

SEA Issues and Actions

1. Issues

General Comments

Only the three Statutory consultees on the SEA passed comments; SEPA, Historic Scotland and Scottish Natural Heritage. Overall these three consultees made positive comments on the Environmental Report. Historic Scotland commented that the Environmental Report provides a clear and comprehensive assessment of the significant environmental effects of the Main Issues Report on the historic environment and SNH commented that overall it is a most comprehensive Interim SEA Report. SEPA also commented that in general they were satisfied that a detailed environmental assessment of the Main Issues Report had been carried out.

Non Technical Executive Summary

SEPA have commented stating that reference should be made in Table 1.1 in the soil section to wind farms and other renewables and associated infrastructure as these can also have an impact on carbon rich soils, not just house building and development. SEPA also make reference to managing waste in Table 1.2 as SEPA would have expected the Environmental Report and the Main Issues Report to take cognisance of avoiding impacts on soils including peatlands as this is an emerging issue. This issue also overlaps the climatic factors section of the Table 1.2. SNH also stated that it would have been helpful in Table 1.2 under the soil section if reference had been made to relevant policies in the plan, as well as reference to the development management stage.

SEPA also highlighted that they would have welcomed reference to the role in which they play in licensing Scottish Water Assets and temporary environmentally acceptable private drainage systems in Table 1.2.

Introduction and Key Facts about Aberdeenshire Local Development Plan

The only consultee to comment on this section of the report was SEPA who noted that they were generally content with the background information presented. SEPA welcome the inclusion of Table 5.7 but note a mistake in the first comment associated with SEPA as this should be noted as a comment from SNH. They also note that they would have liked to see the scoping in/out of allocations/policies detailed within Table 2.2: SEA activities to date.

Outline and Objectives of the Aberdeenshire Local Development Plan

SEPA were again the only consultee to respond on this particular section of the SEA. They acknowledge that the section provides a good summary of the proposed objectives for the plan as well as being accompanied by possible alternative options. They note that there is an inconsistency in Table 3.5 as the table makes reference to Appendix 7.4 which does not appear in the report. SEPA also commented that it would have been helpful to reference in paragraph 3.6 that the vision has already been subject to SEA.

It is also noted under Main Issue 8 that the alternative option may no longer be reasonable as the new flood maps were published on the 15 January 2014 therefore it needs to be reconsidered in the ER Addendum. SEPA also commented that they found Table 3.3 was clearly set out and it was useful where the description included

a justification of why the alternatives had not been considered preferred options. SEPA also note that the existing policies and aims are being carried forward into the Proposed Plan.

Plan, Programme or Strategy Context

Historic Scotland comment that they are pleased to note that the comments that they had made regarding avoidance of adverse impacts from development on both statutory and non-statutory protected sites for cultural heritage have been applied.

SEPA note that they consider that the PPS listed in Table 4.1 provides a good background for the plan-making process and also highlight some amendments that need to be made when referring to some legislation.

SEPA have also produced planning guidance on SEPA's engagement with the development plan process which provides a checklist of the topics we would expect the LDP to address. However, it is not clear if promotion of sustainable waste management; air quality, noise and odour, and protection of the marine environment have been considered within this section as part of the assessment.

In the section on water quality SEPA note that they would have expected reference to improving as well as protecting the water environment. They also provided information regarding the formatting of section 4.1.3 as the bullet points make it difficult to reference. SEPA and SNH also highlight that there are missing appendices which are highlighted within this section, Appendix B, 7.2, 7.2.4 and 7.2.5.

SEPA note that the Table 4.3 generally highlights the main issues of relevance for the SEA issues within their remit. It is also noted that while some reference is made to water efficiency measures they would like to see more prominence given to water quantity and reference to impacts on groundwater.

SNH note that within Table 4.1 under the Homes, Population and Health section it might be worth considering adding reference to access in particular referencing Land Reform (Scotland) Act 2003 and the Scottish Outdoor Access Code. SNH also suggest additional information to be included in section 4.1.3 which is; to ensure avoidance of spread of invasive non-native species.

