – http://www.soils-scotland.gov.uk/.</p> <p>Re Appendix 3.5 Biodiversity, Flora and Fauna some trend information for international and national designated sites could be added by referring to the number of qualifying features that are in favourable conservation status (see data on SiteLink).</p> <p>Appendix 3.6 Human Health – the extent of core paths could be added here, perhaps expressed for sub-areas as a ration of length of core paths to population.</p>	Added – see Appendix 3.4.
Scottish Natural Heritage	Appendix 5 Soil Maps	You may be in possession now of more specific soil information for Aberdeenshire, including carbon-rich soils, which may enable more targeted maps to be included. The new website for soil maps (see above) may be of assistance.	Added – see Appendix 3.28
Scottish Natural Heritage	Appendix 6 Designated Sites	<p>The maps are very small and so are difficult to see in any detail – can larger maps be included?</p> <p>We notice that Areas of Landscape Significance are shown on the map in</p>	Amended.

Consultation Authority	Issue	Concern / Comments	Action proposed
		Appendix 6.2, but understand this local landscape designation is no longer in force.	
Scottish Environment Protection Agency	General Comments	<p>In general SEPA are satisfied that a detailed environmental assessment of the Main Issues Report has been carried out and recognise the significance of the piece of work due to the scale of allocations.</p> <p>Query regarding not all settlements and sites detailed in the Main Issues report (MIR) having been assessed due to having been assessed in the previous ER. This approach is acceptable if there has been no change in circumstances.</p> <p>Following a review of all sites, SEPA feel that in some instances a change in circumstances has not been included. As such SEPA ask that within the ER addendum clarification is provided of where and how all sites within the proposed Plan have been assessed.</p> <p>It would be extremely useful and recommend a table format detailing all site allocations in the proposed Plan, when they were assessed and if assessed in a previous ER that there are no changes in circumstances following Aberdeenshire Council, SEPA and other consultees considerations of the MIR site allocations.</p>	<p>Noted.</p> <p>Noted.</p> <p>Reviewed following discussion with SEPA. Assessments updated to reflect any changes in circumstance, i.e. change to site boundary/ allocation.</p> <p>Noted.</p>
Scottish Environment Protection Agency	Non Technical Executive Summary	Soil – reference is made in the table to house building and development but as per SEPA scoping response other types of development such as wind farms and other renewables and associated infrastructure also have a potential to impact on carbon rich soils and peats. Reference is made here to managing waste and within mitigation measures in Table 1.2 to ensuring ‘that positive effects are enhanced and that minor negative effects do not worsen’. But avoidance of impacts on soils including peatlands is an emerging issue and we would have expected the ER and MIR to take cognizance of this. The issue overlaps those under climatic factors.	Amended in line with comment – see Tables 1.1 and 1.2.
Scottish	Non Technical	Under Material Assets in Table 1.2 we would welcome reference to SEPA and	Revised in line with

Consultation Authority	Issue	Concern / Comments	Action proposed
Environment Protection Agency	Executive Summary	the role we play in licensing Scottish Water Assets and temporary environmentally acceptable private drainage systems where connection to the public sewer is constrained due to capacity issues.	comments
Scottish Environment Protection Agency	Introduction and key facts about Aberdeenshire Local Development Plan	<p>We are generally content with the background information presented. We would welcome inclusion of Table 5.7 detailing how the comments from consultation authorities on the scoping report have been analysed. As a minor point we would highlight that the first point under SEPA: SEA Policy Assessment Matrix – Human Health is an SNH point.</p> <p>We would have liked to see the scoping in/out of allocations/policies clearly detailed within Table 2.2.</p>	<p>Comment noted.</p> <p>Table amended in line with comment – see Table 2.2).</p>
Scottish Environment Protection Agency	Outline and Objectives of the Aberdeenshire Local Development Plan	<p>Table 3.5 makes reference to Appendix 7.4 which does not appear to have been attached to the ER.</p> <p>We note under Section 5.1 that the vision has already been subject to SEA. It would have been helpful if this had also been referenced under Section 3.6.</p> <p>We note under Main Issue 8 – Flooding and Erosion in Table 3.3 ‘An alternative would be to retain the policy as it is and delay update until the content of the Flood Risk Management Plans and the Strategic Flood Hazard maps is known’ – we would highlight for your information that we published new flood maps for Scotland on 15 January 2014 which will shortly be issued to each responsible authority. Further to this we query whether this alternative is now reasonable or needs to be reconsidered in your ER addendum.</p>	<p>Amended in line with comment.</p> <p>Referenced under Section 3.5.</p> <p>Alternatives to preferred flooding policy included and new map added based on new data – see Appendix 3.20</p>
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	<p>Table 4.1 – As a minor point for future reference we would highlight that:</p> <ul style="list-style-type: none"> • Under water the Water Environment (Controlled Activities) (Scotland) Regulations 2011 have been amended and should be referenced as ‘Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended)’. • Under National we note that reference is made to NPF2 and the draft 	Amended in line with comment – see Table 4.1.

Consultation Authority	Issue	Concern / Comments	Action proposed
		<p>NPF3 however reference is only made to The Scottish Planning Policy. We would recommend you confirm this is only the published SPP by reference to 2010 or also include the draft SPP by referencing this separately 2013.</p> <ul style="list-style-type: none"> • Under Water reference should be made to the new flood maps. 	
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	It is not clear if promotion of sustainable waste management; air quality, noise and odour, and protection of the marine environment (which are all issues we would expect to be covered in the LDP), have been considered within this section as part of the assessment – see SEPA planning guidance note entitled <i>Guidance on SEPA engagement with the development plan process</i> .	Amended in line with comment – see Para 4.1.3.
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	We would highlight that under ‘ensure that the water quality and good ecological status of the water framework directive are maintained’, we would have expected reference to improving as well as protecting the water environment as through development there are significant opportunities to meet both these aims of the Water Framework Directive.	Amended in line with comment – see Para 4.1.3 and Appendix 2, Table 2.1.
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	Within Section 4.2 reference is made to ‘The detailed analysis of baseline data is presented in Appendix B’. However Appendix B does not appear to have been attached to the ER. Nor do Appendices 7.2.4 and 7.2.5 which are referred to in Section 4.4.	Amended in line with comment.
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	While some reference is made to water efficiency we would have liked to see more prominence given to water quantity and reference impacts on groundwater.	Noted and revised in line with comment – see Table 4.3.
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	Under climatic factors it states ‘Flood risk can be mitigated through the use of buffer strips/open space’. In future work you may wish to consider referencing other flood risk mitigation measures such as landraising and compensatory storage.	Noted and revised in line with comment – see Table 4.3.
Scottish Environment Protection	Assessment, Mitigation and Monitoring	Under the Water Quality section beginning ‘Liaise with developers to ensure new houses, factories....’ We would have liked to see reference to the end avoiding impacts from cumulative drainage impact.	Added – see Table 5.3.

Consultation Authority	Issue	Concern / Comments	Action proposed
Agency			
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	In the last section of this list under Material Assets we note the statement 'Locate development in areas where mitigation measures will be required in the future (e.g. to prevent flooding, erosion, or replacement open space or natural heritage'. We suggest that if this section is to be repeated in the ER addendum you may wish to reword slightly. This is because it would imply that flood prevention measures are acceptable in areas at risk of flooding, whereby in line with SPP and the basic principles of sustainable flood risk management, such areas should be avoided.	Added – see Table 5.2.
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	Table 5.4 under Air Quality – we would have expected recognition here to the fact that air quality would go down in the actual area where the park and ride is located due to increase in cars going there. Over, however, we agree that this increase will be negated by wider positive implications.	Noted.
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	In future work you may wish to consider splitting a table such as this (Table 5.4) into the six areas, rather than the whole of Aberdeenshire. This would have made it easier to identify which mitigation /enhancement measures are specific, address issues within individual areas of Aberdeenshire and which relate to the whole region.	Table split into two with clear distinction between effects on area by area basis (Table 5.3)
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	We note the mitigation/enhancement measure 'encourage development that removes contaminated land of a former landfill at Blackdog'. We would highlight that unless very carefully managed remediation could have significantly negative impacts on groundwater and surface water.	Added – see Table 5.2.
Scottish Environment Protection	Assessment, Mitigation and Monitoring	We are pleased to note that in response to our scoping comments 'Where negative effects are identified, revising the draft Plan to remove the effect (i.e. avoid) is the best form of mitigation. We would like the ER to make it clear how	This approach was adopted in line with comment.

