

Our ref: PCS/135191
Your ref:

If telephoning ask for:

18 September 2014

Fiona Thompson
Policy Team
Planning and Building Control
Infrastructure Services
Aberdeenshire Council
Woodhill House
Westburn Road
Aberdeen
AB16 5GB

By email only to: ldp@aberdeenshire.gov.uk

Dear Ms Thompson

**Aberdeenshire Local Development Plan 2016
Main Issues Report Addendum 2014**

Thank you for your consultation email regarding the publication of the Main Issues Report (MIR) Addendum for the Aberdeenshire Local Development Plan (LDP), which we received on 7 August 2014. We welcome the opportunity to comment on this document and on the new sites which Aberdeenshire Council are minded to add to the Proposed Local Development Plan, and which were not included as "development bids" to the 2013 Main Issues Report.

The attached Appendix 1 contains our comments/answers to those questions set out in the MIR Addendum which have direct relevance to our interests, with Appendix 2 setting out a table with detailed comments on each of the proposed new site allocations.

If you have any queries relating to this letter, or would find it beneficial to arrange a meeting with us to discuss any of our comments, or for us to provide informal comments on any of the work you are currently undertaking on the proposed plan please contact me by telephone on 01224 266656 or e-mail at planning.aberdeen@sepa.org.uk.

Yours sincerely



Planning Service

SUBMISSION No.		038
ISSUES RAISED		
8/1	2	3
4	5	6
SUPPORTING DOCS		



Chairman
David Sigsworth
Chief Executive
James Carran

Aberdeen Office
Inverdee House, Baxter Street
Torry, Aberdeen AB11 9QA
tel 01224 266600 fax 01224 896657
www.sepa.org.uk

Appendix 1: SEPA comments on general main issue/policy questions

1. General comments

1.1 We welcome the opportunity to comment on the Main Issues Report Addendum which addresses new issues raised as a result of the publication of the final Scottish Planning Policy.

2. Section 2: Wind Energy (previously Main Issue 5)

Q1: Do you have any comments on the Revised Spatial Framework for Wind Energy Development, or the proposal to require the development industry to assess the “visual envelope” of settlements through the planning application process?

2.1 We note “the requirement in Scottish Planning Policy to identify the “visual envelope” of settlements” and that as you are unable to do this have shown on the Revised Spatial Framework for Wind Energy Development the area in which such an assessment should be undertaken. As visual impact is an issue out with our remit we have no comments on the revised Spatial Framework for Wind Energy or the proposal to require the development industry to assess the “visual envelope” of settlements through the planning application process.

8/1
2.2 We note however, the statement within the Actions Section of Issues and Actions Paper 10: Issue 5 Wind Energy that “additional policies are proposed to protect carbon sinks such as peat-lands, but protection of “groundwater dependant ecosystems” would seem to be an onerous level of protection that is well beyond the Natural Heritage policies of the plan.” While we agree that the existing Natural Heritage policies in the 2012 Aberdeenshire Local Development Plan do not provide for protection of groundwater dependent terrestrial ecosystems (GWDTE’s), SG Safeguarding 1: Protection and conservation of the water environment covers protection of water bodies and as a water body GWDTE’s would be covered under this policy.

8/1
2.3 As per Section 6.1 of our correspondence of 31 January 2014 to the Main Issues Report (MIR) (our reference PCS/130260), we would however like to see specific reference made to avoidance of impacts on groundwater dependent terrestrial ecosystems within the emerging plan policies or supplementary guidance.

3. Section 3: Heat Networks

Q2: Do you agree with the preferred approach to promoting heat networks and district heating within the Local Development Plan?

2
3.1 We support the Preferred Approach to incorporate heat mapping into the Climate Change policy, and the inclusion of a map showing indicative overviews of heat supply and demand in the local authority area.

2
3.2 We also support the Preferred Approach to encourage heat networks through the Climate Change policy with specific supplementary guidance provided. We **recommend** that the requirements and recommendations of the policy and guidance are clear that they apply to all types of development – for example all types of major development, and all types of smaller development.