Assessment, Mitigation and Monitoring

Historic Scotland note that a significant negative score was predicted for cultural heritage SEA objective however it is not mentioned in Table 5.2. It is therefore recommended that this omission is rectified and all proposed mitigation measures are covered in this section. Historic Scotland and SNH also note that some of the SEA topics are duplicated in Table 5.3 and it is not clear which aim or vision of the plan that they correspond to. Historic Scotland also reference made to Aberdeenshire's most valued features but it could be made clearer as to what features the Council consider to be 'most valued'.

Historic Scotland are surprised to note that cultural heritage is not mentioned in Table 5.4: Mitigation/Enhancement for development in the 6 areas of Aberdeenshire as there are some alternative site allocations that could have a negative direct or indirect impact on the historic environment, it is therefore recommended that this omission is rectified. Historic Scotland also commend the helpfulness of Table 5.7 in demonstrating how the comments made during the scoping stage have been taken into account.

In paragraph 5.1 SEPA note reference is made to the use of buffer strips/open space, but it is recommended in future work that reference could be made to other flood risk mitigation measures such as landraising and compensatory storage. Also in

the water quality section SEPA would have liked to see reference at the end to avoiding cumulative drainage impact.

SEPA also suggest a wording change to the last material assets section of Table 5.3 as the current text could imply flood prevention measures are acceptable in areas known to be at risk of flooding, whereby instead, in line with SPP and the basic principles of sustainable flood risk management, such areas should be avoided.

In Table 5.4 SEPA would have expected recognition here to the fact that the air quality would go down in the area where the park and ride is located due to the increase in cars going there. Overall, however, we agree that this increase will be negated by wider positive implications. SEPA also feel that splitting this table into a table for each area would make it easier to identify which mitigation/enhance measures are specific, address issues within individual areas of Aberdeenshire and which relate to the whole region.

SEPA also highlight that unless very carefully managed remediation could have a significant negative impact on groundwater and surface water for any development that removes contaminated land on a former landfill site at Blackdog.

SEPA are pleased to see that comments made during the scoping stage have been taken account of. They also note that they would like the Environmental Report to make it clear how carrying out the SEA informed the Plan which is being consulted upon at the same time. Within this section there is also a missing table as reference is made to Table 5.8 but it does not appear in the report.

Under water quality in Table 5.5 SEPA and SHN would like to see water quantity as well as the proposed water quality monitored. SEPA also note that under the soil section 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. SNH also note that within the soil section of the table that development on carbon-rich soils could additionally be monitored based on map data by JHI. They also suggest that for biodiversity 'protected habitats' is broadened in scope to include important non-designated habitats. Finally within the climatic factors section of this table it SNH state that it would be useful if efforts to encourage modal shift could be monitored.

SNH note that they are unclear as to why Main Issue 12 Land Supply and Distribution is not included in the water section of Table 5.2. They also state that Main Issue 1 Climate Change could also be added within the water section as this is proposed to be a policy with regard to water efficiency.

SNH also note that Table 5.4 is not clear as some entries relate to specific allocations but most appear general in nature. SNH question whether the mitigation of the entries in the table relating to a specific allocation will be included as a developer requirement or a development factor in the plan. Reference being made in this table relating to mitigation being based on planning applications and development management is unclear in comparison to reference to specific allocation requirements or general protective policies in the plan.

Appendix 1.1 Main Issues Assessment

Historic Scotland are largely content with the assessment of implications that each main issue could have on the historic environment. However, they do comment that both the preferred option and reasonable alternative options for supporting town centres were given a neutral score where it was thought a positive score should have

been given. This is because this could lead to the re-use of existing derelict buildings and empty listed buildings/buildings within a conservation area being brought back into use.

For Main Issue 1 (a new policy group for climate change) SEPA question the statement that the policy would have a positive impact on water through the requirement for water efficiency measures. SEPA note that from their understanding this would only be in relation to new development, which means any increase in development even with the water efficiency measures there is still going to be an increase in water abstraction rates. Therefore it may be more appropriate to consider this as having mixed positive and negative effects on water.

SEPA also note that Alternative 2 for Main Issue 1 has a more positive overall score for air and biodiversity than the preferred option and in so far as their remit is concerned it would be their preference. SNH agree with this statement but add that whilst they welcome the proposed policy and supplementary guidance they do prefer alternative 2. SEPA also question the statement that main issue 4 is likely to have minimal impact on the water environment in the absence of public sewerage infrastructure and recommended that consideration should have been given to cumulative drainage impact.