Consultation Authority	Issue	Concern / Comments	Action proposed
Agency		carrying out SEA informed the Plan which is being consulted upon at the same time' it will be made clear at the proposed Plan stage how the SEA has influenced the Plan.	
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	Under Section 5.5 reference is made to 'The framework for monitoring significant effect of implementation of the plan is shown in Table 5.8 below' and reference is also made to Table 5.8 in Section 5.9. However there does not appear to be a Table 5.8 in the ER.	Amended – see Sections 5.5 and 5.9.
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	Under Water Quality in Section 5.5 as cognisance of the issues around water abstraction from the River Dee we would have liked to see water quantity as well as the proposed water quality monitored. We note under <i>where can the information be obtained</i> abstraction rates of the River Dee is already listed.	Revised in line with comment – see Section 5.5.
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	Under Soil as detailed in our comments on the MIR, with the increasing pressure for windfarm/renewable energy developments, organic rich soils including peat have become a key issue and therefore we would have liked to see more prominence given to soil resources including peat. As such we would have liked to see the reduction in disturbance of organic rich soil including peat included here.	Revised in line with comment – see Section 5.5.
Scottish Environment Protection Agency	Appendix 1.1 Main Issues	Main Issue 1: We would question the statement that 'The policy would have a positive impact on water through the requirement for water efficiency measures' as we understand this would be in relation to new development so any increase in development even with water efficiency measures is still going to increase water abstraction rates which is a cause for concern particularly in relation to the River Dee. Therefore it may be more appropriate to consider this as having mixed positive and negative effects on water.	Revised in line with comment – see Appendix 1.1.
Scottish Environment Protection Agency	Appendix 1.1 Main Issues	We note and agree that Alternative 2 has more positive overall scoring for air and biodiversity than the Preferred Option and as per our comments on the MIR, in so far as our remit is concerned, it is our preference.	Revised in line with comment – see Appendix 1.1.

Consultation Authority	Issue	Concern / Comments	Action proposed
Scottish Environment Protection Agency	Appendix 1.1 Main Issues	Main Issue 4: we would question the statement that 'it is likely to have minimal impact on the water environment in the absence of public sewerage infrastructure'. We would highlight, and have referenced in our response to the MIR, that consideration should have been given to cumulative drainage impact.	Revised in line with comment – see Appendix 1.1.
Scottish Environment Protection Agency	Appendix 1.2a Preferred Options for settlements in Banff and Buchan, LDP 2012	Banff – EH1 has not been included (MIR: already has planning permission) nor allocation EH2 (MIR: No masterplan, development framework or planning application has been received to date).	EH1 and EH2 added – see Appendix 1.2a.
		Macduff EH1 and E1 – as per our MIR comments there are possible sewerage capacity issues so we would have liked to see reference made to this in the comments column and negative impact rating on water.	Revised as per comment – see Appendix 1.2a
		New Aberdour EH1, EH2 and H1 – would highlight could have been slightly positive effects on water, if as per our MIR comment, adequate attenuation in SUDS to address surface water flooding issues.	Revised as per comment – see Appendix 1.2a
		Rosehearty – H3 has not been included (MIR: No masterplan, development framework or planning application has been received to date).	H3 (EH1) added – see Appendix 1.2a.
		Whitehill – H1 has not been included (MIR: No masterplan, development framework or planning application has been received to date).	H1 added – see Appendix 1.2a.
Scottish Environment Protection Agency	Appendix 1.3a Preferred Options for settlements in Buchan, LDP 2012	Auchnagatt - we would refer to our MIR comments regarding limited public sewer connection which could have negative effects on water and material assets.	Revised as per comment – see Appendix 1.3a
		Crimond – EH1 has not been included (MIR: No masterplan, development framework or planning application has been received to date).	EH1 added – see Appendix 1.3a.
		Cruden Bay – EH2 has not been included (MIR: already has planning permission) nor allocation EH1 (MIR: No masterplan, development framework or planning application has been received to date).	EH2 deleted from LDP. EH1 added – see Appendix 1.3a.
		Fetterangus – EH1 has not been included (MIR: This development has been built out).	EH1 deleted from LDP.
		Mintlaw – EH3 has not been included (MIR: already had a planning application in principle submitted, although this was refused) nor allocation EH1 and EH2 (MIR: No masterplan, development framework or planning application has been	EH3, EH1 and EH2 added – see Appendix 1.3a.

Consultation Authority	Issue	Concern / Comments	Action proposed
		received to date).	
		New Pitsligo – not clear why this settlement is not included, EH1, 2 and 3 assessed in MIR.	EH1, 2 and 3 added – see Appendix 1.3a.
		Peterhead – should CC reference be CC1? EH2, EH3 and H2 not included (MIR: already granted planning permission). We would refer you to our comments on flood risk for site EH2 and 3 in our MIR response.	Amended in line with comment – see Appendix 1.3a.
		St Combs – water recorded as neutral, see comments in our MIR response regarding pluvial and fluvial issues could have negative effect.	Revised as per comment – see Appendix 1.3a.
		Strichen – water is recorded as neutral, see comments in our MIR response regarding required upgrade of waste water infrastructure which could have a negative effect on water and material assets.	Revised as per comment – see Appendix 1.3a.
Scottish Environment Protection Agency	Appendix 1.4a Preferred Options for settlements in Formartine, LDP 2012	Belhelvie – see comments in MIR response on concerns regarding waste water drainage which we would consider a negative impact.	Amended in line with comment – see Appendix 1.4a.
		Daviot – please note comment in MIR response regarding upgrade required for waste water treatment works which we consider a significant negative impact on water and material assets.	Amended in line with comment – see Appendix 1.4a.
		Pitmedden – EH1 has not been included (MIR: planning application has already been applied for, although this was refused).	EH1 added – see Appendix 1.4a.
		Udny Green - EH1 has not been included (MIR: already has planning permission).	Site deleted from LDP.
		Westfield Foveran – E1 has not been included (MIR: already has planning permission in principle).	E1 added – see Appendix 1.4a.
Scottish Environment Protection Agency	Appendix 1.4b Alternative for settlements in Formartine, LDP 2013	Ellon – see comments in MIR response on FM083 regarding wetlands on site so possible negative effects on water/biodiversity.	Revised in line with comment – see Appendix 1.4b.
		Woodhead – FM011 we note the statement that “SEPA has identified Woodhead as area where the proliferation of private waste water drainage systems is	Revised in line with comment – see

Consultation Authority	Issue	Concern / Comments	Action proposed
		currently causing environmental problems. In light of this, the proposed private drainage system could have a significant negative impact". To update you, as per our MIR response, our waste water drainage GIS layer is currently under review and Woodhead has been put forward for removal. We therefore recommend you reconsider the assessment of significant negative impact to negative impact within the ER Addendum.	Appendix 1.4b.
Scottish Environment Protection Agency	Appendix 1.5a Preferred Options for settlements in Garioch, LDP 2012	Blackburn – M1 we would refer you to our comments on the MIR regarding waste water drainage and potential negative effect on material assets.	Revised in line with comment – see Appendix 1.5a.
		Sauchen and Cluny – H1 and H2 we would refer you to our comments on the MIR regarding waste water drainage and potential negative effect on material assets.	Revised in line with comment – see Appendix 1.5a.
		Dunecht – EH1 has not been included (MIR: planning permission in principle is pending).	EH1 added – see Appendix 1.5a.
		Hatton of Fintry – we would refer you to our comments on the MIR regarding waste water drainage and potential negative effect on material assets.	Revised in line with comment – see Appendix 1.5a.
		Inverurie – H2 it is noted was in the shape files but not included in the MIR or ER. Allocation E2 has not been included (MIR: planning permission for access road only). EH4 has not been included (MIR: under construction so designation should be removed). We are not clear what F G77, G162, G129 and G94 designations are and clarification of this in the ER addendum would be welcome. As a general comment on this settlement we would refer you to our general comments on Inverurie in the MIR on waste water drainage which may also be considered a negative under water.	Revised in line with comment. F G77, G162, G129 and G94 references refer to past designations which have since been renamed. Report updated accordingly.
		Keithhall – H1 has not been included (MIR: yet to be progressed).	H1 added – see Appendix 1.5a.
		Kinmuck – H1 has not been included (MIR: planning permission granted).	H1 added – see Appendix 1.5a.

Consultation Authority	Issue	Concern / Comments	Action proposed
		Kintore – EH1, EH2 and EH3 have not been included (MIR: planning applications submitted but embargo on development). Biodiversity is rated as neutral but we would highlight our comments in MIR regarding the Tuach Burn which passes through site so could be negative effects.	EH1, Eh2 and EH3 added – see Appendix 1.5a.
		Kirtkon of Skene – EH1 has not been included (MIR: under construction so remove designation).	Site deleted from LDP.
		Millbank – M1 has not been included (MIR: planning permission refused).	M1 added – see Appendix 1.5a.
		Old Rayne – EH2 see comments on MIR highlighting the site overlaps the River Urie which has a no deterioration objective so consider if water and biodiversity should be changed from neutral to negative if reassessed in ER addendum.	Revised in line with comment – see Appendix 1.5a.
Scottish Environment Protection Agency	Appendix 1.5b Alternative for settlements in Garioch, LDP 2013	Sauchen and Cluny – Ga049 we would refer you to our comment on the MIR in regard to waste water drainage capacity at Sauchen Works which are a negative effect on water and material assets.	Revised as per comment – see Appendix 1.5b.
		Durno – Ga003 see our comments on MIR, we would have serious concerns regarding any future development in Durno due to the high level of private waste water drainage proliferation, this includes both discharges to land and water. Durno has been put forward for inclusion in our waste water drainage consultation GIS layer. As such we would expect soil (as discharges to land), water and material assets to be assessed as significant negative.	Revised as per comment – see Appendix 1.5b.
		Kintore – Ga024 in the comments column we note the statement that this is “a small development that will generally have a neutral impact”. In this regard we would refer you to our MIR comments that the site includes both the Tuach Burn and other watercourses, mostly tributaries, so potential to have negative effects on water and biodiversity.	Revised as per comment – see Appendix 1.5b.
		Westhill – Ga034 and Ga075 refer comments on MIR regarding Brodiach Burn which runs through the site so could be negative effects on water.	Revised as per comment – see Appendix 1.5b.
		We highlight Ga020 (Upper Sauchen) and Ga012 (Corners, Midmar) are listed	Revised as per