4. Section 4: Land Supply and Distribution (Previously Main Issue 12)

Q3: Do you agree with the assessment of land supply in light of the updated information? If not, please explain why.

- 4.1 We note the statement in Section 4.7 of the MIR Addendum that “Scottish Planning Policy requirements therefore now place a greater onus on ensuring that allocations in the 2016 Local Development Plan are expected to be deliverable” and within Section 4.8 that “we therefore continue to be confident that the sites that are currently allocated are deliverable”.
- 4.2 We have no comments on the assessment of land supply or whether this provides a strategic justification to allocate additional development land but would refer you to Appendix 2 of our response of 31 January 2014 to the MIR where we have highlighted any sites we have identified as having a constraint to development, such as flood risk, that may prevent all areas within the site boundaries being available for development.
- 4.3 In addition we would prefer to see allocations identified where there is existing capacity at the sewage treatment works and in the network, or a growth project has already been identified with a programmed delivery date that allows the development to connect without a significant downturn in performance at the work for a time period exceeding a reasonable improvement schedule.

Appendix 2: TABLE 1

Additional Development Sites to Meet Local Needs

Site Name	Increasing vulnerability (if brownfield)	Site within Potentially Vulnerable Area	Allocation potentially at medium to high risk of flooding (Within or adjacent to indicative 1 in 200 flood outline) or at flood risk from another source	Watercourse catchment less than 3km ² hence not modelled in Indicative Flood Map	Potential development of allocation could increase the probability of flooding elsewhere	Additional Information SEPA holds e.g. historic record of flooding from any source / post flood survey / Approved Local Authority or SEPA Flood Studies	Formal flood defences present and current standard of protection	Flood risk detailed comments	Flood Risk: Mitigation required by SEPA to make the site acceptable		Detailed comments on Water Environment and other constraints
								Detailed comments including aspects for consideration in site specific FRA e.g. Structures complicate Flood Risk at site e.g. bridges, culverts etc	Recommend removal from plan (detailed report required)	Assessment of flood risk required	
4 Portsoy BaB101	No	No	No	No	No	Very small area of surface water flooding identified. Would not pose any constraints.	No	No detailed comments.	No	No	Waste Water drainage would require connection to public sewer – consult Scottish Water for advice on available capacity.
OLDMELDRUM Concerns about capacity of the works at Oldmeldrum for any additional development. Advice should be sought from Scottish Water regarding any proposed improvement plans, and whether it will be necessary to have a temporary treatment option. Would only support development involving a temporary treatment system if a planned upgrade has been programmed as have a presumption against private treatment works in networked areas.											
5 Oldmeldrum FM101	n/a	No	No	adjacent to site	No	No	No	Site bordered by a drainage ditch but gradient is steep so unlikely to pose significant risk. Deal with through drainage arrangements.	No	No	There is a field drain to the western boundary of the site. Construction site SUDS would have to be rigorous and an adequate buffer strip will be required. The screening required from allocation FM102 may provide an opportunity to enhance biodiversity e.g. planting native trees.
6 Oldmeldrum FM102	n/a	No	No	adjacent to site	No	No	No	Site bordered by a drainage ditch but gradient is steep so unlikely to pose significant risk. Deal with through drainage arrangements.	No	No	There is a field drain to the western boundary of the site which flows to the Lochter Burn which is Moderate for morphology and Good for ecology in 2012. Construction site SUDS would have to be rigorous and an adequate buffer strip, which could serve as an opportunity to restore morphology, will be required. The screening required from the B9170 may provide an opportunity to enhance biodiversity e.g. planting native trees.
TARVES We note the LDP states " Local mains reinforcement may be required for the water and wastewater infrastructure." Check with Scottish Water if capacity.											
7 Tarves FM103	n/a	No	No	No	No	Very small area of surface water flooding identified. Would not pose any constraints.	No	No detailed comments.	No	No	Waste Water drainage would require connection to the public sewer as the site is adjacent a networked area – consult Scottish Water for advice on available capacity.