SEPA have also query the negative score for landscape in the table under Main Issue 5 (Wind Energy) due to the role of the landscape capacity study within the framework. SEPA also query the neutral/negative score for soil given the protection of carbon-rich soils is one of the spatial layers included in the framework.

Appendix 1.2a Preferred Options for Settlements in Banff and Buchan, LDP 2012

SEPA were the only consultee to comment on this appendix and their general comment was that they found it very useful for cross reference where the allocations in the table were laid out in the same order as the MIR tables. SEPA also highlighted where some sites are listed within the Main Issues Report but are not included in the Environmental Report;

- Banff EH1
- Macduff EH1 and E1
- New Aberdour EH1, EH2 and H1
- Rosehearty H3 and,
- Whitehills H1.

SEPA indicated that clarification should be provided on where and how the all the allocations in the Proposed Plan have been assessed.

Appendix 1.2b Alternative Options for Settlements in Banff and Buchan

SNH highlight bid BaB015 in Aberchirder has been scored as neutral for soil, climate and biodiversity, but being located on peat SNH would have anticipated a negative score for these issues.

Appendix 1.3a Preferred Options for Settlements in Buchan, LDP 2012

SEPA highlight that there are some sites which are listed in the Main Issues Report but are not included in the Environmental Report. These sites are;

- Crimmond EH1
- Cruden Bay EH2
- Fetterangus EH1
- Mintlaw EH1, EH2 and EH3
- New Pitsligo EH1, EH2 and EH3 and,

- Peterhead CC1, EH2, EH3 and H2.

Additional information was also provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
Auchnagatt	SEPA	There is limited connection to public sewers which could have a negative effect on both water and material assets.
St Combs	SEPA	Water is recorded as neutral but SEPA note comments regarding pluvial and fluvial issues which could have a negative effect.
Strichen	SEPA	Water is recorded as neutral but there is a required upgrade needed for the waste water infrastructure which could have negative effect on water and material assets.

Appendix 1.4a Preferred Options for Settlements in Formartine, LDP 2012

SEPA again note that there have been sites included in the Main Issues Report that have not been included in the Environmental Report including;

- Pitmedden EH1
- Udney Green EH1 and ,
- Westfield Foveran E1.

Additional information was also provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
Belhelvie	SEPA	Concerns were raised regarding waste water drainage which might be considered a negative impact.
Daviot	SEPA	An upgrade is required to the waste water treatment works which we consider a significant negative impact on water and material assets.

Appendix 1.4b Alternative Options for Settlements in Formartine

Information was provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
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FM083 - Ellon	SEPA	There are wetlands on the site so there may be a possible negative effect on water and biodiversity.
FM011 - Woodhead	SEPA	Comments related to previous information given from SEPA identifying Woodhead as an area where the proliferation of private waste water drainage systems is currently causing environmental problems. In light of this information it was scored as having a significant negative impact but currently SEPA's waste water drainage layer is under review and Woodhead has been put forward for removal therefore the significant negative impact is recommended to be reconsidered.
FM077 a and c – Potterton	Historic Scotland	The sites are located in close proximity to scheduled monuments. The views towards and from the monuments are likely to be important elements of their setting.

Appendix 1.5a Preferred Options for Settlements in Garioch, LDP 2012

SEPA have identified a list of settlements as follows that are included in the Main Issues Report but have not been assessed in the Environmental Report;

- Dunecht EH1
- Inverurie E2 and EH4
- Keithhall H1
- Kinmuck H1
- Kintore EH1, EH2 and EH3
- Kirkton of Skene EH1 and,
- Millbank M1

SEPA also provide comments relating to waste water for the following settlements and the potential negative effect on material assets;

- Blackburn M1
- Cluny and Sauchen H1 and H2
- Hatton of Fintray and,
- Inverurie

Additional information was also provided for some settlements which is displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
Inverurie	SEPA	Unclear about a few designations in Inverurie and clarification of the sites would be welcomed in the ER Addendum.
EH2 Kintore	SEPA	Consideration should be taken regarding changing biodiversity scores from neutral to negative as the Tuach Burn passes through the site.
EH2 – Old Rayne	SEPA	Consideration should be taken regarding changing biodiversity scores from neutral to negative as the site overlaps the River Urie.