Consultation Authority	Issue	Concern / Comments	Action proposed
		under Westhill rather than with the other 'Landward' sites.	comment – see Appendix 1.5b.
		Landward – Ga057 see comments on MIR regarding possible negative impacts on drainage and water supply for Little Goval.	Amended – see Table 1.5b.
Scottish Environment Protection Agency	Appendix 1.6a: Preferred option for settlements in Kincardine and Mearns LDP 2012	Elsick – M1 has not been included (MIR: planning permission in principle granted).	M1 added – see Appendix 1.6a.
		Fordoun – It is not clear what K81 and K118 designations are and clarification of this is requested in the ER addendum.	Revised as per comment – see Appendix 1.6a.
		Kirkton of Maryculter – H1 has not been included (MIR: planning permission in principle pending).	H1 added – see Appendix 1.6a.
		Marywell – EH1 we would refer you to our MIR comments, as we have raised concerns regarding waste water drainage and potable water supply which would be considered negative effects on water and material assets.	Revised as per comment – see Appendix 1.6a.
		Park – H1 has not been included (MIR: awaiting submission of planning application).	H1 added – see Appendix 1.6a.
		Stonehaven – see general comment on MIR for Stonehaven raising concerns with cumulative impact of all developments on waste water drainage infrastructure which should be considered a negative effect for water and material assets.	Revised as per comment – see Appendix 1.6a.
		Woodlands of Durris – see comment in MIR regarding drainage capacity issues so should be considered negative effect for water and material assets.	Revised as per comment – see Appendix 1.6a.
		Scottish Environment Protection Agency	Appendix 1.6b: Alternative option for settlements in Kincardine and Mearns LDP 2013
Kirkton of Durris – KM057 while we note this is a functioning quarry with planning consent the MIR states the extension would require planning consent and raises the issue of flood risk. Therefore we consider the bid side should not be considered neutral and should be reassessed in regard to the extension	Revised as per comment – see Appendix 1.6b.		

Consultation Authority	Issue	Concern / Comments	Action proposed
		within the ER Addendum.	
		Kirkton of Durriss – KM059 we note the “Water and Material Assets represent a significant negative impact due to the lack of WWT”. We would also highlight, as referenced in our MIR comments, the negative effects from constraints on potable water provision.	Revised as per comment – see Appendix 1.6b.
		Laurencekirk – KM104 has not been included (MIR: Redevelopment of former Mearns Academy Site).	KM104 added – see Appendix 1.6b.
		Marykirk – KM036 as per our comments on the MIR we do not support this site due to flood risk issues which should be recorded as significant negative if reassessed in ER addendum.	Revised as per comment – see Appendix 1.6b.
		Marykirk – KM084 – as per our comments on the MIR flood risk is a constraint here and we would have expected this to be highlighted as a negative in the summary text.	Revised as per comment – see Appendix 1.6b.
		Muchalls – KM018 as per our comment in the MIR, concerns regarding potable water capacity so water may have negative effect.	Revised as per comment – see Appendix 1.6b.
		Landward Bid Sites – KM050 we would refer you to our comments on the MIR relating to flood risk which would be an additional negative effect.	Revised as per comment – see Appendix 1.6b.
		KM044 we would refer you to our comments on the MIR relating to flood risk which should be considered a significant negative effect.	Revised as per comment – see Appendix 1.6b.
Scottish Environment Protection Agency	Appendix 1.7a: Preferred option for settlements in Marr LDP 2012	As a minor point would highlight that within the contents section on pages 2 of the ER this heading refers to ‘alternative option’ and not preferred option.	Noted.
		Cairnie – H1 has not been included (MIR: planning permission approved).	H1 added – see Appendix 1.7a.
		Clatt – H1 we would refer you to our comments on the MIR relating to waste water drainage concerns which should be considered a negative effect for water and material assets.	Revised as per comment – see Appendix 1.7a.
		Drumdelgie – M1 we would refer you to our comments on the MIR relating to	Revised as per

Consultation Authority	Issue	Concern / Comments	Action proposed
		waste water drainage concerns which should be considered a negative effect for water and material assets.	comment – see Appendix 1.7a.
		Finzean – EH1 we would refer you to our comments on the MIR relating to corner of the site being at flood risk which you may wish to consider a negative effect if reassessed in ER addendum.	Revised as per comment – see Appendix 1.7a.
		Inchmarlo – H1 we would refer you to our comments on the MIR relating to water abstraction which could be a negative effect for water and material assets.	Revised as per comment – see Appendix 1.7a.
		Keig – H1 we would refer you to our comments on the MIR relating to waste water drainage which could be a negative effect for water and material assets.	Revised as per comment – see Appendix 1.7a.
		Kincardine O’Neil – all allocations we would refer you to our comments on the MIR relating to waste water drainage which could be a negative effect for water and material assets.	Revised as per comment – see Appendix 1.7a.
		Logie Coldstone – M1 as per our comment on the MIR the ER makes reference to waste water drainage issues. We would therefore have expected a negative effect on water and material assets.	Revised as per comment – see Appendix 1.7a.
		Lumsden – all allocations we would refer you to our comments on the MIR relating to waste water drainage which could be a negative effect for water and material assets.	Revised as per comment – see Appendix 1.7a.-
		Monymusk – all allocations we would refer you to our comments on the MIR relating to waste water drainage which could be a negative effect for water and material assets.	Revised as per comment – see Appendix 1.7a.
		Ruthven – EH1 has not been included (MIR: No master plan, development framework or planning application has been received to date).	Revised as per comment – see Appendix 1.7a.
		Tarland – M1 we would refer you to our comments on the MIR relating to waste water drainage which could be a negative effect for water and material assets.	Revised as per comment – see Appendix 1.7a.
		Towie – H1 we note positive rating but would refer you to our comments on the	Revised as per

Consultation Authority	Issue	Concern / Comments	Action proposed
		MIR relating to waste water drainage and flood risk which could be a negative effect for water, material assets and climate change.	comment – see Appendix 1.7a.
Scottish Environment Protection Agency	Appendix 1.7b: Alternative Options for Settlements in Marr LDP 2013	Aboyne – Ma013 we would refer you to our comment on the MIR highlighting surface water flooding as an issue on this site.	Revised as per comment – see Appendix 1.7b.
		Alford – Ma050, Ma019, Ma036 and Ma034 we would refer you to our comments on the MIR relating to flood risk which would be a negative effect. Ma068 (removal of site) and Ma074 (reserve site for use car park) have not been included.	Text revised and Ma068 and Ma074 added – see Appendix 1.7b.
		Banchory - all allocations we would refer you to our comments on the MIR relating to waste water drainage and abstractions which are negative effects for water and material assets. Ma060 and Ma061 we would refer you to our comments on the MIR relating to flood risk which would be a negative effect. Ma017 has not been included (previously subject to examination).	Text revised and Ma017 added – see Appendix 1.7b.
		Drumblade – Ma009 we would refer you to our comments on the MIR highlighting flood risk which might have a negative effect.	Revised as per comment – see Appendix 1.7b.
		Finzean – Ma044 we would refer you to our comments on the MIR highlighting flood risk which might have negative effect.	Revised as per comment – see Appendix 1.7b.
		Glenkindie – Ma028 we would refer you to our comments on the MIR highlighting flood risk as a significant negative effect and prevents site from being suitable for development.	Revised as per comment – see Appendix 1.7b.
		Lumphanan – Ma042 we would refer you to our comments on the MIR highlighting flood risk as a negative effect.	Revised as per comment – see Appendix 1.7b.
		Torphins – Ma039 has not been included (MIR: allocated as BUS site and bid for change of use).	Ma039 added – see Appendix 1.7b.
		Landward site – Ma059, Ma035, Ma032, Ma023, Ma037 and Ma006 we would refer you to our comments on the MIR highlighting flood risk as a potential	Revised as per comment – see