Appendix 1.5b Alternative option for Settlements in Garioch

Information was provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
Ga059 – Inverurie	Historic Scotland	A scheduled monument is located on the site therefore they would have expected to see a significant negative score as it could potentially impact directly on the monument and impact on its setting.
Ga055 – Inverurie	Historic Scotland	The site is located in proximity to an A listed building. The proximity and scale of the allocation has the potential to impact on the building's setting, therefore a negative score was expected.
Ga054 and Ga050 – Westhill	Historic Scotland	Both sites are located in proximity to a scheduled monument and they both have the potential to impact on its setting, therefore a negative score was expected.
Cluny and Sauchen	SEPA	The waste water drainage capacity at Sauchen Works would have a negative effect on water and material assets.
Ga003 – Durno	SEPA	Serious concerns of future development in Durno due to the high level of private waste water drainage proliferation. Durno has been put forward for inclusion in SEPA's waste water drainage consultation GIS layer. As such SEPA would expect soil, water and material assets to be assessed as significant negatives.
Ga024 – Kintore	SEPA	The site includes both the Tuach Burn and other watercourses, mostly tributaries, so there is potential to have negative effects on water and biodiversity.
Ga034 and Ga075 – Westhill	SEPA	The Brodiach Burn runs through the site so there could be negative effects on water.
Ga057 – Landward	SEPA	There are possible negative impacts on drainage and water supply for Little Goval.
Ga020 and Ga012 – Landward	SEPA	These sites have been identified in the table under Westhill rather than as Landward sites.
Ga060 – Inverurie	SNH	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.
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Appendix 1.6a Preferred Options for Settlements in Kincardine and Mearns, LDP 2012

SEPA again highlight sites that have been included within the Main Issues Report but have not been included in the Environmental Report;

- Chapelton (Elsick) M1
- Kirkton of Maryculter H1, and
- Park H1

Additional information was provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
Fordoun	SEPA	Unclear about a few designations in Fordoun and clarification of the sites would be welcomed in the ER Addendum.
EH1 - Marywell	SEPA	Concerns regarding waste water drainage and potable water supply which would be considered negative effects on water and material assets.
Stonehaven	SEPA	Concerns with cumulative impact of all developments on waste water drainage infrastructure which should be a considered a negative effect for water and material assets.
Woodlands of Durriss	SEPA	Drainage capacity issues so this should be considered a negative impact for water and material assets.

Appendix 1.6b Alternative Options for Settlements in Kincardine and Mearns,

Information was provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
KM036 – Marykirk	Historic Scotland	Site is adjacent to a scheduled monument. There are trees presently on the site which will provide a degree of screening but the development will effectively surround the monument and therefore Historic Scotland would have expected a negative score.
KM087 – Stonehaven	Historic Scotland	Site contains a monument and as the proposal is a large scale and at this stage it is unclear where the development will be located. Therefore it is not known whether it would directly or indirectly impact on the monument and Historic Scotland

		would have expected the potential for a negative score.
KM019 – Fordoun	SEPA	It is unclear why the significant negative impact stated under Fordoun’s current allocations for waste and material assets is not also highlighted here.
KM057 – Kirkton of Durriss	SEPA	SEPA note that this is a functioning quarry and the extension would require planning consent and therefore should not be assessed as neutral for water and should be reassessed.
KM059 – Kirkton of Durriss	SEPA	Highlight that the negative effects from constraints on potable water provision.
KM104 – Laurencekirk	SEPA	It is included in the Main Issues Report but not included in the Environmental Report.
KM036 – Marykirk	SEPA	Do not support this site due to flood risk and it should be recorded as significant negative if reassessed.
KM084 – Marykirk	SEPA	Flood risk is a constraint and it was expected that this would have been highlighted as a negative.
KM018 – Muchalls	SEPA	Concerns regarding potable water capacity so water may have a negative effect.
KM050 – Landward	SEPA	Referred to comments in the MIR relating to flood risk which would be an additional negative effect.
KM044 – Landward	SEPA	Referred to comments in the MIR relating to flood risk which should be considered a significant negative effect.
KM034 – Drumoak	SNH	This site is assessed as neutral for biodiversity but the site is adjacent to the designated area.
KM057 – Kirkton of Durriss	SNH	Assessment of the potential expansion of the quarry would have been expected in the report.
KM022 – Stonehaven	SNH	Assessed for neutral for biodiversity but there appears to be some ancient woodland on the site.
KM030 – Woodlands of Durriss	SNH	Assessed as neutral for both biodiversity and landscape but it was expected that these would have negative assessments as development is close to the River Dee SAC and would result in a loss of woodland.
KM042 – Woodlands	SNH	Assessed as neutral for biodiversity and but it was expected that this would have a negative

of Durris		assessment as development would result in a loss of woodland.
KM050 - Landward	SNH	Assessed as neutral for biodiversity and but it was expected that this would have negative assessment as development is close to the River Dee SAC.
KM100 – Landward	SNH	Site is assessed as neutral for both biodiversity and landscape but the development is likely to result in the loss of trees therefore negative effects would have been expected.
KM044 – Landward	SNH	Assessed as neutral for both biodiversity and landscape but it was expected that these would have negative assessments as development is close to the River Dee SAC and would have a significant adverse landscape impact.

Appendix 1.7a Preferred Options for Settlements in Marr, LDP 2012

SEPA raise a minor point about the title being wrong in the contents page. Additional information was provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
H1 Cairnie and EH1 Ruthven	SEPA	Sites are included in the Main Issues Report but not included in the Environmental Report.
H1 Clatt, M1 Drumdegie, H1 Keig, M1 Logie Coldstone and M1 Tarland. All allocations at Kincardine O'Neil, Lumsden and Monymusk	SEPA	Issues relating to waste water drainage ad this should be considered a negative effect for water and material assets.
EH1 – Finzean	SEPA	A corner of the site is at risk of flooding which should maybe be considered a a negative effect if reassessed.
H1 –	SEPA	Issues relating to water abstraction which could

Inchmarlo		have a negative effect for water and material assets.
H1 – Towie	SEPA	Note positive rating but would refer to comments relating to waste water drainage and flood risk which could be a negative effect for water, material assets and climate change.

Appendix 1.7b Alternative Options for Settlements in Marr

Information was provided for some settlements displayed in the table below.

Settlement and/or Site	Consultee Raising Issue	Issues Raised
Ma019 and Ma050 – Alford	Historic Scotland	Sites are located within Alford Battlefield and are in close proximity to a monument. It would therefore have been expected that these sites would have a significant negative score.
Ma013 – Aboyne	SEPA	Highlighting comments in MIR that surface water and flooding are an issue on this site.
Ma050, Ma019, Ma036 and Ma034 – Alford	SEPA	Flood Risk on these sites would have a negative effect.
Ma068 and Ma074 – Alford Ma039 - Torphins	SEPA	Sites are included in the Main Issues Report but not included in the Environmental Report.
All allocations – Banchory	SEPA	Issues relating to waste water drainage and abstractions which are negative effects for water and material assets.
Ma060 and Ma061- Banchory	SEPA	Comments relating to flood risk which would have a negative effect.
Ma009 – Drumblade Ma042 - Lumphanan	SEPA	Issues regarding flood risk which might have a negative effect.
Ma028 – Glenkindie	SEPA	Comments in the MIR relating to flood risk as a significant negative effect and prevents site from being suitable for development.

Ma059, Ma035, Ma032, Ma023, Ma037 and Ma006 – Landward	SEPA	Comments relating to flood risk as a potential negative effect.
Ma017 – Banchory	SEPA	Site not included in the Main Issues Report but not included in the Environmental Report.
	SNH	Site not included in the Main Issues Report but not included in the Environmental Report. Also highlight immediate proximity to River Dee SAC and the site contains a significant area of mature trees, both with biodiversity value and could have a negative impact.
Ma044 – Finzean	SEPA	Issues regarding flood risk which might have a negative effect.
	SNH	Assessment for biodiversity is neutral but MIR notes negative effect in view of being in immediate proximity to River Dee SAC.
Ma005 and Ma056	SEPA	Assessment of biodiversity is neutral for these sites but they are immediate proximity to River Dee SAC therefore a negative assessment would have been anticipated.
Ma039 - Torphins	SEPA	Sites are included in the Main Issues Report but not included in the Environmental Report.
	SNH	Sites are included in the Main Issues Report but not included in the Environmental Report. SNH also raise the fact that in relation to biodiversity the site is adjacent to the River Dee SAC.