Consultation Authority	Issue	Concern / Comments	Action proposed
		negative effect.	Appendix 1.7b.
Scottish Environment Protection Agency	Settlement options - MIR	We would take this opportunity to highlight that, as detailed in our MIR response, the inclusion of the following sites in the Plan would raise serious environmental concerns for us and as such should be assessed within the ER addendum as having significant negative effects. Flood risk: H1 Strichen, FM038 Middlemuir, H1 Cluny & Sauchen, EH1 Cluny & Sauchen, GA066 Cluny & Sauchen, H1 Inch, GA078 Inverurie, GA079 Inverurie, GA015 Inverurie, GA025 Kintore, EH2 Old Rayne, GA004 Old Rayne, KM036 Marykirk, KM037 Stonehaven, KM033 Netherly, KM029 Netherly, KM044 Waterside, MA028 Glenkindie, MA046 Huntly, MA014 Inchmarlo, MA005 Torphins, MA032 Alford. Waste water drainage – land and water environment: GA003 Durno. Landfill - air, water, land: Ma015 Cammieswood, Banchory.	Strichen, Cluny & Sauchen and Inch issues addressed in consultation with SEPA.
Scottish Environment Protection Agency	Appendix 1.8 Cumulative Effects of the Preferred Options	Query with regard to the statement ‘For Climate change, Green networks and biodiversity, safeguarding resources options, the effects are likely to be positive because of measures such as water saving technologies’. Water abstraction, especially from the River Dee is already an existing issue and as such even with water saving technologies any new development will exasperate this.	Revised as per comment – see Appendix 1.8.
Scottish Environment Protection Agency	Appendix 1.8 Cumulative Effects of the Preferred Options	Emphasis appears to be given to impact on soil from house building but due to the proliferation of small wind turbines developments in Aberdeenshire we would highlight wind energy projects as a potential area of impact that also needs to be considered referenced in the ER Addendum.	Revised as per comment – see Appendix 1.8.
Scottish Environment Protection Agency	Appendix 1.9 – Policy/Main Issue Assessment Criteria	Under positive effects we would have liked to see this include reference to avoidance as well as “sustainable flood management measures”.	Revised as per comment – see Appendix 1.9.
Scottish Environment Protection Agency	Appendix 1.9 – Policy/Main Issue Assessment Criteria	Under biodiversity we would have liked to see reference to removal of Invasive Non Native Species, especially water borne ones in so far as our interests are concerned under positive effects.	Revised as per comment – see Appendix 1.9.
Scottish	Appendix 10 – Bid	It is not clear if under water ‘Waste water drainage hotspots’ refers to SEPA’s	Revised as per

Consultation Authority	Issue	Concern / Comments	Action proposed
Environment Protection Agency	Assessment Criteria	Waste water drainage consultation areas. If so would suggest rewording so this is clearer in ER Addendum.	comment – see Appendix 1.10.
Scottish Environment Protection Agency	Appendix 2: Other Relevant Plans and Environmental Protection Objectives	Under water we would highlight that the Water Framework Directive has two aims to protect and improve so reference should be made to this under the main requirements column if updated in ER addendum.	Revised as per comment – see Appendix 2.
Scottish Environment Protection Agency	Next Steps	We are satisfied with the proposal for a 12 week consultation period for the next ER Addendum. As a minor point we highlight the errors under the expected time frame with reference to 2012 and 2013 instead of 2013 and 2014.	Noted. Amended in line with comment.

Table 5: Analysis of Comments on consultation on the draft environmental report

Consultation Authority/ Consultee	Issue	Concern / Comments	Action proposed
Historic Scotland	General Comment	We note that most of our comments provided at Main Issues Report (MIR) stage have been taken into account when producing the final ER. However, we consider that one area of shortfall within the ER relates to the historic environment policy assessment. Our comments on this aspect of the ER can be found in the Annex to this letter.	Noted
Historic Scotland	The Historic Environment	We note that the historic environment policy assessed within the ER (pages 27, 28 and 29) is not the same as the one appearing in the Proposed LDP. We therefore assume that an older version of Policy HE 1 was	The decision was taken to amalgamate the 5 Proposed Supplementary Guidance (SG) into two policies as a result of a letter from the Chief Planner, Scottish Government

		<p>appraised here. Regardless of this, we do not consider that either an older or a newer version would be appropriate for the inclusion in the Plan as it does not provide a clear or robust framework for assessing developments that could have an impact on the historic environment. We have concluded that the policy cannot successfully mitigate significant adverse impacts on the historic environment in its current form. We are therefore raising the historic environment policy as an unresolved issue and our fuller justification for this will be provided in the representation form.</p>	<p>“Development Plans – Supplementary Guidance” issued on 15 January, 2015, confirming they did not support placing detailed policy content in SG. To keep the Proposed Plan concise the proposed five SG were amalgamated into two policies. Most of the text in the previous Plan’s SG have been carried over into the proposed policies as separate paragraphs. Furthermore, there is repetition in Scottish Planning Policy (SPP) and Scottish Historic Environment Policies (SHEP) on designed landscapes and gardens, and battlefields, which have similar wording. For these reasons, the two policies are considered robust and not contrary to national policy, but for clarity, “and/or setting” will be added after “special character” in paragraph one of Policy HE2. For further information see Main Issues Report 2013, Position Paper 12 Historic Environment Policies.</p>
Scottish Natural Heritage	Non-Technical Summary, page 5, section headed ‘Environmental report’	Re: <i>“In August 2014 we published an interim environmental report alongside the Main Issues Report”</i> – we understand the correct date is October 2013.	Amended
Scottish Natural Heritage	Table 1.1 Assessment of Effects – (i) Water	Re: <i>“The scale of development envisaged is so large that the plan is likely to have long term implications for water abstraction...Although the [LDP] promotes water efficient technologies, the scale of water efficiency technologies envisaged may not be able to compensate for the volume and quality of water</i>	Addressed through the HRA

		<p><i>resources needed to support the allocations”</i></p> <p>The implication of this is that the issue needs to be addressed as part of the Habitats Regulations Appraisal (HRA) of the LDP in respect of the River Dee (SAC). It would be helpful to include a reference here to the HRA appraisal, and possibly also to the relevant section of the City & Shire SDP (page 31).</p>	
Scottish Natural Heritage	Table 1.1 Assessment of Effects – (ii) Biodiversity, flora and fauna	<p>Re: <i>“If we develop 30,000 new houses in the area, we must take some greenfield sites, fragment habitat and lose species and habitats and disturb other species”</i></p> <p>We recognise this is an attempt to write in non-technical language, but we consider that it exaggerates the scale of the impacts. This is because in practice, there are a range of approaches to development delivery that will mitigate the impacts. A well-designed development could actually enhance rather than ‘fragment’ habitat networks and with the right mitigation, species need not be disturbed. In order to address this, we suggest that information about mitigation should, wherever possible, sit alongside assessment of the impacts.</p>	<p>Amended</p> <p>Mitigation siting along assessment is a question of style and taste not law</p>
Scottish Natural Heritage	Table 1.1 Assessment of Effects – (iii) Population	<p>Re: <i>“The scale of the development is so large that if implemented, many people in Aberdeenshire will potentially find homes to buy or rent”</i></p> <p>This is a positive economic and social effect and therefore does not belong in an SEA. The positive effect of new homes on peoples’ health is covered under the assessment of the plan on Human Health.</p>	<p>The environment is both natural and built. Houses will be part of our built environment.</p>
Scottish Natural Heritage	Table 1.2 Mitigation Measures	<p>In broad terms mitigation for significant negative effects on water, soil, biodiversity and landscape is that general policies in the LDP will be applied through the development management process. The key will</p>	<p>Every planning application will be assessed on its merits against the LDP. Given that all policies of the plan applies, it would be inappropriate to repeat</p>

		therefore be for such negative effects to be identified at the DM stage and relevant protective policies applied. In order to support this process, we suggest that relevant development considerations and developer requirements are set out in the plan alongside site allocations, or are at least visible (and easily accessible) to development management staff	
Scottish Natural Heritage	Table 3.2 Settlement Strategy	An alternative (2) is stated here of “ <i>Alternative strategies may be promoted following a review of responses to consultation on the main issues</i> ”. This therefore needs bringing up to date because presumably alternatives (if appropriate) will have been considered as part of the proposed plan-making process	Updated
Scottish Natural Heritage	Table 4.3 Environmental Problems Relevant to LDP - (i) Biodiversity, flora and fauna	Under ‘Possible role of LDP’ it is stated that “ <i>Greater emphasis could be given to identifying, protecting and enhancing green networks</i> ” and “ <i>Water efficiency and the incorporation of water saving technologies could be promoted for all new development</i> ”. This again needs updating – have these measures been taken forward by the Proposed Plan? To what extent have existing environmental problems relevant to the plan been addressed in the preparation of the Proposed Plan?	Policy P2 Open space and access in new Development, Policy PR1 Protecting important resources, Policy C3 Carbon sinks and stores and Appendix 8 Settlement Statements refer to green networks. As part of the Vision for the LDP the LDP seeks “to promote the creation of green networks within and between settlements”. This is considered to be suitable and appropriate reference to green networks. Policy C1 Using resources in buildings states, “New developments in Aberdeenshire also need to achieve a Gold sustainability level in the case of domestic buildings, or BREEAM level 5 standard in non-domestic buildings, for water efficiency to achieve both environmental protection and reduce