Settlement Options – MIR

SEPA note a list of sites that including in the plan would raise serious environmental concerns and should be assessed in the ER addendum as having significant negative effects;

- H1 Strichen
- FM038 Middlemuir
- H1 Cluny and Sauchen
- EH1 Cluny and Sauchen
- GA066 Cluny and Sauchen
- H1 Inch
- KM036 Marykirk
- GA078 Inverurie
- GA079 Inverurie
- GA015 Inverurie
- GA025 Kintore
- EH2 Old Rayne
- GA004 Old Rayne
- MA028 Glenkindie
- Ma046 Huntly
- Ma014 Inchmarlo
- Ma005 Torphins
- Ma032 Alford

- GA003 Durno
- Ma015 Cammieswood,
Banchory

Appendix 1.8 Cumulative Effects of the Preferred Options

SEPA agree with the statement relating to water efficiency in this section. However, SEPA query the statement in relation to climate change, green networks and biodiversity being positive. SEPA note that 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. Also within this section emphasis seems to be given to impact on soil rather than house building but due to the proliferation of small wind turbines we would highlight wind energy as a potential area of impact and this should be considered.

SNH note that Landscape, Human Health, Population and Material Assets appear to be missing as SEA Criteria. SNH also note that although there are water efficient technologies it may not compensate for the volume and quality of water resources needed to support the allocations. This makes monitoring the issue of water demand all the more important.

Appendix 1.9 Policy/Main Issue Assessment Criteria

Under positive effects SEPA would like to see reference included to avoidance as well as “sustainable flood management measures”. Also under biodiversity SEPA would like to see reference to removal of Invasive Non Native Species, especially water borne.

Appendix 1.10 – Bid Assessment Criteria

SEPA highlight that it is not clear if “Waste Water Drainage Hotspots” refers to SEPA’s drainage consultation areas. If this is the case then it is suggested that this should be reworded.

Appendix 2: Other Relevant Plans and Environmental Protection Objectives

SEPA 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 this is updated in the ER Addendum. SHN also highlight that under the International-Nature Conservation the Ramsar Convention should be added for the protection of wetland birds.

SNH suggest that the European Biodiversity Framework be amended to EU Biodiversity Strategy to 2020. SNH also suggest the following as additional documents to be highlighted under National-Nature Conservation and Biodiversity:

- Wildlife and Natural Environment (Scotland) Act 2011
- Protection of Badgers Act 1992 as amended
- 2020 Challenge for Scotland’s Biodiversity (2013)

The Land Reform (Scotland) Act 2003 could be added under National-Health, SNH also suggest that under Local-Access that the Open Space and Landscape entry could be split into entries for the South and Central Aberdeenshire LCA (1998) and the Banff and Buchan LCA (1997).

Appendix 3 Baseline Information

SNH note that in Appendix 3.4 the entry for geodiversity is blank but as a minimum the GCR sites could be noted here as there are 54 sites in Aberdeenshire. For the Biodiversity, Flora and Fauna section Appendix 3.5 SNH note that 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. SNH also suggest that in Appendix 3.6 Human Health that the extent of the core paths be added, perhaps it could be expressed for sub-areas as a ratio of length of core paths to population.

Appendix 5 Soil Maps

SNH highlight that there are now more specific soil information for Aberdeenshire which may enable more targeted maps to be included.

Appendix 6 Designated Sites

SNH and Historic Scotland highlight that the maps are very small and are difficult to see any detail, therefore there is a request for these maps to be included at a larger scale.

SNH also provide a link to information which may be of assistance relating to Natural Heritage designations. It is also highlighted by SNH that Areas of Landscape Significance are shown in Appendix 6.2 but as SNH understand this designation is no longer in force.

2. Actions

The comments raised by the consultees have been noted and the text has been revised where appropriate to take light of the comments. The comments relating to the quality of maps is also noted and this has been actioned by the introduction of new maps within the Environmental Report. The comments raised by SEPA regarding the sites that were included in the Main Issues Report but not in the Environmental Report has also been noted and these sites have now been added into the appropriate appendix and will feature in the ER Addendum.

3. Committee Decisions

No further action is required at this stage as the Environmental Report is a working document.

Infrastructure Services Committee at their meeting of the 3 July 2014 noted this recommendation.