			energy costs.” This provision is considered appropriate.
Scottish Natural Heritage	Table 4.3 Environmental Problems Relevant to LDP - (ii) Water	In terms of water abstraction from the River Dee, we suggest that the report highlights that the conservation status of one of the SAC qualifying interests (freshwater pearl mussel) is currently unfavourable	Updated
Scottish Natural Heritage	Table 5.2 Mitigation Measures Applied to Policies, SG and Sites – (i) Water	<p>Re: “<i>Preferred allocations listed in Table 5.3 will be strictly subject to the mitigation issues listed in this section</i>” – while this is welcome, how will this work in practice? We have suggested (in our plan representation) that the plan includes the following wording “<i>Development proposals must take account of the mitigation measures highlighted in the SEA</i>”</p> <p>Re: “<i>Water abstraction level should be agreed with SEPA, SNH and Scottish Water before development takes place</i>” – This is not a matter that should only be considered on a case-by-case basis. Rather, this is a key issue that will need fuller consideration as part of the Habitats Regulations Appraisal in respect of the effect of the plan on the integrity of the River Dee SAC. With regard to water abstraction affecting the River Dee SAC, we recommend that consideration is given to including Scottish Water and SEPA as parties responsible for mitigation. This is because they are responsible for water abstraction/licensing of water abstraction, and so could be expected to monitor compliance with the relevant water abstraction license(s) for the SAC.</p> <p>Notwithstanding the above, the Council will need to be able to confirm, based on up-to-date (and predicted for the levels of proposed development) water abstraction</p>	Issues is resolved with Scottish Water

		levels information (sourced from Scottish Water) and compliance with licensed abstraction (sourced from SEPA) that any proposed changes in abstraction that would arise from the proposed development allocations is still as described at the time the SDP was drawn up and remains achievable without having an adverse effect on the integrity of the SAC. Please refer to our comments on the HRA record for more details.	
Scottish Natural Heritage	Table 5.2 Mitigation Measures Applied to Policies, SG and Sites – (ii) Climatic Factors	Mitigation measures listed here include “ <i>Allocations for development should be directed away from peat and carbon-rich soils</i> ” and “ <i>Land should not be allocated for forestry activities and wind farms unless the benefits from those activities save more carbon than the peat soil displaced</i> ”. It would be helpful if such statements were brought in line with SPP, eg “ <i>Allocations for development were directed away from peat and carbon-rich soils</i> ”.	<p><i>Principles:</i> <i>Drainage and disturbance of peat releases CO2 (205 of SPP)</i> <i>Where damage has been done and conservation value is low (241 SPP)</i> <i>Changed in Report.</i> <i>Policy C3 on Carbon sinks to be changed</i></p> <p>Policy C3 is considered to be appropriate and provides suitable levels of protection in line with SPP. There is no need to repeat SPP word-for-word in LDP policy.</p>
Scottish Natural Heritage	Table 5.2 Mitigation Measures Applied to Policies, SG and Sites – (iii) Soil	There is no mitigation here for soil compaction, loss, sealing, erosion, degradation and there appears to be no protective policy in the Proposed LDP for soils.	The scale of impact is expected to limited. Prime agricultural land is protected through application of Policy PR1.
Scottish	Table 5.2	“ <i>Policy E1 Natural Heritage refers to Green Networks</i> ”	Policy E1 to be more explicit to be more

Natural Heritage	Mitigation Measures Applied to Policies, SG and Sites – (iv) Biodiversity	<i>and the need to protect and conserve habitats which contribute to them</i> ” – there does not appear to be any explicit reference to green networks in Policy E1 (instead there is some reference to green networks in Policies PR1 and P2).	explicit on green networks Policy P2 Open space and access in new Development, Policy PR1 Protecting important resources, Policy C3 Carbon sinks and stores and Appendix 8 Settlement Statements refer to green networks. As part of the Vision for the LDP the LDP seeks to “to promote the creation of green networks within and between settlements”. This is considered to be suitable and appropriate reference to green networks.
Scottish Natural Heritage	Table 5.3 Preferred Sites with likely significant effects on environmental receptors	(i) a note should be added under ‘Water’ that cumulatively all preferred sites supplied by water from the River Dee will have a likely significant environmental effect; (ii) the mitigation for all these sites with likely significant negative environmental effects is the application of mitigation measures as set out in the preceding table. For biodiversity this refers to – <ul style="list-style-type: none"> • Maintenance and enhancement of habitat links through masterplans. • Connectivity to green network. • Safeguarding of watercourses. • Application of ecological assessments and species surveys. • Requirement for enhancement strategies. • Compliance with relevant general protective and enhancement policies. <p>Although we welcome this, as noted above we wonder how this will be delivered in practice. Have development factors and developer requirements been</p>	Mitigation measure to be included alongside allocations A letter from Scottish Water which includes confirmation that “taking into consideration all proposed developments in both the City and Shire LDPs, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East”. Appendix 3 of the HRA summarises the changes made to the HRA Record, including the amendments made to address the issue of abstraction from the River Dee. SNH have also provided wording “A construction method statement will be required

		included alongside site allocations to ensure relevant protective general policies are applied?	to take account of the potential impacts to the qualifying interests of the River Dee SAC” be added to Logie Coldstone, Strachan, Tarland and Torphins Settlement Statements. This request has been accepted. SNH request that text is added to Aboyne, Finzean, Inchmarlo, Kincardine O’Neil, Logie Coldstone, Strachan, Torphins, Kirkton of Maryculter and Park Settlement Statements to refer to the nearby River Dee to highlight potential need for developer and planners to consider whether a proposal in these settlements may require an appropriate assessment. This request has been accepted.
Scottish Natural Heritage	Table 5.5 Monitoring Plan – (i) Water quantity	Under remedial action it is stated “ <i>Review development allocations, e.g. when drought condition suggests that water abstraction cannot cope with development</i> ”. More detail is required as to how this would work in practice, it raises the question of whether this is feasible occur within the lifetime of this plan if necessary and whether it is still in accordance with the predictions given at the time the SDP was drawn up need to be addressed.	Scottish Water suggest that there is water capacity to meet the needs of the proposed developments
Scottish Natural Heritage	Table 5.5 Monitoring Plan – (iii) Biodiversity	As well as habitats and species, we suggest the green network should be monitored, to identify whether the plan is successfully protecting and enhancing these areas. Reference to Policy 11 here should presumably be amended to Policy E1 (same for Landscape – Policy E2 rather than Policy 12).	Amended
Scottish	Appendix 1.1	Policy B1 Employment and Business Land: It is unclear	Amended to reflect negative impact

Natural Heritage	Policies and Supplementary Guidance	<p>why this is assessed as positive for landscape. Supplementary Guidance: Safeguarded Areas and Areas of Search for Minerals Development – it is unclear why this SG is assessed as positive for soil, biodiversity and landscape when its purpose is to identify land for present or potential future mineral working.</p> <p>Policy PR2 Protecting Important Development Sites – it is unclear why this policy is assessed as positive for biodiversity and landscape when it protects land for development.</p> <p>Policy RD1 Providing Suitable Services – it is unclear why this policy is assessed as positive for soil and landscape when it is concerned with the delivery of services and infrastructure for new development (e.g. roads, water and sewerage, waste management).</p>	<p>Amended to reflect negative impact</p> <p>Amended to reflect negative impact</p>
Scottish Natural Heritage	Appendix 1.2a Banff and Buchan Preferred Sites	<p>Fraserburgh OP2, OP3, BUS1, CC1, BUS4, P3 – it is unclear why these development sites for housing, employment, retail and business are assessed as significantly positive for landscape.</p> <p>Macduff BUS2, OP1 and CC1 – likewise it is unclear why these sites allocated for employment, housing or a commercial centre are assessed as significantly positive for biodiversity and/or landscape, unless the enhancement of landscape and biodiversity is a requirement of any masterplans.</p> <p>Rosehearty OP1 - likewise it is unclear why this site allocated for 50 houses is assessed as significantly positive for landscape, unless this is because of the requirement for strategic landscaping in the</p>	<p>Amended to reflect negative impact</p> <p>Amended to reflect negative impact</p> <p>Amended to reflect negative impact</p>

		masterplan.	
Scottish Natural Heritage	Appendix 1.3a Buchan Preferred Sites	Other sites assessed as significantly positive for landscape or biodiversity which are greenfield and hence where the rationale for the positive impact is unclear (e.g. there is no criterion for ++ assessments for landscape in Appendix 1.9) are – <input type="checkbox"/> Crimond OP1 (25 houses) <input type="checkbox"/> Mintlaw OP1 (500 houses, business, community, services for the elderly, neighbourhood retail centre, employment land) – it is unclear how this will “ <i>enhance the habitat of the South Ugie Water</i> ”	Amended to reflect negative impact Amended to reflect negative impact
Scottish Natural Heritage	Appendix 1.6a Kincardine and Mearns Preferred Sites	Chapelton of Elsick OP1 – some more commentary would be helpful here, given this is an allocation for 4045 houses etc, and given negative assessments for all but material assets, population and human health. Reference could be made to mitigation included in planning permissions. Portlethen R2 – park and ride facility – it is unclear why such development of a greenfield site is assessed as significantly positive for biodiversity. Stonehaven OP1 – it is unclear why this proposed housing development (110 houses) on greenfield land is assessed as significantly positive for biodiversity, especially as this site is near the confluence of Toucks Burn and Carron Water, with associated habitat margins. Can reference be made to biodiversity enhancement measures in the approved masterplan?	Commentary provided Amended to reflect the impacts Amended to reflect the impacts
Scottish Natural Heritage	Appendix 1.7a Marr Preferred Sites	Banchory OP2 and R3 – from a desk appraisal the western part of OP2 (west of Hill of Banchory) and R3 are wooded (ancient woodland – type 2b, long established, of plantation origin), implying significant	Amended to reflect the impacts Amended to reflect the impacts

		<p>loss of ancient woodland here. This does not appear to be reflected in the assessment re biodiversity and landscape.</p> <p>Kincardine O'Neil OP3 and OP2 – these sites are either adjacent or close to the River Dee SAC (including Neil Burn) which should be referred to as part of the biodiversity assessment.</p> <p>Torphins OP1 – this site is close to the River Dee SAC (including Beltie Burn) which should be referred to as part of the biodiversity assessment. (The site is assessed again as MA039 in Appendix 1.7b where it is assessed as significantly negative for biodiversity, because of its close proximity to the SAC).</p>	Amended to reflect the impacts
Scottish Natural Heritage	Appendix 1.8 Cumulative Effects of the Preferred Options	<p>Water (assessed as +/- -) – we are unsure of the meaning of “<i>Developments under the current LDP 2012 are supported by agreements reached with SNH, SEPA and Scottish Water under the LDP</i>”. Please see above comments re need for Habitats Regulations Appraisal to consider this matter more thoroughly. If this refers to our understanding of the situation at the time the City & Shire Strategic Development Plan was drawn up it should say so. If not, it should confirm that the predicted demand for abstraction from the River Dee during the life of the LDP still remains as it did at the time the matter was addressed by the SDP.</p> <p>The need for the HRA to tackle this issue in a comprehensive and transparent way is highlighted here by such statements as “<i>Increased requirement for water abstraction will lead to adverse effects on River Dee as well as protected species through time lag effects Water resources could be over-exploited if a combination of measures is not put in place to tackle it</i>”</p>	Resolved

		<p>..... The scale of development is so large that the LDP is likely to have long-term implication for water abstraction depending on how the LDP is implemented</p> <p>..... Although the LDP promotes water efficiency technologies, the scale of water efficiency technologies envisaged may not be able to compensate for the volume and quality of water resources needed to support the allocations”.</p>	
Scottish Natural Heritage	Appendix 1.8 Cumulative Effects of the Preferred Options	<p>Soil (assessed as +/-) – it is unclear why soil sealing, compaction and loss is considered a short-term effect only, rather than long term. It is stated that there will be significant adverse effects on Aberdeenshire soils, and that the scale of development is large scale. However there appears to be no mitigation to reduce this negative effect. For example there doesn't appear to be any policy in the Proposed LDP to safeguard soil quality.</p>	<p>Safeguarding soil quality is considered under a number of policies. Impact on soils from hill tracks and mineral extraction mitigation is considered under Policy R3 Minerals and Hill Tracks. Prime Agricultural land and woodland loss are considered under Policy PR1 Protecting important resources, and high-carbon peat rich soils are protected under Policy C3 Carbon sinks and stores. Policy E1 Natural heritage requires any impacts to be suitably mitigated.</p>
Scottish Natural Heritage	Appendix 1.10 Allocation/Bid Assessment Criteria	<p>Water - we suggest if a proposal is able to connect to WWTW with adequate capacity this should be assessed as neutral rather than positive. A positive effect would be where a WWTW would be upgraded to a higher standard as a result of investment stimulated by increased demand.</p> <p>Biodiversity – likewise in we suggest proposals that conserve, protect or maintain habitats/species should be assessed as neutral rather than positive. Proposals that enhance habitats/species can be assessed as positive.</p>	<p>The matrices are amended consistent with SNH comments at the MIR stage “where waste water would be treated to a higher standard before discharge” and under biodiversity to “enhance habitats/species can be assessed as positive”</p>
Scottish	Appendix 3.5 –	Data from the Native Woodland Survey of Scotland can	Added

Natural Heritage	Biodiversity, flora and fauna	be added – there are 37,855 ha of native woodland in Aberdeenshire, which is 6% of the land area (includes the Cairngorms National Park area within Aberdeenshire) – see - http://scotland.forestry.gov.uk/supporting/strategy-policy-guidance/native-woodland-survey-of-scotland-nwss/reports	
Scottish Natural Heritage	Appendix 3.28 – Peat Land	A new spatial dataset should shortly be available (in approved rather than draft form) – carbon-rich soil, deep peat and priority peatland habitat - http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/ .	Not available at this time.
Scottish Environment Protection Agency	Outline and Objectives of the Aberdeenshire LDP 2017	We welcome that the implications of the National Planning Framework for Scotland 3 and Scottish Planning Policy, published in June 2014, after the publication and consultation on the Main Issues Report and Main Issues Report Addendum, have been considered.	Noted
Scottish Environment Protection Agency	Outline and Objectives of the Aberdeenshire LDP 2017	1.2 We note, from the statements within the ER, that much of the information contained within the supplementary guidance policy from the current LDP 2012 is now included within the proposed plan and that this change has been implemented following advice received from the Scottish Government. As such it is welcomed that changes to policy content have been noted within table 3.3.	Noted
Scottish Environment Protection Agency	Outline and Objectives of the Aberdeenshire LDP 2017	1.3 However, we note within Table 3.3, under Policy C2 Renewable Energy, the statement that “This policy seeks to approve, subject to other policies,	The Climate Change Proposals map was produced as a reflection of the Scottish Minister’s expectation that the LDP (LDP)

Agency	LDP 2017	<p>wind farms and medium to large turbines following appropriate consideration of the Spatial Framework for wind turbines;...”.</p> <p>As per our comments on the Proposed Plan (our reference PCS/139374) and the draft ER (our reference PCS/138431) we would highlight that Table 1 Spatial Framework is now included within the new Scottish Planning Policy (2014) and that in so far as our interests are concerned, Table 1 affords carbon rich soils, deep peat and priority peatland habitat the same level of protection as wild land. This does not appear to have been taken into consideration in the ER.</p>	<p>should employ a range of graphical techniques to convey the strategy and individual policies and proposals in an accessible way (Circular 6/2013: Development Planning, paragraph 79). The proposals maps illustrates a number of spatial climate change policies. Information is available as planning advice at high resolution. There is no need to provide a higher resolution map in the Plan (Schedule 4 Issue 4 Climate Change).</p> <p>SNH Carbon and Peatland Map (types 1 and 2) is yet to be published and therefore can not be included within the proposals maps.</p>
Scottish Environment Protection Agency	Outline and Objectives of the Aberdeenshire LDP 2016	As a minor point, we highlight that under Table 3.2 Alternative 2 makes reference to “Alternative strategies may be promoted following a review of responses to consultation on the Main issues” rather than consultation on the Proposed Plan Policies and Supplementary Guidance.	Amended
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	We reiterate the comments from our draft ER response that, under National, Table 4.1 makes reference to National Planning Framework for Scotland 3 (NPF3) (2014), National Planning Framework for Scotland 2 (NPF2) (2009), Scottish Planning Policy 2014 and Scottish Planning Policy 2010. Page 1 of Scottish Planning Policy 2014 states “This SPP replaces SPP (2010) and Designing Places (2001)”. As such the ER should make it clear that while the previous	Amended

		superseded SPP and NPF provided the framework for the previous plan the current version of SPP and NPF3, only, informs the framework for the 2016 plan. We note that only NPF3 and SPP 2014 are referenced in Appendix 2.	
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	2.2 As per our previous advice, under the Water Section of the table we welcome the reference to our new flood maps, published in 2014. However we note reference is still made to SEPA Indicative Flood Map 2006. As site assessments of flood risk have been made against the 2014 SEPA flood maps we would like to see the reference to the 2006 maps removed. We note that both the 2006 and 2014 maps are referenced in Appendix 2.	Amended
Scottish Environment Protection Agency	Plan, Programme or Strategy Context	2.3 For future reference and a point we did not pick up under the MIR ER, we highlight the reference under the Overarching Planning Policy section of Table 4.1 to the omission of the word etc under the Planning etc (Scotland) Act 2006.	Amended
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	We reiterate the comments from our draft ER response that, under the Water section of Table 5.2, the mitigation column states "Water abstraction level should be agreed with SEPA, SNH and Scottish Water before development takes place." The issue of water abstraction has been discussed with Scottish Water, Aberdeenshire Council and SEPA at a meeting at Woodhill House on 15 September 2014. It is our understanding that Scottish Water have made an assessment of all the allocations within the local plan MIR and advised Aberdeenshire	Resolved with Scottish Water

		Council of any water abstraction capacity constraints to development.	
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	3.2 While we agree with the Assessment of Effect in Table 1.1 that “the scale of development envisaged is so large that the plan is likely to have long-term implication for water abstraction” we do not consider it appropriate to include SEPA in this mitigation /enhancement measure. It will be up to Scottish Water to advise Aberdeenshire Council if they have available abstraction capacity, within their existing SEPA consented abstraction limits, to meet the allocations in the proposed plan and agree abstractions levels with the developer/Aberdeenshire Council for each development. As such we recommend this section is amended to “Water abstraction level should be agreed with Scottish Water before development takes place.”	SEPA is removed from the mitigation
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	3.3 In Section 5.1 of our response to the MIR ER we stated that “Under climatic factors it states “Flood risk can be mitigated through the use of buffer strips/open space. In future work you may wish to consider referencing other flood risk mitigation measures such as landraising and compensatory storage.” The SEPA consultation response section of Table 5.7 states “noted and revised in line with comment – see Table 4.3.”	Reference is made to landraising and compensatory storage as well
	Assessment, Mitigation and Monitoring	In regard to this we note within Table 5.2, under the mitigation and enhancement column for Climatic Factors, the statement that “Sites included in LDPs should serve to protect areas likely to be at risk from flooding (i.e. through the use of buffer strips, open	Removed

		space, landraising and compensatory storage)”. In this context we would highlight that this reference is not appropriate. The cornerstone of sustainable flood management is the avoidance of flood risk in the first instance. As such the use of buffer strips and open space would meet this. However as per paragraph 265 of Scottish Planning Policy “Land raising should only be considered in exceptional circumstances, where it is shown to have a neutral or better impact on flood risk outside the raised area. Compensatory storage may be required.” We therefore recommend this section is amended to remove the references to landraising and compensatory storage in the finalised ER.	
Scottish Environment Protection Agency	Assessment, Mitigation and Monitoring	3.5 In regard to Soil and ‘where can the information be obtained’ column we would refer you to the comments in Section 4.38 of our Proposed Plan response regarding the Scottish Natural Heritage (SNH) mapping exercise to define areas of ‘carbon rich soils, deep peat and priority peatland habitats’ which will update earlier work undertaken (currently published on the Scotland’s soils website). We would recommend reference to the SNH map being included here.	Added
Scottish Environment Protection Agency	APPENDIX 1: ASSESSMENTS	We note from Table 3.4 that “Existing LDP (2012) allocations will be carried forward into the Proposed LDP. Where appropriate new sites have been identified and assessed (Detailed assessments in Appendix 1.2- Appendix 1.7).” In line with our previous advice we welcome that the site allocations in the Proposed Plan have now all been assessed.	Noted

Scottish Environment Protection Agency	APPENDIX 1: ASSESSMENTS	4.2 We would however also advise that, based on the most recent review, we have now requested that further information, or an FRA, be provided for the following sites: Sandend OP1, OP8 Inverurie, Keithhall OP1. We note from the statement within Section 5.4 that “The mitigation measures have taken into account all comments made following consultation on the scoping report. If our position has changed by the time we are preparing the proposed plan, these measures will be changed accordingly.” We welcome this and request that the assessment of these sites be reviewed and updated, with regard to flood risk and appropriate mitigation, in the finalised ER.	SEA updated. Relevant Settlement Statements updated (Schedule 4 Issue 16: Settlement Statements). The SFRA does not require to be updated at this time.
Scottish Environment Protection Agency	APPENDIX 1: ASSESSMENTS	4.3 We note that the Proposed Plan includes Settlement features, including protected land, for example P3 Memsie for the construction of a new primary school, reserved land, for example R1 Gourdon reserved for future cemetery expansion, other designations, for example BUS 1-5 Fraserburgh. We are of the understanding that the inclusion of the ‘Settlement Features’ in the Proposed Plan establishes the principle of these sites and their proposed use in the LDP, although, the detail of these would need to be supported by a planning application for those that include built development.	All settlement features have been assessed
Scottish Environment Protection Agency	APPENDIX 1: ASSESSMENTS	4.4 Some of the Settlement Features are included in the Assessment of Sites in the ER, however not all of them are. For example for Westhill, R1 is assessed however R2 and	All settlement features have been assessed

		BUS are not. It is not clear why some of these settlement features, which may include future built development, have been included and why others have not. This raises serious concerns for us if the principle of future land use on these sites is established however the environmental impact, for example from flood risk, is not assessed. For example we have objected to the Proposed Plan unless wording is added highlighting the requirement for assessment of flood risk for P3 Memsie, however P3 Memsie is not included in the ER assessment tables.	
Scottish Environment Protection Agency	APPENDIX 1: ASSESSMENTS	PAN 1/2010 <i>Strategic Environmental Assessment of Development Plans</i> makes it clear that the SEA should assess the significant environmental effects of all the sites in the Plan and Paragraph 4.21 of the PAN highlights that "a comprehensive approach will help to avoid further assessment and delay at a later stage". As such, while we are satisfied that the site allocations have been assessed, we would recommend that within the finalised ER an explanation is provided on why some of the Settlement Features, such as reserved land, have not been SEA assessed and others have.	All settlement features have been assessed
Scottish Environment Protection Agency	APPENDIX 1: ASSESSMENTS	4.6 As a minor point we highlight under Appendix 1.1a 'Assessment of sites APPENDIX 1: ASSESSMENTS, Appendix 1.1 Policies and Supplementary Guidance' the incorrect reference on page 112 to Policy H1 Protection of historic buildings, sites, and monuments, Policy H2 Protection of historic and cultural areas, Policy H3 Helping to reuse listed buildings at risk which	Amended

		are referenced in the Proposed Plan as HE1, HE2 and HE3 respectively.	
Scottish Environment Protection Agency	APPENDIX 1: ASSESSMENTS	4.7 In addition we would highlight that we recently updated our website and therefore unfortunately the SEPA web links in the ER, for example http://www.sepa.org.uk/water/river_basin_planning/waterbody_data_sheets.aspx in Appendix 1.10, no longer work.	Noted and changes made
Individual	APPENDIX 1.5b: Alternative option for settlements in Garioch 2013	In the response from SEPA it is stated that they have serious concerns regarding the future development in Durno and the council state that development will place Durno further over capacity. A Scottish Office Reported in a previous plan stated that drainage issues will preclude further development in Durno. Durno is saturated by the cumulative impacts of septic tanks an issue the council is obliged to take serious note of and plan accordingly. Given the concerns it is not seen how further development in Durno can be classed as a positive impact on human health. The current residents will be impacted on negatively due to sewage, noise and light pollution and more vehicles on the narrow road.	Amended to neutral impact.
Scottish Water	Appendix 1.9 Policy Assessment Criteria and Appendix 1.10 Allocation/ Bid Assessment Criteria	The link for the Scottish Water's Asset Capacity Search Tool also needs updated to the following link. This link appears on. https://www.scottishwater.co.uk/business/connections/connecting-your-property/assetcapacity-search . However, it is currently offline while enhancements are made to its functionality.	Updated

Scottish Water	4.1 Relationship with other PPs and environmental objectives, Table 4.1 and Appendix 2 Other Relevant Plans and Environmental Protection Objectives, Table 2.1.	References should be updated: The Strategic Asset Capacity Demand Plan (2009) referenced on these two pages is updated annually. The 2015 version can be found here: - https://www.scottishwater.co.uk/assets/business/files/connections%20documents/asset%20capacity%20search/2015sacdpreport.pdf . At the time of publication the number of public wastewater treatment works were recorded as 1836 and 256 for water treatment works.	Updated.
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The environmental report was amended to reflect recommendations by the Reporter following examination in public of the proposed LDP.

6 Reasons for Adopting the Local Development Plan

6.1 The consideration of alternatives during the SEA process and the consultation on these documents had a significant influence on the content of the proposed LDP. The process strengthened and clarified policies and ensured that an appropriate social, economic and environmental balance was struck. Consistent with Section 18(3)(e), this LDP is adopted in the light of other reasonable alternatives discussed in the environmental report on the basis of the following reasons:

- The preferred options are more consistent with other relevant plans, policies and environmental protective objectives at international, national, regional and local levels than their alternatives. For example, they are consistent with the Scottish Planning Policy and Aberdeen City and Shire Strategic Development Plan 2014.
- They are less likely to have long-term irreversible significant effects on the environment.
- The negative effects within the preferred options are more likely to be easily mitigated than those within other alternatives considered.
- The assessment indicates that the preferred sites are more likely to have long-term positive effects than the alternative sites.
- The preferred options have more in-built protective policies than their alternatives.
- The alternative strategies and policies are less likely to be amenable to consultation outcome than the preferred options.
- The preferred options are more environmentally, socially and economically feasible to implement than the alternative options; as they promote sustainable development.

7 Monitoring Measures

7.1 Aberdeenshire Council is required under to Section 18(3)(f) of the Environmental Assessment (Scotland) Act 2005 to monitor the significant environmental effects when the plan is implemented. This monitoring will include the provision of information on the measures that are to be taken to monitor for any unforeseen environmental effects so that appropriate remedial action may be taken. The following are proposed actions listed in the monitoring framework. An annual monitoring report will be prepared to constantly monitor the significant effects. The framework for monitoring the significant effects of the implementation of the plan is shown in the Table 6 below. The monitoring data will be incorporated into the LDP.

- The strategy will be monitored on an ongoing basis and reviewed yearly where lessons will be learned for the next review.
- When planning new projects that will be required to implement the Plan, further assessments will be conducted to establish any potential and unexpected environmental effects.
- As a requirement of the LDP, officers and teams listed in the monitoring table will monitor and review process and make changes where necessary, particularly where unforeseen issues may arise. It will be part of the LDP's action programme in general.

Table 6: Monitoring Plan

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
Air quality	Reduction in nitrogen dioxide (NO ₂) and particulate emissions.	Aberdeenshire Council <i>Local Air Quality Management: Progress Reports</i> . LDP Monitoring of Objective 2 on integrated land use and transportation.	Whenever the plan is reviewed	Transportation and Infrastructure (T&I) and Planning and Environmental Services (P&ES) of Aberdeenshire Council	Biennially	Review the development allocations.
Water quality	Improvement to water quality and maintain the ecological status of fresh water bodies in rivers and the coastline.	SEPA (bathing and river water quality and abstraction rates of the River Dee) River Basin Management Plan (SEPA)	When the water quality of particular water bodies has not improved or suddenly deteriorates.	SEPA	Annually	Review the Action Programme of the local development plans. Review development allocations
	Increase in the number and duration of bathing water areas passing Bathing water quality EC Guideline Standards.					
Water quantity	The extent to which water abstraction can support projected housing numbers Compliance with	SEPA (bathing and river water quality and abstraction rates of the River Dee) River Basin	When drought condition suggest that water abstraction cannot cope with development	SEPA and Scottish Water	Annually	Review development allocations

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
	abstraction licenses consented by SEPA	Management Plan (SEPA)				
Soil Carbon-rich soils including peat	The extent to which wind farms and other renewable energy projects are likely to disturb carbon rich soils and peat Development on carbon-rich soils	JHI, SEPA and SNH JHI data maps Proposed Land Use Strategy Pilot	When more applications submitted for wind farms fall on carbon rich soil	SNH, Aberdeenshire Council Development Management	Annually	Review development allocations
Soil	Remediation of contaminated land	Aberdeenshire Council <i>Contaminated Land Strategy, Public Register of Contaminated Land</i> and GGP overlay: <i>Potentially contaminated sites Carbon-rich soils, deep peat and priority peatland habitats map consultation</i> " See http://www.snh.gov.uk/docs/A1495150.pdf	If the number of contaminated sites/land has not reduced annually.	P&BS of Aberdeenshire Council (Planning Policy)	Annually	Review the Action Programmes of the local development plans. Review local development plans policies and/or prepare SG.
	Reduction in the area of Prime agricultural land developed	Planning applications	When the plan is reviewed or when it is identified that	P&ES of Aberdeenshire Council	Annually	Review local development plans policies, allocations

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
			planning permission is being granted for development not in accordance with policy.	(Sustainability, Information and Research and Planning Policy)		and/or prepare SG.
	Meeting Landfill Allowance Targets.	SEPA (quarterly Landfill Allowance Scheme)	If the level of Biodegradable Municipal Waste sent to landfill sites does not decline in accordance with the EC Landfill Directive.	SEPA	Annually	Review the Action Programme of the local development plan. Review local development plans policies & SG (on waste management facilities).
Biodiversity	The number of notified or qualitative interests (e.g. protected habitats and species) adversely affected by new development. Protected Habitats including non-designated habitats such as annex 1 habitats, ancient, long established an semi-	Local Development Plan monitoring of Policy E1 (planning applications)	When proposals are supported as departures from local development plan policies.	P&ES of Aberdeenshire Council (Environment and Planning Policy)	Annually	Review local development plans policies

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
	natural woodland and BAP priority habitats					
Climatic factors	Reduction in the North East's global (energy) footprint.	North East Scotland Global Reduction Footprint Report	When the development plan or supplementary guidance is reviewed.	P&ES of Aberdeenshire Council (Sustainability, Information and Research)	Biennially	Review local development plans policies.
	Modal shifts – vehicle counts and cycle counts	Transport for Scotland, Local Transport Strategy	When car dependence is increasing	P&BS of Aberdeenshire Council (Planning Policy) Local Transport Strategy team	Annually	Review local development plans policies related to transportation
	Reduction in the number of properties at risk from flooding (pluvial, fluvial or tidal).	Flood Prevention and Land Drainage (Scotland) Act 1997 Biennial Reports Shoreline Management Plan (once produced)	When the development plan is reviewed.	T&I of Aberdeenshire Council	Biennially	Review local development plans policies and allocations
Human health and Population	Improvement to the issues highlighted in the <i>Scottish Index of Multiple Deprivation</i> affecting Aberdeen and Aberdeenshire.	Scottish Index of Multiple Deprivation	When the development plan is reviewed.	P&ES of Aberdeenshire Council (Sustainability, Information and Research)	Biennially	Review the local development plan policies and land allocations.

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
	<p>Increase in the number of planning permissions granted for the different housing types.</p> <p>Increase in the number and tenure of dwellings built.</p>	<p>Local Development Plan monitoring of Policy 5 (Housing)</p> <p>Housing Land Audit (densities)</p>	<p>When the development plan is reviewed.</p>	<p>P&ES of Aberdeenshire Council (Sustainability, Information and Research) and Planning Policy).</p>	<p>Annually</p>	<p>Review the local development plan policies, land allocations and SG.</p>
<p>Cultural heritage</p>	<p>Reduced numbers of historic buildings registered as 'at risk'.</p>	<p>Buildings at risk register for Scotland (website)</p> <p>Local Development Plan monitoring of Policy 13 (historic environment).</p>	<p>When the number of buildings on the 'at risk' register remains static or increases.</p> <p>When proposals are supported as departures from local development plan policy on the historic.</p>	<p>P&ES of Aberdeenshire Council (Environment and Planning Policy)</p>	<p>Annually</p>	<p>Review the local development plan policies and land allocations and/or prepare SG</p>

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
Landscape	Reduction in the number of planning applications granted planning permission either as departures or against officers' recommendation. For example where: new developments individually or cumulatively adversely affect designated landscapes; & the insensitive siting and design of new developments adversely affect the landscape and townscape setting.	Local Development Plan monitoring of Policy E2 (landscape) (planning applications)	When proposals are supported as departures from local development plan policies.	P&ES of Aberdeenshire Council (Sustainability, Information and Research and Planning Policy)	Annually	Review local development plans policies and land allocations and/or prepare SG
Material assets	Increase in the number of waste management facilities built that address the need identified in the Area Waste Plan.	Local Development Plan monitoring of Objective 4 on sustainable communities (SEPA, quarterly Landfill Allowance Scheme Data).	When requirement set out in the North East Area Waste plan are not being delivered in lower tier plans.	SEPA P&ES of Aberdeenshire Council (Planning Policy)	Annually	Review the Action Programme of the local development plan. Review the local development plan policies, land

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
						allocations and/or SG for waste management facilities.
	Increase and enhancement in the number of wastewater treatment works and water works built.	Scottish Water SEPA	When land allocations are constrained.	P&ES of Aberdeenshire Council (Planning Policy)	Annually	Review the Action Programme of the local development plan. Review the settlement strategy and/or core objectives. Review the local development plan policies and/or land allocations.
	Decrease in waiting list figures for affordable housing.	Council housing waiting lists	When the waiting list figures for affordable housing remain static or increases.	Housing and Social Work of Aberdeenshire Council	Annually	Review the settlement strategy and/or allocations. Review the local development plan policies.
	Increase in redevelopment of brownfield sites.	Employment and Housing Land Audits Scottish Annual	When the amount of brownfield land remains static or	P&ES of Aberdeenshire Council	Annually	Review the Action Programme of the LDP

What needs to be monitored? (e.g. effects)	What sort of information is required? (Indicators)	Where can the information be obtained?	When could the remedial action be considered?	Who is responsible for undertaking the monitoring?	How could the results be presented?	What remedial actions could be taken?
		Vacant & Derelict Land Survey	increases.	(Sustainability, Information and Research)		Review the plan's policies and/or land allocations.
	Increase in the use of sustainable materials in new build and retrofit in planning applications.	Housing Land Audit (densities) LDP monitoring of Policy 8 (design)	When proposals are supported as departures from LDP policies on sustainable development.	P&ES of Aberdeenshire Council (Sustainability, Information and Research and Planning Policy)	Annually	Review the core objectives. Review the local development plan policies.

8 Conclusion

- 8.1 It is our view that this SEA has had a positive effect on the development of the LDP. The SEA process has identified some possible negative effects on the environment; effects that were not anticipated at the start of the planning process. The process has, therefore, enabled mitigation measures to be devised to address negative effects incorporated into the Plan. With the incorporation of mitigation measures and ongoing monitoring of the significant effects of the LDP, it is considered that the proposals included in the LDP are the most suitable alternatives to allow for sustainable economic growth in Aberdeenshire in line with the requirements of the SDP and national policy. Through mitigation measures incorporated in the LDP these negative impacts will be prevented, reduced or compensated for whilst implementing the LDP
- 8.2 Overall the environmental assessment has helped to guide our preference for development options and alternatives, and it has helped us to reword the LDP and clarify the main policy issues. The LDP will need to take account of these mitigations measures during the implementation of the LDP. We believe the SEA process has significantly helped in developing a balanced LDP. This, in turn, will ensure that future development will support economic growth, protect and enhance the environment including mitigation effects on climate and make improvements to the social wellbeing of the residents of Aberdeenshire.